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Name of parent Policy / Administrative Directive	Public Interest Disclosure Policy	
Document Owner	<p>The Governance and Public Interest Disclosure Coordinator is responsible for authoring and reviewing this management program.</p> <p>The Chief Executive Officer is responsible for approving this management plan.</p>	
Approved by CEO on	18 November 2021	
Date of Review	18 November 2022	

1. Background

This management program has been prepared to comply with section 28 (1)(d) of the *Public Interest Disclosure Act 2010* (the PID Act) and Public Interest Disclosure Standard No. 1/2019 (the Standard) issued by the Queensland Ombudsman under section 60 of the PID Act.

2. Purpose

Section 1.3 of the Standard requires the Chief Executive Officer (CEO) of Ipswich City Council (Council) to develop, implement and maintain a management program for PIDs.

3. Regulatory Authority

Public Interest Disclosure Act 2010

4. Roles and Responsibilities

The Chief Executive Officer is responsible for ensuring that Council has a public interest disclosure management program in place and has delegated the responsibility for the implementation of the management program to the Governance and Public Interest Disclosure Coordinator.

5. Key Stakeholders

N/A

6. Human Rights Commitment

Ipswich City Council (Council) has considered the human rights protected under the *Human Rights Act 2019 (Qld)* (the Act) when adopting and/or amending this management plan. When applying this management program, Council will act and make decisions in a way that is compatible with human rights and give proper consideration to a human right relevant to the decision in accordance with the Act.

7. Education and Training Requirements

Outlined in 8.4 below.

8. Management Program Requirements

8.1 Organisational commitment to encourage internal reporting of wrongdoing

The CEO and senior managers of Council:

- recognise the important role disclosers play in identifying wrongdoing and thus improving the integrity and performance of Council and deterring wrongdoing;
- are committed to ensuring that PIDs are properly assessed, investigated and dealt with;
- recognise the value and importance of providing protection to employees who report wrongdoing using appropriate internal or external channels;
- are committed to ensuring that appropriate consideration is given to the interests of persons who are the subject of a PID.

The CEO and senior managers will take all reasonable steps to protect an employee from any detrimental action by way of a reprisal taken because they have made, or it is believed that they have made, a PID.

Council's organisational commitment to ethical practices and to an effective PID Management Program is explicitly stated in Council's Employee Code of Conduct.

8.2 Senior management endorsement of the value of PIDs and the proper management of PIDs and disclosers

The CEO and senior managers of Council recognise that, in order for Council to have a successful disclosure program, it is critical that managers commit to the implementation of Council's PID Management Program and Policy in relation to disclosures.

Senior managers of Council encourage any employee who considers that they have witnessed wrongdoing to come forward and make a disclosure. Senior managers of Council believe that disclosing wrongdoing is in accordance with Council's ethical culture, in particular, acting with integrity and recognise the benefit to Council of encouraging employees to report wrongdoing.

When employees come forward with information about wrongdoing, managers commit to:

- protecting the dignity, wellbeing, career interests and good name of all persons involved;
- protecting the discloser from any adverse action taken as a result of making the disclosure;
- dealing with any bullying, harassment, unfair treatment, victimisation or discrimination that results from a disclosure as a breach of Council's disciplinary procedures;
- responding to the disclosure thoroughly and impartially;
- where some form of wrongdoing has been found, taking appropriate action to deal with it;
- keeping the discloser informed of progress and the outcome.

Senior managers of Council also recognise that members of the public may have information about the operations of Council that meets the criteria for a PID. Members of the public are encouraged to report this information through appropriate channels as listed on Council's website. A PID made by a member of the public will be acknowledged. The discloser will be informed about the outcome of the PID assessment and any action taken as a result of the disclosure.

8.3 A communication strategy for raising employee awareness about PIDs and Council's PID procedures

The CEO recognises that critical to the success of its PID Management Program is employee awareness of the Program, Policy and Procedure. Council's communication strategy involves the following:

- CEO articles prepared for all employees and broadcast via the intranet;
- including a PID page on Council's intranet;
- publishing program, policy and procedure documents on Council's intranet;
- providing the contact details for Council's nominated PID officer in the internal phone list.

8.4 A training strategy for employees

The CEO recognises the importance of educating employees on PID issues and ensuring that ongoing training is provided.

As part of the Induction, Ethics and Code of Conduct training that every employee is required to attend, a segment on the operation of the PID Act will be included. This will be formalised in Council's training plan. The training will cover:

- how to identify wrongdoing;
- how to make a PID;
- the support and protection to be afforded to disclosers;
- how PIDs will be managed by Council.

In addition, Council will make available on Council's intranet, the public interest disclosure videos created by the Queensland Ombudsman's Office. These videos and their accompanying slides provide guidelines on an employee's obligations as well as a separate video aimed at educating senior managers and supervisors.

Tailored training, offered by the Queensland Ombudsman's Office, will be made available when required. Employees will undertake bi-annual online training for fraud and corruption which includes PID components. Attendance at training sessions and online training completion will be recorded in Council's learning management system.

8.5 The appointment of a nominated officer responsible for issues related to the management of PIDs

The Governance and Public Interest Disclosure Coordinator is the nominated officer responsible for issues related to the management of PIDs and has:

- direct access to the CEO in relation to PID matters;
- authority to appropriately manage PIDs;
- access to resources to allow for the proper management of PIDs.

A member of the public or an employee of Council can make a disclosure to the Governance and Public Interest Disclosure Coordinator via the following methods:

Email: PIDS@ipswich.qld.gov.au

Letter: Ipswich City Council
Attn: PID Coordinator
PO Box 191
Ipswich Qld 4035

Phone: 0419 962 508

In addition, employees may make a disclosure to:

- any council employee in a supervisory or management position;
- the Manager, People and Culture;
- the Workplace Relations Manager;
- the Chief Executive Officer;
- Chief Audit Executive;
- the Ethical Standards Manager;
- the Mayor or Councillors.

These officers will forward PIDs received to Council's Governance and PID Coordinator for assessment and appropriate action.

A PID may also be made to an external agency if that agency has the power to investigate and remedy that type of disclosure. For example, a PID about corrupt conduct may be made directly to the Crime and Corruption Commission.

Council has also engaged "FairCall", an independent external intake service, for the purposes of providing another confidential mechanism for current and former employees to report wrongdoings/formal complaints, when they are not comfortable reporting such matters internally.

Current and former employees can lodge reports of wrongdoing/formal complaints to the intake service by:

Phone: 1800 270 925 Australia

Email: faircall@kpmg.com.au

Website URL: <https://www.kpmgfaircall.kpmg.com.au/ipswich>

Post: The FairCall Manager
KPMG Forensic
PO Box H67
Australia Square
SYDNEY NSW 1213

8.6 Ensure that effective systems and procedures are in place for issues arising from PIDs to inform improvements to service delivery, business processes and internal controls

At the conclusion of a PID investigation, the Ethical Standards Manager is responsible for assessing whether any change is needed to Council's policies or internal controls. The Ethical Standards Manager will, within 60 days of the conclusion of the PID investigation, report to the CEO with any recommendation for appropriate change.

9. **Monitoring and review**

Each November a review of Council's PID Management Program will be conducted by the Governance and Public Interest Disclosure Coordinator to ensure its continued effectiveness.

10. Related documents

[Public Interest Disclosure Policy](#)

[Public Interest Disclosure Procedure](#)

[Public Interest Disclosure Standard No. 1/2019 - Public Interest Disclosure Management Program](#)

11. Definitions

<p>Corrupt conduct</p>	<p>Has the same meaning as in the <i>Crime and Corruption Act 2001</i>:</p> <p>(1) Corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that—</p> <p>(a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of—</p> <p>(i) a unit of public administration; or</p> <p>(ii) a person holding an appointment; and</p> <p>(b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that—</p> <p>(i) is not honest or is not impartial; or</p> <p>(ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or</p> <p>(iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and</p> <p>(c) is engaged in for the purpose of providing a benefit to the person or another person or causing a detriment to another person; and</p> <p>(d) would, if proved, be—</p> <p>(i) a criminal offence; or</p> <p>(ii) a disciplinary breach providing reasonable grounds for terminating the person’s services, if the person is or were the holder of an appointment.</p> <p>(2) Without limiting subsection (1), conduct that involves any of the following could be corrupt conduct under subsection (1)—</p> <p>(a) abuse of public office;</p> <p>(b) bribery, including bribery relating to an election;</p> <p>(c) extortion;</p> <p>(d) obtaining or offering a secret commission;</p> <p>(e) fraud;</p> <p>(f) stealing;</p> <p>(g) forgery;</p> <p>(h) perverting the course of justice;</p> <p>(i) an offence relating to an electoral donation;</p> <p>(j) loss of revenue of the State;</p> <p>(k) sedition;</p> <p>(l) homicide, serious assault or assault occasioning bodily harm or grievous bodily harm;</p> <p>(m) obtaining a financial benefit from procuring prostitution or from unlawful prostitution engaged in by another person;</p> <p>(n) illegal drug trafficking;</p> <p>(o) illegal gambling.</p>
<p>Maladministration</p>	<p>Means administrative action that—</p> <p>a) was taken contrary to law; or</p> <p>b) was unreasonable, unjust, oppressive, or improperly discriminatory; or</p> <p>c) was in accordance with a rule of law or a provision of an Act or a practice that is or may be unreasonable, unjust, oppressive, or improperly discriminatory in the particular circumstances; or</p> <p>d) was taken—</p> <p>i) for an improper purpose; or</p>

	<p>ii) on irrelevant grounds; or iii) having regard to irrelevant considerations; or e) was an action for which reasons should have been given, but were not given; or f) was based wholly or partly on a mistake of law or fact; or g) was wrong.</p>
Reprisal	<p>Reprisal occurs if a person causes or attempts to cause detriment to you, because they believe (whether or not this is actually the case) you:</p> <ol style="list-style-type: none"> 1) Have or intend to make a public interest disclosure; or 2) Have or intend to participate in proceedings under the Act. <p>The detriment could be an action (or threats of action) that results in:</p> <ol style="list-style-type: none"> 1) A physical or psychological injury; 2) Loss or damage to property; 3) Intimidation or harassment; 4) Discrimination or disadvantage to your career, employment or business; 5) Financial loss; and 6) Damage to reputation, for example, personal, professional or business reputation.