

# Public Interest Disclosure Management Program

Management program for public interest disclosures made under the *Public Interest Disclosure Act 2010*

## 1. Introduction

This Public Interest Disclosure (PID) Management Program has been developed by Metro South Health in accordance with section 28 of the [Public Interest Disclosure Act 2010](#) (the PID Act) and the Queensland Ombudsman's [Public Interest Disclosure Standard 1/2019 – Public Interest Disclosure Management Program](#).

Metro South Health's PID Management Program encompasses:

- Commitment to encouraging the internal reporting of wrongdoing.
- Senior management endorsement of the value to the health service of PIDs and the proper management of PIDs.
- A communication strategy to raise awareness among employees about PIDs and Metro South Health's [Public Interest Disclosure procedure](#).
- A training strategy to give employees access to training about how to make a PID, information on the support available to a discloser, and advice on how PIDs will be managed.
- Specialist training and awareness about PIDs for senior management and other staff who may receive or manage PIDs, disclosers or workplace issues relating to PIDs.
- The appointment of an officer to be responsible for issues related to the management of PIDs.
- Ensuring effective systems and procedures are in place so that issues and outcomes from PIDs inform improvements to service delivery, business processes and internal controls.
- Regular review of the [Public Interest Disclosure procedure](#) and evaluation of the effectiveness of the PID Management Program.

This PID Management Program should be read in conjunction with the [Public Interest Disclosure procedure](#).

## 2. Purpose

Standard 1.3 – Management Program for PIDs, in [PID Standard 1/2019](#), states that the Management Program must meet the following minimum requirements:

- 1.3.1 Demonstrate organisational commitment.
- 1.3.2 Appoint a PID Coordinator.
- 1.3.3 Delegate PID responsibilities.
- 1.3.4 Implement a communication strategy.
- 1.3.5 Implement a training strategy.
- 1.3.6 Analyse PIDs to inform improvements.

This PID Management Program has been developed to comply with Standard 1.3 – Management Program for PIDs.

## 3. Demonstrate organisational commitment

Metro South Health's Executive Leadership Team:

- Recognises the important role disclosers play in identifying wrongdoing, thereby improving the integrity and performance of the health service and deterring wrongdoing.
- Is committed to ensuring that PIDs are properly assessed and dealt with.

### ICARE<sup>2</sup> values



- Recognises the value and importance of providing protection to employees who report wrongdoing using appropriate internal or external channels.
- Is committed to ensuring that appropriate consideration is given to the interests of persons who are the subject of a PID.
- Commits to ensuring that sufficient resources are allocated to managing the health service's PID Management Program.

Disclosing wrongdoing is in accordance with Metro South Health's ethical culture, in particular, acting with integrity. The health service encourages any employee who considers that they have observed or identified wrongdoing to make a disclosure.

Metro South Health will take all reasonable steps to protect an employee from any detrimental action or reprisal taken because they have made a PID. When employees come forward with information about wrongdoing, managers/supervisors 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.
- Responding to the disclosure thoroughly and impartially.
- Taking appropriate action to deal with wrongdoing.
- Keeping the discloser informed of progress and the outcome.

Metro South Health also recognises that members of the public may have information about the operations of the health service that meets the criteria for a PID. Members of the public are encouraged to report this information to the Metro South Health Ethical Standards Unit via [MetroSouthESU@health.qld.gov.au](mailto:MetroSouthESU@health.qld.gov.au). A PID made by a member of the public will be managed in accordance with Metro South Health's [Public Interest Disclosure procedure](#).

#### 4. Appoint a PID Coordinator

The Health Service Chief Executive, Metro South Health, has appointed the Director, Ethical Standards Unit, as the health service's PID Coordinator, with responsibility for the PID Management Program.

The role of the PID Coordinator is set out in Metro South Health's [Public Interest Disclosure procedure](#) and this PID Management Program.

The PID Coordinator has direct access to the Health Service Chief Executive in relation to PID matters, appropriate delegated authority and access to the necessary resources to ensure that the health service complies with its statutory obligations under the PID Act.

The PID Coordinator will report annually to the Health Service Chief Executive on the implementation and oversight of the PID Management Program.

#### 5. Delegate PID responsibilities

The PID Coordinator is responsible for ensuring all officers:

- Who directly or indirectly supervise or manage other officers are informed that they are a person who may receive a PID in accordance with section 17(3)(d) of the PID Act.
- Who have the function of receiving or taking action on the type of information that may be disclosed in a PID are informed that they are a person who may receive a PID in accordance with section 17(3)(e) of the PID Act.

- With designated responsibility for receiving, assessing, investigating and/or decision-making in relation to PIDs are provided with guidance on the performance of these tasks and appropriate delegated authority.
- Nominated to undertake the role of a PID Support Officer are provided with written guidance on the performance of this role, including information about support services available to assist disclosers.

## 6. Implement a communication strategy

Metro South Health recognises that critical to the success of its PID Management Program is employee awareness of the program and its [Public Interest Disclosure procedure](#).

Metro South Health's communication strategy involves the following:

- All new employees are advised of the health service's [Public Interest Disclosure procedure](#) and PID Management Program at induction.
- The health service's intranet and public website contain easily-accessible information about PIDs, including information about how to make a PID; contact details for the PID Coordinator; and links to its [Public Interest Disclosure procedure](#), this PID Management Program and to other PID information. The information is regularly reviewed and updated to ensure it is complete and up-to-date.
- Messages from the Health Service Chief Executive that reconfirm Metro South Health's commitment to the PID Act, as well as other information and reminders about the health service's PID reporting system, are included periodically in relevant internal electronic publications.
- The PID Coordinator will actively seek opportunities to promote the PID Act and the health service's responsibilities under the Act, such as through participation in staff/leadership forums and the delivery of ad-hoc training/information sessions to relevant staff.

## 7. Implement a training strategy

Metro South Health recognises the importance of providing training to employees on PID issues and ensuring that ongoing training is provided.

The health service's training strategy involves the following:

- At the point of induction, all new employees are provided with information about PIDs, including information about how to make a PID and about the health service's [Public Interest Disclosure procedure](#) and PID Management Program.
- A segment on the operation of the PID Act is included as part of the mandatory Code of Conduct training provided to employees. The health service will maintain records in relation to the completion of such training.
- Relevant senior managers will be provided with opportunities to attend training in relation to PIDs, facilitated by the Office of the Queensland Ombudsman.
- Officers who are called upon to act as PID Support Officers are provided with information and guidance regarding their roles, on each occasion they are engaged.

## 8. Analyse PIDs to inform improvements

Metro South Health acknowledges the value of information obtained from PIDs in identifying systemic issues and trends and informing administrative improvements.

Following the finalisation of a PID made about the health service or an employee of the health service, the PID Coordinator will assess whether any change is needed to service delivery, personnel management, business processes or internal controls.

The PID Coordinator will conduct an annual review of the effectiveness of this PID Management Program and provide a report to the Health Service Chief Executive.