

# Public Interest Disclosure Management Plan

## Purpose

This Public Interest Disclosure Management Plan has been prepared to comply with s.28 of the [Public Interest Disclosure Act 2010](#) (the PID Act) and [Public Interest Disclosure Standard No.1](#) (the Standard) issued by the Queensland Ombudsman under s.60 of the PID Act.

Under the PID Act, Public Interest Disclosures (PIDs) may be made by team members of a public sector entity and by members of the public. This PID Management Plan should be read in conjunction with the Energy and Water Ombudsman Queensland (EWOQ) PID Procedure.

## Scope

This guideline applies to all permanent and temporary full-time, part-time employees and contractors of EWOQ.

## Procedures

Section 6.1.1 of the Standard requires the Ombudsman to develop, implement and maintain a management program for PIDs about the conduct of officers of EWOQ that addresses the following issues:

### 1. Organisational commitment to encourage internal reporting of wrongdoing

The Leadership Team (includes the Ombudsman and Executive Management Group of the EWOQ):

- recognise the important role disclosers play in identifying wrongdoing and thus improving the integrity and performance of the EWOQ and deterring wrongdoing
- is committed to ensuring that PIDs are properly assessed, investigated and dealt with
- recognises the value and importance of providing protection to team members 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.

The Ombudsman will take all reasonable steps to protect a team member from any detrimental action by way of a reprisal taken because they have made a PID.

### 2. Leadership Team endorsement

The Leadership Team recognise that, in order for the EWOQ to have a successful disclosure program, it is critical that the Leadership Team commit to the implementation of the EWOQ PID Management Plan and procedure in relation to disclosures.

The Leadership Team encourages any team member who considers that they have witnessed wrongdoing to come forward and make a disclosure. The Leadership Team believes that disclosing wrongdoing is in accordance with the EWOQ's ethical culture, in particular, acting with integrity. It recognises the benefit to the EWOQ of encouraging team members to report wrongdoing.

When team members 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 efficiently and effectively with any bullying, harassment, unfair treatment, victimisation or discrimination that results from a disclosure as a breach of the EWOQ's disciplinary procedures
- responding to the disclosure thoroughly and impartially
- taking appropriate action to deal with wrongdoing
- keeping the discloser informed of progress and the outcome.

The Leadership Team also recognise that members of the public may have information about the operations of the EWOQ that meets the criteria for a PID. Members of the public are encouraged to report this information to the PID Coordinator. 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.

### **3. A communication strategy for our team**

The Ombudsman recognises that critical to the success of its PID Management Plan is our team member's awareness of the plan and associated procedures. The EWOQ's communication strategy involves the following:

- periodically including on the EWOQ's intranet, information about the EWOQ PID reporting system
- including a PID page on the EWOQ intranet
- providing the contact details for the EWOQ's nominated PID officer on the EWOQ intranet.

### **4. A training strategy for our team**

The Ombudsman recognises the importance of educating team members on PID issues and ensuring that ongoing training is provided.

As part of mandatory ethics and Code of Conduct training that every team member is required to attend annually, a segment on the operation of the PID Act will be included. This will be formalised in the EWOQ'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 the EWOQ

In addition, PID training will be provided:

- in the induction program for new team members and team members returning to the EWOQ workforce after a period of leave

- to the Leadership Team annually by the General Manager – Strategy, Operations and Governance  
GPO Box 3640
- (PID Coordinator) on their obligations in relation to handling PIDs.

## 5. Delegated officer responsible for issues related to the management of PIDs

The PID Coordinator is the delegated officer responsible for issues related to the management of PIDs. The PID Coordinator has:

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

A member of the public or a team member of the EWOQ can make a disclosure to the PID Coordinator by way of:

- Email:** [PID@ewoq.com.au](mailto:PID@ewoq.com.au)
- Letter:** Attn: PID Coordinator  
General Manager – Strategy, Operations and Governance  
GPO Box 3640  
Brisbane South BC Qld 4101
- Telephone:** 1800 662 837  
(ask for the General Manager – Strategy, Operations and Governance in their role as PID Coordinator)

## 6. Internal controls, evaluation and monitoring

At the conclusion of a PID investigation, the General Manager – Strategy, Operations and Governance is responsible for assessing whether any change is needed to the EWOQ service delivery, personnel management, business processes or internal controls.

The General Manager – Strategy, Operations and Governance will, within 60 days of the conclusion of the PID investigation, report to the Ombudsman with any recommendation for appropriate change. The General Manager – Strategy, Operations and Governance will report to the Queensland Ombudsman quarterly regarding any recommendation for changes as a result of that assessment.

The PID Coordinator will conduct an annual review of the effectiveness of EWOQ's PID Management Program and provide a report to the Queensland Ombudsman.

## Associated documents

Legislation:

- [Crime and Corruption Act 2001](#)
- [Ombudsman Act 2001](#)
- [Public Interest Disclosure Act 2010](#)
- [Public Records Act 2002](#)
- [Public Sector Ethics Act 1994](#)

- [Human Rights Act 2019](#)

Useful links

- [Public Interest Disclosure Procedure - Promapp](#)
- [Public Interest Disclosure Procedure](#)
- [Queensland Government Code of Conduct](#)

## Document control

<b>Document ID</b>	CGPP – 606335712-750
<b>Responsible manager</b>	Jeremy Inglis, Manager Policy and Research
<b>Name of Approving EMG Member</b>	Jane Pires - Ombudsman
<b>Date approved</b>	13/12/2023
<b>Date of next review</b>	13/12/2024

<b>Version No.</b>	<b>Description of changes</b>	<b>Prepared by</b>	<b>Date</b>
4.0	New template and updates as part of annual review – clarifying process and responsibilities	Jeremy Inglis	09/11/2022
5.0	Review – no changes required. Noted new Act to be developed to replace the PID Act in 2024	Jeremy Inglis	20/11/2023