

# Public Interest Disclosure Management Plan

February 2024

# Purpose of Public Interest Disclosure Management Plan

The QCA's Public Interest Disclosure Management Plan has been prepared to comply with section 28 of the *Public Interest Disclosure Act 2010* (the PID Act) and Public Interest Disclosure Standard No. 1/2019 (the PID standard) issued by the Queensland Ombudsman under section 60 of the PID Act.

Under the PID Act, a public interest disclosure (PID) may be made by employees of a public sector entity and by members of the public.

## 1 Application

This Public Interest Disclosure Management Plan applies to employees of the Queensland Competition Authority (QCA).

It should be read in conjunction with the QCA's PID Policy and PID Procedure.

## 2 Management Program

The PID standard requires the QCA to develop, implement and maintain a program for the management of PIDs about the conduct of officers of the QCA (QCA employees).

### 2.1 Organisational commitment to encourage internal reporting of wrongdoing

The QCA's Chief Executive Officer (CEO) encourages QCA employees to report any wrongdoing that is:

- conduct that could be corrupt
- conduct that could be maladministration that adversely affects a person in a substantial and specific way
- a substantial misuse of public resources
- a substantial and specific danger to public health or safety
- a substantial and specific danger to the environment
- a reprisal.

QCA employees should feel confident and comfortable about making a disclosure of wrongdoing. The CEO will take all reasonable steps to protect a staff member from any detrimental action in the form of a reprisal taken because they have made a PID.

The CEO and directors:

- recognise the important role disclosers play in identifying wrongdoing and thus improving the integrity and performance of the QCA 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.

## **2.2 Senior management endorsement of the value of PIDs and the proper management of PIDs and disclosers**

The CEO, directors and managers encourage employees who believe they have witnessed a wrongdoing to come forward and make a disclosure. Doing so is in accordance with the culture of the QCA, and in particular with the QCA value of integrity.

Senior managers of the QCA also recognise that members of the public may have information about the operations of the QCA that meets the criteria for a PID. Members of the public are encouraged to report this information to the QCA's Director of Corporate Services (DCS).

The QCA has an obligation to deal with wrongdoing. If a person comes 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 the QCA's disciplinary procedures and a potential breach of the PID Act
- responding to the disclosure thoroughly and impartially
- taking appropriate action to deal with wrongdoing
- acknowledging receipt of the disclosure and keeping the discloser informed of progress and the outcome.

## **2.3 A communication and training strategy for raising employee awareness about PIDs and the QCA's PID procedures**

For the management plan to be successful, employee awareness is critical. The QCA's communication and training strategy is targeted to increase staff awareness about the QCA's commitment to the PID process and the procedures, and include:

- incorporating PID training with the Code of Conduct and ethics training for all staff. The PID content includes guidance on:
  - what a PID is and how to make a PID
  - how to identify a wrongdoing
  - the support and protection for disclosers
  - PID management procedures
- posting links on the intranet to the PID Management Plan, Policy and Procedure
- providing the QCA's nominated PID coordinator's contact details on the internal phone list
- including PID information in the induction program for new starters
- including PID information in the induction program for new project managers.

## **2.4 The appointment of a nominated officer responsible for issues related to the management of PIDs**

The DCS is the nominated PID coordinator, who is responsible for issues related to the management of PIDs. The DCS has direct access to the CEO in relation to PID matters and has the delegated authority to appropriately manage PIDs.

The DCA also has access to resources to allow for the proper investigation of PIDs.

A member of the public or a QCA employee can make a disclosure to the DCS in the following ways:

- email: [publicdisclosures@qca.org.au](mailto:publicdisclosures@qca.org.au)
- mail: Attn: PID Coordinator  
Queensland Competition Authority  
GPO Box 2257  
Brisbane QLD 4001
- phone: 07 3222 0505.

## **2.5 Continuous improvement of procedures**

At the conclusion of a PID investigation, the DCS may consult internally to assess whether any changes are required to the QCA's policies, procedures or practices. The DCS will, within 60 days of the conclusion of a PID investigation, make a report to the CEO with recommendations for change if appropriate.

## **2.6 Regularly evaluating and monitoring of the effectiveness of PID policies and procedures**

The DCS will conduct an annual review of the effectiveness of the QCA's PID Management Plan, Policy and Procedure.