



Public Interest Disclosure Policy

Title:	Public Interest Disclosure Policy
Approved by:	QCN Fibre Board
Responsible lead:	Chief Executive
Audience:	All QCN Fibre Staff
Brief description:	Sets out how QCN Fibre addresses Public Interest Disclosure matters.
Periodicity of review:	Every two years
Approved:	February 2022
Next Scheduled Review Date:	February 2024

Version History

Version	Date	Section(s)	Summary of Amendment
1.0	September 2019	All	Original Version
2.0	21/02/22	All	2-Yearly Review

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1 Introduction

Queensland Capacity Network Pty Ltd (ACN 633 081 517) (**QCN Fibre**) is committed to fostering an ethical, transparent culture that enables QCN Fibre staff to speak up. QCN Fibre staff can disclose certain types of serious wrongdoing in the public sector in a confidential and secure manner without fear of reprisal.

2 Policy Statement

2.1 Public Interest Disclosure Management Program

The Chief Executive Officer has overall responsibility for ensuring that QCN Fibre develops, implements and maintains a Public Interest Disclosure (PID) management program which encompasses:

- Commitment to encouraging the internal reporting of wrongdoing;
- Senior management endorsement of the value to QCN Fibre of PIDs and the proper management of PIDs;
- A communication strategy to raise awareness among employees about PIDs and QCN Fibre's PID procedure;
- QCN Fibre actively includes ethics and integrity training pursuant to its Code of Conduct, particularly during staff inductions;
- Training and awareness about PIDs for staff who may receive or manage PIDs, disclosers or workplace issues relating to PIDs;
- The appointment of a specialist 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 PID Procedure and evaluation of the effectiveness of the PID management program.

2.2 What is PID?

Any person can make a public interest disclosure about:

- A substantial and specific danger to the health or safety of a person with a disability;
- Substantial and specific danger to the environment;
- Reprisal because of a belief that a person has made, or intends to make a disclosure.

In addition, QCN Fibre Staff can make a disclosure about:

- Corrupt conduct by another person;
- The conduct of another person that could, if provided be a reprisal that relates to a previous disclosure made by the employee.

2.3 Who can a PID be disclosed to?

All QCN Fibre staff may make a PID to QCN Fibre (in accordance with the Public Interest Disclosure Procedure) or the Crime and Corruption Commission. A PID can be made anonymously. PID's will be assessed in accordance with the Public Interest Disclosure Procedure.

All matters will be considered on their merits based on the nature, extent and scope of conduct that has given rise to the complaint. The Chief Executive is responsible for assessing and reporting of PIDs under the PID Act to the Queensland Ombudsman on behalf of QCN Fibre.

2.4 Assessing a PID

Under the PID Act, QCN Fibre may decide not to investigate or deal with a PID in various circumstances. If a decision is made not to investigate a PID QCN Fibre will give the discloser written reasons for that decision. The disclosure may request a review by writing to the Chief Executive Officer of QCN Fibre within 28 day of receiving the written reasons for the decision.

For all investigations, QCN Fibre will review systems, policies and procedures to identify whether there are improvements that can be made and consider if staff training is required.

2.5 Organisational Support for Disclosers

QCN Fibre will not tolerate any form of reprisal including harassment or victimisation, and will act to protect employees who raise a concern in good faith and honestly believe information provided tends to show corrupt conduct. Deliberately providing false or misleading information is an offence under the PID Act. QCN Fibre actively includes ethics and integrity training pursuant to its Code of Conduct, particularly during staff inductions.

2.6 Record Keeping

QCN Fibre has an obligation under the PID Act and the Public Records Act 2002 to keep accurate data about the receipt and management of PIDs.

3 Breaches and Disciplinary Action

QCN Fibre Staff found to be in breach of this policy or their Employment Agreement, may be subject to disciplinary action up to and including termination of employment.

A release of information in breach of this policy will be regarded as a serious matter and will be dealt with under QCN Fibre's Performance Counselling and Discipline Procedure outlined in the Employment Handbook.

4 References

The following policies and legislation should be read with this policy:

- QCN Fibre Code of Conduct
- Crime and Corruption Act 2001 (Qld)
- Ombudsman Act 2001 (Qld)
- Public Interest Disclosure Act 2010 (Qld)
- Public Records Act 2002 (Qld)
- Public Sector Ethics Act 1994(Qld)

5 Definitions

The following definitions apply to this policy and any related policy documents.

Term	Definition
Discloser	A person who makes a disclosure in accordance with the Public Interest Disclosure Act 2010.
QCN Fibre Staff	The Directors of QCN Fibre and any QCN Fibre employee whether permanent, temporary, full-time, part-time or casual, or any volunteer, student, contractor, consultant, labour hire worker, or anyone who works in any other capacity for QCN Fibre.
Organisational Support	Organisational support means actions such as, but not limited to: <ol style="list-style-type: none"> a) providing moral and emotional support; b) advising disclosers about agency resources available to handle any concerns they have as a result of making their disclosure;

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- c) appointing a mentor, confidante or other support officer to assist the discloser through the process;
 - d) referring the discloser to the arrangement of other professional counselling;
 - e) generating support for the discloser in their work unit where appropriate;
 - f) ensuring that any suspicions of victimisation or harassment are dealt with;
 - g) maintaining contact with the discloser; and
 - h) negotiating with the discloser and their support officer a formal end to their involvement with the support program when it is agreed that they no longer need assistance.
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Public Interest Disclosure Act Public Interest Disclosure Act 2010 (Qld)

Reprisal Means causing, attempting to cause or attempting to induce a person to cause detriment to a person because, or in the belief that, that person or someone else:

- has made or intends to make a disclosure; or
- is, has been, or intends to be, involved in a proceeding under the Public Interest Disclosure Act or Corporations Act, against any person.
