

USC Public Interest Disclosure (PID) Management Program

1. Introduction and Purpose

This PID management program (the management program) has been developed in accordance with s.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.

Under section 1.3 of the standard, the Vice-Chancellor and President must develop, implement and maintain a management program for PIDs that addresses the following:

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 management program should be read in conjunction with the University of the Sunshine Coast's *Public Interest Disclosure Policy and Procedures*.

2. Management program

2.1 Demonstrate organisational commitment

The VCP and its Senior Executive:

- are committed to encouraging internal reporting of wrongdoing;
- will manage PIDs and disclosures in accordance with the PID Act; and
- acknowledge the value to the USC receiving reports of wrongdoing, investigating and acting on those reports.

USC's commitment to ethical practices are detailed in the *Staff Code of Conduct – Governing Policy* where it is clear that all staff are required to abide by the code, behaving professionally and with respect and consideration for others. Staff are encouraged to report the behaviour of other staff, should they feel it falls below these expected standards as soon as possible.

When staff come forward with information about wrongdoing, USC commits 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 (reprisal);

- treating any bullying, harassment, unfair treatment, victimisation or discrimination that results from such a disclosure as a breach of the relevant policy or Code of Conduct;
- responding to the disclosure thoroughly and impartially;
- providing appropriate support to all staff who make public interest disclosures;
- ensuring that public interest disclosures made to USC are properly assessed and, when appropriate, properly investigated and dealt with;
- taking appropriate action in relation to any wrongdoing that is the subject of a public interest disclosure made to USC;
- where some form of wrongdoing has been found, taking appropriate action to deal with it;
- keeping the discloser informed of the progress and outcome; and
- maintaining confidentiality.

It is recognised that other relevant persons (students, members of the public, stakeholders etc) may have information to disclose about USC that meets the criteria for a PID. These PIDs are encouraged to be reported and will be managed in accordance with the USC's *Public Interest Disclosure Policy and Procedures*.

2.2 Appoint a PID Coordinator

The VCP has appointed the Director, Human Resources as the PID Coordinator, with responsibility for the management program.

The Director, Human Resources has:

- Direct access to the VCP in relation to PID matters;
- Delegated authority to appropriately manage PIDs;
- Access to resources to allow for the proper administration of the management program.

The PID Coordinator can be contacted by email at pid@usc.edu.au

2.3 Delegate PID responsibilities

The PID Coordinator is responsible for ensuring that:

- all staff who directly or indirectly supervise or manage other staff are informed that they are a person who may receive a PID in accordance with section 17(3)(d) of the PID Act;
- all staff 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;
- all staff with designated responsibility for receiving, assessing, investigating and/or decision making in relation to PIDs are provided with written guidance on the performance of these tasks and appropriate delegated authority; and
- all staff 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 within the entity and externally.

2.4 Implement a communication strategy

To ensure the PID management program's success, the following USC communication strategy has been established:

- All new employees are to be informed of the management program, policy and procedures upon induction;
- Information about the management program, policy and procedures is available on the USC's internal and public website. This includes how to make a disclosure;
- Regular targeted communications raising awareness of the management program, policy and procedures, including communicating the obligations of staff who directly or indirectly supervise or manage other staff.

2.5 Implement a training strategy

USC's training strategy involves the following:

- PID Awareness training offered to all staff;
- Targeted PID Awareness training for supervisors, HR personnel and other identified key staff who may become involved in the initial intake and/or management of a PID;
- Targeted training to staff that may be assigned as a PID Support Officer;
- PID training modules offered by the QLD Ombudsman to be completed by the PID Coordinator and other delegated staff assisting with the assessment and management of PIDs. The modules include:
 - o Module 1: Assessment and Management
 - o Module 2: Risk Assessment and Protection
 - o Module 3: Support

2.6 Analyse PIDs to inform improvements

USC acknowledges the value of information obtained from PIDs in identifying systemic issues and trends, and informing administrative improvements.

Following the finalisation of a PID, the PID Coordinator will assess whether any change is needed to the USC's service delivery, personnel management, business processes or internal controls. The PID Coordinator will report to the VCP and other relevant committees regarding any recommendation for change as a result of that assessment.

The PID Coordinator will conduct an annual review of the effectiveness of the PID Management Program and provide a report to the VCP if any amendments are recommended.

Approved by:

A handwritten signature in black ink, appearing to read 'Helen Bartlett', is written over a light blue horizontal line.

Professor Helen Bartlett, Vice-Chancellor and President

Date: 22/9/2021