

Public Interest Disclosure Policy and Procedure

Version: 1.00

1 Policy statement

The Queensland Racing Integrity Commission (QRIC) is committed to the objects of the *Public Interest Disclosure Act 2010* (PID Act). Public Interest Disclosures (PIDs) are an important component of ensuring QRIC employees uphold the highest standard of integrity and accountability and, as such, the QRIC strongly supports PIDs being made.

The QRIC encourages any person who considers that they have knowledge or evidence of wrongdoing to make a disclosure. Every QRIC employee has an ethical responsibility to disclose wrongdoing in accordance with our ethical culture and the general requirement to act with integrity at all times. Furthermore, Section 9 of the [Public Sector Ethics Act 1994](#) places an obligation on all QRIC employees to disclose fraud, corruption and maladministration. The obligation to report wrongdoing is also reflected in Principle 1 of the [Queensland Public Service Code of Conduct](#).

When a PID is reported, the QRIC will:

- Properly assess and, where appropriate, investigate the disclosure thoroughly;
- Where required, take action on any wrongdoing in relation to the disclosure; and
- Ensure the discloser is supported throughout and kept informed of the progress and outcome of the investigation.

This policy and procedure sets out the framework and process for the management of PIDs made to the QRIC, as required by the PID Act and the Public Interest Disclosure Standard No. 1 (PID Standard).

2 Authority

[Public Interest Disclosure Act 2010](#)

[Public Interest Disclosure Standard No 1](#)

[Crime and Corruption Act 2001](#)

[Queensland Public Service Code of Conduct](#)

3 Background and context

A PID is the disclosure, in the public interest, of information specified under sections 12 and 13 of the PID Act and made to an appropriate public sector entity that has the responsibility to appropriately action the information. It is a disclosure about suspected wrongdoing or danger in the public sector.

Information about suspected wrongdoing may or may not constitute a PID, depending on whether the disclosure is made by a public officer or by any other person. The PID Act provides unique protection from reprisal for public officers disclosing information in the public interest to an appropriate entity about:

- a) Corrupt conduct, as defined in the *Crime and Corruption Act 2001*; or

- b) Maladministration that adversely affects anyone's interest in a substantial and specific way;
- c) Negligent or improper management by a public officer, public sector entity or a government contractor resulting in a substantial waste of public funds; or
- d) Conduct by another person causing a substantial and specific danger to public health or safety or to the environment.

The PID Act can also provide protection to members of the community who make a PID about a substantial and specific danger to:

- a) Public health and safety including the health and safety of a person with a disability;
- b) The environment; or
- c) A reprisal against anybody as a result of a PID.

A public service officer can make a PID about all of the above matters.

The protections under the PID Act apply to a person who makes a PID, based on an honest belief, on reasonable grounds, about the conduct or other matters disclosed. However, it is a criminal offence under the PID Act to make a PID and intentionally provide information that is false or misleading.

The PID Act creates a number of 'proper authorities' to give disclosers choice about where to direct their PID:

- a) Every public sector entity is a proper authority if the disclosure is about the conduct of that entity or its employees (every public sector entity should publish its procedures for managing PID on its website).
- b) Any public sector entity with the power to investigate or remedy the PID matter is a proper authority. For example, the Crime and Corruption Commission (CCC) is a proper authority for disclosures about corrupt conduct.
- c) Any Member of Parliament is a proper authority.

Under the PID Act, special rules apply to disclosures about misconduct by judicial officers.

3.1 Subjective and objective test

For a disclosure to be considered as a PID, the disclosure of information must also satisfy the threshold tests in Section 12 (3) or Section 13 (3) of the PID Act (the subjective and objective tests) as outlined below:

Subjective test - the person honestly believes on reasonable grounds that the information tends to show the conduct or other matter; or

Objective test - the information tends to show the conduct or other matter, regardless of whether the person honestly believes the information tends to show the conduct or other matter.

The discloser is protected if they honestly believe on reasonable grounds that what they are disclosing has occurred or if it is evident from the information disclosed that what they are disclosing has occurred. The discloser is not required to evidence or substantiate their complaint and should avoid undertaking any kind of investigation into the matter themselves.

Some disclosures are not protected by the PID Act, including disclosures made to the media, false and misleading disclosures, those which question the merits of government or agency policy and those that are made to avoid disciplinary action.

4 Scope

As a public sector entity established under the *Racing Integrity Act 2016*, the QRIC is subject to the PID Act. This policy applies to all employees, whether full-time, part-time, temporary, casual or on contract of service. However, for the purpose of the PID Act, contractors, consultants and volunteers are not considered employees. It also applies to any external person who is making a PID to the QRIC.

5 Abbreviations, acronyms and definitions

QRIC	Queensland Racing Integrity Commission
PID Act	<i>Public Interest Disclosure Act 2010</i>
PID	Public Interest Disclosure
Corrupt Conduct	As defined in Section 15 of the <i>Crime and Corruption Act 2001</i> . If proven, it may be a criminal offence or reasonable grounds for terminating service.
Case Manager	A person who provides support to a discloser.
Discloser	A person who makes a PID, as outlined in Sections 12 and 13 of the PID Act.
Employee	A public officer of a public sector entity is an employee, member or officer of the entity. An employee includes a person on a contract of service (temporary and casual officers where there is direct employment arrangement). However, for the purpose of the PID Act, contractors, consultants and volunteers are not considered employees.
Maladministration	Defined in schedule 4 of the PID Act, maladministration is widely defined to cover an act or failure to do an act that was unlawful, unreasonable, unfair, improper, unjust, and improperly discriminatory or based on a mistake or fact or otherwise wrong. It must adversely affect someone's interest in a substantial and specific way.
Reprisal	Refers to a situation where a person causes, attempts or conspires to cause detriment to another person because of a belief that the person or another person has made or may make a PID.
Wrongdoing	Are any dealings or behaviour including, but not limited to, instances of unlawful, negligent, corrupt or improper conduct.

6 Key principles

The QRIC is committed to creating and maintaining a work environment that encourages and facilitates the disclosure of wrongdoing by:

- a) Providing staff with awareness via this policy and procedure on:
 - identifying wrong doing;
 - how to make a PID;
 - the support and protection afforded to disclosers; and
 - how PIDs are managed within the organisation.
- b) Identifying and eliminating unlawful, negligent or improper conduct from the workplace.
- c) Promoting the public interest by facilitating complaints and PID that relate to the QRIC.
- d) Encouraging employees and others to disclose information about suspected wrongdoing through employee awareness and appropriate governance measures including risk assessment.
- e) Ensuring that complaints and disclosures, including those made anonymously, are properly assessed and where appropriate, dealt with, reviewed or investigated thoroughly and impartially.
- f) Affording support and protection from reprisals to disclosers or those who are the subject of a PID.

7 PID Management Procedures

7.1 Making a PID

7.1.1 QRIC employees

Under the Code of Conduct for the Queensland Public Service (section 1.1), it is an ethical obligation of public officials to report suspected wrongdoing when they become aware of it or suspect it is occurring. Employees may make a PID about matters listed below:

- Conduct of another person that could be corrupt conduct;
- Conduct of another person that could be maladministration and adversely affects a person's interests in a substantial and specific way;
- A substantial misuse of public resources (other than an alleged misuse based on mere disagreement over policy, purposes or priorities of expenditure);
- Substantial and specific danger to the environment;
- Substantial and specific danger to public health or safety;
- Substantial and specific danger to the health or safety of a person with a disability; or
- A reprisal because of a belief that a person has made, or intends to make a PID.

An employee does not need to identify that their disclosure is a PID for it to be assessed and managed as one. The disclosure will be assessed by the PID Coordinator to determine if it meets the

definition of corrupt conduct and requires reporting to the appropriate authority. If the disclosure is assessed as a PID, the discloser will receive the legal protections available under the PID Act.

7.1.1.1 Making Internal Disclosures

Employees are encouraged to make disclosures internally in the first instance. In order to safeguard their own confidentiality and that of the subject of the PID, employees are encouraged to make a disclosure they believe to be a PID directly to the Commissioner or Deputy Commissioner.

However, where this is not possible or appropriate, employees will still be afforded the protections of the PID Act if they make their disclosure to:

- The QRIC PID Coordinator (Manager, Policy and Legislation, Office of the Commissioner);
- A Director;
- Their line manager or supervisor; or
- Any other person in a management position within QRIC

Consider who is best placed to deal with your disclosure. If you believe your manager is involved in the complaint or is the subject of the complaint, the PID should be made to a more senior manager, or one of the appropriate officers listed above. Where senior or executive management of the QRIC are the subject of the complaint or the PID it can be made to an appropriate external entity.

7.1.1.2 Making External Disclosures

Employees may choose to make a disclosure to someone external to the QRIC either as a first step, or if they are not satisfied with our organisation's response to a disclosure. While staff are urged to disclose to someone in this organisation, you will be supported and protected if you disclose to an appropriate external authority.

Be aware that when you disclose to an external entity, it is very likely that it will discuss your case with the QRIC. The QRIC will make every effort to assist and cooperate with any entity dealing with a PID about this organisation to work towards a satisfactory outcome.

Be aware that if you make a disclosure to an external entity, it must be one that can investigate and deal with the matter, for you to receive the protections provided under the PID Act. External entities that employees can make a PID to include:

- The Crime and Corruption Commission (CCC);
- A member of the Legislative Assembly (Member of Parliament);
- A Chief Judicial Officer of the relevant court or tribunal (if the disclosure relates to a judicial officer).

7.1.2 Members of the public

Members of the public may make a PID about matters that may involve:

- A substantial and specific danger to the health or safety of a person with a disability;
- A substantial and specific danger to the environment; or
- An act of reprisal because of a belief that a person has made, or intends to make a PID.

Members of the public are encouraged to make a PID to the QRIC Commissioner or Deputy Commissioner, where possible and appropriate. However, they are also entitled to make a PID to any of the parties listed in 7.1.1, or by completing the PID disclosure form on the QRIC internet site.

If a QRIC employee receives a PID from a member of the public, they must treat the matter seriously and confidentially and refer it to:

- The Commissioner or Deputy Commissioner;
- The QRIC PID Coordinator (Manager, Policy and Legislation, Office of the Commissioner);
- The Manager, Human Resources, Office of the Commissioner;
- A Director; or
- Their line manager or supervisor.

The PID Coordinator (Manager, Policy and Legislation, Office of the Commissioner) must be advised in all cases either by the discloser or the person to whom the PID was made.

7.1.3 Anonymous disclosures

Any person may make an anonymous disclosure either in writing, by telephone or by using the [complaints form](#) on the QRIC website. If you do decide to disclose anonymously, be sure to provide sufficient information for the matter to be investigated, as it will not be possible for an investigator to contact you for clarification or more information. Also, it will not be possible for us to keep you informed on the progress in handling your disclosure and you could experience difficulties in relying upon the protections afforded by the PID Act.

The likelihood of a successful outcome is increased greatly if, when making a disclosure, you make your identity known. Nonetheless, if you have reported anonymously and provided enough information for our organisation to act, we are committed to acting upon your request.

7.1.4 Making disclosures to journalists

Disclosure to a journalist is an **avenue of last resort**. Any person may make a disclosure to a journalist, but only when they have made a PID using the avenues outlined in this policy and procedure, and the entity to which the disclosure was made or, if the disclosure was referred to another department, the entity to which the disclosure was referred:

- Decided not to investigate or deal with the disclosure; or
- Investigated the disclosure but did not recommend taking any action in relation to the disclosure; or
- Did not notify the person, within 6 months after the date the disclosure was made, whether or not the disclosure was to be investigated or dealt with.

In these circumstances **only**, will the discloser retain protected status.

All media enquiries or requests from journalists, relating to PIDs or otherwise, must be directed to the Principal Media and Communications Officer, Office of the Commissioner, in accordance with the QRIC Media Policy.

7.2 Managing a PID

7.2.1 Initial assessment and referral

All PIDs received must be referred as soon as possible to the QRIC's PID Coordinator (Manager, Policy and Legislation, Office of the Commissioner) to determine action to be taken. The PID Coordinator will determine if a disclosure is a PID on the basis of whether it is:

- An appropriate disclosure;
- Of public interest information;
- Made by the proper person; and
- To a proper authority.

If there is any doubt whether a disclosure is a PID, it will be assumed to be and managed accordingly. The person making the disclosure does not have to identify the matter as a PID; the PID Coordinator will make that determination.

The QRIC has a statutory obligation under the *Crime and Corruption Act 2001* to refer suspected corrupt conduct to the CCC. If the matter is assessed and found to meet the corrupt conduct criteria it will be referred to the CCC for direction on action to be taken. If the disclosure is not assessed as suspected corrupt conduct, the matter will be referred to the Manager, Human Resources, Office of the Commissioner for action as suspected misconduct.

7.2.2 No further action

The QRIC may decide to take no further action on a PID where:

- The subject of the PID has already been dealt with by another appropriate process;
- The matter raised should be dealt with by another appropriate process;
- The age of the information makes it impractical to investigate the matter;
- The information is considered too trivial to warrant investigation; or
- The entity that has jurisdiction to investigate the matter has notified the QRIC that investigation is not warranted.

Written reasons for not taking any further action must be provided by the PID Coordinator to the person making the disclosure. Once received, if the person making the disclosure is not satisfied, they have 28 days to apply for an internal review of the decision by the Director, Office of the Commissioner.

7.2.3 Referral to another agency

If the PID relates to suspected corrupt conduct by employees of another Queensland Government agency, the PID Coordinator will refer the complaint to the relevant agency.

Following consultation with the discloser, PIDs about danger to public health or safety and danger to the health and safety of a person with a disability will be referred to the appropriate government entity to be dealt with. The QRIC must assess the risk of reprisal prior to referring a PID to another agency.

7.2.4 Protection of employees

Under all circumstances, the QRIC will support and protect employees who make disclosures based on a reasonable belief of wrongdoing.

However, the PID Act, establishes a particular responsibility for the QRIC to establish reasonable procedures to support and protect its employees from reprisals that are, or may be, taken against them as a result of making a PID and to support them through the investigation process.

Information about the discloser's identity or personal affairs, the information disclosed in the PID and the fact that a PID has been made will be kept confidential. Disclosers will be consulted prior to any action that could identify them to a third party. Only QRIC officers directly involved in dealing with the matter will be advised of the details of the PID.

When confidentiality is not possible (e.g. due to the circumstances of the complaints or when the disclosure has become public knowledge), the discloser will be consulted about the risk of reprisal and will receive protection and support. The relevant manager will inform employees of the work unit that the QRIC has a zero tolerance of reprisal action and to maintain confidentiality.

7.2.5 Case Management Support for Disclosers

Disclosers will be offered and provided appropriate support and advice by a suitable Case Manager. The selection of a Case Manager must be in consultation with the PID Coordinator and the discloser. It is important that the Case Manager is impartial and has no involvement in the complaint matter, either as a witness or a potential subject officer.

The Discloser and the Case Manager will be in regular contact through a mutually agreed method and schedule. The Case Manager will also have access to resources (available on the Queensland Ombudsman website) that provide guidance on their responsibilities and available support.

7.2.6 Risk assessment

A risk assessment of possible reprisal action must be undertaken as a matter of priority. As this may need to occur prior to identifying and arranging a suitable Case Manager, the initial risk assessment will be done by the PID Coordinator and a member of QRIC management. However, if the manager is involved in the matter, the PID Coordinator will identify and recommend a suitable employee to assist in the risk assessment. The risk assessment will be conducted in conjunction with the discloser as they are best placed to provide information about the perceived risk of reprisal.

Regular appraisal of risk must be undertaken throughout the investigation phase to reduce the possibility of reprisal action against the discloser. The discloser needs to be consulted about their perceptions of risk, as they are best placed to know the likely risks relating to employees involved in the PID.

Where the risk level is assessed as anything greater than low, a case management strategy will be developed and implemented to mitigate the risk. In some circumstances relocation to another work group or location may need to be considered. Relocation can only occur with the consent of the discloser and, in the case of relocation to another department, with the consent of the other department's chief executive.

Disclosers and their families are able to seek free, professional and confidential counselling through Optum, the QRIC's employee assistance provider, details of which are published on the intranet - [Employee Assistance Program](#).

7.2.7 Subject Officers

QRIC employees who are the subject of any allegation of wrongdoing will be afforded procedural fairness (natural justice), and assumed to be innocent of any allegation until evidence proves otherwise. Employees will also be given the opportunity to respond to an allegation before a final decision is made on the outcome of the investigation.

Subject officers and their families, are able to seek free, professional and confidential counselling through Optum, the QRIC's employee assistance provider, details of which are published on the intranet - [Employee Assistance Program](#).

To the best of its ability, the QRIC will also support members of the public who make PIDs by providing regular contact and advice throughout the process.

7.2.8 When employees are NOT protected

The Act does **not** provide for protection of an employee who:

- Fails to follow the correct disclosure process;
- Intentionally gives false or misleading information; or
- Makes a PID directly to or through the media rather than through the approved process (e.g. making a disclosure to a journalist **before** following due the QRIC's process).

7.2.9 Reprisals

A reprisal against a protected discloser is a criminal offence (s 41 of the Act).

Under the Act:

- Disclosers incur no criminal or civil liability (e.g. for defamation) for PIDs made appropriately.
- It is a criminal offence for a public officer to take reprisal action against a protected discloser.
- The CCC can investigate suspected reprisals against public sector employees.
- A public sector employee can ask their employer or the Queensland Ombudsman for relocation if they suffer from or risk reprisal.

Reprisals against an employee who makes a disclosure, or fears that they may be subject to reprisal action, must be reported immediately to the Case Manager, the Commissioner or Deputy Commissioner, the QRIC PID Coordinator, a Director, the Manager, Human Resources or the employee's manager/supervisor. The PID Coordinator must be advised in all cases and will refer allegations of suspected reprisal conduct to the CCC.

In the event that reprisal action is taken, protected disclosers may lodge a complaint with the Anti-Discrimination Commission (*Anti-Discrimination Act, 1991*, Chapter 6 and 7) or apply for an injunction through the Queensland Industrial Relations Commission (QIRC) or Supreme Court who can grant an injunction against reprisal action. If an application is lodged with the Anti-Discrimination Commission, the discloser cannot also apply to the QIRC or the Supreme Court, as only one of these options is available (s 50 of the PID Act).

Disclosers may also lodge a claim for damages through the District or Supreme Court (s 42 of the PID Act,). If they are QRIC employees they may lodge a claim against the QRIC, as the QRIC can be held responsible if an employee commits a reprisal. The QRIC must be able to demonstrate that it took reasonable steps to prevent reprisal against the discloser occurring (s43 of the Act).

7.2.10 Reasonable management action

Reasonable management action is not a reprisal and may be taken against an employee who has made a PID. However, the manager's reasons for taking the action must not include the fact the employee has made the PID and must be in accordance with QRIC policies and processes, including procedural fairness principles. Reasonable management action includes a fair appraisal of work performance, a requirement to undertake counselling, suspension from the workplace or a disciplinary action that is appropriate or relevant to the circumstances.

7.2.11 The investigation

The Commissioner may delegate the PID to an officer of the QRIC who will determine whether an investigation is required based on the seriousness of the allegations and any CCC recommendations. After a decision to investigate has been made, the PID Coordinator will engage a specialist officer to undertake the investigation. During this process, all parties named in the disclosure, and in subsequent interviews, will be contacted for an interview where they may provide their version of events.

At the conclusion of the interview stage, the investigating officer collates the information gathered and prepares a report for the QRIC, which may include recommendations, and makes a determination as to whether on the balance of probabilities the complaint (or each allegation) has been substantiated or not.

An investigation may result in one or more of the following outcomes:

- Disciplinary action being commenced;
- A recommendation that there be administrative changes;
- A recommendation that corruption prevention strategies be developed;
- A criminal charge; or
- The complaint being dismissed as unsubstantiated.

7.2.12 After the investigation

The Commissioner or delegate receives the investigating officer's report, considers the recommendations, then approves or does not approve the recommended action.

The discloser will be provided with reasonable information in writing about the action taken on their disclosure and the results. Before information is released it must be considered whether giving the information is likely to adversely affect:

- Anybody's safety;
- The investigation of an offence or possible offence; or
- Necessary confidentiality about an informant's existence or identity.

The discloser will be advised of the conclusion, of any organised support arrangements following completion of the investigation and of the action taken. This will signal the end of the reporting process and the finalisation of the matter.

8 Responsibility and Accountability

The Commissioner is responsible for:

- Creating an ethical workplace culture where employees report suspected wrongdoing when they become aware of it and are supported when they do so. (*Code of Conduct for the Queensland Public Service*);
- Ensuring reasonable procedures are in place to deal with a PID and that those procedures are published to enable members of the public and employees to access them (*Public Interest Disclosure Act 2010*);
- Ensuring that PIDs are properly assessed, investigated and dealt with, including appropriate action being taken in relation to any wrongdoing in a PID (*Public Interest Disclosure Act 2010*);
- Ensuring that employees making a PID receive support and protection from reprisal (*Public Interest Disclosure Act 2010*);
- Ensuring that all legislative obligations in relation to reporting and investigation are met (*Public Interest Disclosure Act 2010*);
- Ensuring that all matters involving suspected corrupt conduct are referred to the Crime and Corruption Commission. (*Crime and Corruption Act 2001*).

The Deputy Commissioner and all Directors are accountable within their areas of responsibility for:

- Ensuring reasonable procedures are in place to receive and deal with a PID made by:
 - employees reporting corrupt conduct and making PIDs within their business areas about any matters which may be disclosed (under sections 12 and 13 of the PID Act 2010); and
 - members of the public making a PID to QRIC about:
 - a substantial and specific danger to the environment;
 - a substantial and specific danger to the health or safety of a person with a disability; or
 - a reprisal because of a belief that a person has made or intends to make a PID.
- Ensuring employees are aware of these procedures and the support and protection that is provided to employees who make a PID and for those employees who are the subject of a PID;
- Ensuring employees are aware of the protection offered to members of the public as a protected discloser when making a PID to QRIC under the *Public Interest Disclosure Act 2010*;
- Ensuring employees, managers and supervisors are trained in ethical decision-making, Code of Conduct for the Queensland Public Service, misconduct prevention and relevant QRIC policies;
- Ensuring approved recommendations arising from reports investigating information provided as a PID are acted upon appropriately; and
- Creating an ethical workplace culture through leading by example.

The QRIC PID Coordinator (Manager, Policy and Legislation) is responsible for:

- Overall co-ordination of the QRIC Public Interest Disclosure process;
- Development, maintenance and communication of the QRIC Public Interest Disclosure Policy and Procedure;
- Arranging resources or training in identifying and managing PIDs, disclosers or workplace issues relating to a PID;
- Informing the Commissioner and the Crime and Corruption Commission of any cases of suspected corrupt conduct;
- Providing advice in relation to the QRIC's obligations under the *Public Interest Disclosure Act 2010*;
- At the direction of the delegate, arranging for a PID to be investigated;
- Reporting investigation outcomes to relevant parties;
- Advising line managers and supervisors with regard to case management of disclosers and employees who are the subject of a PID to ensure they receive fair treatment, have access to support and assistance and protected disclosers are safeguarded from reprisal;
- Ensuring legislative reporting obligations on PID issues are met; and
- Providing information concerning PIDs to the Commissioner, relevant senior executives and the Audit and Risk Committee as required.

Assigned PID Case Managers are responsible for:

- Advising the discloser about what making a PID means;
- Assessing the immediate protection needs of the discloser;
- Listening and responding to any concerns of harassment, intimidation or victimisation in reprisal for making a PID;
- Coordinating and providing support to the discloser;
- Working with management to foster a supportive work environment;
- Advising the discloser of progress;
- Keeping records of all aspects of case management of the discloser, including all contact and follow-up action; and
- Endeavouring to ensure that the expectations of the discloser are realistic.

The QRIC Audit and Risk Committee is responsible for:

- Analysing tabled data to identify trends and areas of concern and recommending strategies to address these issues; and
- Ensuring strategies are in place within QRIC to promote awareness about PIDs, ethical behaviour and decision-making and misconduct prevention for managers, supervisors and employees.

Managers and Supervisors are responsible for:

- Ensuring employees in their area are aware of their obligations in relation to the requirements of this policy and procedure;
- Continually assessing and monitoring the workplace for any signs of reprisal against an employee making a PID and taking reasonable action to protect them;
- Monitoring the welfare of an employee who has made a PID on an ongoing basis and arranging appropriate support;

- Ensuring an employee, who is the subject of a PID, receives fair treatment and has access to support and assistance; and
- Ensuring that where allegations made in a PID are substantiated, recommendations from the investigation are implemented as soon as practicable, with effective systems and processes put in place to reduce the likelihood of recurrence.

Employees are responsible for:

- Being aware of and complying with all relevant whole-of-Government and QRIC policies and procedures, including the Code of Conduct for the Queensland Public Service and QRIC Fraud and Corruption Prevention Policy and Procedure;
- Attending training in ethical decision-making, Code of Conduct for the Queensland Public Service and misconduct prevention when offered;
- Being aware of the possibility that corrupt conduct may exist in the workplace and reporting any concerns to their manager or supervisor or an appropriate official in accordance with this policy and procedure; and
- Creating an ethical culture by leading by example.

9 Reporting requirements

The QRIC will report to the Queensland Ombudsman (QO) statistical information about PIDs and any other information requested by the QO regarding the QRIC's performance in relation to the administration of the Act. The information will not include any details that could identify the discloser.

All recording and reporting of PID information will be managed by the QRIC PID Coordinator (Manager, Policy and Legislation, Office of the Commissioner), unless the PID is about this individual then it will be managed by the Director, Office of the Commissioner.

Correspondence relating to PIDs should be marked "Private and Confidential" and addressed to:

The PID Coordinator
Office of the Commissioner
Queensland Racing Integrity Commission
PO Box 56666
CITY EAST QLD 4002
or via phone on: 3174 0412

10 Forms

Employees and members of the public can use the QRIC [complaints form](#) to make PIDs anonymously or otherwise.

11 Complaints and appeals

Disclosers who are not satisfied with the outcome of their PID can apply to the Commissioner for a review of the decision within 28 days of being notified of the PID outcome.

Disclosers who are not satisfied with the PID investigation outcome are also entitled to raise the matter with other appropriate entities (refer to the [Queensland Ombudsman](#) website).

Employees who are the subject of allegations of wrongdoing do not have any grievance or appeal rights against the allegation itself, providing the employee making the PID is acting in good faith and the information is not intentionally false or misleading.

However, an employee who is the subject of an administrative decision or action is entitled to lodge a complaint in accordance with the QIRC's Employee Complaints Management Policy and Procedure should they feel that the administrative **decision** is unfair or biased.

If the employee considers that the issue is not resolved following the finalisation of the complaints process, they may be able to lodge an appeal with the Industrial Registry of the Queensland Industrial Relations Commission (QIRC). The QIRC website provides [general information about appeals](#).

12 Related and reference documents

[The Queensland Ombudsman Public Interest Disclosure Guides](#)

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