



Introduction

This Public Interest Disclosure (PID) Management Program has been developed by the Office of the Health Ombudsman (OHO) in accordance with s.28 of the [Public Interest Disclosure Act 2010](#) (the PID Act) and [Public Interest Disclosure Standard 1/2019 – Public Interest Disclosure Management Program](#).

It is to be read with the OHO's PID Policy and its supporting PID procedures – *Managing PIDs about the OHO* and *Managing PIDs in health service complaints, notifications, and other matters*.

The Health Ombudsman has overall responsibility for ensuring the OHO's development, implementation, and maintenance of its PID Management Program which encompasses:

- a commitment to encouraging the internal reporting of wrongdoing
- senior management's endorsement of the value of PIDs and proper PID management
- communication strategies to raise awareness among employees about PIDs and the OHO's PID policy and procedures
- a training strategy providing employees with information and access to training about what a PID is, how to make a PID, how PIDs are managed and support available to those who make a PID
- specialist training and awareness for senior management and other staff who may receive or manage PIDs or handling other workplace issues relating to PIDs
- the appointment of officers (PID Coordinators) to be responsible for issues related to the management of PIDs
- a system of review ensuring outcomes from PIDs inform improvements to service delivery, business processes and internal controls
- regular review of the PID Policy and the supporting procedures
- regular evaluation of the effectiveness of the PID Management Program.

Purpose

The purpose of this PID Management Program document is to demonstrate the OHO's fulfilment of obligations under PID Act and PID standard 1.3, which requires the OHO to:

- demonstrate organisational commitment (standard 1.3.1)
- appoint a PID Coordinator (1.3.2)
- delegate PID responsibilities (1.3.3)
- implement a communication strategy (1.3.4)
- implement a training strategy (1.3.5)
- analyse PIDs to inform improvements (1.3.6).



Demonstrate organisational commitment

The OHO is committed to upholding an honest, ethical and accountable culture. All public sector employees, including OHO employees, have a positive duty to report wrongdoing, as required by the Code of Conduct for the Queensland Public Service and the *Crime and Corruption Act 2001*. The OHO recognises the important role PIDs can play in identifying wrongdoing. By making a PID, a discloser is contributing to an ethical workplace culture and supporting the performance of the OHO or their respective government entity.

The OHO will take all necessary steps to:

- promote the public interest by facilitating PIDs of wrongdoing in the public sector
- ensure PIDs are properly assessed, investigated, and dealt with by the most appropriate proper authority
- ensure appropriate consideration is given to the interests of persons who are the subject of a PID (subject officer)
- afford all necessary protections and supports to persons making PIDs, and all other individuals involved in the PID process.

In the context of a disclosure made as part of a health service complaint, notification, or other matter (collectively 'complaint'), the OHO recognises that while the OHO may be considered a *proper authority* for receiving and dealing with a disclosure, there may be another public entity better placed to investigate and/or remedy the information disclosed. When presented with a disclosure, the OHO is committed to identifying the most appropriate proper authority for dealing with the disclosure, and where safe to do so, facilitating the prompt referral of the disclosure to the most appropriate proper authority.

The OHO also recognises that members of the public may make a PID about the OHO and its staff, and encourages members of the public to report such information to the appropriate OHO PID Coordinator, as set out below and in the OHO's PID policy and the *PIDs about the OHO procedure*. A PID made by a member of the public will be managed in accordance with the aforementioned policy and procedure.

Appoint a PID Coordinator

The Health Ombudsman has appointed two PID coordinators with shared responsibility for different PIDs managed by the OHO:

- The Executive Director, Assessment and Resolution (A&R) is the PID Coordinator typically responsible for matters relating to PIDs identified in health service complaints, notifications and other matters.
- The Executive Director, Corporate and Strategic Services (CSS) is the PID Coordinator with responsibility for PIDs made related to the OHO or its staff.

PID coordinators are responsible for maintaining oversight of the OHO's PID Management Program and act as a principal point of contact with the Office of the Queensland Ombudsman (the oversight agency). The specific roles and contact information of the two PID Coordinators is set out in the OHO's PID Policy.



Delegate PID responsibilities

The PID coordinators are responsible for ensuring:

- the OHO maintains a management program for PIDs made to the OHO, consistent with any standard made under s.60 of the PID Act
- all officers who directly or indirectly supervise or manage other officers are informed they are a person who may receive a PID as per s.17(3)(d) of the PID Act
- all officers with the function of receiving or actioning types of information recognised by the PID Act, are informed they are a person who may receive a PID as per s.17(3)(e) of the PID Act
- all officers with the responsibility of receiving, assessing, investigating and/or decision-making in relation to PIDs are provided with written guidance and appropriate delegation
- where necessary, nominating PID support officers and ensuring these officers are provided with sufficient guidance, including information about available internal and external support services
- where the OHO is responsible for dealing with a PID, data is provided to the Queensland Ombudsman via the RaPID database and includes all necessary details as set out under s.29(2) of the PID Act.

Implement a communication strategy

The OHO acknowledges that employee awareness is critical to the success of the PID Management Program and will ensure:

- all new employees are informed of the PID Policy, procedures, and PID Management Program at induction
- current information about PIDs is made available on the OHO's staff intranet, including the OHO's PID Policy, procedures, and PID Management Program, as well as any developed training packages
- the OHO's current PID policy is published on the OHO's public webpage
- periodic messages to staff about any news related to the PID Act, PID management, or updates to the OHO's PID resources will be communicated to staff via the OHO's staff electronic newsletters.

Implement a training strategy

The OHO commits to providing PID training to its employees and will ensure:

- all new employees are provided PID Awareness Training as part of induction, introducing employees to the OHO's PID policy and procedures, as well as accessing online educational PID resources provided by the [Queensland Ombudsman](#)
- reference to PIDs and the PID Act is included in the mandatory Code of Conduct training
- where possible, both operational staff and leadership are afforded the opportunity to attend more comprehensive PID training

- PID Support Officers are provided adequate guidance and any necessary training.

Analyse PIDs to inform improvements

The OHO commits to monitoring and analysis of PIDs to identify potential systemic issues or trends, and where relevant inform administrative improvement.

Following the finalisation of a PID about the Office or an officer of the Office, the PID Coordinator with oversight for the management of the PID will consider whether any changes to the OHO's service delivery, personnel management, business processes or internal controls are required, and bring these for discussion to the Health Ombudsman and the Executive Leader Committee.

Version control	
Version no.	Changes made
1.0	New document

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Contact	Principal Governance and Policy Officer
Custodian	Executive Director, Corporate and Strategic Services Executive Director, Assessment and Resolution
Approved by	Health Ombudsman
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Signature	<i>J. M. Anderson</i>
Security classification ¹	Official

¹ NB. This footnote is intended to provide guidance when deciding the security classification of information.

Official – routine information without special sensitivity or handling requirements and a low business impact per document if compromised or lost. For example, information that may be shared across government agencies.

Sensitive – information that requires additional handling care due to its sensitivity or moderate business impact if compromised or lost. For example, information containing legal professional privilege.

Protected – information that requires the most careful safeguards due to its sensitivity or major business impact if compromised or lost. For example, cabinet documents.