

BP8043 - Public Interest Disclosure Policy

Document Owner	Executive Manager, People, Culture and Safety
Document Author	Senior Lawyer, Governance and Compliance
Supporting Legislation and Documents	Public Interest Disclosure Act 2010 (Qld) Crime and Corruption Act 2001 (Qld) Criminal Code Act 1899 (Qld) Public Interest Disclosure Standard 1/2019 Public Interest Disclosure Standard 2/2019 Public Interest Disclosure Standard 3/2019
Documents Directly Related	BP8036 - Code of Conduct - Team Members BP11023 - Code of Conduct - Suppliers and Contractors Pr9671 - Public Interest Disclosure Procedure BP8042 - Conflict of Interest Policy Related training: <ul style="list-style-type: none"> • 1EPIDAST - Public Interest Disclosure - All team members module (UW) • 1EPIDLST - Public Interest Disclosure - Leaders module (UW)

1. Policy Statement

Unitywater is committed to fostering an ethical, transparent culture. In pursuit of this, Unitywater values the disclosure of information about suspected wrongdoing in the public sector so that it can be properly assessed and, if necessary, appropriately investigated.

Unitywater will provide support to an employee or others who make disclosures about matters in the public interest. This Policy demonstrates this commitment and ensures that practical and effective procedures are implemented which comply with the requirements of the [Public Interest Disclosure Act 2010 \(Qld\)](#) (PID Act).

2. Purpose and Objectives

By complying with the PID Act, Unitywater will:

- promote the public interest by facilitating public interest disclosures (PIDs) of wrongdoing;
- ensure that PIDs are properly assessed and, where appropriate, properly investigated and dealt with;
- ensure appropriate consideration is given to the interests of persons who are the subject of a PID; and
- ensure protection from reprisal is afforded to persons making PIDs.

As required under the PID Act, the Chief Executive Officer will implement procedures to ensure that:

- any public officer who makes a PID is given appropriate support;
- PIDs made to Unitywater are properly assessed and, where appropriate, properly investigated and dealt with;
- appropriate action is taken in relation to any wrongdoing which is the subject of a PID;
- a management program for PIDs made to Unitywater, consistent with the standards issued by the Queensland Ombudsman, is developed and implemented; and
- public officers who make PIDs are offered protection from reprisal by Unitywater or other public officers of Unitywater.

Unitywater's Public Interest Disclosure Procedure ([Pr9671](#)) is available for public viewing at <https://www.unitywater.com>.

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3. Policy Scope/Coverage

This policy, and the Public Interest Disclosure Procedure ([Pr9671](#)) apply to all Unitywater Board Members, employees, and contractors.

This policy forms part of the learning content in uLearn modules:

- 1EPIDAST - Public Interest Disclosure - All team members module (UW); and
- 1EPIDLST - Public Interest Disclosure - Leaders module (UW).

4. Roles and Responsibility

The **Chief Executive Officer** has overall responsibility for ensuring that Unitywater develops, implements and maintains a PID management program and has approved a PID management program which encompasses:

- commitment to encouraging the internal reporting of wrongdoing;
- senior management endorsement of the value to Unitywater of PIDs and the proper management of PIDs;
- a communication strategy to raise awareness among employees about PIDs and Unitywater's PID procedure;
- a strategy to give employees access to training about how to make a PID, information on the support available to a discloser, and advice on how PIDs will be managed;
- specialist training and awareness about PIDs for senior management and other team members 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; and
- regular review of the Public Interest Disclosure Procedure and evaluation of the effectiveness of the PID management program.

The Chief Executive Officer may designate roles and responsibilities for managing PIDs to employees within Unitywater as described in the Public Interest Disclosure Procedure ([Pr9671](#)).

Executive Manager, People, Culture and Safety as Document Owner is responsible for:

- Conducting and/or delegating regular reviews to ensure this policy and related resources (e.g. procedures, forms, website content) remain fit for purpose, consistent and current.
- Approving this policy for publication (and/or seeking Board approval where required).
- Ensuring all relevant stakeholders and team members have been consulted and feedback is captured and actioned (where applicable).
- Ensuring appropriate communication and/or training is provided to relevant team members when implementing a new, amended or obsolete document (where applicable).
- Monitoring compliance with internal/external requirements (e.g. monitor legislation changes and assess/update this policy when required).

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Team members are responsible for:

- Working in accordance with this policy.
- Advising the Document Owner if this policy is not consistent with current practices.
- Where possible, minimise printing and/or avoid creating duplicate copies of this policy. Ensure current versions are sourced from the [Document Centre](#).

5. Definitions

Term	Meaning
PID	Means public interest disclosure
PID Act	Means the Public Interest Disclosure Act 2010 (Qld)
Reprisal	<p>The term 'reprisal' is defined under the PID Act as causing, attempting to cause or conspiring to cause detriment to another person in the belief that they or someone else:</p> <ul style="list-style-type: none"> • has made or intends to make a disclosure; or • has been or intends to be involved in a proceeding under the disclosure Act against any person. <p>Reprisal under the PID Act is a criminal offence and investigations may be undertaken by the Queensland Police Service.</p>