

Public Interest Disclosure Policy

Owner: Human Resources

CS/HR/0003

Last reviewed: 06/08/2025

Version: 1.00

1 Purpose

This policy and its correlating procedure provides employees and members of the public with information on how to make a Public Interest Disclosure (disclosure) about suspected wrongdoing or danger related to the Queensland Academy of Sport (QAS), what happens when information is provided, and the rights of disclosers under the [Public Interest Disclosure Act 2010](#) (PID Act).

This policy is supported by the following documents:

- Public Interest Disclosure Procedure
- Complaint Management Policy
- Complaint Management Procedure
- Complaint Management Framework
- Fraud and Corruption Policy
- Corrupt Conduct Management Policy
- Corrupt Conduct Management Procedure

2 Statement

The QAS is committed to fostering an ethical transparent culture. In pursuit of this, the QAS values the disclosure of information about suspected wrongdoing in the public sector so that it can be properly assessed and, if necessary, appropriately investigated. The QAS will provide support to an employee or others who make disclosures about matters in the public interest. This procedure demonstrates this commitment and ensures that practical and effective procedures are implemented which comply with the requirements of the PID Act. When a person comes forward with information about wrongdoing, we commit to:

- protect the dignity, wellbeing, career interests and good name of all persons involved
- protect the person from adverse treatment taken as a result of making the disclosure
- respond to the person thoroughly and impartially
- take appropriate action to deal with any wrongdoing or danger (if substantiated)
- keep the discloser informed of the progress and outcome

2.1 What is a Public Interest Disclosure?

A disclosure is a complaint or report where a person honestly believes on reasonable grounds, or the information tends to show, conduct of wrongdoing in the public sector. A disclosure can be



made by a public officer or a member of the public. A disclosure occurs when any person, whether or not a public officer, has information about:

- 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.

A disclosure occurs when a public officer has information about:

- corrupt conduct
- maladministration
- a substantial misuse of public resources
- a substantial and specific danger to public health or safety or the environment.

A person who has information about one of these matters that involves or may involve the QAS may make a disclosure in accordance with this policy and the Public Interest Disclosure Procedure to:

- Human Resources
- any person in a supervisory or management position within the QAS
- the Chief Executive Officer
- the Minister.

If a disclosure is made to a supervisor, that information is to be expeditiously progressed to Human Resources.

To enable further investigation, all disclosures must:

- be clear and factual
- avoid speculation, emotive language, embellishment
- avoid the provision of only vague details.

3 Authority

[Public Interest Disclosure Act 2010](#)

[Public Sector Ethics Act 1994](#)

[Crime and Corruption Act 2001](#)

[Public Sector Act 2022](#)

[Queensland Public Service Code of Conduct](#)

4 Scope

This policy applies to all persons who perform work for QAS including:

- Employees
 - permanent, fixed-term and temporary
 - secondees from other agencies (including staffing approved under interchange or mobility arrangements)
 - work placement staff (such as trainees, work experience students, cadets)

- PhD students (working at QAS under a university agreement)
- non-executive employees engaged via a fixed term contract
- senior officers and senior executives including those engaged via a section 155 contract remunerated at SES level or above.

Contractors

- sub-contractors
- consultants
- their employees (including labour hire staff) who are engaged via contract or agreement.

QAS Board

Note: For application of this policy and supporting documents, the term ‘worker’ is used collectively to describe persons who perform work for QAS.

5 Delegations

Delegations in relation to this document are to be exercised in accordance with the Human Resource Delegation Instrument.

Note: Delegation Instruments are reviewed on a regular basis to ensure they remain current and relevant to operational needs. It is recommended that delegate authority levels are confirmed prior to exercising any powers.

6 Responsibilities

6.1 Chief Executive Officer

- Communicate the expectation that all employees are required to conduct their duties to high professional and ethical standards and always act in the public interest in accordance with the [Code of Conduct for the Queensland Public Service](#)
- Ensure appropriate communication and awareness strategies are in place to educate employees about disclosures

6.2 Managers and supervisors

- Report information or complaints in accordance with this procedure for disclosure assessment
- Maintain confidentiality about a potential disclosure and consider the risk of reprisal
- Provide or facilitate support to a person who has made a disclosure
- In consultation with Human Resources, provide or facilitate support for a person who is the subject of a disclosure and afford them natural justice
- Monitor the workplace for signs of reprisal against a discloser, or any other person
- Escalate any potential reprisal to Human Resources for assessment, management and possible investigation
- Not take any action to investigate prior to review and advice by Human Resources.

6.3 Employees

- Report alleged wrongdoing or danger in accordance with this procedure

- Maintain confidentiality to ensure process integrity and reduce the risk of reprisal
- Assist in an investigation of a disclosure by providing all relevant information if requested.

6.4 Human Resources

- Properly assess, and where appropriate investigate or deal with disclosures
- Manage all disclosures in accordance with the PID Act, independently of any investigation and the resultant decision-making process
- Manage the risk of reprisal against disclosers or third parties
- Provide appropriate information to disclosers and oversee the coordination of support and protection offered
- Implement and maintain a secure and confidential information system to record and manage disclosures
- Meet reporting requirements to the Office of the Queensland Ombudsman
- Monitor, review and provide advice on legislative obligations relevant to disclosures
- Develop and deliver training or information on disclosures for employees, supervisors and managers
- Undertake a review of this procedure at two-yearly intervals, or more frequently if required.

7 Reporting requirements

The QAS must report to the Queensland Ombudsman statistical information about disclosures and any other information requested from time to time. This information will not include any details that could identify a discloser.

8 Storage of information

All information will be managed in accordance with the:

- [Public Records Act 2023](#)
- [Queensland Government Recordkeeping and Information Management Framework](#)
- [Queensland Government Records Governance Policy](#)

In addition, personal information will be managed in accordance with the [Information Privacy Act 2009](#), in particular the Queensland Privacy Principles (QPPs) in that Act.

8.1 Public Interest Act 2010 specific storage of information requirements

The PID Act requires the QAS to ensure that a proper record is kept about disclosures received by the QAS, including:

- the name of the discloser, if known
- the information disclosed
- any action taken on the disclosure.

For the purposes of record-keeping the definition of a disclosure includes purported disclosures. Therefore, for record-keeping purposes, the QAS will keep a record of any complaints or reports of

wrongdoing that undergo a PID assessment by the QAS. If a Member of Parliament (MP) refers a disclosure to the QAS, the QAS will record the name of the MP.

The following information is to be recorded, and properly secured:

- the identity of the discloser
- how the disclosure was made and to whom
- any notes the discloser has made or documentary evidence that supports the allegation
- the nature of the disclosure and its background
- whether confidentiality was requested/explained
- whether the risk of reprisal was considered, and any steps taken to prevent reprisal
- details of information provided to the discloser and any response, including dates
- action taken in response, including any investigation
- any support provided or offered to the discloser.

If a disclosure is made verbally, the QAS will ensure that a written version of the disclosure is prepared and accepted as accurate by the discloser.

9 Complaints management

A person who is dissatisfied with, and is directly affected by, a service, action or decision made by QAS, its staff or persons it has engaged to provide services may lodge a complaint in accordance with the [Public Sector Act 2022](#) and relevant QAS policies and procedures.

If a complainant is dissatisfied with any action taken by QAS in relation to a complaint, and after they have exhausted all available avenues of review within QAS as outlined in the Complaint Management Policy, they can request for QAS' decision to be reviewed by the [Queensland Ombudsman](#).

10 Employee grievances and appeals

An employee who is the subject of an administrative decision or action is entitled to lodge a complaint in accordance with the Managing Employee Grievances Policy should they feel the administrative decision is unfair or biased.

Employees who are unsatisfied with the outcome of their employee complaint may be entitled to lodge an appeal in accordance with [PSC Appeals Directive 04/23](#).

An appeal may be started by giving the Industrial Registrar an appeal notice. Further information on starting an appeal and appeal rights is available from the [Queensland Industrial Relations Commission](#) website.

11 Human rights considerations

This document is compatible with human rights under the [Human Rights Act 2019](#) because it limits a human right only to the extent that is reasonable and demonstrably justifiable in accordance with section 13 of that Act.

This document was last reviewed in 06/08/2025 to ensure actions and decisions under the policy are made in a manner compatible with human rights. Please note, when implementing this policy, workers must still consider if any human rights are relevant to and likely to be impacted by a particular decision, and whether any limitation of human rights are reasonable and justified.

12 Definitions

Word/Term/Acronym	Meaning
Adverse Action	Has the same meaning as defined in the <i>Industrial Relations Act 2016</i> .
Agency	Refers to other Queensland State Government department/s and statutory body/ies.
Complaint	A matter reported to a receiving officer. A complaint is not a disclosure unless assessed as meeting the requirements of a public interest disclosure under the <i>Public Interest Disclosure Act 2010</i> .
Corrupt Conduct	Has the same meaning as defined in the <i>Crime and Corruption Act 2001</i> .
Delegate	The Chief Executive Officer and any employee occupying a position which has been authorised to make decisions, exercise powers and/or undertake functions that have been sub-delegated under legislation or a delegation instrument.
Detriment	Includes: • Personal injury or prejudice to safety • Property damage or loss • Intimidation or harassment • Adverse action, discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business • Financial loss • Damage to reputation, for example, personal, professional or business reputation
Discloser	A person who makes a disclosure in accordance with the PID Act.
Environment	Includes: • Ecosystems and their constituent parts, including people and communities • All natural and physical resources • The qualities and characteristics of locations, places and areas, however large or small, that contribute • To their biological diversity and integrity, intrinsic • Attributed scientific value or interest, amenity, harmony and sense of community • The social, economic, aesthetic and cultural conditions that affect, or are affected by, things mentioned in the above paragraphs.
Maladministration	As defined in schedule four of the PID Act: Maladministration includes administrative actions that are unlawful, unreasonable, unfair, improperly discriminatory, taken for an improper purpose or otherwise wrong.

Word/Term/Acronym	Meaning
Manager/Supervisor	Any person whose duties involve or include managing or supervising others in the performance of their duties, irrespective of their formal title.
Public Health or Safety	Includes, but is not limited to the health or safety of persons: • Under the lawful care or control of the QAS or the State of Queensland; • Using community facilities and services provided by the QAS or the State of Queensland; and • In the workplace
Public Interest Disclosure	Has the same meaning as defined under Chapter 2 of the PID Act.
Public Officer	A public officer of a public sector entity, is an employee, member or officer of a public sector entity, and includes a person engaged by the entity under a contract of service.
Reprisal	Has the same meaning as defined in section 40 of the PID Act and includes causing, attempting or conspiring to cause detriment to any person because, or in the belief, anybody has made, or may make, a disclosure or because the other person or someone else is, has been or intends to be involved in a proceeding under the PID Act.
Substantial and specific	Substantial means 'of a significant or considerable degree'. It must be more than trivial or minimal and have some weight or importance. Specific means 'precise or particular'. This refers to conduct or detriment that is able to be identified.

13 Date of effect and review

This policy and its supporting documents:

- come into effect from the date of delegate approval
- will be reviewed within two years of the approval date unless otherwise:
 - stipulated in statutory obligations
 - triggered by circumstances determined appropriate by QAS.

14 Delegate approval

DAVID LYONS

Chairperson

Queensland Academy of Sport Board

Date: 06 August 2025

15 Version history

Version	Date	Author	Amendment description	Action
1.00	6/08/2025	Human Resources	New document	Approved by the Board