

From: [Jess M Byrne](#)
To: [Theresa Hodges](#); [Shaun Drummond](#)
Subject: RE: Notice of Public Interest Disclosure Act 2010 (Qld) Review
Date: Tuesday, 29 November 2022 3:29:00 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

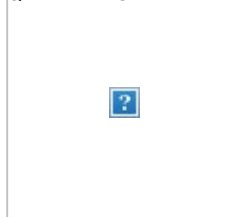
Thanks Shaun.

We have a PID network meeting on Thursday this week which I believe is going to touch on the review of the PID Act, so I will share anything that comes out of that also.

Cheers

Jess

Queensland Government



Jess Byrne

Director, Ethical Standards Unit

Office of the Director-General | Queensland

Health

Working hours Monday to Friday

P [REDACTED]
E [REDACTED]@health.qld.gov.au
W health.qld.gov.au
A [lvl 2, 33 lotte Street, Brisbane Q 4000](#)

campaign image



Queensland Health acknowledges the Traditional Custodians of the land across Queensland, and pays respect to First Nations Elders past, present and future.

From: Theresa Hodges [REDACTED]@health.qld.gov.au>
Sent: Tuesday, 29 November 2022 2:35 PM
To: Shaun Drummond [REDACTED]@health.qld.gov.au>; Jess M Byrne [REDACTED]@health.qld.gov.au >
Subject: RE: Notice of Public Interest Disclosure Act 2010 (Qld) Review
 Thanks Shaun

From: Shaun Drummond [REDACTED]@health.qld.gov.au>
Sent: Tuesday, 29 November 2022 2:28 PM
To: Theresa Hodges [REDACTED]@health.qld.gov.au>; Jess M Byrne [REDACTED]@health.qld.gov.au>
Subject: Fwd: Notice of Public Interest Disclosure Act 2010 (Qld) Review

Hi

FYI some work for us early next year

Cheers

Shaun

Get [Outlook for iOS](#)

From: PID Act Review [REDACTED]@justice.qld.gov.au>
Sent: Tuesday, November 29, 2022 9:25:39 AM
To: Shaun Drummond <[REDACTED]@health.qld.gov.au>
Cc: Trish Nielsen [REDACTED]@health.qld.gov.au>; DG correspondence [REDACTED]@health.qld.gov.au>

Subject: Notice of Public Interest Disclosure Act 2010 (Qld) Review

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Dear Mr Drummond,

The Attorney-General and Minister for Justice, Minister for Women and Minister for the Prevention of Domestic and Family Violence (Attorney-General) has asked me to conduct a review of the *Public Interest Disclosure Act 2010* (PID Act). The Attorney-General announced the review in a media release, available [here](#). The review is expected to be completed by 30 April 2023.

There will be significant value in considering the views and experiences of stakeholders about the operation of the PID Act. To achieve this, I intend to release an issues paper in January 2023 seeking submissions from interested parties, with a period of approximately 4 weeks to respond.

I would be grateful if you could ask relevant staff in your department to plan their work program for early 2023 with the review in mind, so that staff and resources can be available to provide a submission by the closing date, if your department wishes to make a submission. You may also consider asking your department to undertake any preliminary work that may be useful to inform your submission.

I request that you provide this information to your Ethical Standards Unit, Human Resources team or equivalent team, who provide advice and assistance with public interest disclosures (PIDs) in your agency. I would also be grateful if you could provide this information to all statutory bodies, government owned corporations and other entities within your department's or Minister's portfolio responsibilities.

I look forward to engaging with you and other stakeholders. Please direct any queries to [\[redacted\]@justice.qld.gov.au](mailto: [redacted]@justice.qld.gov.au).

Regards,

Alan Wilson KC

Reviewer

Public Interest Disclosure Review

E: [\[redacted\]@justice.qld.gov.au](mailto: [redacted]@justice.qld.gov.au)

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DOH DISCLOSURE LOG

From: [DG correspondence](#)
To: [DL-HSCEs](#)
Subject: C-ECTF-22/18715 - Review of the Public Interest Disclosure Act 2010
Date: Tuesday, 13 December 2022 1:15:00 PM
Attachments: [C-ECTF-2218715 - Notice of Public Interest Disclosure Act 2010 \(Old\) Review.msg](#)
[image001.png](#)

Good afternoon,

Please be advised there is a review being undertaken of the *Public Interest Disclosure Act 2010*, led by the Department of Justice and Attorney-General. Alan Wilson KC has been appointed to conduct the review and is intending to release an issues paper in January 2023 seeking submissions from interested parties.

Further information about the review and what you need to do to prepare for the review is contained within the attached email.

Please share this information with relevant staff in your agencies, particularly Ethical Standards / Integrity / Human Resources teams so they can be prepared in early 2023 to participate in the review.

If you or your staff have any questions please direct these to _____@justice.qld.gov.au.

Regards
Shaun



Ministerial & Executive Services Unit Office
of the Director-
General | Queensland Health

E _____health.qld.gov.au
W health.qld.gov.au

DOH DISCLOSURE LOG

SDLO

From: Matthew Rigby
Sent: Tuesday, 31 January 2023 10:46 AM
To: Shaun Drummond
Subject: FW: Review of the Public Interest Disclosure Act 2010 - Issues paper released

Hi Trish – for your information and records. I was unable to send from Shaun’s email on my iPad.

Thanks Matt



Matt Rigby
 Executive Director
 Office of the Director-General
 Queensland Health

M [REDACTED]
E [REDACTED]@health.qld.gov.au
W health.qld.gov.au
A [Level 14, 33 Charlotte Street Brisbane QLD 4000](#)

From: Matthew Rigby
Sent: Monday, 30 January 2023 9:04 PM
To: DG correspondence [REDACTED]@health.qld.gov.au >
Cc: Kyle Fogarty [REDACTED]@health.qld.gov.au >
Subject: Fwd: Review of the Public Interest Disclosure Act 2010 - Issues paper released

Hi team,

Can you please send action this email that Shaun has received.

Thanks Matt

Matt Rigby
 Executive Director
 Office of the Director-General
 Queensland Health
 M [REDACTED]

From: PID Act Review [REDACTED]@justice.qld.gov.au>
Sent: Monday, January 30, 2023 2:12 pm
To: PID Act Review <[REDACTED]@justice.qld.gov.au>
Subject: Review of the Public Interest Disclosure Act 2010 - Issues paper released

DOH DISCLOSURE LOG

This email originated from outside Queensland Health. DO NOT click on any links or open attachments unless you recognise the sender and know the content is safe.

Dear colleagues,

The Honourable Alan Wilson KC has been asked by the Attorney-General to [review the Public Interest Disclosure Act 2010](#).

Mr Wilson has released an issues paper about the review of the PID Act, available [here](#). The review invites submissions to respond to the issues paper. The questions in the issues paper are provided as a guide, however submissions may take any form or structure and may respond to other issues or topics.

Submissions can be made **until 5pm on Friday 24 February 2023** by email to [redacted]@justice.qld.gov.au or by post to:

Public Interest Disclosure Review Secretariat
Strategic Policy and Legal Services
Department of Justice and Attorney-General
GPO Box 149
BRISBANE QLD 4001

The review is interested to receive submissions from a broad range of stakeholders, including individuals who have made or may make a public interest disclosure. To ensure the issues paper is distributed broadly, we would be grateful if you could:

- pass it on to interested parties, including employees, colleagues and stakeholders who may wish to make a submission;
- publicise it within your organisation or to your stakeholders through email newsletters or publishing it on your intranet page.

Could all departments please provide a copy of this email to all statutory bodies, GOCs and public entities for which your department has portfolio responsibility?

If you have any queries about how to make a submission please contact [redacted]@justice.qld.gov.au. We look forward to hearing from you.

Regards,



Public Interest Disclosure Review Secretariat
Strategic Policy and Legal Services
Department of Justice and Attorney-General

E: [redacted]@justice.qld.gov.au

***** * *****

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RTI Release

DOH DISCLOSURE LOG

SDLO

From: Matthew Rigby
Sent: Wednesday, 1 February 2023 11:36 AM
To: Jess M Byrne
Subject: RE: For approval - eAlert content - Review of the PID Act

Thanks Jess – approved.

Cheers Matt



Matt Rigby

Executive Director

Office of the Director-General
 Queensland Health

M [REDACTED]
E [REDACTED]@health.qld.gov.a
W health.qld.gov.au
A Level 14, 33 Charlotte Street, Brisbane QLD 4000

From: Jess M Byrne <[REDACTED]@health.qld.gov.au>
Sent: Wednesday, 1 February 2023 11:04 AM
To: Matthew Rigby [REDACTED]@health.qld.gov.au>
Subject: For approval - eAlert content - Review of the PID Act

Hi Matt

We were thinking of getting an eAlert out to communicate widely across Qld Health that submissions are invited in response to the issues paper regarding the review of the PID Act. The following draft is submitted for your approval.

Have your say on the review of the Public Interest Disclosure Act 2010

Public submissions are invited in response to an [issues paper](#) as part of the review of the *Public Interest Disclosure Act 2010* (PID Act).

The PID Act facilitates reports of wrongdoing in the public sector when it is in the public interest to do so, as well as providing protections for those who make disclosures. It is a key part of Queensland's integrity framework, so it is important the legislation is effectively achieving its goals and reflects best practice.

Submissions can be made **until 5pm on Friday 24 February 2023**. Further information on how to have your say is available [here](#).

Cheers
 Jess

DOH DISCLOSURE LOG



Jess Byrne

Director, Ethical Standards Unit

Office of the Director-General | Queensland Health

Working hours Monday to Friday

P [Redacted]
E [Redacted]@health.qld.gov.au
W health.qld.gov.au
A [lvl 2, 33 Charlotte Street, Brisbane Q 4000](http://lvl2.33charlottestreet.com.au)

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RTI Release

DOH DISCLOSURE LOG

SDLO

From: DESU
Sent: Wednesday, 1 February 2023 11:46 AM
To: SDLO; DG correspondence
Cc: Matthew Rigby; DESU
Subject: C-ECTF-23/1107 - Review of the PID Act
Attachments: DRAFT - Email response to HSCEs and health portfolio agencies.DOCX

Hi team

Can we please arrange for the correspondence that was sent from Alan Wilson KC to the Director-General (C-ECTF-23/1107 refers) to be forwarded to the Health Service Chief Executives as well as agencies in the Minister's health portfolio (it should go to the same people that were sent the correspondence in C-ECTF-22/18715).

Attached is a draft email for this purpose, which is also saved in the working papers.

I haven't put this through the workflow as I still need the container to action a response to the input paper for the DOH, which will be provided for DG approval by the due date.

If you have any questions please let me know.

Cheers
Jess



Jess Byrne
Director, Ethical Standards Unit
Office of the Director-General | Queensland Health
Working hours Monday to Friday

P [Redacted] | [Redacted]
[Redacted]@health.qld.gov.au
W health.qld.gov.au
A [vl 2, 33 Charlotte Street, Brisbane Q 4000](http://vl2.33.Charlotte.Street.Brisbane.Q.4000)



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DOH DISCLOSURE LOG

Draft response

To: Health Service Chief Executives and agencies within the Minister's portfolio

From: Director-General

Subject: Submissions invited regarding the review of the Public Interest Disclosure Act 2010

Good morning/afternoon

As you are aware, there is currently a review being undertaken of the *Public Interest Disclosure Act 2010*.

Submissions are now being invited in response to an [issues paper](#). Submissions can be made until **5pm on Friday 24 February 2023**.

Further information about the review is contained within the attached email.

Please share this information with relevant staff in your agencies, particularly your Ethical Standards / Integrity / Human Resources teams so they can assist you in participating in the review.

If you or your staff have any questions please direct these to [\[REDACTED\]@justice.qld.gov.au](mailto: [REDACTED]@justice.qld.gov.au).

Regards
David

DOH DISCLOSURE LOG

DG correspondence

From: DG correspondence
Sent: Wednesday, 1 February 2023 12:33 PM
To: DL-HSCEs
Cc: DL-HHS-Generic-Emails-Accounts
Subject: C-ECTF-23/1107 - Submissions invited regarding the review of the Public Interest Disclosure Act 2010
Attachments: HPE CM: C-ECTF-23/1107 - Fwd: Review of the Public Interest Disclosure Act 2010 - Issues paper released

Good afternoon

As you are aware, there is currently a review being undertaken of the *Public Interest Disclosure Act 2010*.

Submissions are now being invited in response to an [issues paper](#). Submissions can be made until **5pm on Friday 24 February 2023**.

Further information about the review is contained within the attached email.

Please share this information with relevant staff in your agencies, particularly our Ethical Standards / Integrity / Human Resources teams so they can assist you in participating in the review.

If you or your staff have any questions please direct them to _____@justice.qld.gov.au.

Regards,
 David Rosengren
 A/Director-General.



Ministerial & Executive Services Unit, Office of the
 Director-General | Queensland Health

E _____@health.qld.gov.au

W health.qld.gov.au

DOH DISCLOSURE LOG

From: [DG correspondence](#)
To: [DG correspondence](#)
Subject: HPE CM: C-ECTF-23/1107 - Fwd: Review of the Public Interest Disclosure Act 2010 - Issues paper released
Date: Wednesday, 1 February 2023 12:32:31 PM
Attachments: [image001.png](#)

From: PID Act Review <[REDACTED]@justice.qld.gov.au>
Sent: Monday, January 30, 2023 2:12 pm
To: PID Act Review <[REDACTED]@justice.qld.gov.au>
Subject: Review of the Public Interest Disclosure Act 2010 - Issues paper released

This email originated from outside Queensland Health. DO NOT click on any links or open attachments unless you recognise the sender and know the content is safe.

Dear colleagues,

The Honourable Alan Wilson KC has been asked by the Attorney-General to [review the Public Interest Disclosure Act 2010](#).

Mr Wilson has released an issues paper about the review of the PID Act available [here](#). The review invites submissions to respond to the issues paper. The questions in the issues paper are provided as a guide, however submissions may take any form or structure and may respond to other issues or topics.

Submissions can be made **until 5pm on Friday 2 February 2023** by email to [\[REDACTED\]@justice.qld.gov.au](#) or by post to:

Public Interest Disclosure Review Secretariat
 Strategic Policy and Legal Services
 Department of Justice and Attorney-General
 GPO Box 19
 BRISBANE QLD 4001

The review is interested to receive submissions from a broad range of stakeholders, including individuals who have made or may make a public interest disclosure. To ensure the issues paper is distributed broadly, we would be grateful if you could:

- pass it on to interested parties, including employees, colleagues and stakeholders who may wish to make a submission;
- publicise it within your organisation or to your stakeholders through email newsletters or publishing it on your intranet page.

Could all departments please provide a copy of this email to all statutory bodies, GOCs and public entities for which your department has portfolio responsibility?

If you have any queries about how to make a submission, please contact [\[REDACTED\]@justice.qld.gov.au](#). We look forward to hearing from you.

Regards,

Public Interest Disclosure Review Secretariat
Strategic Policy and Legal Services
Department of Justice and Attorney-General

E: [redacted]@justice.qld.gov.au

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***** ** *****

RTI REQUESTS

DOH DISCLOSURE LOG



Records Detailed

DOH RTI 4889/23

Page 1
Date 13/07/2023
Time 4:25:26 PM
Login Name Burns, Jessica

C-ECTF-22/18715

DG AD - Alan Wilson - Department of Justice and Attorney-General - Notice of Public Interest Disclosure Act 2010 Qld Review

Date Created 29/11/2022 at 1:48 PM
Date Registered 29/11/2022 at 1:50 PM
Date Closed 03/07/2023 at 6:48 AM
Last Action Date 13/12/2022 at 1:17 PM

Record Type Executive Correspondence Folder
Assignee ELECTRONIC ONLY since 13/12/2022 at 1:16 PM
Owner QH - Department of Health (DoH)
Home Director-General
Schedule Number 1073
Disposition Active
Security OFFICIAL
Notes "Monday, 3 July 2023 at 7:03:46 AM (GMT+10:00) Scerri, Robyn (Mrs):"
Record closed six months after Date Last Updated to trigger Retention period

"Tuesday, 13 December 2022 at 1:16:47 PM (GMT+10:00) Handyside, Alison:"
As per below instructions - email was forwarded to HSCEs and minister's health portfolio for information purposes. Refer to working papers. Container and WF finalised.

"Friday, 9 December 2022 at 2:20:19 PM (GMT+10:00) Byrne, Jess:"
Note the correspondence from Alan Wilson KC requests the information be shared within Queensland Health and all health portfolio agencies.

Email from Alan Wilso KC to be forwarded to Health Service Chief Executives as well as agencies in the Minister's health portfolio for information purposes. Proposed wording for accompanying email has been drafted by ESU and is contained in working papers.

"Wednesday, 30 November 2022 at 5:38:49 PM (GMT+10:00) Mandic, Sabina:"
DDGCSD-CORRO provided copy of email to HRSCorro advising HR to provide input as required. Thanks, Sab obo HRSCorro

"Tuesday, 29 November 2022 at 2:57:13 PM (GMT+10:00) Handyside, Alison:"
Ethical Standards for Action Direct - please advise of any actions taken. I note that the DG has forwarded this onto CHRO and ESU for noting/actioning. Copy

Contained Records	Record Title	Organization	Type	Phone Number	Primary?
C-ECTF-22/18715-002	Alan Wilson - Department of Justice and Attorney-General - Notice of Public Interest Disclosure Act 2010 Qld Review				
C-ECTF-22/18715-001	Working Papers				
Contact					
Handyside, Alison		ODG - MESU - DG Correspondence (DG Corro)	At location	(07) [REDACTED]	No

DOH DISCLOSURE LOG

End of Report

Qld Health

Dataset CENTRAL BUS

SDLO

From: SDLO
Sent: Wednesday, 15 February 2023 10:36 AM
To: Shaun Drummond
Cc: Renaie Tesch; Trish Nielsen; Matthew Rigby; DG correspondence; SDLO
Subject: FOR DG APPROVAL - C-ECTF-23/1107 - CD 24 FEB 2023 - DG LTR - Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010
Attachments: DG LTR - response to issues paper.DOCX; DOH submission.PDF; C-ECTF-23/1107 - Fwd: Review of the Public Interest Disclosure Act 2010 - Issues paper released

Dear Shaun,

Please see below and attached for your approval.

Action/s required	1. Approve letter 2. Approve use of esig
RM #	C-ECTF-23/1107
Brief/Corro Type	DG letter for approval
Action required	Approval and approved use of esig
Date required by	DG action required by: 24 February 2023 in order to meet submissions timeframe set by the Department of Justice and Attorney-General
Title	Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010
Notes for DG from RM	Dear Shaun, letter prepared by Ethical standards Unit in response to DJAG providing an opportunity to review an issues paper about the Review into the <i>Public Interest Disclosure Act 2010</i> . ESU has prepared a submission obo QH (Attach 1) Thanks Claire
Electronic/wet signature (what is required)	Electronic signature on letter
Attachments	DG LTR - Response to issues paper Attachment 1 – DOH submission INCOMING - Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010
Other/to note	There is a typo in the submission on pg 2, I will ask ESU to update before we send to DJAG.

Kind regards,
Claire



Claire Daly
Senior Departmental Liaison Officer
Ministerial and Executive Services, Office of the
Director-General and System Strategy
Division | Queensland Health

P (07) [REDACTED]
E [\[REDACTED\]@health.qld.gov.au](mailto:[REDACTED]@health.qld.gov.au)
W health.qld.gov.au
A Level 37, 1 William Street, Brisbane

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RTI Release

DOH DISCLOSURE LOG

Review of Public Interest Disclosure Act 2010

Department of Health response to issues paper

3.1 Policy objectives of the PID Act

Question posed in issues paper	Department of Health response
<p>Are the objects of the PID Act valid and is the Act achieving these objects? Has the PID Act been effective in uncovering wrongdoing in the public sector?</p>	<p>The PID Act has been valuable in its objective to uncover wrongdoing in the public sector through the protections that apply to those that come forward with relevant information or concerns.</p> <p>However, the PID Act in isolation is not a sole motivator for employees making complaints. There are legislative and policy requirements that place positive obligations on employees to report wrongdoing (i.e. Code of Conduct, mandatory notifications for registered health practitioners etc).</p> <p>The majority of complainants do not make reference to the PID Act when submitting complaints, and often are unaware that what they have raised is a public interest disclosure.</p>
<p>Is the title of the legislation suitable? Should any other terms, such as 'whistleblower' or 'wrongdoing', be included in the title or used in the legislation?</p>	<p>Although the terminology 'public interest disclosure' has been in effect since 2011, many people still aren't familiar with it, even after completing mandatory training. Many people remain much more familiar with the terminology 'whistleblower'.</p> <p>There is possibly some stigma attached to words like 'whistleblower' which may contribute to complainants hesitancy to make disclosures. It would be important for the title of the legislation to adequately reflect the content of the legislation.</p>
<p>Are changes needed to ensure public confidence in the integrity of the PID regime?</p>	<p>While the Act under s59 provides for the oversight agency to monitor compliance and review the way in which public sector entities deal with PIDs generally, the oversight agency needs to be resourced sufficiently to perform these functions. Queensland Ombudsman facilitates agencies to perform an annual self-assessment against the PID Standards, however this is the agency assessing itself. The process lacks independence and doesn't provide opportunities for feedback or continuous improvement.</p> <p>Public confidence in the integrity of the PID regime may be strengthened if people were aware that the actions of agencies were subject to scrutiny and audit by an external agency.</p>
<p>Are any changes needed to the PID Act to make it more compatible with the Human Rights Act 2019?</p>	<p>Human rights should always be considered as part of any decision-making process, so there is no real need to make changes to the PID Act for the purpose of the Human Rights Act.</p>

3.2 What is a public interest disclosure

Question posed in issues paper	Department of Health response
<p>What types of wrongdoing should the PID regime apply to? Should the scope be narrowed or broadened? Why and how?</p>	<p>Section 12 and 13 of the PID Act are quite prescriptive as to the types of wrongdoing that can be reported. The overwhelming majority of matters assessed as PIDs relate to corrupt conduct and, and on occasion, maladministration and/or reprisal.</p> <p>Consideration should be given to why specific types of wrongdoing were included in the PID Act over other types of wrongdoing that may be of equal seriousness. Perhaps there is an argument to be less prescriptive about the types of wrongdoing generally to ensure the Act fulfils its obligations and doesn't preclude a report of serious wrongdoing that serves the public interests. The New Zealand's approach of defining serious wrongdoing seems like a good approach.</p> <p>The use of the terminology 'substantial and specific', where those terms aren't defined in the Act, can be subjective. There would be a benefit to having defined terms and a specific measure or threshold to assist in the assessment process. The current legislation has many elements and 'public interest information' which are difficult to interpret and measure leading to inconsistency and confusion.</p> <p>Consideration should also be given to ensuring the tests being applied are consistent across legislation. For example, the Queensland Ombudsman take the view that the test for a PID under s13(1) a)(i) is lower than the reasonable suspicion test that is used by the Crime and Corruption Commission.</p>
<p>Should a PID include disclosures about substantial and specific dangers to a person with a disability or to the environment? Why or why not?</p>	<p>The danger to the environment and danger to person/s with a disability are very specific types of wrongdoing. Within the Department there have been very few examples of PIDs being assessed under these public interest information types.</p> <p>In the health context, concerns about danger to a person with a disability would often be captured in the serious professional misconduct space, which would generally reach the threshold of suspected corrupt conduct anyway.</p>
<p>Is there benefit in introducing a public interest or risk of harm test in the definition of a PID?</p>	<p>A risk of harm test may be useful to capture serious or systemic matters.</p> <p>It should also be noted that given the widening of the definition of corrupt conduct, there is a range of conduct that is captured as a PID that may not necessarily be a serious public interest issue (eg. A health practitioner inappropriately accessing their own record using a departmental system). It also means that some grievances (eg. Bullying complaints about a line manager toward a subordinate employee) may also be getting captured, which probably wasn't the intention of the PID Act.</p> <p>By having to satisfy a certain threshold in terms of seriousness and impact may alleviate some of the more minor or individual issues that would be better dealt with through other existing complaint or performance management pathways being inadvertently captured.</p>

<p>Should a person be required to have a particular state of mind when reporting wrongdoing to be protected under the PID regime? Are the current provisions appropriate and effective?</p>	<p>The PID Act could be simplified by limiting protections where there is a level of objective information that tends to demonstrate the wrongdoing.</p>
---	--

3.3 Who can make a public interest disclosure?

Question posed in issues paper	Department of Health response
<p>Who should be protected by the PID regime? Should the three categories of disclosers (public officer, employees of government owned corporations or Queensland Rail, and any person) be retained? Why or why not?</p>	<p>The department's response will be limited to commentary on two categories of disclosers, being public officers and any person.</p> <p>When looking at the objectives of the PID Act in relation to promoting the reporting of wrongdoing in the public sector and ensuring PIDs are properly investigated and dealt with, it makes sense to allow PIDs to be made by either a public officer or any person. Both could have information that serves the public interest.</p> <p>However, the difficulty arises in relation to the objective of affording protections from reprisals because an agency's ability to protect a member of the public from reprisal is very difficult. For this reason, the evidence would be an argument for limiting the categories of disclosers to public officers.</p>
<p>Should the definition of public officer be expanded to include those performing services for the public sector whether paid or unpaid, for example volunteers, students, contractors and work experience participants?</p> <p>Should former public officers be covered?</p>	<p>The department agrees the definition of public officer should be expanded to include those performing services for the public sector whether paid or unpaid (eg. volunteers, students, contractors and work experience where there is employer-employee like arrangement) in place.</p> <p>For instance, currently, the PID Act does not provide protections for a student (eg paramedic, doctor, nurse) who may identify wrongdoing whilst on 'prac' or 'training' at a facility, or even volunteers who work alongside employees in these environments. In these situations there is often a power imbalance, and this cohort may be more at risk of reprisal in terms of future employment prospects. While agencies can err on the side of caution and provide protections, by having the definition expanded in legislation would assist those students and volunteers providing health care whilst working within hospitals, Ambulance services and other health care placements to disclose wrongdoing within the workplace.</p> <p>Providing PID protections to former public officers may not serve in the public interest if employees wait until they resign or retire or have secured employment elsewhere to report wrongdoing. These complaints may not be made until 'well after the fact' where evidence may not be readily available, recollection of events unclear and risk of reprisal would be seemingly 'nought'. The ability to protect former officers from reprisal (if it did exist) would also be an issue due to no ability to oversee in workplace/have constant communication.</p>
<p>Should relatives of disclosers, or witnesses be eligible to make</p>	<p>No, relatives of disclosers/witnesses should not be eligible to make PIDs. This may facilitate 'hearsay' evidence being</p>

<p>PIDs? Should they, or anyone else, be entitled to protection under the PID regime?</p>	<p>admitted into complaint material. The ability to protect relatives (members of the public) from reprisal in this scenario would also be an issue due to no ability to oversee in workplace/have constant communication.</p> <p>Witnesses who participate in an investigative process are generally already captured in the provisions of reprisal (i.e. if the subject was to engage in reprisal because they believe somebody has been involved in a proceeding).</p> <p>Any expansion to the PID Act to cover relatives and witnesses individually could create an administrative burden with limited benefit.</p>
<p>Should different arrangements apply to role reporters? Why and how?</p>	<p>Yes, different arrangements should apply to role reporters. By virtue of their position, role reporters are likely to make numerous PIDs through the audits they conduct or information they generate. There is often no risk of reprisal identified in these matters. An easing of the administrative burden for these PIDs is necessary to deal with repeated interactions with PID role reporters. For instance, an easing of written correspondence, assigning PID Support officers and provision of outcome advice to PID role reporters who frequently audit and report on matters that are assessed PIDs (i.e. information access matters) An online/ out option would be beneficial in these circumstances.</p>

3.5 Making, receiving and identifying PIDs

Question posed in issues paper	Department of Health response
<p>Are the requirements for making, receiving and identifying PIDs appropriate and effective?</p>	<p>The requirements for making, receiving and identifying PIDs are generally appropriate and effective.</p>
<p>Who should be able to receive PIDs? Do you support having multiple reporting pathways for disclosers? Is there a role for a clearing house or a third party hotline in receiving PIDs?</p>	<p>Having multiple reporting pathways is helpful in ensuring a no wrong doors approach to raising wrongdoing.</p> <p>The ESU concurs with the views expressed in the issues paper regarding the implications of two agencies concurrently assessing/managing a matter and suggests the Act be amended such that in the first instance the matter should be referred internally unless special circumstances exist.</p> <p>Having a clearing house or third party hotline would appear to be duplication of the mechanisms that each agency already has in place.</p>
<p>At what point in time should the obligations and protections under the PID regime come into effect?</p>	<p>At the time of the disclosure.</p>
<p>Should the PID legislation require a written decision be made about PID status as recommended by the Queensland Ombudsman? What</p>	<p>The PID Act should require written decisions to be provided about PID decisions. Caution should be exercised in terms of prescribing timeframes, given the complexity of complaints can impact on the timeframe for assessment.</p>

<p>would the implications be for agencies?</p>	<p>Consideration should also be given to how this would work with role reporters or even senior executives if there are opt out mechanisms.</p> <p>The PID Act (or standards) should also make clear the appeal or review mechanisms available should someone not be satisfied with the original PID decision. This should include what the internal or external reviews is looking at (eg. Is it only considering whether the original decision was fair and reasonable, or is there the ability to overturn a decision).</p>
<p>Are the provisions for disclosures to the media and other third parties appropriate and effective? Are there additions or alternatives that should be considered?</p>	<p>While s20 provides for when an officer may make a disclosure to a journalist it does not consider penalties for inappropriate disclosure of relevant information to journalists.</p> <p>Consideration could be given to expanding this provision to include penalties for inappropriately disclosing relevant information to journalists where a department is dealing with the matter.</p>

3.6 Managing, investigating and responding to PIDs

Question posed in issues paper	Department of Health response
<p>Are the requirements for managing, investigating and responding to PIDs appropriate and effective?</p>	<p>Overall, the requirements in the Act for managing, investigating and responding to PIDs are appropriate and effective. The Act should not be too prescriptive as these decisions should be made on a case by case basis depending on the nature of the matter.</p> <p>Consideration could be given to providing more information in standards or guidance material regarding the application of various provisions of the Act, such as the situations or scenarios where the identity of the discloser is required to be disclosed (i.e. to provide natural justice to the subject officer, to inform a delegate etc).</p>
<p>Are agencies able to provide effective support for disclosers, subject officers and witnesses? Are any additional or alternative powers, functions or guidance needed?</p>	<p>The Department is in position to provide effective support for disclosers, subject officers and witnesses when they are a current Departmental employee. This can be challenging when they cease employment or are a member of the public in terms of monitoring the risk and on occasion, maintaining contact and engagement from the individual that is external to the Department.</p>
<p>Should the PID Act include duties or requirements for agencies to</p> <ol style="list-style-type: none"> take steps to correct the reported wrongdoing generally or in specific ways? provide procedural fairness to the discloser, subject officer and witnesses? assess and minimise the risk of reprisals? 	<p>The PID Act should continue to place a general obligation or requirements to deal with the reported wrongdoing. However, the delegated decision maker almost always has the discretion on a case-by-case basis to decide the steps taken to deal with the matter i.e. investigation, discipline process, managerial action or no action at all, unless the conduct is such that it needs to be reported to another entity i.e. QPS in instances of criminality. Providing specific steps to address wrongdoing in legislation could limit the prerogative of the delegate decision maker/typecast certain matters to certain outcomes.</p> <p>As for procedural fairness/natural justice, these are complex legal concepts which may or may not benefit from inclusion specifically in the PID Act. Often these aspects are referred to in</p>

	<p>correspondence to the PID and the subject officer on a somewhat general basis.</p> <p>c. The PID Act already requires agencies to afford protections from reprisals. This could be extended to specifically require agencies to assess and minimise the risk of reprisal. However, this is largely already contemplated in agency policy and procedures.</p>
<p>Should a discloser be able to opt out of protections afforded under the Act, such as the requirement to receive information or be provided support? Should this only apply to role reporters, or to any type of discloser?</p>	<p>Role reporters should have the ability to opt out of certain processes in relation to receiving information (such as introductory letters and phone calls). There may also be a case for high level PIDs e.g. Director level and above who make PIDs about subordinate officers opting out of certain processes under the PID Act. This should be able to be determined on a case by case basis on the basis of risk.</p>

3.7 Protections for disclosers, subject officers and witnesses

Question posed in issues paper	Department of Health response
<p>Are the current protections for disclosers, subject officers and witnesses appropriate and effective? Should additional or alternative protections be considered?</p>	<p>The protections for disclosers are appropriate and effective where the discloser is an employee. It remains difficult for the Department to ensure adequate protections for former employees and members of the public.</p>
<p>Are the current provisions about confidentiality adequate and fit for purpose? Should any improvements be considered?</p>	<p>The ESU agrees with recommendation 16 of the 2017 Queensland Ombudsman review which recommended "Section 65(3) of the PID Act should be amended to clarify that making a record of confidential information or disclosing it to someone else is permitted for the purpose of taking reasonable steps to assess disclosures, including consultation with other public sector entities."</p> <p>Section 65 could be expanded to include examples involving the disclosure of confidential information to other entities outside of the complaints process, but in the interest of assisting disclosers, such as WorkCover to assist with the disclosers claim for workers compensation. It is unclear in the PID Act whether the disclosure of complaint information that also forms part of a WorkCover claim is an inappropriate disclosure or whether this is considered 'an appropriate discharging of a function under another Act'. Further guidance within the PID Act regarding this issue is recommended.</p>
<p>Is the definition of reprisal appropriate and effective? Do any issues arise in identifying, managing and responding to reprisals?</p>	<p>In the first instance, the definition of reprisal in Section 40 of the PID Act is satisfactory particularly as it captures any act, attempt or conspiring to cause a detriment.</p> <p>However there appears to be some differing interpretation of section 40(a)(b) which defines: A person must not cause, or attempt or conspire to cause, detriment to another person because, or in the belief that the other person or someone else</p>

	<p>is, has been, or intends to be, involved in a proceeding under the Act against any person.</p> <p>While the ESU previously considered the intent of this provision was to consider witnesses providing supporting information through a process (i.e. witness in an investigation), previous advice suggested this can apply more broadly as the definition from the Acts Interpretation Acts defines proceeding as 'legal or other action'. In a scenario where the HR officer assisting with a discipline process or correspondence received a detriment (verbal abuse) the ESU has been advised that this may be considered 'reprisal' as a result of 'another person' raising a PID, despite no obvious connection to disclosing information originally. This may be an overreach of the intent of the PID Act.</p>
Is there a role for an independent authority to support disclosers in Queensland? If so, what should its role be?	Having a separate body to support disclosers would add another layer of bureaucracy, double handling and confusion between the agency and the independent authority.
Do you support an administrative redress scheme for disclosers who consider they have experienced reprisals?	There are already numerous channels to address concerns of reprisal without adding in an administrative redress scheme. The PID Act would benefit from providing clarity about how reprisals should be addressed rather than adding in additional elements.

3.8 Remedies

Question posed in issues paper	Department of Health response
Are the remedies available to disclosers under the PID Act reasonable and effective? Are any changes needed?	<p>The management of reprisals would benefit from clarity.</p> <p>There are administrative, civil and criminal options in relation to the management of reprisals that could be taken:</p> <ul style="list-style-type: none"> - Under section 41 of the Act, reprisal is deemed an indictable offence so could be referred to the QPS (however there have been limited prosecutions that have occurred in relation to reprisal. In our experience, when matters have been referred to QPS they tend to be considered under other sections of the Criminal Code rather than 'reprisal' per se. - Under section 42 of the Act a reprisal is a Tort and a claim for damages can be made to a court. - Under section 44 of the Act a person may make a complaint under the Anti-Discrimination Act about a reprisal. - Under section 67(1) of the Act the offence of taking reprisal is deemed misconduct so could be investigated by an agency and dealt with through a disciplinary process; - Under section 67(2) of the Act the CCC may investigate the contravention. <p>Consideration should be given to simplifying the Act in relation to the remedies available. While the intent would not be to</p>

	<p>minimise or weaken the remedies available, the Act could be amended to make it clearer that there are a range of choices and what happens if you choose one option over another, what prevails etc. It would also make it clearer for agencies what their responsibilities are in relation to dealing with matters of reprisal.</p>
<p>Do you support an administrative redress scheme for disclosers who consider they have experienced reprisals?</p>	<p>There are already numerous channels to address concerns of reprisal without adding in an administrative redress scheme.</p> <p>The PID Act would benefit from providing clarity about how reprisals should be addressed rather than adding in additional elements.</p>

3.9 Role of the oversight agency

Question posed in issues paper	Department of Health response
<p>Are the Queensland Ombudsman's functions and powers suitable and effective for the purpose of the oversight body?</p>	<p>The ESU is of the view that the Queensland Ombudsman's functions and powers are suitable and effective for the purpose of the oversight body. The PID Review may consider the level of involvement required from the Queensland Ombudsman to ensure the PID Act remains effective and their powers to audit agencies on their assessment and management of PIDs.</p> <p>The biggest issue for the Queensland Ombudsman is the resourcing of the PID function. At present, the resourcing of the function is not conducive for them to be able to adequately perform their functions under the Act.</p>
<p>Are there any conflicts between the Queensland Ombudsman's advisory and review functions for PIDs? If yes, how could these be managed or resolved?</p>	<p>While the Department hasn't experienced or had any concerns with themselves, there could be a perception of a conflict between the Queensland Ombudsman's advisory and review functions for PID. If required, this could be resolved by having the advisory function taken out of the QO and placed in another central agency.</p>
<p>Do the roles of integrity bodies overlap during the PID process? Are changes needed or do the existing arrangements work effectively?</p>	<p>There is a large degree of overlap between integrity bodies during the PID process. The overlap probably can't be avoided, however there needs to be clarity of roles to avoid duplication and ensure the respective requirements of each integrity body can be appropriately managed.</p>
<p>Are the Standards published by the Queensland Ombudsman effective? Are changes needed?</p>	<p>Guiding resources always provide benefit and advice to Departments, however section 60 of the PID Act, determines how public sector entities are to perform their functions under this Act. This then requires Departments to refer to the legislation and 3 separate documents (standards) to comply with legislative requirements. While a Department's ESU or PID liaison officer may be across these documents, it can be difficult for an employee with limited PID knowledge to navigate.</p> <p>The Standards can be very prescriptive and bind agencies to a range of administrative processes. The right balance needs to be reached to ensure the requirements for managing PIDs aren't overly burdensome.</p>

<p>Do you agree with the recommendations of the Queensland Ombudsman's 2017 review?</p>	<p>The Department agrees, in the most part with the recommendations of the Queensland Ombudsman's 2017 review.</p> <p>The recommendations that the Department believe warrant further thought or consideration include those that relate to:</p> <ul style="list-style-type: none"> - Whether PIDs should be accepted after an employee's resignation from the agency and any timeframe that may be attached; - Whether specific timeframes should be mandated for providing a written reason for an assessment decision; - Whether specific timeframes should be mandated for providing status reports to disclosers during the management of their PIDs. - Whether the subject of a PID that has not been substantiated is offered protection from detriment by the entity - whether there should be an administrative redress scheme.
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3.10 Practical considerations

Question posed in issues paper	Department of Health response
<p>Should the PID legislation be more specific about how it interacts with any other legislation, process or scheme</p>	<p>There would be value in the PID Act being specific about how it interacts with other complaint processes.</p>
<p>Should the PID legislation include incentives for disclosers? If so, how should they operate?</p>	<p>No. The provision of incentives could potentially lead to the submission of purported PIDs for false or malicious purposes (i.e to receive incentives/rewards on baseless claims).</p>
<p>Are current arrangements for training and education about the PID Act effective? How could they be improved?</p>	<p>Current training offered by the Queensland Ombudsman has been a great benefit for Department staff who are able to participate.</p>
<p>Is the PID Act readable and easy to understand? How could the clarity of the Act be improved?</p>	<p>Less legalistic terminology would assist employees and members of the public alike. More defined terms would assist those involved with the administration of the Act i.e. complaint managers, assessment officers. Addition of flowcharts and list of responsibilities and obligations for various levels involved with administration of Act including the public official/DGs, assessment function, disclosers, support officers, subject officers.</p>

DOH DISCLOSURE LOG

RTI Release

DOH DISCLOSURE LOG



Enquiries to: Jess Byrne
Director
Ethical Standards Unit
Telephone: [REDACTED]
Our ref: C-ECTF-23/1107

Queensland Health

The Honourable Alan Wilson KC
Public Interest Disclosure Review Secretariat
Strategic Policy and Legal Services
Department of Justice and Attorney-General

Email: [REDACTED]@justice.qld.gov.au

Dear Mr Wilson

Thank you for your correspondence dated 30 January 2023, inviting the Department of Health (the Department) to provide a submission in relation to the review of the *Public Interest Disclosure Act 2010* (the PID Act).

The PID Act is an important part of the integrity framework in the Queensland public sector therefore I would like to thank you for this opportunity to provide feedback and further inform the review process.

The Department's Ethical Standards Unit is responsible for the management and administration of public interest disclosures for the Department. The Ethical Standards Unit has reviewed the published issues paper.

Please find attached the Department's response to some of the questions posed within the issues paper for your consideration.

Should you require further information, the Department's contact is Ms Jess Byrne, Director, Ethical Standards Unit who can be contacted on telephone [REDACTED] or via email [REDACTED]@health.qld.gov.au.

Yours sincerely

Shaun Drummond
Director-General

DOH DISCLOSURE LOG

Prepared by: Ashley Macfarlane
Principal Complaints Officer
Ethical Standards Unit
Ph: [REDACTED]
Date: 06/02/2023

Cleared by: Jess Byrne
Director
Ethical Standards Unit
Ph: [REDACTED]
Date: 12/02/2023

Document Name: C-ECTF-23/1107

RTI Release

DOH DISCLOSURE LOG

From: [Matthew Rigby](#)
To: [DG correspondence](#)
Cc: [Kyle Fogarty](#)
Subject: C-ECTF-23/1107 - Fwd: Review of the Public Interest Disclosure Act 2010 - Issues paper released
Date: Monday, 30 January 2023 9:03:56 PM
Attachments: [image001.png](#)

Hi team,

Can you please send action this email that Shaun has received.

Thanks Matt

Matt Rigby
 Executive Director
 Office of the Director-General
 Queensland Health
 M [REDACTED]

From: PID Act Review [REDACTED]@justice.qld.gov.au>
Sent: Monday, January 30, 2023 2:12 pm
To: PID Act Review [REDACTED]@justice.qld.gov.au
Subject: Review of the Public Interest Disclosure Act 2010 - Issues paper released

This email originated from outside Queensland Health. DO NOT click on any links or open attachments unless you recognise the sender and know the content is safe.

Dear colleagues,

The Honourable Alan Wilson KC has been asked by the Attorney-General to [review the Public Interest Disclosure Act 2010](#).

Mr Wilson has released an issues paper about the review of the PID Act, available [here](#). The review invites submissions to respond to the issues paper. The questions in the issues paper are provided as a guide however submissions may take any form or structure and may respond to other issues or topics.

Submissions can be made **until 5pm on Friday 24 February 2023** by email to [\[REDACTED\]@justice.qld.gov.au](#) or by post to:

Public Interest Disclosure Review Secretariat
 Strategic Policy and Legal Services
 Department of Justice and Attorney-General
 GPO Box 149
 BRISBANE QLD 4001

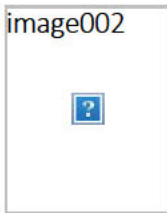
The review is interested to receive submissions from a broad range of stakeholders, including individuals who have made or may make a public interest disclosure. To ensure the issues paper is distributed broadly, we would be grateful if you could:

- pass it on to interested parties, including employees, colleagues and stakeholders who may wish to make a submission;
- publicise it within your organisation or to your stakeholders through email newsletters or publishing it on your intranet page.

Could all departments please provide a copy of this email to all statutory bodies, GOCs and public entities for which your department has portfolio responsibility?

If you have any queries about how to make a submission, please contact [redacted]@justice.qld.gov.au. We look forward to hearing from you.

Regards,



Public Interest Disclosure Review Secretariat
 Strategic Policy and Legal Services
 Department of Justice and Attorney-General

E: [redacted]@justice.qld.gov.au

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SDLO

From: Shaun Drummond
Sent: Friday, 17 February 2023 9:54 AM
To: SDLO
Cc: Renaie Tesch; Trish Nielsen; Matthew Rigby; DG correspondence; SDLO
Subject: Re: FOR DG APPROVAL - C-ECTF-23/1107 - CD 24 FEB 2023 - DG LTR - Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010

Hi

Approved for my e-signature

Regards
 Shaun

Shaun Drummond

Director-General
 Queensland Health
 Office of the Director-General | Queensland Health

P [REDACTED]
E [REDACTED]@health.qld.gov.au
W health.qld.gov.au
A [1 William Street Brisbane](#)

From: SDLO <[REDACTED]@health.qld.gov.au>
Sent: Wednesday, February 15, 2023 10:35:54 AM
To: Shaun Drummond <[REDACTED]@health.qld.gov.au>
Cc: Renaie Tesch <[REDACTED]@health.qld.gov.au>; Trish Nielsen <[REDACTED]@health.qld.gov.au>; Matthew Rigby <[REDACTED]@health.qld.gov.au>; DG correspondence <[REDACTED]@health.qld.gov.au>; SDLO <[REDACTED]@health.qld.gov.au>
Subject: FOR DG APPROVAL - C-ECTF-23/1107 - CD 24 FEB 2023 - DG LTR - Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010

Dear Shaun,

Please see below and attached for your approval.

Action/s required	1. Approve letter 2. Approve use of esig
RM #	C-ECTF-23/1107
Brief/Corro Type	DG letter for approval
Action required	Approval and approved use of esig
Date required by	DG action required by: 24 February 2023 in order to meet submissions timeframe set by the Department of Justice and Attorney-General
Title	Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010
Notes for DG from RM	Dear Shaun, letter prepared by Ethical standards Unit in response to DJAG providing an opportunity to review an issues paper about the Review into the <i>Public Interest Disclosure Act 2010</i> . ESU has prepared a submission obo QH (Attach 1) Thanks Claire

Electronic/wet signature (what is required)	Electronic signature on letter
Attachments	DG LTR - Response to issues paper Attachment 1 – DOH submission INCOMING - Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010
Other/to note	There is a typo in the submission on pg 2, I will ask ESU to update before we send to DJAG.

Kind regards,
Claire



Claire Daly

Senior Departmental Liaison Officer

Ministerial and Executive Services, Office of the
Director-General and System Strategy
Division | Queensland Health

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Queensland Health acknowledges the Traditional Custodians of the land across Queensland, and pays respect to First Nations Elders past, present and future.

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HEALTH VISION**

A world class health system for all Queenslanders



DOH DISCLOSURE LOG

DG correspondence

From: DG correspondence
Sent: Friday, 17 February 2023 10:49 AM
To: [REDACTED]@justice.qld.gov.au
Subject: C-ECTF-23/1107 - Correspondence from Shaun Drummond, Director-General, Queensland Health
Attachments: DG LTR - response to issues paper.pdf; DOH submission.PDF

Good Morning

Please see attached correspondence from Shaun Drummond, Director-General, Queensland Health, for your attention.

Should you have any questions in relation to this advice, please contact Ms Jess Byrne, Director, Ethical Standards Unit who can be contacted on telephone [REDACTED] or via email [REDACTED]@health.qld.gov.au.

Kind Regards



Ministerial & Executive Services Unit, Office of the
 Director-General | Queensland Health

E [REDACTED]@health.qld.gov.au
W [REDACTED]@health.qld.gov.au

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 SAVE LIVES**

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Queensland Health acknowledges the Traditional Owners of the land, and pays respect to Elders past, present and future.

DOH DISCLOSURE LOG

Review of Public Interest Disclosure Act 2010

Department of Health response to issues paper

3.1 Policy objectives of the PID Act

Question posed in issues paper	Department of Health response
<p>Are the objects of the PID Act valid and is the Act achieving these objects? Has the PID Act been effective in uncovering wrongdoing in the public sector?</p>	<p>The PID Act has been valuable in its objective to uncover wrongdoing in the public sector through the protections that apply to those that come forward with relevant information or concerns.</p> <p>However, the PID Act in isolation is not a sole motivator for employees making complaints. There are legislative and policy requirements that place positive obligations on employees to report wrongdoing (i.e. Code of Conduct, mandatory notifications for registered health practitioners etc).</p> <p>The majority of complainants do not make reference to the PID Act when submitting complaints, and often are unaware that what they have raised is a public interest disclosure.</p>
<p>Is the title of the legislation suitable? Should any other terms, such as 'whistleblower' or 'wrongdoing', be included in the title or used in the legislation?</p>	<p>Although the terminology 'public interest disclosure' has been in effect since 2011, many people still aren't familiar with it, even after completing mandatory training. Many people remain much more familiar with the terminology 'whistleblower'.</p> <p>There is possibly some stigma attached to words like 'whistleblower' which may contribute to complainants hesitancy to make disclosures. It would be important for the title of the legislation to adequately reflect the content of the legislation.</p>
<p>Are changes needed to ensure public confidence in the integrity of the PID regime?</p>	<p>While the Act under s59 provides for the oversight agency to monitor compliance and review the way in which public sector entities deal with PIDs generally, the oversight agency needs to be resourced sufficiently to perform these functions. Queensland Ombudsman facilitates agencies to perform an annual self-assessment against the PID Standards, however this is the agency assessing itself. The process lacks independence and doesn't provide opportunities for feedback or continuous improvement.</p> <p>Public confidence in the integrity of the PID regime may be strengthened if people were aware that the actions of agencies were subject to scrutiny and audit by an external agency.</p>
<p>Are any changes needed to the PID Act to make it more compatible with the Human Rights Act 2019?</p>	<p>Human rights should always be considered as part of any decision-making process, so there is no real need to make changes to the PID Act for the purpose of the Human Rights Act.</p>

3.2 What is a public interest disclosure

Question posed in issues paper	Department of Health response
<p>What types of wrongdoing should the PID regime apply to? Should the scope be narrowed or broadened? Why and how?</p>	<p>Section 12 and 13 of the PID Act are quite prescriptive as to the types of wrongdoing that can be reported. The overwhelming majority of matters assessed as PIDs relate to corrupt conduct and, and on occasion, maladministration and/or reprisal.</p> <p>Consideration should be given to why specific types of wrongdoing were included in the PID Act over other types of wrongdoing that may be of equal seriousness. Perhaps there is an argument to be less prescriptive about the types of wrongdoing generally to ensure the Act fulfils its obligations and doesn't preclude a report of serious wrongdoing that serves the public interests. The New Zealand's approach of defining serious wrongdoing seems like a good approach.</p> <p>The use of the terminology 'substantial and specific', where those terms aren't defined in the Act, can be subjective. There would be a benefit to having defined terms and a specific measure or threshold to assist in the assessment process. The current legislation has many elements and 'public interest information' which are difficult to interpret and measure leading to inconsistency and confusion.</p> <p>Consideration should also be given to ensuring the tests being applied are consistent across legislation. For example, the Queensland Ombudsman take the view that the test for a PID under s13(1) a)(i) is lower than the reasonable suspicion test that is used by the Crime and Corruption Commission.</p>
<p>Should a PID include disclosures about substantial and specific dangers to a person with a disability or to the environment? Why or why not?</p>	<p>The danger to the environment and danger to person/s with a disability are very specific types of wrongdoing. Within the Department there have been very few examples of PIDs being assessed under these public interest information types.</p> <p>In the health context, concerns about danger to a person with a disability would often be captured in the serious professional misconduct space, which would generally reach the threshold of suspected corrupt conduct anyway.</p>
<p>Is there benefit in introducing a public interest or risk of harm test in the definition of a PID?</p>	<p>A risk of harm test may be useful to capture serious or systemic matters.</p> <p>It should also be noted that given the widening of the definition of corrupt conduct, there is a range of conduct that is captured as a PID that may not necessarily be a serious public interest issue (eg. A health practitioner inappropriately accessing their own record using a departmental system). It also means that some grievances (eg. Bullying complaints about a line manager toward a subordinate employee) may also be getting captured, which probably wasn't the intention of the PID Act.</p> <p>By having to satisfy a certain threshold in terms of seriousness and impact may alleviate some of the more minor or individual issues that would be better dealt with through other existing complaint or performance management pathways being inadvertently captured.</p>

<p>Should a person be required to have a particular state of mind when reporting wrongdoing to be protected under the PID regime? Are the current provisions appropriate and effective?</p>	<p>The PID Act could be simplified by limiting protections where there is a level of objective information that tends to demonstrate the wrongdoing.</p>
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3.3 Who can make a public interest disclosure?

Question posed in issues paper	Department of Health response
<p>Who should be protected by the PID regime? Should the three categories of disclosers (public officer, employees of government owned corporations or Queensland Rail, and any person) be retained? Why or why not?</p>	<p>The department's response will be limited to commentary on two categories of disclosers, being public officers and any person.</p> <p>When looking at the objectives of the PID Act in relation to promoting the reporting of wrongdoing in the public sector and ensuring PIDs are properly investigated and dealt with, it makes sense to allow PIDs to be made by either a public officer or any person. Both could have information that serves the public interest.</p> <p>However, the difficulty arises in relation to the objective of affording protections from reprisals because an agency's ability to protect a member of the public from reprisal is very difficult. For this reason, the evidence would be an argument for limiting the categories of disclosers to public officers.</p>
<p>Should the definition of public officer be expanded to include those performing services for the public sector whether paid or unpaid, for example volunteers, students, contractors and work experience participants?</p> <p>Should former public officers be covered?</p>	<p>The department agrees the definition of public officer should be expanded to include those performing services for the public sector whether paid or unpaid (eg. volunteers, students, contractors and work experience where there is employer-employee like arrangement) in place.</p> <p>For instance, currently, the PID Act does not provide protections for a student (eg paramedic, doctor, nurse) who may identify wrongdoing whilst on 'prac' or 'training' at a facility, or even volunteers who work alongside employees in these environments. In these situations there is often a power imbalance, and this cohort may be more at risk of reprisal in terms of future employment prospects. While agencies can err on the side of caution and provide protections, by having the definition expanded in legislation would assist those students and volunteers providing health care whilst working within hospitals, Ambulance services and other health care placements to disclose wrongdoing within the workplace.</p> <p>Providing PID protections to former public officers may not serve in the public interest if employees wait until they resign or retire or have secured employment elsewhere to report wrongdoing. These complaints may not be made until 'well after the fact' where evidence may not be readily available, recollection of events unclear and risk of reprisal would be seemingly 'nought'. The ability to protect former officers from reprisal (if it did exist) would also be an issue due to no ability to oversee in workplace/have constant communication.</p>
<p>Should relatives of disclosers, or witnesses be eligible to make</p>	<p>No, relatives of disclosers/witnesses should not be eligible to make PIDs. This may facilitate 'hearsay' evidence being</p>

<p>PIDs? Should they, or anyone else, be entitled to protection under the PID regime?</p>	<p>admitted into complaint material. The ability to protect relatives (members of the public) from reprisal in this scenario would also be an issue due to no ability to oversee in workplace/have constant communication.</p> <p>Witnesses who participate in an investigative process are generally already captured in the provisions of reprisal (i.e. if the subject was to engage in reprisal because they believe somebody has been involved in a proceeding).</p> <p>Any expansion to the PID Act to cover relatives and witnesses individually could create an administrative burden with limited benefit.</p>
<p>Should different arrangements apply to role reporters? Why and how?</p>	<p>Yes, different arrangements should apply to role reporters. By virtue of their position, role reporters are likely to make numerous PIDs through the audits they conduct or information they generate. There is often no risk of reprisal identified in these matters. An easing of the administrative burden for these PIDs is necessary to deal with repeated interactions with PID role reporters. For instance, an easing of written correspondence, assigning PID Support officers and provision of outcome advice to PID role reporters who frequently audit and report on matters that are assessed PIDs (i.e. information access matters) An online/ out option would be beneficial in these circumstances.</p>

3.5 Making, receiving and identifying PIDs

Question posed in issues paper	Department of Health response
<p>Are the requirements for making, receiving and identifying PIDs appropriate and effective?</p>	<p>The requirements for making, receiving and identifying PIDs are generally appropriate and effective.</p>
<p>Who should be able to receive PIDs? Do you support having multiple reporting pathways for disclosers? Is there a role for a clearing house or a third party hotline in receiving PIDs?</p>	<p>Having multiple reporting pathways is helpful in ensuring a no wrong doors approach to raising wrongdoing.</p> <p>The ESU concurs with the views expressed in the issues paper regarding the implications of two agencies concurrently assessing/managing a matter and suggests the Act be amended such that in the first instance the matter should be referred internally unless special circumstances exist.</p> <p>Having a clearing house or third party hotline would appear to be duplication of the mechanisms that each agency already has in place.</p>
<p>At what point in time should the obligations and protections under the PID regime come into effect?</p>	<p>At the time of the disclosure.</p>
<p>Should the PID legislation require a written decision be made about PID status as recommended by the Queensland Ombudsman? What</p>	<p>The PID Act should require written decisions to be provided about PID decisions. Caution should be exercised in terms of prescribing timeframes, given the complexity of complaints can impact on the timeframe for assessment.</p>

<p>would the implications be for agencies?</p>	<p>Consideration should also be given to how this would work with role reporters or even senior executives if there are opt out mechanisms.</p> <p>The PID Act (or standards) should also make clear the appeal or review mechanisms available should someone not be satisfied with the original PID decision. This should include what the internal or external reviews is looking at (eg. Is it only considering whether the original decision was fair and reasonable, or is there the ability to overturn a decision).</p>
<p>Are the provisions for disclosures to the media and other third parties appropriate and effective? Are there additions or alternatives that should be considered?</p>	<p>While s20 provides for when an officer may make a disclosure to a journalist it does not consider penalties for inappropriate disclosure of relevant information to journalists.</p> <p>Consideration could be given to expanding this provision to include penalties for inappropriately disclosing relevant information to journalists where a department is dealing with the matter.</p>

3.6 Managing, investigating and responding to PIDs

Question posed in issues paper	Department of Health response
<p>Are the requirements for managing, investigating and responding to PIDs appropriate and effective?</p>	<p>Overall, the requirements in the Act for managing, investigating and responding to PIDs are appropriate and effective. The Act should not be too prescriptive as these decisions should be made on a case by case basis depending on the nature of the matter.</p> <p>Consideration could be given to providing more information in standards or guidance material regarding the application of various provisions of the Act, such as the situations or scenarios where the identity of the discloser is required to be disclosed (i.e. to provide natural justice to the subject officer, to inform a delegate etc).</p>
<p>Are agencies able to provide effective support for disclosers, subject officers and witnesses? Are any additional or alternative powers, functions or guidance needed?</p>	<p>The Department is in position to provide effective support for disclosers, subject officers and witnesses when they are a current Departmental employee. This can be challenging when they cease employment or are a member of the public in terms of monitoring the risk and on occasion, maintaining contact and engagement from the individual that is external to the Department.</p>
<p>Should the PID Act include duties or requirements for agencies to</p> <ol style="list-style-type: none"> take steps to correct the reported wrongdoing generally or in specific ways? provide procedural fairness to the discloser, subject officer and witnesses? assess and minimise the risk of reprisals? 	<p>The PID Act should continue to place a general obligation or requirements to deal with the reported wrongdoing. However, the delegated decision maker almost always has the discretion on a case-by-case basis to decide the steps taken to deal with the matter i.e. investigation, discipline process, managerial action or no action at all, unless the conduct is such that it needs to be reported to another entity i.e. QPS in instances of criminality. Providing specific steps to address wrongdoing in legislation could limit the prerogative of the delegate decision maker/typecast certain matters to certain outcomes.</p> <p>As for procedural fairness/natural justice, these are complex legal concepts which may or may not benefit from inclusion specifically in the PID Act. Often these aspects are referred to in</p>

	<p>correspondence to the PID and the subject officer on a somewhat general basis.</p> <p>c. The PID Act already requires agencies to afford protections from reprisals. This could be extended to specifically require agencies to assess and minimise the risk of reprisal. However, this is largely already contemplated in agency policy and procedures.</p>
<p>Should a discloser be able to opt out of protections afforded under the Act, such as the requirement to receive information or be provided support? Should this only apply to role reporters, or to any type of discloser?</p>	<p>Role reporters should have the ability to opt out of certain processes in relation to receiving information (such as introductory letters and phone calls). There may also be a case for high level PIDs e.g. Director level and above who make PIDs about subordinate officers opting out of certain processes under the PID Act. This should be able to be determined on a case by case basis on the basis of risk.</p>

3.7 Protections for disclosers, subject officers and witnesses

Question posed in issues paper	Department of Health response
<p>Are the current protections for disclosers, subject officers and witnesses appropriate and effective? Should additional or alternative protections be considered?</p>	<p>The protections for disclosers are appropriate and effective where the discloser is an employee. It remains difficult for the Department to ensure adequate protections for former employees and members of the public.</p>
<p>Are the current provisions about confidentiality adequate and fit for purpose? Should any improvements be considered?</p>	<p>The ESU agrees with recommendation 16 of the 2017 Queensland Ombudsman review which recommended "Section 65(3) of the PID Act should be amended to clarify that making a record of confidential information or disclosing it to someone else is permitted for the purpose of taking reasonable steps to assess disclosures, including consultation with other public sector entities."</p> <p>Section 65 could be expanded to include examples involving the disclosure of confidential information to other entities outside of the complaints process, but in the interest of assisting disclosers, such as WorkCover to assist with the disclosers claim for workers compensation. It is unclear in the PID Act whether the disclosure of complaint information that also forms part of a WorkCover claim is an inappropriate disclosure or whether this is considered 'an appropriate discharging of a function under another Act'. Further guidance within the PID Act regarding this issue is recommended.</p>
<p>Is the definition of reprisal appropriate and effective? Do any issues arise in identifying, managing and responding to reprisals?</p>	<p>In the first instance, the definition of reprisal in Section 40 of the PID Act is satisfactory particularly as it captures any act, attempt or conspiring to cause a detriment.</p> <p>However there appears to be some differing interpretation of section 40(a)(b) which defines: A person must not cause, or attempt or conspire to cause, detriment to another person because, or in the belief that the other person or someone else</p>

	<p>is, has been, or intends to be, involved in a proceeding under the Act against any person.</p> <p>While the ESU previously considered the intent of this provision was to consider witnesses providing supporting information through a process (i.e. witness in an investigation), previous advice suggested this can apply more broadly as the definition from the Acts Interpretation Acts defines proceeding as 'legal or other action'. In a scenario where the HR officer assisting with a discipline process or correspondence received a detriment (verbal abuse) the ESU has been advised that this may be considered 'reprisal' as a result of 'another person' raising a PID, despite no obvious connection to disclosing information originally. This may be an overreach of the intent of the PID Act.</p>
Is there a role for an independent authority to support disclosers in Queensland? If so, what should its role be?	Having a separate body to support disclosers would add another layer of bureaucracy, double handling and confusion between the agency and the independent authority.
Do you support an administrative redress scheme for disclosers who consider they have experienced reprisals?	There are already numerous channels to address concerns of reprisal without adding in an administrative redress scheme. The PID Act would benefit from providing clarity about how reprisals should be addressed rather than adding in additional elements.

3.8 Remedies

Question posed in issues paper	Department of Health response
Are the remedies available to disclosers under the PID Act reasonable and effective? Are any changes needed?	<p>The management of reprisals would benefit from clarity.</p> <p>There are administrative, civil and criminal options in relation to the management of reprisals that could be taken:</p> <ul style="list-style-type: none"> - Under section 41 of the Act, reprisal is deemed an indictable offence so could be referred to the QPS (however there have been limited prosecutions that have occurred in relation to reprisal. In our experience, when matters have been referred to QPS they tend to be considered under other sections of the Criminal Code rather than 'reprisal' per se. - Under section 42 of the Act a reprisal is a Tort and a claim for damages can be made to a court. - Under section 44 of the Act a person may make a complaint under the Anti-Discrimination Act about a reprisal. - Under section 67(1) of the Act the offence of taking reprisal is deemed misconduct so could be investigated by an agency and dealt with through a disciplinary process; - Under section 67(2) of the Act the CCC may investigate the contravention. <p>Consideration should be given to simplifying the Act in relation to the remedies available. While the intent would not be to</p>

	<p>minimise or weaken the remedies available, the Act could be amended to make it clearer that there are a range of choices and what happens if you choose one option over another, what prevails etc. It would also make it clearer for agencies what their responsibilities are in relation to dealing with matters of reprisal.</p>
<p>Do you support an administrative redress scheme for disclosers who consider they have experienced reprisals?</p>	<p>There are already numerous channels to address concerns of reprisal without adding in an administrative redress scheme.</p> <p>The PID Act would benefit from providing clarity about how reprisals should be addressed rather than adding in additional elements.</p>

3.9 Role of the oversight agency

Question posed in issues paper	Department of Health response
<p>Are the Queensland Ombudsman's functions and powers suitable and effective for the purpose of the oversight body?</p>	<p>The ESU is of the view that the Queensland Ombudsman's functions and powers are suitable and effective for the purpose of the oversight body. The PID Review may consider the level of involvement required from the Queensland Ombudsman to ensure the PID Act remains effective and their powers to audit agencies on their assessment and management of PIDs.</p> <p>The biggest issue for the Queensland Ombudsman is the resourcing of the PID function. At present, the resourcing of the function is not conducive for them to be able to adequately perform their functions under the Act.</p>
<p>Are there any conflicts between the Queensland Ombudsman's advisory and review functions for PIDs? If yes, how could these be managed or resolved?</p>	<p>While the Department hasn't experienced or had any concerns with themselves, there could be a perception of a conflict between the Queensland Ombudsman's advisory and review functions for PID. If required, this could be resolved by having the advisory function taken out of the QO and placed in another central agency.</p>
<p>Do the roles of integrity bodies overlap during the PID process? Are changes needed or do the existing arrangements work effectively?</p>	<p>There is a large degree of overlap between integrity bodies during the PID process. The overlap probably can't be avoided, however there needs to be clarity of roles to avoid duplication and ensure the respective requirements of each integrity body can be appropriately managed.</p>
<p>Are the Standards published by the Queensland Ombudsman effective? Are changes needed?</p>	<p>Guiding resources always provide benefit and advice to Departments, however section 60 of the PID Act, determines how public sector entities are to perform their functions under this Act. This then requires Departments to refer to the legislation and 3 separate documents (standards) to comply with legislative requirements. While a Department's ESU or PID liaison officer may be across these documents, it can be difficult for an employee with limited PID knowledge to navigate.</p> <p>The Standards can be very prescriptive and bind agencies to a range of administrative processes. The right balance needs to be reached to ensure the requirements for managing PIDs aren't overly burdensome.</p>

<p>Do you agree with the recommendations of the Queensland Ombudsman's 2017 review?</p>	<p>The Department agrees, in the most part with the recommendations of the Queensland Ombudsman's 2017 review.</p> <p>The recommendations that the Department believe warrant further thought or consideration include those that relate to:</p> <ul style="list-style-type: none"> - Whether PIDs should be accepted after an employee's resignation from the agency and any timeframe that may be attached; - Whether specific timeframes should be mandated for providing a written reason for an assessment decision; - Whether specific timeframes should be mandated for providing status reports to disclosers during the management of their PIDs. - Whether the subject of a PID that has not been substantiated is offered protection from detriment by the entity - whether there should be an administrative redress scheme.
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3.10 Practical considerations

Question posed in issues paper	Department of Health response
<p>Should the PID legislation be more specific about how it interacts with any other legislation, process or scheme</p>	<p>There would be value in the PID Act being specific about how it interacts with other complaint processes.</p>
<p>Should the PID legislation include incentives for disclosers? If so, how should they operate?</p>	<p>No. The provision of incentives could potentially lead to the submission of purported PIDs for false or malicious purposes (i.e to receive incentives/rewards on baseless claims).</p>
<p>Are current arrangements for training and education about the PID Act effective? How could they be improved?</p>	<p>Current training offered by the Queensland Ombudsman has been a great benefit for Department staff who are able to participate.</p>
<p>Is the PID Act readable and easy to understand? How could the clarity of the Act be improved?</p>	<p>Less legalistic terminology would assist employees and members of the public alike. More defined terms would assist those involved with the administration of the Act i.e. complaint managers, assessment officers. Addition of flowcharts and list of responsibilities and obligations for various levels involved with administration of Act including the public official/DGs, assessment function, disclosers, support officers, subject officers.</p>

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RTI Release

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Enquiries to: Jess Byrne
Director
Ethical Standards Unit
Telephone: [REDACTED]
Our ref: C-ECTF-23/1107

Queensland Health

The Honourable Alan Wilson KC
Public Interest Disclosure Review Secretariat
Strategic Policy and Legal Services
Department of Justice and Attorney-General

Email: [REDACTED]@justice.qld.gov.au

Dear Mr Wilson

Thank you for your correspondence dated 30 January 2023, inviting the Department of Health (the Department) to provide a submission in relation to the review of the *Public Interest Disclosure Act 2010* (the PID Act).

The PID Act is an important part of the integrity framework in the Queensland public sector therefore I would like to thank you for this opportunity to provide feedback and further inform the review process.

The Department's Ethical Standards Unit is responsible for the management and administration of public interest disclosures for the Department. The Ethical Standards Unit has reviewed the published issue paper.

Please find attached the Department's response to some of the questions posed within the issues paper for your consideration.

Should you require further information, the Department's contact is Ms Jess Byrne, Director, Ethical Standards Unit who can be contacted on telephone [REDACTED] or via email [REDACTED]@health.qld.gov.au.

Yours sincerely

Shaun Drummond
Director-General
17/02/2023

DOH DISCLOSURE LOG



Records Detailed

DOH RTI 4889/23

Page 1
 Date 13/07/2023
 Time 4:32:31 PM
 Login Name Burns, Jessica

C-ECTF-23/1107

CD 24 FEB 2023 - DG LTR - Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010

Date Created 30/01/2023 at 12:00 PM
 Date Registered 31/01/2023 at 12:03 PM
 Date Closed 17/02/2023 at 10:52 AM
 Last Action Date 17/02/2023 at 10:50 AM

Record Type Executive Correspondence Folder
 Assignee ELECTRONIC ONLY since 17/02/2023 at 10:50 AM
 Owner QH - Department of Health (DoH)
 Home ODG - Office of the Director-General
 Schedule Number 1073
 Disposition Active
 Security OFFICIAL
 Notes "Friday, 17 February 2023 at 10:50:43 AM (GMT+10:00) Handyside, Alison:"
 Correction - container and workflow finalised by DG Corro.

"Friday, 17 February 2023 at 10:50:09 AM (GMT+10:00) Handyside, Alison:"
 DG e-sig added to letter. Letter and DOH Submission sent via DG corro with a blind copy sent to Rob Hunter for his records. Container completed and WF returned to DESU for finalisation.

"Friday, 17 February 2023 at 10:42:10 AM (GMT+10:00) Handyside, Alison:"
 DG approved use of e-sig, saved in wps.

"Wednesday, 15 February 2023 at 1:37:22 PM (GMT+10:00) Handyside, Alison:"
 DESU corrected spelling in DOH Submission. Awaiting DG approval.

"Wednesday, 15 February 2023 at 10:41:28 AM (GMT+10:00) Handyside, Alison:"
 DG CORRO - update 3.2 spelling error.

"Wednesday, 15 February 2023 at 10:36:03 AM (GMT+10:00) Daly, Claire:"
 Dear Shaun, letter prepared by Ethical standards Unit in response to DJAG providing an opportunity to review an issues paper about the Review into the Public Interest Disclosure Act 2010. ESU has prepared a submission obo QH (Attach 1)
 Thanks
 Claire

"Tuesday, 14 February 2023 at 9:34:35 AM (GMT+10:00) Handyside, Alison:"
 DG Corro review complete. Progressed to SDLO for review. PID Act is being reviewed and submissions have been invited in response to an issues paper. ESU has reviewed the issues paper and prepared a submission for the Department of Health.
 Draft letter and DOH submission to be progressed to DG for approval.

DG CORRO - Please ensure both the letter and submission are provided to the PID Act Review team. Note due date of 24 February 2023.

"Sunday, 12 February 2023 at 4:47:19 PM (GMT+10:00) Byrne, Jess:"
 PID Act is being reviewed and submissions have been invited in response to an issues paper. ESU has reviewed the issues paper and prepared a submission for the Department of Health.
 Draft letter and DOH submission to be progressed to DG for approval.

Please ensure both the letter and submission are provided to the PID Act Review team. Note due date of 24 February 2023.

"Wednesday, 1 February 2023 at 12:36:19 PM (GMT+10:00) Handyside,

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Records Detailed

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Page 2
Date 13/07/2023
Time 4:32:31 PM
Login Name Burns, Jessica

Continued...

Alison:"

DG Corro has forwarded email from Alan Wilson KC to HSCE's and Min health portfolio. Emails saved in wps for reference.

"Wednesday, 1 February 2023 at 11:35:07 AM (GMT+10:00) Byrne, Jess:"

In addition to the below, ESU will prepare a response to the issues paper for DG approval.

"Wednesday, 1 February 2023 at 11:34:34 AM (GMT+10:00) Byrne, Jess:"

Note the correspondence from Alan Wilson KC requests the information be shared within Queensland Health and all health portfolio agencies.

Email from Alan Wilson KC to be forwarded to Health Service Chief Executives as well as agencies in the Minister's health portfolio for information purposes.

Proposed wording for accompanying email has been drafted by ESU and is contained in working papers.

"Tuesday, 31 January 2023 at 12:04:25 PM (GMT+10:00) Handyside, Alison:"

DESU for DG Response using template D or Template 1 if brief is applicable. Due to DG Corro 20 February 2023.

ODG note CD of 24 February 2023.

Relationship	Record Number	Registered	Created	
Related to	C-ECTF-23/4488	20/04/2023 at 11:37 AM	19/04/2023 at 11:34 AM	
Related to	C-ECTF-23/1071	30/01/2023 at 3:51 PM	30/01/2023 at 3:50 PM	
Contained Records	Record Title			
C-ECTF-23/1107-003	DG LTR - response to issues paper			
C-DOC-23/37397	DOH submission			
C-ECTF-23/1107-002	Alan Wilson - Department of Justice and Attorney-General - Review of the Public Disclosure Act 2010			
C-ECTF-23/1107-001	Working Papers			
Contact	Organization	Type	Phone Number	Primary?
Handyside, Alison	ODG - MESU - DG Correspondence (DG Corro)	At location	(07) [REDACTED]	No

DOH DISCLOSURE LOG

End of Report

Qld Health

Dataset CENTRAL BUS