

COMPLAINTS ABOUT THE PUBLIC OFFICIAL POLICY

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Policy Snapshot

Titles Queensland is committed to dealing with complaints that involve, may involve or are reasonably suspected to involve Corrupt Conduct by the Chief Executive Officer to ensure transparency, accountability and integrity are upheld, and to maintain public confidence in Titles Queensland.

The Policy outlines how Titles Queensland will comply with section 48A of the Crime and Corruption Act and is designed to promote public confidence, accountability, integrity and transparency about the way Titles Queensland deals with a Complaint about suspected corrupt conduct by the Chief Executive Officer when performing a Titles Registry Function.

1. Policy objective

The Chief Executive Officer is the Public Official of Titles Queensland for the purposes of the CC Act.

This Policy outlines how Titles Queensland will deal with a Complaint (or information or matter) that involves or may involve Corrupt Conduct by the Chief Executive Officer when performing a Titles Registry Function.

2. Roles and Responsibilities

This Policy applies:

- (a) if there are grounds to suspect that a Complaint may involve Corrupt Conduct by the Chief Executive Officer when performing a Titles Registry Function; and
- (b) to all persons who hold an appointment in, or are Employees (including contractors) of, Titles Queensland when performing a Titles Registry Function.

The following roles and/or groups have specific responsibilities in the development, implementation and ongoing compliance of this Policy:

Chair of the Board	Act as a Nominated Person pursuant to the CC Act.
Chief Executive Officer	Report all complaints that involve or may involve Corruption of the Public Official to a Nominated Person.
Employees	Identify and report suspected Corruption and Complaints against the Chief Executive Officer to a Nominated Person.
General Counsel	Act as a Nominated Person pursuant to the CC Act.

3. Key terms/ definitions

CCC	means the Crime and Corruption Commission continued in existence under the CC Act.
CC Act	<i>Crime and Corruption Act 2001</i> (Qld).
Complaint	includes information or matter about corruption: see definition provided by section 48A(4) of the CC Act.
Contact details for Nominated Persons	General Counsel and Company Secretary: Post: GPO Box 1401, Brisbane Qld 4001 Email: BoardSecretariat@titlesqld.com.au Chair of the Board: Post: GPO Box 1401, Brisbane Qld 4001 Email: Chair@titlesqld.com.au
Corrupt conduct	has the meaning given by section 15 of the CC Act.
deal with	includes investigate the complaint, gather evidence, refer the complaint, start disciplinary proceedings, and other actions in accordance with Schedule 2 (Dictionary) of the CC Act.
Employees	means all employees and contractors of Titles Queensland, whether on a full time, part time or casual basis.

Nominated Person	means each of the General Counsel and Company Secretary, and the Chair of the Board.
Policy	means this Complaints about the Public Official Policy, as amended from time to time.
Public Official	see Schedule 2 (Dictionary) and also section 48A of the CC Act.
Titles Queensland	means Queensland Titles Registry Pty Ltd ACN 648 568 101.
Titles Registry Function	has the meaning given by section 5 of the <i>Queensland Future Fund (Titles Registry) Act 2001</i> (Qld).

4. Nominated Person

Having regard to section 48A(2) and (3) of the CC Act, this Policy nominates the General Counsel and Company Secretary, and the Chair of the Board each as the Nominated Persons to notify the CCC of the Complaint and to deal with the Complaint in accordance with the CC Act.

Where there is more than one Nominated Person:

- (a) the Nominated Persons will decide who will be the Nominated Person for a particular Complaint; and
- (b) where a Nominated Person decides to notify the CCC about a Complaint, the Nominated Person will inform the CCC that they are the Nominated Person for that Complaint.

The provisions of the CC Act that regulate how the Chief Executive Officer as the Public Official of Titles Queensland is to notify or deal with a Complaint also apply to the Nominated Person.

5. Complaints about the Chief Executive Officer

5.1 Reporting a Complaint about the Chief Executive Officer

If a Complaint involves an allegation of Corrupt Conduct by the Chief Executive Officer, the Complaint may be reported to:

- (a) a Nominated Person; or
- (b) the CCC directly, via the [form](#) on the CCC's website; or
- (c) a person to whom there is an obligation to report under an Act (this does not include an obligation imposed by sections 38 or 39(1) of the CC Act).

If there is uncertainty about whether or not a Complaint should be reported, it is best to report it to a Nominated Person.

5.2 Complaints received by a Nominated Person

If a Nominated Person reasonably suspects that a Complaint involves or may involve Corrupt Conduct by the Chief Executive Officer, they are to:

- (a) notify the CCC of the Complaint pursuant to section 38 of the CC Act; and
- (b) deal with the Complaint, subject to the CCC's monitoring role, when pursuant to section 46 of the CC Act, the CCC refers the Complaint to a Nominated Person to deal with.

5.3 Complaints received by the Chief Executive Officer

If the Chief Executive Officer receives a Complaint that may involve Corrupt Conduct on their part, they must:

- (a) report the Complaint to a Nominated Person as soon as practicable and may also notify the CCC; and
- (b) take no further action to deal with the Complaint unless requested to do so by the Nominated Person.

6. Recordkeeping requirements

Should a Nominated Person decide that a Complaint about alleged Corrupt Conduct by the Chief Executive Officer is not required to be notified to the CCC under section 38 of the CC Act, the Nominated Person must make a record of the decision that complies with section 40A of the CC Act.

7. Resourcing the Nominated Person

If pursuant to section 46 of the CC Act, a Nominated Person has responsibility to deal with the Complaint:

- (a) Titles Queensland will ensure that sufficient resources are available to the Nominated Person(s) to enable them to deal with the Complaint appropriately;
- (b) The Nominated Person is to ensure that any consultations for the purpose of securing resources sufficient to deal with the Complaint appropriately are confidential and are not disclosed, other than to the CCC, without:
 - (i) authorisation under a law of the Commonwealth or the State, or
 - (ii) the consent of the Nominated Person responsible for dealing with the Complaint;
- (c) A Nominated Person must, at all times, use their best endeavours to act independently, impartially and fairly having regard to the:
 - (i) purposes of the CC Act;
 - (ii) the importance of promoting public confidence in the way suspected Corrupt Conduct in Titles Queensland is dealt with; and
 - (iii) Titles Queensland's statutory, policy, and procedural framework.

If a Nominated Person has responsibility to deal with the Complaint, they are delegated the same authority, functions and powers as the Chief Executive Officer to direct and control staff of Titles Queensland as if the Nominated Person is the Chief Executive Officer for the purpose of dealing with the Complaint only.

8. Liaising with the CCC

The Chief Executive Officer is to keep the CCC and the Nominated Person informed of:

- (a) the contact details for the Chief Executive Officer and the Nominated Person; and
- (b) any proposed changes to this Policy.

9. Consultation with the CCC

The Chief Executive Officer will consult with the CCC when preparing any policy about how Titles Queensland will deal with a Complaint that involves or may involve Corrupt Conduct by the Chief Executive Officer.

10. Further information

For further information about reporting corruption and the role of the CCC visit the CCC website at: <https://www.ccc.qld.gov.au/>.

11. References

- 2.06 Whistleblower Policy
- 2.14 Fraud, Corruption and Bribery Policy
- 6.02 Code of Conduct and Ethics
- Crime and Corruption Act 2001* (Qld)