



Public Interest Disclosure Procedure & Guidelines

This procedure details the guidelines and process for the disclosure and management of public interest disclosures under the Public Interest Disclosure Act 2010 ("the Act) as amended

Category	Governance	Policy number: MDG-027
Related forms, policies and procedures	Public Interest Disclosure Policy Queensland Ombudsman Guides PID Risk Assessment Guide form Fraud Control Plan	
Key words	Public Interest; wrongdoing; corrupt conduct; maladministration	
Relevant legislation	<i>Local Government Act 2009</i> <i>Public Interest Disclosure Act 2010</i> <i>Human Rights Act 2019</i> <i>Public Records Act 2002</i>	
References and resources	Public Interest Disclosure Standards Queensland Ombudsman	

Review due by	Governance	Date: Annually
Approved by	Council Resolution LG0969	Date: 8 April 2021
Approved by	Council Resolution LG0472	Date: 28 February 2019
Approved by	Council Resolution 1275	Date: 26 May 2016

1. Introduction

Cassowary Coast Regional Council (Council) is committed to fostering an ethical, transparent culture. In pursuit of this, Council values the disclosure of information about suspected wrongdoing in the public sector so that it can be properly assessed and, if necessary, appropriately investigated. Council will provide support to an employee or others who make disclosures about matters in the public interest. This Procedure demonstrates this commitment, and ensures that practical and effective procedures are implemented which comply with the requirements of the *Public Interest Disclosure Act 2010 Qld* ("the Act).

2. Objective/purpose

By complying with the PID Act, Cassowary Coast Regional Council will:-

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

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

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

Council's Public Interest Disclosure Policy, Guidelines and Procedure are available for public viewing at <http://www.cassowarycoast.qld.gov.au/>. The Public Interest Disclosure Guidelines and Procedure document will be reviewed annually and updated as required to ensure it meets the requirements of the PID Act and the standard issued by the Queensland Ombudsman.

3. Scope

The procedure and guidelines apply to all councillors, staff and members of the public and should be read in conjunction with the Public Interest Disclosure Policy ORG009.

4. Responsibility

The Chief Executive Officer is responsible for ensuring this guideline and procedure is understood and adhered to by all councillors and staff. Council's Executive Management Team endorses the value to Council of PIDs and the proper management of PIDs.

5. Definitions

CEO – shall mean the person appointed to the position of Chief Executive Officer under the *Act* and anyone acting in that position.

Councillors – shall mean all elected members of council including the Mayor.

Corrupt conduct— as per section 15 of the Crime and Corruption Act 2001 and would if proved be a criminal offence, or a disciplinary breach and may include:-

- abuse of public office;
- bribery, including bribery relating to an election;
- extortion;
- Obtaining or offering a secret commission;
- Impair, or could impair, public confidence in public administration;
- fraud;
- stealing;
- forgery;
- perverting the course of justice;
- an offence relating to an electoral donation;
- loss of revenue;
- sedition;
- homicide, serious assault or assault occasioning bodily harm or grievous bodily harm;
- illegal drug trafficking;
- obtaining a financial benefit from procuring prostitution
- illegal gambling.

PID – Public Interest Disclosure, is a disclosure about wrongdoing in the public sector that serves the public interest.

Discloser - the person who makes a PID

Maladministration — action that was:-

- taken contrary to law; or
- was unreasonable, unjust, oppressive, or improperly discriminatory; or was in accordance with a rule of law or a provision of an Act or a practice that is or may be unreasonable, unjust, oppressive, or improperly discriminatory in the particular circumstances; or
- was an action for which reasons should have been given, but were not given; or
- was based wholly or partly on a mistake of law or fact – was wrong.

Proper authority varies for different types of disclosures. In addition to making a disclosure to the Cassowary Coast Regional Council for any matter concerning the Council, the other external proper authorities are provided at Item 6.3.

Public Officer – of a public sector entity, is an employee, member or officer of the entity.

Subject Officer - the person about whom a PID is made

Reportable conduct - is conduct by a person or persons connected with council which is:

- Dishonest;
- Fraudulent;
- Corrupt;

- Illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property);
- A breach of legislation or local laws;
- Serious improper conduct;
- Unsafe work practices;
- Conduct which may cause financial or non-financial loss to the council or be otherwise detrimental to the interests of the council;
- Gross mismanagement;
- Serious or substantial waste; or
- Repeated instance of breach of administrative procedures.

Reprisal - any person causes, or attempts or conspires to cause, detriment to another person because or in the belief that a person has made or may make a PID. Some examples of a detriment which could give rise to allegations of reprisals include:

- Personal injury or prejudice to safety
- Property damage or loss
- Intimidation or harassment
- Unlawful discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business
- Threats of any of the above
- Financial loss from any of the above.
- Damage to reputation, including, for example, personal, professional or business reputation.

The Act – shall mean the *Public Interest Disclosure Act 2010*.

6. Procedure

6.1 PID Management Program

Council's PID management program encompasses—

- commitment to encouraging the internal reporting of wrongdoing
- a training strategy to give employees access to training about how to make a PID, information on the support available to a discloser, and advice on how PIDs will be managed.
- specialist training and awareness about PIDs for senior management and other staff who may receive or manage PIDs, disclosers or workplace issues relating to PIDs.
- the appointment of a specialist officer/unit to be responsible for issues related to the management to PIDs. ensuring effective systems and procedures are in place so that issues and outcomes from PIDs inform improvements to service delivery, business processes and internal controls

6.2 The Chief Executive Officer has designated the following roles and responsibilities for managing PIDs within Council.

Role	Responsibilities	Officer
Disclosure Recipient	<p>Under the Act, the Chief Executive Officer is to be the official recipient of the disclosure. The CEO is to apply the four tests of the Public Interest Disclosure (PID) to determine if the disclosure is in fact a PID. Once the CEO has determined it is a PID they are to forward the PID to the PID Coordinator.</p> <p>Anonymously - Through 'making a complaint' via Council Website</p> <p>In person – Council offices, Shire Hall 70 Rankin Street, Innisfail or Tully Civic Centre</p> <p>In writing - CONFIDENTIAL PID - CEO Po Box 887 INNISFAIL QLD 4860</p> <p>By phone – 1300 763 903</p> <p>By email- ceo@ccrc.qld.gov.au</p>	Chief Executive Officer
PID Coordinator	<ul style="list-style-type: none"> • Principal contact for PID issues within Council • Document and manage implementation of PID management program • Review and update PID procedure annually • Maintain and update internal records of PIDs received • Report data on PIDs to Qld Ombudsman • Assess PIDs received • Provide acknowledgment of receipt for PID to discloser • Undertake Risk assessments in consultation with disclosers and other relevant officers • Liaise with other agencies about referral of PIDs • Collates and publishes statistics on PIDs • Liaises with the CEO on all aspects of the PID management process • Allocate Investigator and Support Officer to PID matter 	Governance Lead, Cassowary Coast Regional Council, PO Box 887 Innisfail Qld 4860 T: 1300 763 903 Email:- governance@ccrc.qld.gov.au
PID Support Officer x 2 Internal support & External Support	<ul style="list-style-type: none"> • Provide advice and information to the discloser on Council's PID procedure • Provide personal support and referral to other sources of advice or support as required Facilitate updates on progress of investigation • Proactively contact discloser throughout the PID management process. 	Chief People and Culture Officer (Internal Support) Governance Officer (External Support)
Investigator	<ul style="list-style-type: none"> • Conduct investigation of information in PID in accordance with terms of reference • Prepare report for delegated decision-maker 	Appointed case by case
Delegated decision maker	Review investigation report and determine whether alleged wrongdoing is substantiated	Chief Executive Officer or appointed delegate

6.3 Who can a PID be disclosed to?

A PID must be made to the 'proper authority' to receive disclosures of the type being made.

Disclosers are encouraged to make a disclosure to an appropriate officer of Council first. If the matter is not resolved, or the discloser is concerned about confidentiality, the disclosure may be made to another appropriate agency.

Providing multiple reporting pathways is a crucial element of Council's PID arrangements. While staff are encouraged to disclose internally, they should also be aware of their rights to disclose (or seek review) externally. Whichever option the discloser takes, it is in Council's interest to provide them with clear advice on how to disclose.

Council provides a number of safe and accessible reporting options which allow employees to report wrongdoing to a person other than their line manager or someone they work with regularly where the discloser:-

- Believes the person is involved in the wrongdoing
- Believes the person already knows about the wrongdoing and has failed to address it
- Feels management will see the exposure of wrongdoing as potentially embarrassing or a poor reflection on themselves
- Is concerned about confidentiality
- Fears reprisals.

Who to contact with Council	Any person (including employees) can make a disclosure to— <ul style="list-style-type: none"> • Any person in a supervisory, coordinator or management position, in any area of Council • The chair of the Audit Committee • The Chief Executive Officer
When the disclosure relates to:	The appropriate entity is:
Corrupt Conduct	Crime and Corruption Commission
Maladministration	Queensland Ombudsman (Councillors referred to Office of the Independent Assessor)
Substantial Misuse of public resources	Queensland Audit Office (Councillors referred to Office of the Independent Assessor)
Danger to public health or safety of a child or young person with a disability	Department of Children, Youth Justice and Multicultural Affairs or Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships for disclosures about danger to the health and safety of a child or young person with a disability
Danger to environment	Department of Environment and Science
Danger to public health and safety of a person with a disability	Public Guardian Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships
Reprisals	Crime and Corruption Commission and when appropriate the Queensland Police Service (Councillors referred to Office of the Independent Assessor)

A disclosure can also be made to a journalist if the following conditions have been met—

- A valid PID was initially made to a proper authority, and
- The proper authority—
 - o Decided not to investigate or deal with the disclosure, or
 - o Investigated the disclosure but did not recommend taking any action, or
 - o Failed to notify the discloser within six months of making the disclosure whether or not the disclosure was to be investigated or otherwise dealt with.

A person who makes a disclosure to a journalist in these circumstances is protected under the PID Act. However, disclosers should be aware that journalists are not bound under the confidentiality provisions of section 65 of the PID Act.

6.4. What can be disclosed?

Under the PID Act, **any person** can make a disclosure about a—

- Substantial and specific danger to the health or safety of a person with a disability
- Substantial and specific danger to the environment
- Reprisal because of a belief that a person has made, or intends to make a disclosure.

In addition, Council officers and councillors can make a disclosure about the following public interest matters—

- Corrupt conduct
- Maladministration
- A substantial misuse of public resources
- A substantial and specific danger to public health or safety
- Substantial and specific danger to the environment

6.5. Preservation of confidentiality

If a person gains confidential information because of the person's involvement in the PID Act's administration, the person must not make a record of the information, or intentionally or recklessly disclose the information to anyone, other than under the following situations—

- To discharge a function under another Act including, for example, to investigate something disclosed by a public interest disclosure; or
- For a proceeding in a court or tribunal; or
- If the person to whom the confidential information relates consents in writing to the making of the record or disclosure of the information; or If—
 - The person cannot reasonably obtain the consent of the person to whom the confidential information relates; and
 - Making the record or disclosing the information is unlikely to harm the interests of the person to whom the confidential information relates and is reasonable in all the circumstances; or
- If the person reasonably believes that making the record or disclosing the information is necessary to provide for the safety or welfare of a person; or if authorised under a regulation or another Act.

From 1 July 2019, the *Human Rights Act 2019* commenced to assist in protecting the basic human rights of every person in Queensland. The Queensland Human Rights Commission (QHRC) was

established, in part, to ensure all public entities act or make decisions in a way that is compatible with your human rights, and to receive human rights complaints.

On 1 January 2020, a number of other provisions of the HR Act commenced, which means complaints Council receives about alleged corruption may also be human rights complaints involving the acts or decisions of a public entity (including its employees). Not all corruption complaints will be human rights complaints.

For more information about your rights under the HR Act, how to make a human rights complaint can be found at: <https://www.qhrc.qld.gov.au/complaints>

6.6. Assessing a PID

If there is any doubt as to whether a matter is a PID, further information may be obtained to inform the decision. If doubt still remains, the matter will be considered and managed as a PID.

It is an offence under the PID Act to intentionally give false or misleading information intending it be acted on as a PID. Employees may be subject to disciplinary action for intentionally giving false or misleading information in a PID, or during an investigation into a PID.

The disclosure will be assessed in accordance with the PID Act.

Once the matter has been assessed as a PID, Council will advise the discloser—

- that their information has been received and assessed as a PID
- the action to be taken by Council in relation to the disclosure, which could include referring the matter to an external agency, or investigating
- the likely timeframe involved
- the name and contact details of Council's support officer they can contact for updates or advice
- the discloser's obligations regarding confidentiality
- the protections the discloser has under the PID Act
- the commitment of Council to keep appropriate records and maintain confidentiality except where permitted under the PID Act
- how updates regarding intended actions and outcomes will be provided to the discloser
- contact details for the Council's Employee Assistance Program.

If the PID has been made anonymously and the discloser has not provided any contact details, Council will not be able to acknowledge the PID or provide any updates.

Upon receiving a PID, Council (*PID Coordinator and relevant Manager*) will conduct a risk assessment to assess the likelihood of the discloser suffering reprisal action as a result of having made the disclosure (refer *PID Risk Assessment Guide form*). The assessment will take into account the actual and reasonably perceived risk of the discloser suffering detriment, and will include consultation with the discloser. The process of risk assessment must include input from the discloser. When assessing the risk, an assessment of the discloser's need for support must also be conducted.

Consistent with the assessed level of risk, Council will arrange any reasonably necessary support or protection for the discloser and where practical, their anonymity.

6.7 Referring a PID

If Council decides there is another proper authority that is better able to deal with the PID, the PID may be referred to that agency. This may be because—

- the PID concerns wrongdoing by that particular agency or an employee of that agency
- the agency has the power to investigate or remedy the matter.

In these cases, the discloser will be advised of the action taken by Council.

It may also be necessary to refer the PID to another agency because of a legislative obligation, for example, refer a matter to the Crime and Corruption Commission where there is a reasonable suspicion that the matter involves or may involve corrupt conduct. Only appropriate officers of Council are permitted to communicate with another agency about the referral of a PID as authorised by the CEO.

6.8 Declining to take action on a PID

Council may decide not to investigate or deal with a PID in various circumstances, including—

- the information disclosed has already been investigated or dealt with by another process
- the information disclosed should be dealt with by another process
- the age of the information makes it impractical to investigate
- the information disclosed is too trivial and dealing with it would substantially and unreasonably divert Council from the performance of its functions
- another agency with jurisdiction to investigate the information has informed Council that an investigation is not warranted.

If a decision is made not to investigate or deal with the PID, Council will give the discloser written reasons for that decision.

If the discloser is dissatisfied with the decision they can request a review by writing to the Chief Executive Officer within 28 days of receiving the written reasons for the decision.

6.9 Investigating a PID

The investigation of a PID will be carried out by trained and experienced people. Council will either already employ investigators or will engage the services of a specialist investigator and provide some practical guidance on undertaking an investigation of this type.

The investigator must be independent and not have an actual or potential conflict of interest in the matter. They should be separate from any workgroup that includes the discloser or subject(s) of the PID. Where the allegation is serious, involves senior management or implicates a group of employees, Council will employ outside investigators in order to be perceived as objective and remove any potential conflict.

At the commencement of an investigation, the discloser will be—

- notified by the investigator that they have been appointed to conduct the investigation
- asked to clarify any matters
- asked to provide any additional material they might have
- made aware that people might attempt to guess their identity.

If a decision is made to investigate a PID, this will be done with consideration for the—

- principles of natural justice
- obligation under the PID Act to protect confidential information
- obligation under the PID Act to protect officers from reprisal
- interests of subject officers

If as a result of investigation, the information about wrongdoing provided in the PID is substantiated, appropriate action will be taken.

Where the investigation does not substantiate wrongdoing, Council will review systems, policies and procedures to identify whether there are improvements that can be made and consider if staff training is required.

6.10 Organisational Support for disclosers

Disclosers should not suffer any form of detriment as a result of making a PID.

In the event of reprisal action being alleged or suspected, Council will—

- attend to the safety of disclosers or affected third parties as a matter of priority
- review its risk assessment and any protective measures needed to mitigate any further risk of reprisal
- manage any allegation of a reprisal as a PID in its own right.

Details about disclosures, investigations, and related decisions will be kept secure and accessible only to the people involved in the management of the PID. Council will ensure that communication with all parties involved will be arranged discreetly to avoid identifying the discloser wherever possible.

While council will make every attempt to protect confidentiality, a discloser's identity may need to be disclosed to—

- provide natural justice to subject officers
- respond to a court order, legal directive or court proceedings.

Disclosers should be aware that while Council will make every attempt to keep their details confidential, it cannot guarantee that others will not try to deduce their identity. Information and support will be provided to the discloser until the matter is finalised.

Making a PID does not prevent reasonable management action. That means that the discloser will continue to be managed in accordance with normal, fair and reasonable management practices during and after the handling of the PID.

For the purpose of this Guideline/Procedure, organisational support means actions such as, but not limited to—

The role of both the PID Coordinator and PID Support Officer or alternate PID

Support Officer may include—

- maintaining contact with the discloser
- ensure that any suspicions of victimisation or harassment are dealt with
- providing a sounding board and positive reinforcement;
- providing moral and emotional support
- advising disclosers about Council resources available to handle any concerns they have as a result of making their disclosure

- appointing a mentor, confidante or other support officer to assist the discloser through the process
- attending interviews or meetings with the discloser;
- acting as a liaison point with management and investigators;
- referring the discloser to Council's Employee Assistance Program or arranging for other professional counselling as needed; and
- providing a balanced, independent view of what, if anything is occurring in their workplace.
- Negotiating with the discloser and their support officer a formal end to their involvement with the support program when it is agreed that they no longer need assistance.

6.11 Responding to reprisals

Whenever a Manager receives a disclosure, that Manager in consultation with the PID Coordinator is under an obligation to consider the likelihood of the discloser suffering some form of reprisal as a result.

It is the responsibility of the manager receiving the disclosure in consultation with the PID Coordinator to assess the actual and reasonably perceived risk of victimisation or unlawful discrimination against the discloser (or those who may be suspected of disclosing) such assessment must be fully documented.

The Chief Executive Officer, through the PID Coordinator and PID Support Officer must ensure protective measures are in place which will be proportionate to the risk of reprisal, and the potential consequences of a reprisal. If the risk is assessed as sufficiently high, Council must prepare a protection plan to protect the discloser. Where feasible, this should be developed in consultation with the discloser and other relevant stakeholders Council is committed to ensuring that no disciplinary or adverse action, including workplace reprisals by managers or councillors, occurs as a result of a disclosure. Under s40 of the Act, "*A person must not cause, or attempt to conspire to cause, detriment to another person because, or in the belief that –*

(a) The other person or someone else has made, or intends to make, a public interest disclosure;
or

(b) The other person or someone else is, has been, or intends to be, involved in a proceeding under the Act against any person."

All managers are under an obligation to notify the PID Coordinator if they believe any staff member is suffering detriment as a result of reporting a wrongdoing.

The discloser has the right to request that Council take positive action to protect them. Under s46 of the Act a public officer can appeal administrative actions if they have resulted in disciplinary action, a transfer or unfair treatment against the officer. Under s47 of the Act a public officer has the right to request a relocation if they fear a reprisal.

If there has been a reprisal the PID Coordinator must be informed immediately. Also all managers must notify the PID Coordinator of any allegations of reprisal action against a discloser, or if they themselves suspect that reprisal action against a discloser is occurring. In the event of a reprisal being alleged or suspected, Council must act in the interest of the discloser by—

- (a) Attending to the safety of the discloser(s) or affected third parties as a matter of priority;
- (b) Reviewing the risk assessment of reprisal and any protective measures needed; and
- (c) Managing any allegation of a reprisal as a PID in its own right.

Any employee found to have engaged in reprisals will be the subject of disciplinary action.

Under s150AW *Local Government Act 2009*– Any Councillor found to have engaged in reprisals will be subject to a maximum penalty of 167 penalty units or 2 years imprisonment.

6.12 Finalising the matter

The discloser and subject officer(s) should be separately informed of the investigation findings and any steps taken as a result.

If a PID is substantiated, advise the discloser of this and of any action that will be taken in response. Actions may include on or more of the following—

- Stopping the conduct or preventing it from recurring and how that would be achieved
- Implementing or changing policies, procedures or practices
- Offering mediation or conciliation
- Taking disciplinary action against a person responsible for the conduct
- Referring the conduct to the Qld Police Service or another person, organisation or entity that has the jurisdiction to take further action (e.g. initiating legal proceedings against those involved in criminal activity).

There may be occasions where a PID is unable to be substantiated. The discloser should be advised —

- That Council supports them for having properly raised the matter
- Inform the discloser of the usefulness of the information in preventing such issues from arising in the future
- Explain why the PID was not upheld, without breaching confidentiality
- Inform them of where they can go to complain, if they believe the outcome is wrong
- Inform them of who to talk to if they are experiencing problems for having spoken up.

Once a matter is finalised, Council will debrief other staff in the workplace involved individually or in groups to—

- Clarify any decisions or outcomes, without breaching confidentiality; and
- Emphasise the opportunities to learn from the situation.

6.13 Record-keeping and reporting

Council has a duty under the *Public Records Act 2002 (Qld)* to make, keep, manage and dispose of public records, Crime and Corruption Commission and *Queensland State Archives 2009* or the Queensland Ombudsman can provide further advice. If the PID was made orally, Council must ensure that the written version of the PID is accepted as accurate by the discloser.

The Act requires Council to keep an adequate record of public interest disclosures, including details of the discloser, the nature of the information disclosed, and action taken by the Council, even where the disclosure is investigated and found to be incorrect. This is done so that disclosers are identified and can be protected from reprisal.

The PID Coordinator is to maintain a confidential file pertaining to each potential PID, with the following minimal requirements—

- The name of the person making the disclosure (if known)
- Details of the disclosure
- The determination made in respect of the PID claim

- Action taken on the disclosures (including review, investigation or other form of managerial response).

Anonymised data is reported to the Office of the Queensland Ombudsman in their role as the oversight agency, through the PID reporting database.

All records of public interest disclosures and their investigation will be kept in the official, central records system and will be kept strictly confidential. Responsibility for creating records and for fulfilling Council's reporting obligations rests with the PID Coordinator. Council is also required to provide the Public Service Commission (PSC) with the following information:

- The date the disclosure was received, and where it was received from
- The status of the discloser (e.g. Council officer, staff from another entity, member of the public, anonymous)
- The gender and status of the subject officer (Council officer, non staff member)
- The relationship between the discloser and the subject officer
- The location of the subject officer (geographical region)
- A summary of the allegation/information received
- The involvement of an external agency/party
- The action taken to minimise any risk of reprisal
- Date inquiry/investigation commenced and completed
- The outcome of the assessment, inquiry/investigation
- The date the PID was resolved or closed
- When the outcome was advised to the discloser
- If no action was taken, the reason for the decision
- Other legal processes associated with the disclosure.

6.14 Council to provide training

Training will be provided by Council's Governance Team to Senior Officers and other officers involved in the handling of PIDs to ensure that they—

Can identify wrongdoing;

- know how to recognise a PID and what action to take when they receive PIDs or other information about wrongdoing;
- are aware of their responsibility to their employees;
- manage Public Interest Disclosures;
- display a positive attitude to their employees disclosing wrongdoing;
- are able to offer genuine support to employees who disclose.

Educating staff on PID issues should be part of Council's induction program and ongoing training. Therefore, People & Culture will include PID matters as a component of their broader ethics and/or code of conduct training, and explain in practical terms how PIDs can be made.

All employees need to know:-

- how to recognise wrongdoing
- how to make a PID
- that Council is committed to protecting and supporting those who report. Managers and supervisors require training on their obligations in relation to PIDs. Relevant information will be provided at this level.

Further information and training material, including videos can be found at

6.15 Reviewing effectiveness

The effectiveness of Council's PID program will be reviewed regularly (at least annually). Responsibility for this will be given to a senior officer appointed by the CEO or internal audit committee. A review will consider whether—

- this policy and procedures are consistent with best practice and current legislation
- PIDs are being recorded appropriately
- Action taken in response to PIDs is in accordance with Council procedures and any standard issued by the Public Service Commission (PSC)
- Confidentiality issues are being handled effectively
- Staff believe they have been treated well after making a PID
- Timely and constructive information is being provided to those involved
- Employees are aware of, and trust in, Council's program.

In conducting the review, it is recommended that, at a minimum, Council—

- Extracts key information from Council record-keeping system, such as outcomes and details of the support provided to those involved
- Examines the level and appropriateness of resources allocated to cases
- Asks disclosers and the subjects of PIDs to provide written feedback about their experience
- Seeks information on how the arrangements are working from managers and supervisors with experience in dealing with PIDs
- Surveys employees on their awareness, experience and confidence in the PID process.

Where the review suggests there are problems, either generally or within a local area, Council should take action to address. For example, if the review shows there is confusion about whether or not a report of wrongdoing is a PID, it may be best to revisit Council policy/guidelines etc. and/or improve training and communications.