

Public Interest Disclosure Procedure

Public Interest Disclosures

Introduction/Policy Statement

Gympie Regional Council is committed to fostering a culture of integrity, transparency, and accountability in all aspects of its operations. In line with our vision to embrace opportunity, promote wellbeing, and celebrate strong communities, we recognise the importance of supporting individuals who speak up about wrongdoing in the public sector.

This Public Interest Disclosure Procedure outlines Council's commitment to encouraging and managing disclosures of suspected misconduct, maladministration, or other serious matters in accordance with the *Public Interest Disclosure Act 2010 (Qld)*. We aim to ensure that disclosures are handled confidentially, fairly, and without reprisal, and that appropriate action is taken to investigate and address concerns raised.

Council values the courage of individuals who make disclosures in good faith and is dedicated to creating a safe environment where employees, contractors, and members of the public feel supported to report concerns that serve the public interest.

1. Objective/Purpose

Gympie Regional Council is committed to upholding the principles of transparency, accountability, and ethical governance. In accordance with Section 28 of the Public Interest Disclosure Act 2010 (Qld) and Section 1.1.1 of the Public Interest Disclosure Standard No. 1/2019, Council has implemented reasonable procedures to ensure the effective management of Public Interest Disclosures (PIDs).

By complying with the PID Act and associated standards, Gympie Regional Council will:

- Promote the public interest by facilitating the reporting of wrongdoing through PIDs.
- Ensure that PIDs are properly assessed and, where appropriate, investigated and dealt with.
- Take appropriate action in response to any wrongdoing identified through a PID.
- Provide appropriate support to public officers who make PIDs.
- Offer protection from reprisal to persons making PIDs.
- Ensure that the interests of persons who are the subject of a PID are appropriately considered, applying principles of natural justice.

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

- Procedures for managing PIDs are developed and implemented in alignment with the standards issued by the Queensland Ombudsman.
- All public officers who make a PID are supported throughout the process.
- PIDs made to Gympie Regional Council are assessed, investigated, and managed appropriately.

- A PID management program is maintained to ensure ongoing compliance and effectiveness.
- Protections from reprisal are actively enforced for disclosers and associated persons.

Gympie Regional Council's Public Interest Disclosure Procedure is publicly accessible via the Council's website and will be reviewed annually to ensure it remains compliant with legislative and regulatory requirements.

PID Management Program

The Chief Executive Officer has overall responsibility for ensuring that Gympie Regional Council develops, implements and maintains a PID management program. The Gympie Regional Council PID management program encompasses:

- commitment to encouraging the internal reporting of wrongdoing
- senior management endorsement of the value to Gympie Regional Council of PIDs and the proper management of PIDs
- a communication strategy to raise awareness among employees about PIDs and Gympie Regional Council's PID procedure
- 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 of PIDs
- ensuring effective systems and procedures are in place so that issues and outcomes from PIDs inform improvements to service delivery, business processes and internal controls
- regular review of the Public Interest Disclosure Procedure and evaluation of the effectiveness of the PID management program.

The Chief Executive Officer has designated the following roles and responsibilities for managing PIDs within Gympie Regional Council:

Role:	Responsibilities:	Officer:
PID Coordinator	<ul style="list-style-type: none"> ▪ principal contact for PID issues within Gympie Regional Council ▪ document and manage implementation of PID management program ▪ review and update PID procedure annually 	Manager Governance, Integrity and Risk Email: wezley.frankcombe@gympie.qld.gov.au Phone: 07 5480 2091

Role:	Responsibilities:	Officer:
	<ul style="list-style-type: none"> ▪ maintain and update internal records of PIDs received ▪ report data on PIDs to Queensland Ombudsman ▪ assess PIDs received ▪ provide acknowledgment of receipt of PID to discloser ▪ undertake risk assessments in consultation with disclosers and other relevant officers ▪ liaise with other agencies about referral of PIDs ▪ allocate Investigator and Support Officer to PID matter 	
PID Support Officer	<ul style="list-style-type: none"> ▪ provide advice and information to discloser on Gympie Regional Council 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 PID management process 	Coordinator Governance Email: christine.kennedy@gympie.qld.gov.au Phone: 07 5481 0753
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 	An appropriate internal or external investigator will be appointed for each PID investigated depending upon the type of disclosure and other relevant considerations.
Delegated decision-maker	<ul style="list-style-type: none"> ▪ review investigation report and determine whether alleged wrongdoing is substantiated 	An appropriate decision-maker will be appointed for each PID investigated.

2. Why make a PID?

Employees who are prepared to speak up about public sector misconduct, wastage of public funds, suspected unlawful activity, or danger to health, safety, or the environment are vital to maintaining integrity and accountability in public administration. Gympie Regional Council supports and encourages the disclosure of information about wrongdoing because:

- Implementing systems for reporting and managing wrongdoing contributes to the integrity and ethical governance of Council.

- Outcomes of Public Interest Disclosures (PIDs) can lead to improvements in systems and processes that prevent fraud, corruption, and economic loss.
- The community's trust in public administration is strengthened by having robust and transparent processes for reporting and responding to wrongdoing.

In accordance with Sections 36–43 and 65 of the PID Act, and Section 1.1.6 of PID Standard No. 1/2019, Gympie Regional Council ensures that:

- **Confidentiality:** The identity of disclosers and other identifying information is protected to the greatest extent possible, in line with section 65 of the PID Act.
- **Protection from reprisal:** Disclosers are protected from any form of reprisal, including unfair treatment or victimisation, and Council actively assesses and manages reprisal risks.
- **Immunity from liability:** Disclosers are not subject to civil, criminal, or administrative liability for making a PID, provided they act honestly and without malice (section 36).
- **Protection from defamation:** Disclosers have a defence against defamation claims related to the disclosure (section 38).
- **Natural justice:** Subject officers are afforded procedural fairness, and their rights are respected throughout the PID process.
- **Vicarious liability:** Council acknowledges its responsibility under section 43 for the actions of its officers in relation to reprisals and ensures appropriate training and oversight.

Gympie Regional Council's PID Procedure includes a reprisal risk assessment process, support mechanisms for disclosers and witnesses, and clear confidentiality protocols. These measures are part of Council's PID Management Program, which aligns with the Queensland Ombudsman's standards and is reviewed annually.

3. What is a Public Interest Disclosure?

Under the *Public Interest Disclosure Act 2010 (Qld)*, Gympie Regional Council recognises and supports the right of individuals to make disclosures about wrongdoing in the public sector. The Council's Public Interest Disclosure Procedure applies to both public officers and members of the public, in accordance with legislative requirements.

Disclosures by Any Person

Any person may make a disclosure about:

- A substantial and specific danger to the health or safety of a person with a disability.
- The commission of an offence, or a contravention of a condition imposed under legislation listed in Schedule 2 of the PID Act, where the offence or contravention poses a substantial and specific danger to the environment.
- A reprisal taken or threatened because of a belief that a person has made or intends to make a PID.

Disclosures by Public Officers

Public officers may also disclose the following public interest matters:

- Corrupt conduct.
- Maladministration that adversely affects a person's interests in a substantial and specific way.
- A substantial misuse of public resources.
- A substantial and specific danger to public health or safety.
- A substantial and specific danger to the environment.

Assessment of Disclosures

A disclosure qualifies as a PID under the Act if the discloser:

- Has a reasonable belief that the information indicates wrongdoing, or
- Provides evidence that tends to show the wrongdoing has occurred.

Gympie Regional Council will assess all information received to determine whether it constitutes a PID, regardless of whether:

- The disclosure is made as part of the discloser's duties (e.g., an auditor reporting fraud).
- The disclosure is made anonymously.
- The discloser identifies the information as a PID.
- The disclosure is later found to be unsubstantiated - protections still apply if the information was assessed as a PID.

Compliance with PID Standard No. 1/2019 – Section 1.1.2

Gympie Regional Council's PID Procedure clearly identifies:

- **Who is covered:** both public officers and members of the public.
- **What can be reported:** all categories of wrongdoing listed under sections 12 and 13 of the PID Act.
- **How disclosures are assessed:** based on reasonable belief or supporting evidence.
- **Protections and obligations:** including confidentiality, immunity, and protection from reprisal.

4. 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 Gympie Regional Council first. If the matter is not resolved, or the discloser is concerned about confidentiality, the disclosure may be made to another appropriate agency.

Who to contact within Gympie Regional Council :	Other agencies that can receive PIDs:
<p>Any person (including employees) can make a disclosure to:</p> <ul style="list-style-type: none"> • any person in a supervisory or management position • the human resources unit • the Chief Executive Officer email: council@gympie.qld.gov.au phone: 1300 307 800 • the Manager Governance, Integrity and Risk email: governance@gympie.qld.gov.au phone: 07 5480 2091 	<p>Disclosures can be made to an agency that has a responsibility for investigating the information disclosed:</p> <ul style="list-style-type: none"> • Crime and Corruption Commission (CCC) for disclosures about corrupt conduct including reprisal • Queensland Ombudsman for disclosures about maladministration • Queensland Audit Office for disclosures about a substantial misuse of resources • Department of Child Safety, Seniors and Disability Services for disclosures about danger to the health and safety of a child or young person with a disability or for disclosures about danger to the health and safety of a person with a disability • Office of the Public Guardian for disclosures about danger to the health and safety of a person with a disability • Department of the Environment, Tourism, Science and Innovation for disclosures about danger to the environment • A Member of the Legislative Assembly (MP) for any wrongdoing or danger • The Chief Judicial Officer of a court or tribunal in relation to a disclosure about wrongdoing by a judicial officer. <p>• Also, a person may make a complaint under the Anti-Discrimination Act 1991 about a reprisal in accordance with section 44 of the PID Act. A complaint can be lodged with the Queensland Human Rights Commission.</p>

Under Section 20 of the Public Interest Disclosure Act 2010 (Qld), a person may make a public interest disclosure (PID) to a journalist only if the following conditions are met:

- The person previously made a PID to a proper authority, and
- One of the following applies:
 - The proper authority decided not to investigate or deal with the disclosure, or
 - The proper authority investigated the disclosure but did not recommend taking any action, or

- The proper authority 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.

If these conditions are satisfied, the person is entitled to the protections provided under the PID Act, including immunity from liability and protection from reprisal.

However, it is important to note that journalists are not bound by the confidentiality provisions under Section 65 of the PID Act. This means that while the discloser is protected, the information disclosed may be made public by the journalist.

5. How to make a PID

Gympie Regional Council has implemented reasonable procedures for making a PID, including:

Lodgement Options

- **Email:** officeofceo@gympie.qld.gov.au

- **Post:**

Addressed to:

Chief Executive Officer
Gympie Regional Council
PO Box 155
Gympie QLD 4570

- **In Person:**

Town Hall front counter
2 Caledonian Hill, Gympie

These options provide accessible and confidential channels for lodging disclosures, meeting the standard's requirement for reasonable procedures.

Guidance for Disclosers

To assist in assessment and investigation, disclosers are encouraged to:

- Provide **contact details** (email or phone, even if anonymous).
- Include detailed information:
 - Who was involved
 - What happened
 - When and where it occurred
 - Witnesses and evidence
 - Any other relevant context

This guidance aligns with best practice under the PID Standard and supports effective PID management.

6. Deciding whether a matter is a PID

Gympie Regional Council is committed to ensuring that all disclosures are assessed fairly, promptly, and in accordance with the *Public Interest Disclosure Act 2010* and the *Public Interest Disclosure Standard No. 2/2019*.

Under Sections 11–19 of the PID Act, a PID may be made by any person or public officer, and may be submitted verbally, in writing, or anonymously. Disclosures may be made to a proper authority, including Gympie Regional Council, where the matter relates to the conduct of the Council or its officers.

If there is any doubt as to whether a matter constitutes a PID, further information may be obtained to inform the decision. In accordance with Section 2.1.1 of PID Standard No. 2/2019, if doubt remains, the matter will be treated and managed as a PID to ensure protections are applied.

Disclosures that are mere disagreements over policy or lawful decisions do not meet the threshold for a PID under the Act.

In line with Sections 66 and 67 of the PID Act, it is an offence to intentionally provide false or misleading information intending it be treated as a PID. Employees may face disciplinary action for knowingly providing false or misleading information in a PID or during its investigation.

If a discloser identifies their information as a PID, but it is assessed not to meet the criteria under the PID Act, Gympie Regional Council will:

- Advise the discloser that their information was received but not assessed as a PID.
- Provide written reasons for the decision, including the criteria considered.
- Inform the discloser of their right to request a review of the decision and how to do so.
- Outline any action Council proposes to take in relation to the matter.
- Provide information about other options available to the discloser.

This process ensures compliance with Section 2.1.3 of PID Standard No. 2/2019, which requires that disclosers be informed of assessment outcomes, reasons for decisions, and available review mechanisms

7. Assessing a PID

The disclosure will be assessed in accordance with the PID Act, the PID standards, Gympie Regional Council's Public Interest Disclosure Procedure and any other relevant procedure(s).

Once the matter has been assessed as a PID, Gympie Regional Council will advise the discloser:

- that their information has been received and assessed as a PID
- the action to be taken by Gympie Regional 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 the Gympie Regional Council support officer they can contact for updates or advice
- of the discloser's obligations regarding confidentiality
- the protections the discloser has under the PID Act

- the commitment of Gympie Regional 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 Gympie Regional Council's Employee Assistance Program.

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

8. Referring a PID

Where a PID is received and assessed as relating to a matter outside the jurisdiction of Gympie Regional Council, or where another agency is better placed to investigate or manage the disclosure, Council will refer the PID to the appropriate proper authority under Section 32 of the PID Act.

Before referring a PID, Council will:

- Assess the disclosure to confirm it meets the criteria under Sections 11–13 and 17 of the PID Act.
- Conduct a risk assessment and if the PID involves potential reprisal, Council will assess and manage the risk in accordance with Sections 40–43, and ensure the discloser is supported throughout the process.
- Take reasonable steps to protect the confidentiality of the discloser and the information, in accordance with Section 65.
- Inform the discloser of the referral, including:
 - The name of the agency to which the PID is being referred.
 - The reason for the referral.
 - Any actions Council will take prior to referral.
 - The protections that continue to apply under the PID Act.
 - Contact details for follow-up or support.

Council will ensure that the referral is made securely and that records are maintained in line with its PID Management Program, as required under Section 28.

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 (as required by section 38 of the [Crime and Corruption Act 2001](#)).

The confidentiality obligations of the PID Act permit appropriate officers of Gympie Regional Council to communicate with another agency about the referral of a PID. Officers will exercise discretion in their contacts with any other agency.

The discloser will be advised of the action taken by Gympie Regional Council.

9. Risk assessment and protection from reprisal

Disclosers should not suffer any form of detriment as a result of making a PID. Upon receiving a PID, Gympie Regional Council will

- **Conduct a Reprisal Risk Assessment**

A formal risk assessment will be undertaken to identify any potential risks of reprisal against the discloser or others associated with the disclosure. This includes evaluating the nature of the disclosure, the parties involved, and the workplace context. This assessment will take into account the actual and reasonably perceived risk of the discloser (or witnesses or affected third parties) suffering detriment and will include consultation with the discloser.

A risk assessment will be undertaken if the discloser is anonymous on the basis of information available in the PID. The risk assessment will also take into account the risk to persons who may be suspected of making the PID.

- **Implement Risk Mitigation Measures**

Where a risk of reprisal is identified, Council will implement appropriate controls, which may include:

- Adjusting work arrangements or reporting lines.
- Limiting access to sensitive information.
- Providing ongoing support through a designated PID Support Officer.
- Monitoring the workplace environment for signs of retaliation.

- **Maintain Confidentiality**

Council will take all reasonable steps to protect the identity of the discloser and the confidentiality of the information, in accordance with Section 65 of the PID Act. Disclosure of identifying information will only occur where permitted by law.

- **Monitor and Review**

Council will regularly review the risk assessment and mitigation strategies throughout the PID management process to ensure continued protection.

- **Respond to Allegations of Reprisal**

Any allegation of reprisal will be treated seriously and investigated promptly. Council acknowledges its responsibilities under Section 43 of the PID Act for the actions of its officers and will take disciplinary or legal action where reprisal is substantiated.

- **Support Services**

Disclosers will be informed of available support services, including access to Council's Employee Assistance Program (EAP) for confidential counselling and wellbeing support.

10. Declining to take action on a PID

Under the PID Act, the Gympie Regional Council may decide not to investigate or deal with a PID if the disclosure is assessed and determined not to meet the criteria of a Public Interest

Disclosure under sections 11-13 and 17 of PID Act such as:

- 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 Gympie Regional Council from the performance of its functions
- another agency with jurisdiction to investigate the information has informed Gympie Regional Council that an investigation is not warranted.

If a decision is made not to investigate or deal with a PID Gympie Regional Council will:

- Advise the discloser in writing that the information has been received but was not assessed as a PID.
- Provide clear reasons for the decision, referencing the relevant criteria under the PID Act.
- Inform the discloser of their right to request a review of the decision, including how to lodge a review request.
- Outline any action Council proposes to take in relation to the matter, if applicable.
- Provide information about other options available to the discloser, such as lodging a complaint through Council's Complaints Management process or referring the matter to another agency.

Council will ensure that this communication is respectful, transparent, and maintains the confidentiality of the discloser in accordance with **Section 65** of the PID Act.

If the disclosure was made anonymously and no contact details were provided, Council may be unable to notify the discloser of the outcome. However, the matter will still be assessed and managed appropriately.

11. Communication with disclosers

In accordance with section 32 of the Public Interest Disclosure Act 2010 and Standard 2.2 of Public Interest Disclosure Standard No. 2/2019, Gympie Regional Council is committed to providing reasonable information to disclosers throughout the PID process.

- **Acknowledgement:** The Council will acknowledge receipt of the PID in writing as soon as practicable.
- **Initial Information Provided:** Upon receipt, the discloser will be provided with written information including:
 - Confirmation that the PID has been received.
 - A description of the proposed action to be taken in response to the PID.
 - An outline of the protections available under the PID Act.

- The confidentiality obligations of both the discloser and the Council.
- Available support arrangements for the discloser.
- **Ongoing Communication:** The Council will maintain regular contact with the discloser and provide updates on the progress of the PID, including any changes to the proposed action or timeframes.
- **Final Outcome:** After finalising action in response to the PID, the Council will provide the discloser with:
 - A written summary of the action taken.
 - A description of the results of that action, unless doing so would adversely affect safety, an investigation, or necessary confidentiality (as per section 32(4) of the PID Act)
- **Limitations on Disclosure:** Information may be withheld if its release would likely:
 - Adversely affect any person's safety.
 - Compromise the investigation of an offence or possible offence.
 - Breach necessary confidentiality about an informant's existence or identity.

12. Confidentiality

Gympie Regional Council is committed to maintaining the confidentiality of public interest disclosures in accordance with sections 28, 29, and 65 of the Public Interest Disclosure Act 2010 and Standard 1.1.6 of Public Interest Disclosure Standard No. 1/2018.

- The identity of a discloser and the information they provide will be treated as confidential and will only be disclosed:
 - Where required to administer the PID Act or another law.
 - To comply with a court order or legal directive.
 - Where disclosure is necessary to afford natural justice, and it is unlikely to result in reprisal.
 - With the written consent of the discloser.
 - Where disclosure is reasonable and unlikely to harm the discloser, and consent cannot reasonably be obtained.
- All communication with parties involved in a PID will be conducted discreetly and sensitively, with every effort made to avoid identifying the discloser.
- Disclosers should be aware that while Gympie Regional Council will take all reasonable steps to protect their identity, absolute confidentiality cannot be guaranteed, and others may attempt to deduce their identity.
- Any breach of confidentiality may constitute misconduct and will be dealt with accordingly.

13. Support for disclosers

Gympie Regional Council is committed to supporting disclosers in accordance with the Public Interest Disclosure Act 2010, Public Interest Disclosure Standard No. 1/2019, and Standard No. 2/2019.

- Upon receiving a PID, the Council will assess the support needs of the discloser and provide timely, appropriate, and confidential support.
- Support may include:
 - Access to employee assistance programs or counselling.
 - Workplace adjustments to reduce stress or risk.
 - Information and guidance about the PID process and protections.
 - Referral to external support services, if required.
- The Council will take all reasonable steps to protect disclosers from reprisal, including:
 - Conducting a risk assessment.
 - Implementing preventative measures.
 - Monitoring the ongoing wellbeing of the discloser.
- Disclosers will be informed that reasonable management action taken by the Council (e.g. performance management or disciplinary action unrelated to the PID) is not considered reprisal under the PID Act.
- Support will be provided throughout the PID process and reviewed regularly to ensure it remains appropriate.

14. Investigating a PID

If a decision is made to investigate a public interest disclosure (PID), Gympie Regional Council will do so in accordance with the Public Interest Disclosure Act 2010 and relevant standards. Investigations will be conducted with due regard for:

- The principles of natural justice.
- The Council's obligation to protect the confidentiality of the discloser and the information disclosed, as required under section 65 of the PID Act.
- The obligation to protect disclosers from reprisal, in line with sections 40–43 of the PID Act.
- The interests and rights of subject officers, including fair treatment and procedural fairness.

Where wrongdoing is substantiated, the Council will take appropriate and proportionate action in response.

Where wrongdoing is not substantiated, the Council will:

- Review relevant systems, policies, and procedures to identify opportunities for improvement.

- Consider whether staff training or awareness is required to address any systemic issues identified during the investigation.

Throughout the process, the Council will ensure that all parties are treated fairly, confidentially, and respectfully, and that the PID is managed in accordance with the Council's PID procedure and the Queensland Ombudsman's standards.

15. Rights of subject officers

Gympie Regional Council acknowledges that being the subject of a public interest disclosure (PID) can be a stressful experience. In accordance with the *Public Interest Disclosure Act 2010* and relevant standards, the Council is committed to ensuring that subject officers are treated fairly, confidentially, and respectfully.

The Council will protect the rights of subject officers by:

- Ensuring the PID is managed impartially, fairly, and reasonably, in accordance with the principles of natural justice.
- Confirming that the PID is an allegation only until substantiated by evidence obtained through investigation.
- Providing subject officers with timely information about:
 - The nature of the allegation (where appropriate),
 - Their rights and responsibilities,
 - The progress and outcome of any investigation.
- Referring subject officers to the Employee Assistance Program (EAP) or other support services.
- Maintaining confidentiality in accordance with section 65 of the PID Act, and ensuring that information is only disclosed where legally required or necessary for procedural fairness.

Support and information will be provided to subject officers throughout the PID process and until the matter is finalised, regardless of the outcome.

16. Record-keeping

In accordance with its obligations under the Public Interest Disclosure Act 2010, Public Records Act 2002, and Public Interest Disclosure Standards, Gympie Regional Council will ensure that:

- A secure and confidential record-keeping system is maintained that is appropriate to the nature, size, and geographic spread of the Council.
- Accurate and complete records are kept for each PID, including:
 - The name of the discloser (if known),
 - The information disclosed,
 - The name of any referring entity (if applicable),
 - Any action taken in response to the PID,
 - Any other information required under PID Standard No. 3/2019.
- Anonymised data is reported to the Office of the Queensland Ombudsman, the oversight agency, via the secure RaPID database.

- Records relating to disclosures, investigations, and decisions will be kept secure and accessible only to authorised personnel involved in PID management.
- All record-keeping will comply with the confidentiality obligations under section 65 of the PID Act.

17. Definitions (meanings of words and acronyms used in this Procedure)

Term	Definition
Administrative action	<p>(a) means any action about a matter of administration, including, for example:</p> <ul style="list-style-type: none"> (i) a decision and an act; and (ii) a failure to make a decision or do an act, including a failure to provide a written statement of reasons for a decision; and (iii) the formulation of a proposal or intention; and (iv) the making of a recommendation, including a recommendation made to a Minister; and (v) an action taken because of a recommendation made to a Minister; and <p>(b) does not include an operational action of a police officer or of an officer of the Crime and Corruption Commission.</p>
Confidential information	<p>(a) includes —</p> <ul style="list-style-type: none"> (i) information about the identity, occupation, residential or work address or whereabouts of a person — <ul style="list-style-type: none"> (A) who makes a public interest disclosure; or (B) against whom a public interest disclosure has been made; and (ii) information disclosed by a public interest disclosure; and (iii) information about an individual's personal affairs; and (iv) information that, if disclosed, may cause detriment to a person; and <p>(b) does not include information publicly disclosed in a public interest disclosure made to a court, tribunal or other entity that may receive evidence under oath, unless further disclosure of the information is prohibited by law.</p>


Term	Definition
Corrupt conduct	<p>As defined in section 15 of the Crime and Corruption Act 2001</p> <p>(1) Corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that—</p> <p>(a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of—</p> <ul style="list-style-type: none"> (i) a unit of public administration; or (ii) a person holding an appointment; and <p>(b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that—</p> <ul style="list-style-type: none"> (i) is not honest or is not impartial; or involves a breach of trust placed in a person holding an appointment, either knowingly or recklessly; or (iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and <p>(c) would, if proved, be—</p> <ul style="list-style-type: none"> (i) a criminal offence; or (ii) a disciplinary breach providing reasonable grounds for terminating the person’s services, if the person is or were the holder of an appointment. <p>(2) Corrupt conduct also means conduct of a person, regardless of whether the person holds or held an appointment, that—</p> <p>(a) impairs, or could impair, public confidence in public administration;</p> <p>and</p> <p>(b) involves, or could involve, any of the following—</p> <ul style="list-style-type: none"> (i) collusive tendering; (ii) fraud relating to an application for a licence, permit or other authority under an Act with a purpose or object of any of the following (however described)

Term	Definition
	<p>(A) protecting health or safety of persons;</p> <p>(B) protecting the environment;</p> <p>(C) protecting or managing the use of the State's natural, cultural, mining or energy resources;</p> <p>(iii) dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets;</p> <p>(iv) evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue;</p> <p>(v) fraudulently obtaining or retaining an appointment; and</p> <p>(c) would, if proved, be</p> <p>(i) a criminal offence; or a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.</p>
Detriment	<p>includes –</p> <p>(a) personal injury or prejudice to safety; and</p> <p>(b) property damage or loss; and</p> <p>(c) intimidation or harassment; and</p> <p>(d) adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business and</p> <p>(e) financial loss; and</p> <p>(f) damage to reputation, including for example personal, professional or business reputation</p>
Disability	<p>As defined in section 11 of the Disability Services Act 2006, for the purposes of this procedure:</p> <p>(1) A disability is a person's condition that</p> <p>(a) is attributable to</p> <p>(i) an intellectual, psychiatric, cognitive, neurological, sensory or physical impairment; or</p> <p>(ii) a combination of impairments mentioned in subparagraph</p> <p>and</p> <p>(b) results in</p> <p>(i) a substantial reduction of the person's capacity for communication, social interaction, learning, mobility or self care or management; and</p>

Term	Definition
	<p>(ii) the person needing support.</p> <p>(2) For subsection (1), the impairment may result from an acquired brain injury.</p> <p>(3) The disability must be permanent or likely to be permanent. The disability may be, but need not be, of a chronic episodic nature.</p>
Discloser	A person who makes a disclosure in accordance with the Public Interest Disclosure Act 2010 .
Employee	of an entity, includes a person engaged by the entity under a contract of service.
Investigation	For the purposes of this procedure, investigation includes any enquiry undertaken to establish whether the information provided in a PID can be substantiated, including a review or audit.
Journalist	a person engaged in the occupation of writing or editing material intended for publication in the print or electronic news media.
Maladministration	<p>As defined in schedule 4 of the Public Interest Disclosure Act 2010, maladministration is administrative action that—</p> <ul style="list-style-type: none"> (a) was taken contrary to law; or (b) was unreasonable, unjust, oppressive, or improperly discriminatory; or (c) 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 (d) was taken— <ul style="list-style-type: none"> (i) for an improper purpose; or (ii) on irrelevant grounds; or (iii) having regard to irrelevant considerations; or (e) was an action for which reasons should have been given, but were not given; or (f) was based wholly or partly on a mistake of law or fact; or was wrong.
Natural justice	Natural justice, also referred to as ‘procedural fairness’ applies to any decision that can affect the rights, interests or expectations of individuals in a direct or immediate way. Natural justice is at law a safeguard applying to an individual whose rights or interests are

Term	Definition
	<p>being affected.</p> <p>The rules of natural justice, which have been developed to ensure that decision-making is fair and reasonable, are:</p> <ul style="list-style-type: none"> • avoid bias; and • give a fair hearing. <p>act only on the basis of logically probative evidence.</p>
Organisational support	<p>For the purposes of this procedure, organisational support means actions such as, but not limited to:</p> <ul style="list-style-type: none"> • providing moral and emotional support • advising disclosers about agency 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 • referring the discloser to the agency's Employee Assistance Program or arranging for other professional counselling • generating support for the discloser in their work unit where appropriate • ensuring that any suspicions of victimisation or harassment are dealt with • maintaining contact with the discloser • negotiating with the discloser and their support officer a formal end to their involvement with the support program when it is agreed that they <p>no longer need assistance.</p>
Oversight Agency	The Queensland Ombudsman, responsible for monitoring and reviewing PID management across public sector entities.
PID Coordinator	The designated officer responsible for managing PID processes, including assessment, reporting, and liaison with oversight bodies.
PID Reporting Database (RaPID)	The secure online database maintained by the Queensland Ombudsman for agencies to report anonymised PID data.
Proper authority	A person or organisation that is authorised under the Public Interest Disclosure Act 2010 to receive disclosures.

Term	Definition
Public officer	A public officer, of a public sector entity, is an employee, member or officer of the entity.
Reasonable belief	A view which is objectively fair or sensible.
Reasonable management action	<p>Action taken by a manager in relation to an employee, includes any of the following taken by the manager—</p> <ul style="list-style-type: none"> (a) a reasonable appraisal of the employee’s work performance; (b) a reasonable requirement that the employee undertake counselling; (c) a reasonable suspension of the employee from the employment workplace; (d) a reasonable disciplinary action; (e) a reasonable action to transfer or deploy the employee; (f) a reasonable action to end the employee’s employment by way of redundancy or retrenchment. (g) a reasonable action in relation to an action mentioned in paragraphs (a) to (f); (h) a reasonable action in relation to the employee’s failure to obtain a promotion, reclassification, transfer or benefit, or to retain a benefit, in relation to the employee’s employment.
Reprisal	<p>The term ‘reprisal’ is defined under the Public Interest Disclosure Act 2010 as causing, attempting to cause or conspiring to cause detriment to another person in the belief that they or someone else:</p> <ul style="list-style-type: none"> • has made or intends to make a disclosure; or • has been or intends to be involved in a proceeding under the disclosure Act against any person. <p>Reprisal under the Public Interest Disclosure Act 2010 is a criminal offence and investigations may be undertaken by the Queensland Police Service.</p>
Subject officer	An officer who is the subject of allegations of wrongdoing made in a disclosure.



<i>Term</i>	<i>Definition</i>
Substantial and specific	<p>Substantial means 'of a significant or considerable degree'. It must be more than trivial or minimal and have some weight or importance.</p> <p>Specific means "precise or particular". This refers to conduct or detriment that is able to be identified or particularised as opposed to broad or general concerns or criticisms.</p>

18. Relevant Legislation

[Crime and Corruption Act](#)

[2001 Local Government Act](#)

[2009 Ombudsman Act 2001](#)

[Public Interest Disclosure Act 2010 Public Records Act 2002](#)

[Public Sector Ethics Act 1994](#)

19. Related Policies and Procedures

Administrative Action Complaints Procedure

Employee Code of Conduct

Councillor Code of Conduct

Risk Management Policy

20. Supporting information

- [Public Interest Disclosure Standard No. 1/2019](#)
- [Public Interest Disclosure Standard No. 2/2019](#)
- [Public Interest Disclosure Standard No. 3/2019](#)
(Please note the above Standards are issued under the PID Act and are mandatory for compliance)
- [Disclosure Fact sheet 1: What is a disclosure](#)
- [Disclosure Fact sheet 2: Checklist for making a disclosure](#)
- [Disclosure Fact sheet 3: Discloser information and support](#)

21. Version Control

Version	Amendments	Approved	Date
1. New version		M2/12/2025	10/12/2025
2.			