

Program: Ethical Standards, Audit and Risk
Date of Adoption: 29 October 2025
Resolution Number: ORD-2025-281
Review Date: 29 October 2029

Scope

This Policy applies to all Public Interest Disclosures (PIDs) received by Mackay Regional Council (MRC).

Objective

The objectives of the Policy are to:

- Promote the public interest by facilitating PIDs of wrongdoing in MRC;
- Ensure that PIDs are adequately 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; and
- Ensure protection from reprisal to persons making PIDs.

Policy Statement

The *Public Interest Disclosure Act 2010* (the Act) provides that the Chief Executive Officer (CEO) will implement procedures to ensure that:

- Any Employee who makes a PID is given appropriate support;
- PIDs made to MRC are adequately assessed and, where appropriate, properly investigated and dealt with; and
- Appropriate action is taken concerning any wrongdoing which is the subject of a PID.

MRC considers that to the extent this policy engages and limits, or potentially limits, any human rights, that limitation is reasonable in that it is proportionate and justified.

This process is to remain in force until otherwise determined
by Mackay Regional Council

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1.0 Principles

MRC encourages Disclosures of any reportable conduct.

MRC will ensure that suitably trained officers will undertake investigations concerning PIDs. These officers will be delegated by the CEO.

MRC recognises that a Discloser has a right of protection under the Act and that MRC may be liable if it does not take action to prevent and deter reprisal.

MRC will not tolerate intimidation, harassment or victimisation, assault or any other inappropriate conduct directed towards a person because of suspicion or belief that the person may or has made a PID. MRC will deal with any occurrences under appropriate disciplinary and/or harassment procedures in line with the requirements of the Act.

Councillors and Employees are also obligated to comply with the ethical principles set out in the *Public-Sector Ethics Act 1994*. The principle that relates to disclosures of interest is labelled "integrity and impartiality". This principle is about public trust and an Employee's obligation to maintain and enhance public confidence in the integrity of the Local Government.

MRC's Code of Conduct also sets out the behavioural standards expected of Employees.

The Queensland Government Code of Conduct for Councillors in Queensland sets out the behavioural standards expected of Councillors.

If an Employee or Councillor maliciously makes an alleged PID that they know to be untrue, their actions will be regarded as misconduct. They will be dealt with under the appropriate disciplinary procedures.

Principles:

- Every Councillor and Employee has an ethical responsibility to report suspected misconduct, maladministration, wasting of public funds, substantial and specific danger to public health and safety, the environment or a person with a disability, and reprisal action;
- The principle of natural justice (procedural fairness) will apply to all investigations of matters on the subject of PIDs;
- The rights of any person who is subject to, or in some way associated with, a PID will be safeguarded. MRC is committed to affording support and protection from reprisals to any person making a PID and appropriately dealing with the Employees who take reprisal action;
- Managers and supervisors must ensure Employees are aware of their responsibilities in making a PID and can advise other persons of the appropriate reporting processes.

1.1 Types of Reportable Conduct

Under the Act, only some kinds of information are PIDs.

The information disclosed must be public interest information. Any person, including an Employee or Councillor, can make a PID about:

- Danger to the health or safety of a person with a disability;
- Commission of an offence of a substantial and specific danger to the environment.
- Reprisal after making a PID.

An Employee can also disclose public interest information, including:

- corrupt conduct
- maladministration that adversely affects someone's interest in a substantial and specific way;
- negligent or improper management of public resources;
- an act which endangers public health or safety; or
- an act that endangers the environment.

The Disclosure may concern the Conduct of any Councillor, Employee or anyone contracting to supply goods or services to MRC.

1.2 Anonymous and Pseudonymous Disclosures

Whilst anonymous and pseudonymous disclosures can be made, MRC prefers that Disclosers identify themselves if they feel comfortable to do so. This enables the best assessment and investigation of the Disclosures and ensures that the Discloser is provided appropriate support.

If a Discloser chooses to remain anonymous or pseudonymous, they are asked to provide as much information as possible in their Disclosure to enable proper assessment and investigation of the PID.

Because of their anonymity or pseudonymity, Anonymous and pseudonymous Disclosers will not/cannot be informed of the investigation outcome. As a result, some of the protections in the Act may not apply to anonymous or pseudonymous disclosers.

1.3 Receiving, Assessing and Acting on PIDs

All Disclosures received by MRC will be assessed, and if the Disclosure does not meet the criteria as a PID, it will be directed to the appropriate complaints process.

1.4 Investigation Process

To ensure the integrity of the investigation process for PIDs, MRC will, at all times during the investigation of the PIDs, commit to:

- Maintain and preserve confidentiality;
- Follow the approved processes in managing PIDs and protect Employees from reprisals;
- Deal decisively with reprisals and possible reprisals;
- Record disclosures;
- Verify disclosures; and
- Provide reasonable information to the Discloser on the results of the investigation.

A delegated officer will investigate all disclosures made under the Act.

1.5 Action Taken on the Disclosure and the Results

MRC is committed to good governance and to ensuring PID outcomes inform improvements. Further, it will encourage corporate compliance and ethical conduct when providing feedback on the outcome of the investigation and action taken to the Discloser.

1.6 Protection of the Discloser

MRC recognises the sensitivities associated with PIDs and the need to maintain public confidence.

The rights of any person who is subject to or in some way associated with a PID will be safeguarded. MRC is committed to affording support and protection from reprisal to any person making a PID and appropriately dealing with Employees who take reprisal action.

The CEO may intervene directly to protect the Discloser and take immediate action to deal with suspected reprisal.

A Discloser is not protected under the Act if the Disclosure involves any wrongdoing on the part of the Discloser.

1.7 Recording and Reporting

MRC must establish proper record keeping practices in relation to all Reportable Conduct under *Public Interest Disclosure Standards 3/2019*.

1.8 Making a Disclosure

Please refer to the attached Corporate Standard on options for making a PID.

2.0 Definitions

To assist in interpreting, the following definitions shall apply:

Anonymous shall mean a discloser which does not provide any personal information or identifiers. MRC should not be able to identify the discloser at the time of the dealing or subsequently.

CEO shall mean the Chief Executive Officer. A person who holds an appointment under section 194 of the *Local Government Act 2009*. This includes a person acting in this position.

Council shall mean all of the elected representatives including the Mayor of Mackay Regional Council.

Councillor shall mean an individual elected representative including the Mayor of Mackay Regional Council.

Corrupt Conduct has the same meaning as 'corrupt conduct' under the *Crime and Corruption Act 2001*, which is the Conduct of a person, regardless of whether the person holds or held an appointment, that:

- (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of –
 - (i) a unit of public administration; or
 - (ii) a person holding an appointment; and
- (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 –
 - (i) is not honest or is not impartial; or
 - (ii) involves a breach of the 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.
- (c) is engaged in to provide a benefit to the person or another person or cause a detriment to another person; and
- (d) would if proved, be –
 - (i) a criminal offence; or
 - (ii) a disciplinary breach providing reasonable grounds for terminating the person's services if the person is or was the holder of an appointment.

Corrupt Conduct may include, but is not limited to:

- (a) abuse of public office;

- (b) bribery, including bribery relating to an election;
- (c) extortion;
- (d) obtaining or offering a secret commission;
- (e) fraud;
- (f) stealing;
- (g) forgery;
- (h) perverting the course of justice;
- (i) an offence relating to an electoral donation;
- (j) loss of revenue of the State;
- (l) homicide, serious assault or assault occasioning bodily harm or grievous bodily harm;
- (m) obtaining a financial benefit from procuring prostitution or from unlawful prostitution engaged in by another person;
- (n) illegal drug trafficking;
- (o) illegal gambling.

Corruption shall mean a dishonest activity in which an Employee, Councillor, volunteer, consultant or contractor acts contrary to the interest of Mackay Regional Council and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or another person or organisation.

Discloser shall mean a person who makes a PID in accordance with the Act. A Discloser may or may not wish to remain anonymous or pseudonymous.

Disclosure shall mean a Public Interest Disclosure.

Maladministration shall mean an administrative action that:

- 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:
 - 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
- g) was wrong.

MRC shall mean Mackay Regional Council.

Employees shall mean all persons employed at Mackay Regional Council on a permanent, temporary, volunteer or casual basis and may include persons engaged under a service contract.

PID shall mean Public Interest Disclosure/s.

Pseudonymous shall mean a discloser using a name, term or descriptor that is different to the person's actual name. Examples include an email address that does not contain the person's actual name, a username that a person uses when participating in an online forum, or an artist who uses a 'pen-name' or 'screen-name'.

Public Interest Disclosure (PID) shall mean Disclosure of information to a proper authority in accordance with the Act and includes all information and help given by the Discloser to the proper authority.

The Act distinguishes between disclosures made by:

- A public officer; and
- Anyone else.

PIDs made by public officers must concern:

- (a) The Conduct of another person that could, if proved, be –
 - (i) Corrupt conduct; or
 - (ii) Maladministration that adversely affects a person's interests in a substantial and specific way; or
- (b) A substantial misuse of public resources (other than an alleged misuse based on mere disagreement over Policy that may adequately be adopted about priorities or expenditure); or
- (c) A substantial and specific danger to public health or safety; or
- (d) A substantial and specific danger to the environment.

PIDs made by any other person must concern;

- A substantial and specific danger to the health or safety of a person with a 'disability' as defined in the *Disability Services Act 1992*; or
- A substantial and specific danger to the environment; or
- Contravention that is or would be a substantial and specific danger to the environment; or
- A reprisal taken against anybody as a result of a PID.

A person has information about the Conduct of another person or another matter if either:

- The person honestly believes on reasonable grounds that the information tends to show the Conduct or other matter or;
- The information tends to show the Conduct or other matters regardless of whether the person honestly believes the information tends to show the Conduct or other matter.

The Disclosure is still a PID and covered by the Act, including:

- Disclosures made to the media (except for special circumstances outlined in Part 4, Section 20 of the Act);
- Those made frivolously or vexatious;
- Those who primarily question the relative merits of government or agency policy; and
- Those that are made substantially to avoid disciplinary action.

Disclosures that are wilfully false constitute an offence under the Act.

The Disclosure cannot be based on a mere disagreement over a Policy that may adequately be adopted regarding priorities or expenditure.

Public Officer shall mean an employee, member or officer of a public sector entity..

Reportable Conduct shall mean any conduct by a person connected with Council, which is:

- Workplace Code of Conduct
- Fraud
- Physical Assault
- Property Damage
- Secret Commissions
- Sexual harassment
- Unethical Business Conduct
- Theft
- Workplace Health and Safety
- Bullying/Harassment
- Elected Member/CEO/Director/Program Manager Conduct

Reprisal shall occur if a person causes or attempts to cause **detriment** to another person because they believe (whether or not this is the case) that:

- a). a person has made a Disclosure against them; or
- b). a person intends to participate in proceedings under the Act.

The Act shall mean the Public Interest Disclosure Act 2010.

3.0 Review of Policy

This Policy will be reviewed when any of the following occur:

- The related documents are amended or replaced.
- Other circumstances as determined from time to time by a resolution of the Council.

Notwithstanding the above, this Policy is to be reviewed at intervals of no more than four (4) years.

4.0 Reference

- *Crime and Corruption Act 2001*
- *Local Government Act 2009*
- *Human Rights Act*
- *Information Privacy Act 2009*
- [Ombudsman Act 2001](#)
- *Public Interest Disclosure Act 2010*
- *Public Interest Disclosure Standards*
- *Public Sector Ethics Act 1994*
- Mackay Regional Council's Code of Conduct
- The Queensland Government Code of Conduct for Councillors in Queensland
- MRC Policy 043 Enterprise Risk Management Policy
- MRC Policy 045 Fraud and Corruption Prevention Policy
- MRC Policy 001 Administrative Action Complaints Policy
- MRC Policy 041 Gifts and Benefits Policy
- MRC Policy 004 Discrimination and Harassment policy
- MRC Policy 009 Disciplinary Procedure Policy
- MRC Policy 008 Acceptable Usage of Council Information, Communication and Technology (ICT) Systems Policy
- MRC Policy 010 Equal Employment Opportunity Policy

5.0 Attachments

- Corporate Standard 078.1 – Public Interest Disclosure Management Plan

Version Control:

Version	Reason / Trigger	Change	Endorsed / Reviewed	Date
1	New Policy		Adopted by Council	18.06.14
2	Review of Policy		Adopted by Council	28.09.16
3	Review of Policy	Amendments to policy	Adopted by Council	12.09.18
4	Review of Policy	Amendments to policy	Adopted by Council	13.02.19
5	Review of Policy	Amendments to Policy and new Standard	Adopted by Council	27.07.22
6	Review of Policy	Update	ORD-2025-281	29.10.25

Program	Ethical Standards, Audit & Risk
Date of Endorsement	29 October 2025
Version	2
Review Date	29 October 2029

1.0 Scope

This document provides the procedure for Mackay Regional Council (MRC) to follow in managing Public Interest Disclosures (PIDs) and incorporates MRC's Public Interest Disclosure Management Plan.

2.0 Objective

This Standard has been developed to:

- Provide a clear identification of who is under the Act;
- Encourage the reporting of wrongdoing;
- Establish a transparent reporting system to enable Employees to make a PID both internally and externally;
- Provide a means for complying with the confidentiality requirements of the Act;
- Provide for the rights of review, both internal and external;
- Provide for the assessment of the risk of reprisal;
- Describe the roles and responsibilities of key Employees in the management of PIDs and the support and protection of Disclosers; and
- Provide an outline of the rights of the subject Employees.

3.0 Reference

- *Crime and Corruption Act 2001*
- *Local Government Act 2009*
- *Human Rights Act 2019*
- *Information Privacy Act 2009*
- *Ombudsman Act 2001*
- *Public Interest Disclosure Act 2010*
- *Public Interest Disclosure Standards*
- *Public Sector Ethics Act 1994*
- Mackay Regional Council's Code of Conduct
- The Queensland Government Code of Conduct for Councillors in Queensland
- MRC Policy 043 Enterprise Risk Management
- MRC Policy 045 Fraud and Corruption Prevention
- MRC Policy 001 Administrative Action Complaints
- MRC Policy 041 Gifts and Benefits
- MRC Policy 004 Discrimination and Harassment
- MRC Policy 009 Disciplinary Procedure
- MRC Policy 008 Acceptable Usage of Council Information, Communication and Technology (ICT) Systems

- MRC Policy 010 Equal Employment Opportunity
- MRC Policy 078 Public Interest Disclosure

4.0 Definitions

To assist in interpreting the following definitions shall apply:

Anonymous shall mean a discloser which does not provide any personal information or identifiers. MRC should not be able to identify the discloser at the time of the dealing or subsequently.

PID Coordinator shall mean Mackay Regional Council's delegated officer who will coordinate the investigations of the Public Interest Disclosure.

Conduct shall mean:

- a). For a person, regardless of whether the person holds an appointment – conduct, or a conspiracy or attempt to engage in conduct, of or by the person that adversely affects, or could adversely affect, directly or indirectly, the honest and impartial performance of functions or exercise powers of:
 - i. A unit of public administration; or
 - ii Any person holding an appointment.
- b) For a person who holds or held an appointment – conduct, or a conspiracy or attempted to engage in conduct, or a conspiracy or attempt to engage in conduct, of or by the person that is or involves;
 - i. The performance of the persons, functions or the exercise of the person's powers, as the holder of the appointment, in a way that is not honest or is not impartial; or
 - ii. A breach of the trust placed in the person as the holder of the appointment; or
 - iii. A misuse of information or material acquired in or in connection with the performance of the person's functions as the holder of the appointment, whether the misuse is for the person's benefit or the benefit of someone else.
- c) Any conduct inconsistent with MRC's Code of Conduct.

Confidential Information shall:

- (a) include:
 - (i) information about the identity, occupation, residential or work address or whereabouts of a person —
 - (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

- (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.

Corrupt Conduct has the same meaning as 'corrupt conduct' under the *Crime and Corruption Act 2001*, which is the conduct of a person, regardless of whether the person holds or held an appointment, that:

- (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of –
 - (i) a unit of public administration; or
 - (ii) a person holding an appointment; and
- (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 –
 - (i) is not honest or is not impartial; or
 - (ii) involves a breach of the 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.
- (c) is engaged in to provide a benefit to the person or another person or cause a detriment to another person; and
- (d) would if proved, be –
 - (i) a criminal offence; or
 - (ii) a disciplinary breach providing reasonable grounds for terminating the person's services if the person is or was the holder of an appointment.

Corrupt conduct may include, but is not limited to:

- (a) abuse of public office;
- (b) bribery, including bribery relating to an election;
- (c) extortion;
- (d) obtaining or offering a secret commission;
- (c) fraud;
- (f) stealing;
- (g) forgery;
- (h) perverting the course of justice;
- (i) an offence relating to an electoral donation;

- (j) loss of revenue of the State;
- (l) homicide, serious assault or assault occasioning bodily harm or grievous bodily harm;
- (m) obtaining a financial benefit from procuring prostitution or from unlawful prostitution engaged in by another person;
- (n) illegal drug trafficking;
- (o) illegal gambling.

Corruption shall mean a dishonest activity in which an Employee, Councillor, volunteer, consultant or contractor acts contrary to the interest of MRC and abuses his/her position of trust to achieve some personal gain or advantage for him or herself or another person or organisation.

Council shall mean all elected representatives including the Mayor of Mackay Regional Council.

Councillor shall mean an individual elected representative, including the Mayor of Mackay Regional Council. **Disability** shall mean:

- a). A disability is a person's condition that:
 - i. is attributable to an intellectual, psychiatric, genitive, neurological sensory or physical impairment; or
 - ii. a combination of impairments mentioned in subparagraph (i) and results in a:
 - 1. substantial reduction of a person's capacity for communication, social interaction, learning, mobility, self-care, or management; and
 - 2. the person needing support.
- b). For subsection (a), the impairment may result from an acquired brain injury;
- c). The disability must be permanent or likely to be permanent;
- d). The disability may be, but need not be, of a chronic episodic nature.

Danger to the health or safety of a person with a disability means any **substantial** and **specific** danger to the health or safety of a person with a **disability** can also be the subject of a PID. Examples include:

- Disability service officers physically or sexually abusing clients;
- Inadequate decision making for the care of a mental health patient.

Detriment shall include:

- (a) personal injury or prejudice to safety; and
- (b) property damage or loss; and
- (c) intimidation or harassment; and
- (d) adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business; and

(e) financial loss; and

(f) damage to reputation, including, for example, personal, professional or business reputation.

Discloser shall mean a person who makes a Disclosure in accordance with the *Public Interest Disclosure Act 2010*.

Disclosure shall mean a Public Interest Disclosure.

ELT shall mean Executive Leadership Team, consisting of the Chief Executive Officer, Executive Officer, all Directors and Senior Legal Counsel.

Employee/s shall mean all persons employed at Mackay Regional Council on a permanent, temporary, volunteer or casual basis and may include persons engaged under a service contract.

Environment shall include:

- a). Ecosystems and their constituent parts, including people and communities; and
- b). All natural and physical resources; and
- c). The qualities and characteristics of locations, places and areas, however large or small, that contribute to their biological diversity and integrity, intrinsic or attributed scientific value or interest, amenity, harmony and sense of community; and
- d). The social, economic, aesthetic and cultural conditions that affect, or are affected by, things mentioned in paragraphs (a) and (b).

Danger to the environment refers to any **substantial** and **specific** danger that is an offence or the contravention of a condition imposed under Queensland environment legislation (as listed in schedule 2 of the PIDA); examples include:

- A shipping company discharging oil into the coastal waters of Queensland;
- Any person or business clearing trees without a permit.

Fraud shall mean an intentionally dishonest activity causing actual or potential financial loss (or reputational damage) to any person or organisation, including theft of money or other property by Employees or persons external to Mackay Regional Council.

Some examples of fraud are (but are not limited to):

- Theft and/or misuse of MRC's revenue;
- Unauthorised use of MRC assets (including plant, equipment, and inventory);
- Credit card fraud;
- Forgery or alteration of cheques, invoices, computer records etc.;
- Submission of fraudulent applications for reimbursement;
- Payments to fictitious Employees or suppliers (third parties);
- False accounting;
- Wilfully providing false or misleading information to MRC or failing to provide information where there is an obligation to do so.

Frivolous shall mean conduct that has been assessed as not having any serious value.

Investigation shall mean, for this purpose, an investigation that includes an enquiry undertaken to establish whether the information provided in a PID can be substantiated, including a review or audit.

Maladministration shall mean administrative action that:

- 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:
 - i. For an improper purpose; or
 - ii. On irrelevant grounds; or
 - iii. Having regard to irrelevant considerations; or
- e). Was an action of 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
- g). Was wrong.

MRC shall mean Mackay Regional Council.

Natural Justice shall mean the 'procedural fairness' applies to any decision that can affect individuals' rights, interests, or expectations in a direct or immediate way. Natural justice is, at law, a safeguard applying to an individual whose rights or interests are being affected.

The rules of natural justice, which have been developed to ensure that decision-making is fair and reasonable, are:

- avoid bias, and
- give a fair hearing.
- act only on the basis of logically probative evidence.

Official Misconduct shall mean inappropriate or improper conduct in an official capacity.

Pseudonymous shall mean a discloser using a name, term or descriptor that is different to the person's actual name. Examples include an email address that does not contain the person's actual name, a username that a person uses when participating in an online forum, or an artist who uses a 'pen-name' or 'screen-name'.

Public Health or Safety shall include the health or safety of persons:

- a). Under lawful care or control; or

- b). Using Community facilities or services provided by the public or private sector; or
- c). In employment workplaces.

PID shall mean Public Interest Disclosure/s.

Public Interest Disclosure shall mean a Disclosure of information to a proper authority in accordance with the Act and includes all information and help given by the Discloser to the property authority.

The *Public Interest Disclosure Act 2010* distinguishes between Disclosures made by:

- A Public Officer; and
- Anyone else.

PIDs made by Public Officers must concern:

- a). The conduct of another person that could, if proved, be –
 - i. Official misconduct; or
 - ii. Maladministration that adversely affects a person's interests in a substantial and specific way; or
- b). A substantial misuse of public resources (other than alleged misuse based on disagreements over a policy that may properly be adopted about amounts, purposes, priorities, or expenditure).
- c). A substantial and specific danger to public health or safety; or
- d). A substantial and specific danger to the environment.

PIDs made by any person must concern;

- A substantial and specific danger to the health or safety of a person with a 'disability' as defined in the *Disability Services Act 1992*.
- A substantial and specific danger to the environment.
- A reprisal was taken against anybody as a result of a PID.

A person has information about the conduct of another person or another matter if either:

- The person honestly believes on reasonable grounds that the information tends to show the conduct or other matter; or
- The information tends to show the conduct or other matters regardless of whether the person honestly believes the information tends to show the conduct or other matter.

The Disclosure is still a PID and covered by the *Public Interest Disclosure Act 2010*, including:

- Disclosures made to the media (except for special circumstances outlined in Part 4, Section 20);
- Those made frivolously or vexatious;
- Those who primarily question the relative merits of government or agency policy; and
- Those that are made substantially to avoid disciplinary action.

Public Officer shall mean an employee, member or officer of a public sector entity.

Reportable Conduct shall mean any conduct by a person connected with MRC, which is:

- Workplace Code of Conduct
- Fraud
- Physical Assault
- Property Damage
- Secret Commissions
- Sexual harassment
- Unethical Business Conduct
- Theft
- Workplace Health and Safety
- Bullying/Harassment
- Elected Member/CEO/Director/Program Manager Conduct

Reprisal shall occur if a person causes or attempts to cause **detriment** to another person because they believe (whether or not this is the case) that:

- a). a person has made a Disclosure against them, or
- b). a person intends to participate in proceedings under the Act.

Senior Leadership Team shall mean all members of the management team.

Subject Officer shall mean the person to whom the PID has been made against.

The Act shall mean the Public Interest Disclosure Act 2020.

5.0 Standard Statement

ELT endorses the value of PIDs and its responsibility to ensure that MRC implements and maintains proper management of PIDs, including the protection of all parties by:

- committing to encouraging the internal reporting of wrongdoing;
- senior management endorsement of the value to MRC of PIDs and the proper management of PIDs;
- a communication strategy to raise awareness among Employees about PIDs and MRC'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 adequate 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.

5.1 Roles and Responsibilities

5.1.1 *ELT*

- To ensure that all Employees are required to conduct their duties to high professional and ethical standards and always act in the public interest (Code of Conduct);
- To ensure that reasonable procedures are in place to deal with a Disclosure and that those procedures are published to enable persons and public officials to access them;
- That Disclosures are assessed, investigated and dealt with, including appropriate action being taken in relation to any wrongdoing in a Disclosure;
- Employees who make a Disclosure receive the appropriate support and protection from reprisal;
- That all legislative obligations in relation to reporting and investigation are met; and
- All matters involving suspected corrupt conduct are referred to the Crime and Corruption Commission pursuant to the *Crime and Corruption Act 2001*.

5.1.2 *Strategic Leadership Team, Coordinators and Supervisors*

- The SLT, Coordinators and Supervisors are responsible for maintaining the ethical culture and are to lead by example;

- Provide clear direction to Employees on how to raise matters that involve official misconduct while maintaining the confidentiality and natural justice;
- Ensure that all Employees in their operational area are aware of their obligations concerning the requirements of the Public Interest Disclosure Policy and this procedure; and
- Monitor the workplace for signs of reprisal against a Discloser or an Employee who is the subject of a Disclosure.

5.1.3 *Employees*

- All Employees are responsible for complying with the Public Interest Disclosure Policy and Corporate Standard; and MRC's Code of Conduct;
- Employees are encouraged to report their concerns about suspected misconduct or unethical behaviour in accordance with the Public Interest Disclosure Policy and Corporate Standard;
- Employees are to participate in various awareness training programs.

5.1.4 *PID Coordinator*

- Principal contact for PID issues within MRC;
- Document and manage the implementation of the PID management program;
- Review and update PID procedure when required;
- 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 the referral of PIDs;
- Allocate Investigator and Support Officer to PID matter.

5.1.5 *PID Support Officer*

- Provide advice and information to Discloser on MRC's PID procedure;
- Provide personal support and referral to other sources of advice or support as required;
- Facilitate updates on the progress of the investigation;
- Proactively contact Discloser throughout the PID management process.

5.1.6 *Investigator*

- Conduct investigation of information in PID in accordance with terms of reference;
- Prepare a report for delegated decision-maker.

Note: An appropriate internal or external investigator will be appointed for each PID investigated depending upon the type of Disclosure and other relevant considerations

5.1.7 *Delegated Decision-maker*

- Review the investigation report and determine whether alleged wrongdoing is substantiated

Note: An appropriate decision-maker will be appointed for each PID investigated.

5.2 Confidentiality

MRC is committed to maintaining confidentiality when handling Disclosures. Confidentiality protects the Discloser against reprisals and any other person affected by the Disclosure.

While MRC will make every attempt to protect the confidentiality, however, 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.

MRC will ensure that communication with all parties involved will be arranged discreetly to avoid identifying the Discloser wherever possible.

Disclosers should be aware that while MRC will make every attempt to keep their details confidential, it cannot guarantee that others will not try to deduce their identity.

6.0 Important Information regarding Public Interest Disclosures

6.1 Who can make a "Public Interest Disclosure"?

Anyone, including persons external to MRC, may make a public Interest Disclosure if they have information about:

- a) A substantial and specific danger to the health and safety of a person with a disability;
- b) A substantial and specific danger to the environment;
- c) The conduct of another person that could, if proved, be a reprisal.

In addition, those internal to MRC, including the Mayor, Councillors, Employees, and Contractors, may make a public interest Disclosure if they have information about the conduct of another person, which could if proved, be:

- a) Corrupt conduct ;and
- b) Maladministration that adversely affects a person's interest in a substantial and specific way;
- c) A substantial misuse of public resources;
- d) A substantial and specific danger to public health or safety; or
- e) A substantial and specific danger to the environment.

6.2 What is a "Public Interest Disclosure"?

Under the Act, any person can disclose a:

- substantial and specific danger to the health or safety of a person with a disability;
- the commission of an offence, or contravention of a condition imposed would be a 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, Employees can 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;
- substantial and specific danger to the environment.

A Discloser can have either a 'reasonable belief' that wrongdoing has occurred or provide evidence that shows the wrongdoing has occurred.

A Disclosure amounts to a PID and is covered by the Act and includes some provisions under the *Information Privacy Act 2009* even if the:

- Discloser reports the information as part of their duties – such as an auditor reporting fraud or an occupational health and safety officer reporting a safety breach;
- Disclosure is made anonymously or pseudonymously – the Discloser is not required to give their name or any identifying information;
- Discloser has not identified the material as a PID – it is up to MRC to assess the information received and decide if it is a PID;
- If a Disclosure is an unsubstantiated following investigation – the Discloser is protected when the information they provide is assessed as a PID, whether or not it is subsequently investigated or found to be substantiated.

6.3 Why make a PID

Any Discloser who is prepared to speak up about any official misconduct, wastage of public funds, suspected unlawful activity or danger to health, safety or the environment can be an essential source of information to identify and address problems in the public sector administration. MRC supports the Disclosure of information about wrongdoing because:

- implementing systems for reporting and dealing with wrongdoing contributes to the integrity of MRC;
- the outcomes of PIDs can include improvements to systems that prevent fraud and other economic loss to MRC;
- the community's trust in public administration is strengthened by having strong processes for reporting wrongdoing.

When making a PID, the Discloser receives the protections provided under the Act, including:

- confidentiality – the Discloser's name and other identifying information will be protected to the extent possible;
- protection against reprisal – the Discloser is protected from unfair treatment by MRC and/or Employees as a result of making the PID;
- immunity from liability – the Discloser cannot be prosecuted for disclosing the information but is not exempt from the action if they have engaged in wrongdoing;
- protection from defamation – the Discloser has a defence against an accusation of defamation by any subject officer.

6.4 Reprisals

A reprisal is when a person causes or attempts to conspire to cause detriment to another person because, or in the belief that, another person has made or may make a Public Interest Disclosure.

Detriment may include one or more of the following:

- Personal injury or prejudice to safety;
- Property damage or loss;
- Intimidation or harassment;
- Adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business;
- Financial loss; or
- Damage to reputation, including, for example, personal, professional or business reputation.

MRC is committed to ensuring that a Discloser does not suffer any form of reprisal as a result of making a Disclosure unless he/she has knowingly participated in the wrongful action being disclosed and is not subjected to any disciplinary action.

MRC will take all steps possible to stop the reprisal and protect the Discloser if a reprisal occurs. The action taken by MRC will depend on the circumstances and seriousness of the reprisal. Any employee found to be engaging in an activity that is deemed a reprisal under the Act would be considered official misconduct and must be referred to the Crime and Corruption Commission. The Employee will also be subject to disciplinary action.

SLT and all senior officers in MRC are obligated to notify the PID Coordinator for PIDs if it is reported, or they suspect, that a Discloser is suffering reprisal due to making a Disclosure.

When the PID Coordinator becomes aware of reprisal action against a Discloser, he/she is to take immediate steps to ensure the Discloser's protection and immediately commence an investigation into the reprisal. The reprisal is to be investigated in its own right and not part of the initial Disclosure. The investigation will be conducted by a representative of the Strategic Leadership Team not involved in investigating the initial Disclosure. The PID Coordinator will keep the Disclosure informed of the investigation's progress and/or outcome.

6.5 Disclosures not Protected by the Act

Some Disclosures are not protected by the Act, including Disclosures:

- Made to the media;
- Deemed frivolous or vexatious;
- That questions the merits of MRC or Council's policy; and
- Made to avoid disciplinary action.

6.6 False Disclosures

Under the Act, it is an offence to make false Disclosures.

7.0 Procedure for Making a "Public Interest Disclosure."

7.1 Report of a "Public Interest Disclosure"

MRC encourages that the preferred option for making a PID is in writing (whenever possible) and contains as much relevant information as available. However, a Disclosure can be made verbally to Council.

MRC encourages the reporting of Disclosures to: -

- Supervisors or Coordinator;
- Corporate Governance;
- Executive Officer, Manager and Directors;
- The Chief Executive Officer; or
- The Mayor.

The following methods can be used to make a Disclosure:

Online: Disclosure Portal (Employees only)

Email: MRCDisclose@mackay.qld.gov.au

By Post: Addressed to: Chief Executive Officer, PO Box 41, Mackay Qld 4740

In Person: Over the Counter, at a Council Customer Service Centre

By Telephone: 1300 MACKAY (1300 622 529)

Any person may choose to make a Disclosure to an appropriate external entity rather than to MRC (i.e. Crime and Corruption Commission in relation to corrupt conduct, Queensland Ombudsman etc.).

7.2 How to make a PID

A Discloser can make a PID in any way, including anonymously or pseudonymously, either verbally or in writing. To assist in the assessment and any subsequent investigation of a PID, Disclosers are requested to:

- provide contact details (this could be an email address that is created to make the Disclosure or a telephone number)
- provide as much information as possible about the suspected wrongdoing, including:
 - who was involved?
 - what happened
 - when it happened
 - where it happened
 - whether there were any witnesses, and if so, who they are
 - any evidence that supports the PID and where the evidence is located
 - any further information that could help investigate the PID
- provide this information in writing.

7.3 False or Misleading Information

A person who gives information to a proper authority, knowing that it is false or misleading and intending to be acted upon as a PID, may face disciplinary action and criminal prosecution. Knowingly providing false or misleading information is different to providing information that turns out to be incorrect or unable to be substantiated.

7.4 Disclosing Public Interest Disclosures to Journalists

Section 20 of the Act states that a Disclosure can only be disclosed to a Journalist under the following conditions:

- 1) MRC has decided not to investigate or deal with the Disclosure;
- 2) MRC investigated the Disclosure but did not recommend the taking of any action in relation to the Disclosure;
- 3) MRC did not notify the person, within a six (6) month period after the date the Disclosure was made, whether or not the Disclosure was to be investigated or dealt with.

Unauthorised Disclosure to a Journalist may expose the Discloser (Public Officer) to disciplinary action and/or civil action.

8.0 Assessment & Investigation of a "Public Interest Disclosure"

8.1 Assessment

An appropriate PID Coordinator on behalf of the MRC will initially assess the Disclosure to decide how to best deal with that Disclosure. The Disclosure will be assessed on the following:

- a) If the Disclosure has been received in the acceptable nominate manner;
- b) Does the Disclosure fall within the categories as per the Act to be investigated - Please see Clause 2.2;
- c) An acknowledgement letter shall be forwarded to the Discloser, which will outline the contact methods and advise of timeframes in which a decision may be expected;
- d) The PID Coordinator will coordinate the investigation by referring it to relevant Programs to either investigate or obtain information; and
- e) The PID Coordinator will keep complete and accurate records in the document management system regarding the Disclosure.

8.2 No Action Required

The PID Coordinator may decide not to investigate or deal with a public interest Disclosure if:

- a) The substance of the Disclosure has already been investigated or dealt with by another appropriate process; or
- b) MRC reasonably considers that another appropriate process should deal with the Disclosure; or
- c) The age of the information the subject of the Disclosure makes it impracticable to investigate; or
- d) MRC reasonably considers that the Disclosure is too trivial to warrant an investigation and that dealing with the Disclosure would substantially and unreasonably divert the resources of MRC from their use by MRC in the performance of its functions; or
- e) That another entity that has jurisdiction to investigate the Disclosure has notified MRC that investigation of the Disclosure is not warranted.

If the PID Coordinator decides not to investigate or deal with the Disclosure, then the PID Coordinator will provide written notice of its decision to the Discloser.

If the Discloser is unhappy with this decision not to deal with the Disclosure, they may apply to the MRC for a review of the decision within 28 days after receiving the written decision.

Under the Act, MRC must keep a proper record of any Disclosure made. The record must include:

- a) The name of the person making the Disclosure if known; and
- b) The information disclosed; and
- c) Any action taken on the Disclosures;
- d) Any other information as required per Section 60 of the Act.

8.3 Referral of Disclosure

If MRC decides there is another proper authority that can better deal with the PID. In that case, MRC may refer a Disclosure to another authority (referral entity) if the Disclosure relates to:

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

Before referring the PID to another authority, MRC will conduct a risk assessment and not proceed with the referral if there is an unacceptable risk of reprisal.

It may also be necessary to refer the PID to another authority 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 Act permits the PID Coordinator of MRC to communicate with another authority about the referral of a PID. The PID Coordinator will exercise discretion in their contact with any other authority.

If the matter is referred, the Discloser will be advised accordingly in writing, outlining:

- a) Which entity that Disclosure was referred to; and
- b) MRC's decision on why the Disclosure was referred.

8.5 Risk Assessment

Disclosers should not suffer any form of detriment due to making a PID.

Upon receiving a PID, a risk assessment to assess the likelihood of the Discloser (or witnesses or affected third parties) suffering reprisal action as a result of having made the Disclosure will be undertaken. This assessment will consider the actual and reasonably perceived risk of the Discloser (or witnesses or affected third parties) suffering detriment and will include consultation with the Discloser.

The Enterprise Risk Management Framework provides a risk assessment framework that will assist in evaluating the risks of reprisal. Risks identified will be discussed with the Discloser and the necessary Manager or Supervisor.

8.6 Timeframes

The timeframe for dealing with a Disclosure will depend on an assessment of the following factors by the PID Coordinator:

- **Urgent Disclosures:**

A Disclosure that relates to the health & safety of a person, a serious environmental issue or official misconduct may be considered an urgent Disclosure;

- **Normal Disclosures:**

Most Disclosures of general nature will fall within this category. The likelihood that the Disclosure can quickly be resolved will also be considered in this category.

- **Complex Disclosures:**

The criteria for complexity may be in relation to the number of issues identified in the Disclosure and the nature of the Disclosure;

- **Internal review or external review:**

Timeframes for internal or external reviews for Disclosures will be assessed in accordance with whether it is deemed urgent, normal or complex.

MRC will endeavour to meet the following time frames for dealing with Disclosures:

Type of Disclosure	Timeframe
Urgent	14 business days
Normal	60 business days
Complex	120 business days

If these timeframes cannot be met for any reason, contact will be made with the Discloser to request a necessary extension to complete the investigation prior to the expiry of the initial timeframe. A confirmation letter will also be forwarded to the Discloser confirming agreement or non-agreement to the extension.

The extension timeframe must be reasonable in all circumstances but in no case more than six months from the date that MRC received the Disclosure.

8.7 Investigation

If a decision is made to investigate a PID, this will be done with consideration of the following:

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

If the information about wrongdoing provided in the PID is substantiated due to the investigation, appropriate action will be taken.

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

If deemed necessary, an appropriate investigator will be appointed. An appropriate investigator may be a member of ELT, a Manager, a Representative of People & Culture, Corporate Governance or a suitably qualified external investigator appointed by MRC.

If the investigation has been delegated, the Investigator is to report back to the PID Coordinator on progress, feedback, any recommendations, and decision-related to Disclosure.

8.8 Communication with Disclosers

Under the Act, MRC must give reasonable information to a Discloser.

MRC will acknowledge receipt of the PID in writing (unless the Disclosure was made anonymously or pseudonymously) as soon as practicable. The Discloser will be provided with information that meets the requirements of the Act and the standards issued by the Queensland Ombudsman, including:

- a) a description of the action proposed to be taken, or taken, in relation to the Disclosure and the reasons for the decision;
- b) likely timeframes;
- c) if the action has been taken in relation to the Disclosure, a description of the results of the action;
- d) contact details for further information or in the event of a suspected reprisal;
- e) support arrangements;

- f) confidentiality obligations of the Discloser and MRC.

MRC may not give the information above if giving the information would be likely to affect adversely:

- a) anybody's safety; or
- b) the investigation of an offence or possible offence; or
- c) necessary confidentiality about an informant's existence or identity.

MRC will maintain contact with the Discloser and provide regular updates during the management of the PID.

In accordance with the Act, after finalising action in response to the PID, MRC will advise the Discloser in writing of the action taken and the results.

8.9 Support for Disclosers

MRC recognises that providing appropriate support to a Discloser is an important feature of effective PID management.

An assessment will be undertaken to identify the support needs of the Discloser. Where appropriate, a PID Support Officer will be assigned to the Discloser. The PID Support Officer will assist the Discloser to access information about PIDs, protections available under the Act and the PID management process. The PID Support Officer will proactively contact the Discloser to offer support.

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 according to normal, fair and reasonable management practices during and after the handling of the PID.

8.10 Rights of Subject Officers

MRC acknowledges that for those officers who are the subject of a PID, the experience may be stressful. MRC must protect their rights by:

- assuring them that the PID will be dealt with impartially, fairly and reasonably in accordance with the principles of natural justice;
- confirming that the PID is an allegation only until information or evidence obtained through an investigation substantiates the allegation;
- providing them with information about their rights and the progress and outcome of any investigation;
- referring them to the Employee Assistance Program for support.

Information and support will be provided to a subject officer until the matter is finalised.

8.11 Decision

Once the investigation has been completed, the delegated decision-maker will forward a Decision Letter to the Discloser advising the outcome of the investigation.

The Decision letter will contain a right of review that encompasses both internal and external review.

8.12 Consultation

Where appropriate, the PID Coordinator shall keep the CEO informed of progress during the assessment and investigation of the Disclosure. If requested by the CEO, progress reports will also be provided to the ELT Team.

9.0 MRC's Administrative Responsibilities

9.1 Staff Responsibilities

All MRC staff, especially SLT, Coordinators and Supervisors, must familiarise themselves with PIDS, including this Corporate Standard and their obligations under the Code of Conduct for staff.

The Strategic Leadership Team should assist staff in sourcing or providing information about making a Disclosure and be able to inform staff of the process for making a Disclosure.

9.2 Training

A training strategy will be implemented for all staff who are responsible for the management of PIDs. Training will include:

- MRC Code of Conduct;
- How to identify wrongdoing;
- How to make or identify a public interest Disclosure;
- The support and protection when a PID is made; and
- How to make a PID and how MRC handles them.

SLT, Coordinators and Supervisors will also receive training on their obligations in relation to handling Public Interest Disclosures and how to assist with the investigation.

MRC will also be committed to providing the necessary resources to deliver additional training as needs are identified.

9.3 Record Keeping & Reporting

Under Legislation, there is a requirement by MRC to keep proper records of a Disclosure made or referred to MRC, including:

- The name (if known) of the person making the Disclosure;
- Detail of the Disclosure;
- Any action taken with respect to the Disclosure.

- Anonymised data is reported to the Office of the Queensland Ombudsman as the oversight agency through the PID reporting database.

Records about Disclosures, investigations and related decisions will be kept secure and accessible only to appropriately authorised people involved in the management of the PID.

MRC will endeavour to protect the confidentiality of the Disclosures to the best of its ability; however, it must advise that this may not always be possible in some instances. MRC would consult with the Discloser in this situation.

10.0 Further Information and Advice

10.1 Rights of Review

The right to appeal will depend on the type of Disclosure made to MRC. The below table outlines the types of decisions that can be appealed, the timeframes and to whom the appeal is to be addressed:

Type of Disclosure	Responsibility	Timeframe
That no action is required on a Disclosure	Chief Executive Officer (CEO)	60 business days
Corrupt Conduct	Crime and Corruption Commission (CCC)	As soon as practicable
Maladministration	Queensland Ombudsman	As soon as practicable
Reprisal	• Chief Executive Officer • Anti-Discrimination Commission Queensland • Queensland Industrial Relations Commission • Supreme Court for an injunction	As soon as practicable
Disciplinary Action against a Public Officer or transfer or appointment to another position and unfair treatment	Chief Executive Officer	60 business days

The Discloser may also seek their own legal advice as to whether they could apply to the Supreme Court to review the decision under the *Judicial Review Act 1991*.

In the first instance, all appeals should be in writing and addressed to MRC. The CEO or PID Coordinator will then assess the category under Sections 12 and 13 of the Act to determine which category the Disclosure falls under and refer the appeal to the appropriate external review agency.

The Chief Executive Officer
Mackay Regional Council
PO Box 41
Mackay Qld 4740

Email: MRCDisclose@mackay.qld.gov.au

10.2 Contact Information

For further advice regarding Public Interest Disclosures, please contact:

Internal:

A member of the Corporate Governance Team in the Ethical Standards, Audit & Risk Program

External:

Queensland Ombudsman Advisory Service

The Queensland Ombudsman has been allocated responsibility for providing advice and guidance to public sector entities and officials to meet their responsibilities created from the *Public Sector Ethics Act 1994* and the *Public Interest Disclosure Act 2010*.

Enquiries: Monday to Friday from 8.30am to 5.00pm
Phone: 1800 068 908
Email: pidadmin@ombudsman.qld.gov.au

Further information can also be located on the Queensland Public Sector Ethics website: - <http://www.ethics.qld.gov.au/>

The following information and facts sheets on Public Interest Disclosures are available on that website:

- [Blowing the whistle in Queensland](#)
- [Thinking about blowing the whistle? \(a guide for individuals\)](#)
- [Has one of your staff blown the whistle? \(a guide for managers\)](#)
- [Managing a public interest Disclosure program \(a guide for public sector organisations\)](#)

11.0 Review of Standard

This corporate standard will be reviewed when any of the following occur:

1. The related policy documents are amended or replaced.
2. Other circumstances as determined from time to time.

Notwithstanding the above, this policy is to be reviewed at intervals of no more than four (4) years.

Version Control:

Version	Reason / Trigger	Change	Endorsed/Reviewed	Date
1	New		Council	27.7.2022
2	Review		ORD-2025-281	29/10/25