

1. Purpose

Council is committed to fostering an ethical and transparent culture. In pursuit of this, Council values the disclosure of information about suspected wrongdoing in the public sector so it can be properly assessed and, if necessary, appropriately investigated.

Council will provide support to an employee or others who make disclosures about matters in the public interest. This Procedure demonstrates this commitment and ensures that practical and effective procedures are implemented which comply with the requirements of the *Public Interest Disclosure Act 2010* (PID Act).

By complying with the PID Act, Council will:

- Promote the public interest by facilitating Public Interest Disclosures (PIDs) of wrongdoing;
- Ensure that PIDs are properly assessed and, where appropriate, properly investigated and dealt with;
- Ensure protection from reprisal is afforded to persons making PIDs; and
- Ensure appropriate consideration is given to the interests of persons who are the subject of a Public Interest Disclosure (PID).

As required under the PID Act, the Chief Executive Officer (CEO) will implement procedures to ensure that:

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

The Public Interest Disclosure Procedure will be reviewed every two years and updated as required to ensure it meets the requirements of the PID Act and the standards issued by the Queensland Ombudsman.

2. Scope

This Procedure applies to Councillors, employees and contractors working for Council regardless of how they are engaged. For the purpose of this Procedure, the term contractor includes on hired temporary labour services (agency staff) and subcontractors.

3. Responsibility

Council's employees, contractors, volunteers and representative agents are responsible for:

- Complying with the Public Interest Disclosure Policy, this Procedure and Council's Code of Conduct;
- Reporting their concerns about suspected misconduct or unethical behaviour in accordance with the Public Interest Disclosure Policy and this Procedure; and
- Participating in various awareness training programs.

The CEO has designated the following roles and responsibilities for managing PIDs within Council:

PID Coordinator (Director Corporate and Community Services)

- Principal contact for PID issues within Council;
- Document and manage implementation of PID management program;
- Review and update the PID Procedure;
- Maintain and update internal records of PIDs received;
- Report data on PIDs to the Queensland Ombudsman;
- Assess PIDs received;
- Provide acknowledgment of receipt of PID to the discloser;
- Undertake risk assessments in consultation with disclosers and other relevant Officers;
- Liaise with other agencies about referral of PIDs; and
- Allocate Investigator and Support Officer to PID matter.

PID Support Officer (Administration Services Team Leader)

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

Investigator

An appropriate internal or external investigator will be appointed for each PID investigated depending upon the type of disclosure and other relevant considerations. Responsibilities include:

- Conducting an investigation of information in the PID in accordance with terms of reference/delegation and
- Preparing a report for the Delegated Decision Maker.

Delegated Decision Maker

An appropriate Decision Maker will be appointed by the PID Coordinator for each PID investigated. Responsibilities include:

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

4. Definitions

Administrative action means any action about a matter of administration, including, for example:

- a. A decision and an act;
- b. A failure to make a decision or do an act, including a failure to provide a written statement of reasons for a decision;
- c. The formulation of a proposal or intention;
- d. The making of a recommendation; and
- e. An action taken because of a recommendation.

Confidential information includes:

- a. Information about the identity, occupation, residential or work address or whereabouts of a person:
 - i. Who makes a PID; and
 - ii. Against whom a PID has been made;
- b. Information disclosed by a PID;
- c. Information about an individual's personal affairs;
- d. Information that, if disclosed, may cause detriment to a person; and
- e. Does not include information publicly disclosed in a PID 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 as defined in s15 of the *Crime and Corruption Act 2001* means:

- 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;
 - 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; and
 - c. 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 were the holder of an appointment.
- Conduct of a person, regardless of whether the person holds or held an appointment, that:
 - a. Impairs, or could impair, public confidence in public administration; and
 - b. Involves, or could involve, any of the following:
 - 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):
 - Protecting health or safety of persons;
 - Protecting the environment; and
 - Protecting or managing the use of the State's natural cultural, mining or energy resources;
 - iii. Dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of Council assets;
 - iv. Evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue;
 - v. Fraudulently obtaining or retaining an appointment; and

- c. 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 were the holder of an appointment.

Detriment includes:

- 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; and
- Damage to reputation, including, for example, personal, professional or business reputation.

Disability means:

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

Director Corporate and Community Services means the same as the Director Corporate and Financial Services as mentioned in associated documents. The amended title reflects the reviewed responsibilities of this position effective 5 January 2022.

Discloser means a person who makes a disclosure in accordance with the PID Act.

Employee is a person engaged by an entity under a contract of service.

Investigation means any enquiry undertaken to establish whether the information provided in a PID can be substantiated, including a review or audit.

Journalist is a person engaged in the occupation of writing or editing material intended for publication in the media.

Maladministration is administrative action that:

1. Was taken contrary to law;
2. Was unreasonable, unjust, oppressive, or improperly discriminatory;
3. 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;

4. Was taken:
 - a. For an improper purpose;
 - b. On irrelevant grounds; or
 - c. Having regard to irrelevant considerations; or
5. Was an action for which reasons should have been given, but were not given;
6. Was based wholly or partly on a mistake of law or fact; or
7. Was wrong.

Natural justice means 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;
- Give a fair hearing; and
- Act only on the basis of logically probative evidence.

Organisational support means actions such as, but not limited to:

- Providing moral and emotional support;
- Advising Disclosers about resources available to handle any concerns they may 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 Council's Employee Assistance Program or arranging for other professional counselling;
- Generating support for the Discloser in their work unit, where appropriate;
- Ensuring any suspicions of victimisation or harassment are dealt with; and
- 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 they no longer need assistance.

Proper authority is a person or organisation that is authorised under the PID Act to receive disclosures.

Public Officer refers to an employee, member or Officer of Council.

Reasonable belief is a view which is objectively fair or reasonable.

Reasonable management action is action taken by a manager in relation to an employee including:

- A reasonable appraisal of the employee's work performance;
- A reasonable requirement that the employee undertake counselling;
- A reasonable suspension of the employee from the employment workplace;
- A reasonable disciplinary action;
- A reasonable action to transfer or deploy the employee;
- A reasonable action to end the employee's employment by way of redundancy or retrenchment;
- A reasonable action in relation to an action mentioned to those listed above;
- 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 is defined under the PID Act as causing, attempting to cause or conspiring to cause detriment to another person in the belief that they or someone else:

- Has made, or intends to make, a disclosure; or
- Has been, or intends to be, involved in a proceeding under the PID Act against any person.

Reprisal under the PID Act is a criminal offence and investigations may be undertaken by the Queensland Police Service.

Subject Officer is an Officer who is the subject of allegations of wrongdoing made in a disclosure.

Substantial means 'of a significant or considerable degree'. It must be more than trivial or minimal and have some weight or importance; and

Specific means "precise or particular" and refers to conduct or detriment that is able to be identified or particularised as opposed to broad or general concerns or criticisms.

5. Procedure

5.1 PID Management Program

- The CEO has overall responsibility for ensuring that Council develops, implements and maintains a PID management program (PIDMP). The PIDMP encompasses:
 - Commitment to encouraging the internal reporting of wrongdoing;
 - Executive Management Team endorsement of the value to Council of PIDs and the proper management of PIDs;
 - A communication strategy to raise awareness among employees about PIDs and Council's PID procedure;
 - A training strategy to give employees access to training on 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 Directors, Managers and other staff who may receive or manage PIDs, Disclosures 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 issues and outcomes from PIDs inform improvements to service delivery, business processes and internal controls; and
 - Regular review of this Procedure and evaluation of the effectiveness of the PIDMP.

5.2 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 can be the most important sources of information to identify and address problems in public sector administration.

Council supports the disclosure of information about wrongdoing because:

- The Implementation of systems for reporting and dealing with wrongdoing contributes to the integrity of Council;
- The outcomes of PIDs can include improvements to systems that prevent fraud and other economic loss to Council; and

- The community's trust in public administration is strengthened by having strong processes in place for reporting wrongdoing.

When making a PID, the Discloser receives protections provided under the PID 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 Council and employees of Council as a result of making the PID;
- Immunity from liability – the Discloser cannot be prosecuted for disclosing the information but is not exempt from action if they have engaged in wrongdoing; and
- Protection from defamation – the Discloser has a defense against an accusation of defamation by any Subject Officer.

5.3 What is a Public Interest Disclosure?

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

- Substantial and specific danger to the health or safety of a person with a disability;
- The commission of an offence or contravention of a condition imposed under a provision of legislation mentioned in Schedule 2 of the PID Act, if the offence or contravention would be a substantial and specific danger to the environment; and
- Reprisal because of a belief that a person has made or intends to make a disclosure.

In addition, Council Officers can make a disclosure about 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; and
- Substantial and specific danger to the environment.

A Discloser can have either a 'reasonable belief' wrongdoing has occurred or provide evidence which tends to show the wrongdoing has occurred.

A disclosure amounts to a PID and is covered by the PID Act even if the:

- Discloser reports the information as part of their duties – such as an auditor reporting fraud or the Workplace Health and Safety Coordinator reporting a safety breach;
- Disclosure is made anonymously – 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 Council to assess information received and decide if it is a PID; or
- Disclosure is 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.

5.4 Who can a PID be disclosed?

Disclosers are encouraged to make a disclosure to an appropriate Council Officer first as outlined below. 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 COUNCIL	OTHER AGENCIES THAT CAN RECEIVE PIDS
<p>Any person (including employees) can make a disclosure to:</p> <ul style="list-style-type: none"> The PID Coordinator; Their manager or supervisor The CEO; or Any member of the Executive Management Team (EMT). 	<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, Youth and Women for disclosures about danger to the health and safety of a child or young person with a disability; Department of Communities, Disability Services and Seniors 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 Environment and Science disclosures about danger to the environment; A Member of the Legislative Assembly (MP) for any wrongdoing or danger; or The Chief Judicial Officer of a court or tribunal in relation to a disclosure about wrongdoing by a judicial officer.

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

- A valid PID was initially made to a proper authority, and
- The proper authority:
 - Decided not to investigate or deal with the disclosure; investigated the disclosure but did not recommend taking any action; and
 - Failed to notify the Discloser within six (6) months of making the disclosure, whether or not the disclosure was to be investigated or otherwise dealt with.

A person who makes a disclosure to a journalist in these circumstances is protected under the PID Act. However, Disclosers should be aware journalists are not bound under the confidentiality provisions of s65 of the PID Act.

5.5 How to make a PID

Any complaint may in fact be a PID. Each complaint is initially assessed to determine if it is a PID. The complainant is not required to identify if a complaint is being made as a PID.

However, should a Discloser wish to formally make a PID, Council will accept the PID anonymously, either verbally or in writing. Disclosers are requested to provide the following information to assist in the assessment, and any subsequent investigation, of a PID:

- Their contact details (this could be an email address that is created for the purpose of making the disclosure or a telephone number); and
- 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; and
 - Any further information that could help investigate the PID.

Council encourages that a PID is made in writing (whenever possible) and contains as much relevant information that a Discloser is able to provide. Council's contact details are as follows:

Address: Public Interest Disclosure Coordinator

Hinchinbrook Shire Council

PO BOX 366

Ingham QLD 4850

Email: council@hinchinbrook.qld.gov.au

Phone: 4776 4600 (requesting to speak to their preferred Officer or the PID Coordinator)

5.6 Deciding whether a matter is a PID

If there is any doubt if a matter is a PID, further information may be obtained to inform the decision. If doubt still remains, the matter will be considered and managed as a PID. Mere disagreements over policy do not meet the threshold for a PID under the PID Act.

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

Where a Discloser states they are making a PID, but it is assessed that the matter is not a PID, Council will advise the Discloser:

- That their information has been received but was not assessed as a PID;
- The reasons for the decision;
- The review rights available if the Discloser is dissatisfied with the decision and how to request review;
- Any action Council proposes to take in relation to the matter; and
- Any other options the Discloser has in relation to the matter.

5.7 Assessing a PID

The disclosure will be assessed in accordance with the PID Act, the PID standards, this Procedure and any other relevant procedure(s).

Once the matter has been assessed as a PID, Council will advise the Discloser:

- That their information has been received and assessed as a PID;

- The action to be taken by Council in relation to the disclosure, which could include referring the matter to an external agency, for investigating;
- The likely timeframe involved;
- The name and contact details of Council's Support Officer they can contact for updates or advice;
- Their obligations regarding confidentiality;
- The protections the Discloser has under the PID Act;
- The commitment of Council to keep appropriate records and maintain confidentiality, except where permitted under the PID Act;
- How updates regarding intended actions and outcomes will be provided to the Discloser; and
- Contact details for the Council's Employee Assistance Program.

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

5.8 Referring a PID

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

- The PID concerns wrongdoing by that agency or an employee of that agency; and
- That agency has the power to investigate or remedy the matter.

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

It may also be necessary to refer the PID to another agency because of a legislative obligation, for example referring 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 s38 of the Crime and Corruption Act 2001).

The confidentiality obligations of the PID Act permit appropriate Officers of 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 Council.

5.9 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, Council will conduct a risk assessment following the Queensland Ombudsman's Risk Assessment Guide, to assess the likelihood of the Discloser (or witnesses or affected third parties) suffering reprisal action as a result of having made the disclosure.

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.

A risk assessment will be undertaken if the Discloser is anonymous based on the information available in the PID. The risk assessment will also consider the risk to persons who may be suspected of making the PID.

Consistent with the assessed level of risk, Council will develop and implement a risk management plan and arrange any reasonably necessary support or protection for the Discloser (or witnesses or affected third parties).

Council will regularly reassess the risk of reprisal while the PID is being managed, in consultation with the discloser, and review the risk management plan if required.

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

- Attend to the safety of the Discloser (or witnesses or affected third parties) as a matter of priority;
- Review its risk assessment, risk management plan and any protective measures needed to mitigate any further risk of reprisal; and
- Manage any allegation of a reprisal as a PID in its own right.

5.10 Declining to take action on a PID

Under the PID Act, the decision may be made not to investigate or deal with a PID in various circumstances, including:

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

If a decision is made not to investigate or deal with a PID, the Discloser will be provided with written reasons for that decision.

If the Discloser is dissatisfied with the decision, they may request a review by writing to the CEO within 20 business days of receiving the written reasons for decision.

5.11 Communications with Disclosers

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

If a complaint is assessed as a PID, Council will acknowledge receipt of the PID in writing as soon as practicable. The Discloser will be provided with information that meets the requirements of the PID Act and the standards issued by the Queensland Ombudsman, including:

- The action that will be taken in response to the PID;
- The protections under the PID Act;
- Confidentiality obligations of the Discloser and Council; and
- Support arrangements.

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

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

5.12 Confidentiality

While making every attempt to protect confidentiality, a Discloser's identity may need to be disclosed to provide natural justice to subject officers and to respond to a Court Order, legal directive or court proceedings.

Communication with all parties involved is to be arranged discreetly to avoid identifying the Discloser wherever possible.

Disclosers should be aware that while every attempt will be made to keep their details confidential, no guarantee can be provided that others will not try to deduce their identity.

5.13 Support for Disclosers

Recognising 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 by the PID Coordinator to the Discloser.

The PID Support Officer will assist the Discloser to access information about PIDs, protections available under the PID 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, the Discloser will continue to be managed in accordance with normal, fair and reasonable management practices during and after the handling of the PID.

5.14 Investigating a PID

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

- Principles of natural justice;
- Obligation under the PID Act to protect confidential information;
- Obligation under the PID Act to protect Officers from reprisal; and
- Interests of Subject Officers.

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

Regardless of whether the investigation substantiates wrongdoing or not, the investigation is to identify whether there are improvements that can be made to systems, policies and procedures, and to consider if staff training is required.

5.15 Right of Subject Officers

Council acknowledges that for Officers who are the subject of a PID the experience may be stressful, and Council will protect their rights by:

- Assuring them the PID will be dealt with impartially, fairly and reasonably in accordance with the principles of natural justice;
- Confirming 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; and
- Referring them to Council's Employee Assistance Program (EAP) for support.

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

5.16 Record-keeping

In accordance with its obligations under the PID Act and the *Public Records Act 2002*, Council will ensure:

- Accurate data is collected about the receipt and management of PIDs; and
- Anonymised data is reported to the Office of the Queensland Ombudsman in their role as the oversight agency, through the PID reporting database.

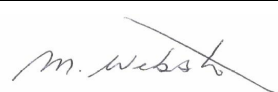
Records about disclosures, investigations, and related decisions will be kept secure and accessible only to appropriately authorised people involved in the management of the PID.

6. Legal Parameters

- *Crime and Corruption Act 2001*;
- *Disability Services Act 2006*;
- *Human Rights Act 2019*;
- *Local Government Act 2009*;
- *Ombudsman Act 2001*;
- *Public Interest Disclosure Act 2010*;
- *Public Records Act 2002*; and
- *Public Sector Ethics Act 1994*.

7. Associated Documents

- Public Interest Disclosure Policy;
- Public Interest Disclosure Management Program (PIDMP);
- Administrative Action Complaints Management Policy;
- Administrative Action Complaints Management Procedure;
- Employee Code of Conduct;
- Code of Conduct for Councillors in Queensland; and
- Queensland Ombudsman's Risk Assessment Guide.

DOCUMENT HISTORY AND STATUS						
Action	Name			Position	Signed	Date
Approved by Council	Michelle Webster			CEO		11/09/2023
Policy Version	1	Initial Version Adopted	10/03/20216	Current Version Adopted		11/9/2023
Maintained By	Corporate and Community Services			Next Review Date		11/9/2023
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