

1. Purpose

This Procedure documents Council's approach when managing Public Interest Disclosure (PIDs) and incorporates Council's Public Interest Disclosure Management Plan.

Hinchinbrook Shire Council is committed to the promotion of the public interest and encourages and supports Public Interest Disclosures of wrong doing in Council.

The objectives of the Policy are:

- To create a positive reporting environment that encourages the making of Public Interest Disclosures;
- To provide processes that ensure Public Interest Disclosures are dealt with in a thorough and timely manner;
- To provide appropriate support and protection to Council Officers or members of the public to make a Public Interest Disclosure;
- To ensure that Council fulfils its responsibility under the *Public Interest Disclosure Act 2010*.
- To ensure that the Disclosure is kept informed throughout the process.

The Chief Executive Officer and Council Management endorse the value of Public Interest Disclosures to Council and recognise the importance of the proper management of Public Interest Disclosures including the protection of all parties.

2. Scope

This Procedure applies to all employees and external parties (including contractors and volunteers), representatives and agents of Hinchinbrook Shire Council ("Council") who undertake work on behalf of Council.

3. Responsibilities

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

- to comply with the Public Interest Disclosure Policy, associated Procedures and Council's Code of Conduct;
- for reporting their concerns about suspected misconduct or unethical behaviour in accordance with the Public Interest Disclosure Policy and this Procedure;
- to participate in various awareness training programs.

Council's Management Team, Coordinators and Supervisors are responsible for:

- maintaining the ethical culture and are to lead by example;
- providing clear direction to employees on how to raise matters that involve official misconduct, while maintaining confidentiality and natural justice;
- ensuring that all employees in their operational area are aware of their obligations in relation to the requirements of the Public Interest Disclosure Policy and this procedure; and
- monitoring the workplace for signs of reprisal against a Disclosure or an employee who is the subject of a Disclosure.

The CEO is responsible for ensuring that:

- all employees are aware of the need to conduct their duties to high professional and ethical standards and always act in the public interest (Code of Conduct);
- 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;
- Disclosures are properly assessed, investigated and dealt with, including appropriate action being taken in relation to any wrong doing in a Disclosure;
- employees who make a Disclosure receive the appropriate support and protection from reprisal;
- all legislative obligations in relation to reporting and investigation are met; and

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- all matters involving suspected official misconduct are referred to the Crime and Corruption Commission pursuant to the Crime and Corruption Act 2001.

4. Definitions

Authorised Officer shall mean 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 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 that is inconsistent with Council's Code of Conduct.

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

Council shall mean Hinchinbrook Shire Council.

Councillor shall mean a Councillor of a Council within the meaning of the *Local Government Act 2009*, which specifically includes the Mayor.

Disability shall mean:

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

Discloser shall mean a person who makes a Public Interest Disclosure

Disclosure shall mean a Public Interest Disclosure

Employees shall mean all Council employees and contractors (regardless of their employment status or type of employment e.g. permanent, casual full time, part time).

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

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d) The social, economic, aesthetic and cultural conditions that affect, or are affected by, things mentioned in paragraphs a) and b).

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

- Theft and/or misuse of Council's revenue;
- Unauthorised use of Council assets (including plant and equipment and inventory);
- Credit card fraud;
- Forgery or alteration of cheques, invoices, computer records etc.;
- Submission of false taxation arrangements for an employee or contractor;
- Submission of fraudulent applications for reimbursement;
- Payments to fictitious employees or suppliers (third parties);
- False accounting;
- Wilfully providing false or misleading information to Council 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 or value.

Maladministration shall mean administrative action that was:

- a) taken contrary to law; or
- b) unreasonable, unjust, oppressive or improperly discriminatory; or
- c) 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) taken:
 - i) for an improper purpose; or
 - ii) on irrelevant grounds; or
 - iii) having regard to irrelevant considerations; or
- e) an action on which reasons should have been given, but were not given; or
- f) based wholly or partly on a mistake of law or fact; or
- g) wrong.

Official Misconduct Has the same meaning as in the *Crime and Corruption Act 2001*. It is conduct that could, if proved, be:

- a) a criminal offence; or
- b) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or was the holder of an appointment.

PID shall mean Public Interest Disclosure/s.

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

- a) under lawful care or control; or
- b) using Community facilities or services provided by public or private sector; or
- c) in employment workplaces

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 proper 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

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- b) a substantial misuse of public resources (other than alleged misuse based on mere disagreements over policy that may properly be adopted about amounts purposes or 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 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 (exception special circumstances outline in Part 4, Section 20);
- those made frivolously or vexatious;
- those which primarily question the relative merits of government or agency policy; and
- those that are made substantially to avoid disciplinary action.

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

- Dishonest;
- Fraudulent;
- Corrupt;
- Illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property);
- A breach of Legislation or Local Laws;
- Unethical (either a breach of Council's Code of Conduct for Employees or generally);
- Serious improper conduct;
- Unsafe work practices;
- Conduct which may cause financial or non-financial loss to the Council or be otherwise detrimental to the Interests of Council;
- Gross Mismanagement;
- Serious or substantial waste; or
- Repeated instance of breach of administrative procedures;
- Environmental dangers.

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

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

The **detriment** could be an action (or threats of action) that result in:

- a) a physical or psychological injury;
- b) loss or damage to property;
- c) intimidation or harassment;
- d) discrimination or disadvantage to a persons' career, employment or business;
- e) financial loss; including damage to reputation.

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5. Procedure

5.1 Reporting a PID

Anyone, including persons external to Council, may make a PID if they have information about:

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

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

- Official misconduct (as defined in the Crime and Corruption Act 2001); and
- Maladministration that adversely affects a person's interest in a substantial and specific way;
- A substantial misuse of public resources;
- A substantial and specific danger to public health or safety; or
- A substantial and specific danger to the environment.

A PID can be reported to:

- The Mayor; or
- The Chief Executive Officer (or his delegate); or
- Any Executive Manager, Manager, Coordinator or Supervisor;

After the receipt of the Disclosure, the officer who received the Disclosure shall refer the Disclosure to the appropriate Authorised Officer for Assessment and coordination of investigation in accordance with this Procedure.

Council encourages that a PID is made in writing (whenever possible) and contains as much relevant information as available. However, a PID can be made verbally to Council.

Council's contact details are as follows:

Mayor/Chief Executive Officer/other position title
Hinchinbrook Shire Council
PO BOX 366
Ingham QLD 4850

Email: council@hinchinbrook.qld.gov.au
Telephone: 4776 4600

Any person may choose to make a PID to an appropriate external entity rather than to Council (i.e. Crime and Corruption Commission, Queensland Ombudsman etc). Such organisations may choose to refer the matter directly back to Council.

Whilst anonymous Disclosures can be made, Council prefers that Disclosers identify themselves as this enables the best assessment and investigation of the PID and ensures appropriate support is provided to the Discloser.

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

Anonymous Disclosers will not/can not be informed of the investigation outcome by reason of their anonymity and as a result some of the protections in the Act may not apply to anonymous Disclosers.

To ensure comprehensive and successful investigation of a perceived wrong doing, persons making a PID are encouraged to provide all known information that might be relevant including:

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- the circumstances of the incident/matter including dates, times and locations;
 - the details of personnel or other involved; and
 - possible sources of additional information or evidence e.g. other people or files.

It is an offence to intentionally make false Disclosures. A person who gives information to a proper authority, knowing that it is false or misleading and intending that it 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.

5.2 Investigating a PID

An appropriate Authorised Officer will initially assess the PID to make a decision on how to best deal with that Disclosure. The Disclosure will be properly assessed on the following:

- if the Disclosure has been received in the acceptable nominate manner;
- whether the Disclosure falls within the categories as per the Act to be investigated.

An acknowledgment letter shall be forwarded to the Discloser which will outline the contact methods and advise of timeframes in which a decision may be expected. All Disclosures received by Council will be acknowledged. In addition, Council will give the Discloser reasonable information about their Disclosure, including:

- A description of the action proposed to be taken, or taken, in relation to the Disclosure and the reasons for the decision;
- Likely timeframes;
- If action has been taken in relation to the Disclosure, a description of the results of the action;
- Contact details for further information or in the event of a suspected reprisal.

Council may not give the aforementioned information if giving the information would be likely to adversely affect:

- Anybody's safety; or
- The investigation of an offence or possible offence; or
- Necessary confidentiality about an informant's existence or identity.

The Authorised Officer will coordinate the investigation by referring it to relevant areas to either investigate or obtain information.

The Authorised Officer will keep full and accurate records in the document management system regarding the Disclosure.

The Authorised Officer may decide not to investigate or deal with a PID if:

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

If the Authorised Officer decides not to investigate or deal with the Disclosure, the Authorised Officer 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 Council for a review of the decision within 28 days after receiving the written decision.

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After the Authorised Officer has assessed the Disclosure, the Authorised Officer may determine to undertake the investigation themselves or he/she may refer the Disclosure to an appropriate investigator to undertake the investigation (eg if he/she believes there is a conflict of interest or simply because it is better suited that the investigation be delegated). An appropriate investigator may be a Director, Manager, Representative of Human Resources or another appropriate staff member.

If the investigation has been delegated, the Investigator is to report back to the Authorised Officer on progress, feedback, any recommendations and decision in relation to Disclosure.

Council may refer a Disclosure to another public sector entity (referral entity) if the Disclosure relates to:

- the conduct of the referral entity or an officer of the referral entity;
- the conduct of an entity (including Council) or another matter that the referral entity has the power to investigate or remedy.

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

- which entity that Disclosure was referred to;
- Council's decision why the Disclosure was referred;

Under the Act, Council is required to keep a proper record of any Disclosure made. The record must include:

- the name of the person making the Disclosure, if known; and
- the information disclosed; and
- any action taken on the Disclosures;
- any other information as required per Section 60 of the Act as required.

The Authorised Officer is required to report all PIDs to the Queensland Ombudsman.

5.3 Timeframes

Timeframes for internal or external reviews for Disclosures will be assessed in accordance to whether it is deemed, urgent, normal or complex. Council will endeavour to meet the following time frames for dealing with Disclosures:

Urgent Disclosures : 15 business days:

A Disclosure which relates to the health & safety of a person, a serious environmental issue or official misconduct may be considered in this category.

Normal Disclosures : 60 business days

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 : 90 business days

The criteria for complexity may be in relation to the number of issues identified in the Disclosure.

If these timeframes cannot be met for any reason the Authorised Officer will make contact 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 of the circumstances but in no case more than 3 months from the date that the Disclosure was received by council.

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5.4 Decision

Once the investigation has been completed the Authorised Officer will forward a Decision Letter to the Disclosure advising outcome of the investigation.

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

The Authorised Officer shall keep the CEO informed of the progress during the assessment and investigation of the Disclosure. If requested by the CEO, progress reports will also be provided to the Executive Management Team.

5.5 Confidentiality

Council is committed to maintaining confidentiality when handling Disclosures. Confidentiality not only protects the Disclosure against reprisals, but any other person affected by the Disclosure.

The Act does not expressly require that information relating to a Disclosure, such as the allegation and evidence, be maintained as confidential. However, such information will be treated confidentially except where the investigation process requires this information to be disclosed.

Confidential information in this context includes:

- The fact a Disclosure has been made;
- Any information that may identify the Disclosure or any person who may be the subject of a Disclosure.
- The actual information that has been disclosed;
- Information relating to the Disclosure that, if known, may cause detriment.

An intentional and unauthorised breach of confidentiality may result in disciplinary or criminal action.

The Authorised Officer is to advise the Disclosure if his/her identity needs to be revealed for any reason and to seek consent if possible. However the Authorised Officer is to attempt as far as practicable to avoid a situation where the Discloser's identity would need to be revealed.

In protecting the Discloser's confidentiality, the Authorised Officer is to ensure that the details of the Disclosure, the investigation and related decisions are kept secure. Authorised release of Disclosures covers those instances where the release is specifically required:

- To provide natural justice to the subject person;
- When responding to a court order or legal directive (e.g. Subpoena, notice to produce etc.); or
- In Court proceedings.

While Council is prepared to take all necessary steps to protect the confidentiality of the information that is disclosed, the Discloser also has some obligations. Council encourages Disclosers not to talk about their Disclosure to their colleagues or anyone other than the Authorised Person. The fewer people who know about the Disclosure – both before and after it is made – the more likely it is that Council will be able to keep identities confidential and protect the Discloser and persons involved from any detrimental action in reprisal.

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

- Council has decided not to investigate or deal with the Disclosure;
- Council investigated the Disclosure but did not recommend the taking of any action in relation to the Disclosure;
- Council 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.

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

5.6 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.

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

If a reprisal does occur, Council will take all steps possible to stop the reprisal and to protect the Discloser. The action taken by Council 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 a disciplinary action.

All senior officers in Council are obliged to notify the Authorised Officer for Public Interest Disclosures if it is reported, or they suspect, that a Discloser is suffering reprisal as a result of making a Disclosure.

When the Authorised Officer becomes aware of a reprisal action against a Discloser he/she is to take immediate steps to ensure the protection of the Disclosure and to 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 is to be conducted by a representative of the Management Team not involved in the investigation of the initial Disclosure. The Authorised Officer will keep the Disclosure informed of the progress and/or outcome of the investigation.

6. Legal Parameters

Public Interest Disclosure Act 2010
Public Sector Ethics Act 1994
Crime and Corruption Act 2001
Local Government Act 2009
Code of Conduct

7. Associated Documents

Public Interest Disclosure Policy
Fraud and Corruption Policy
Code of Conduct
Administrative Action Complaints Policy

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Appendix : Rights to Appeal

The rights to appeal will depend on the type of Disclosure made to Council. The below table outlines the types of decision which are able to be appealed, 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	60 business days
Official Misconduct	Crime, and Corruption Commission	As soon as practicable
Maladministration	Queensland Ombudsman	As soon as practicable
Reprisal	<ul style="list-style-type: none"> • 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 for a review of the decision under the *Judicial Review Act 1991*.

All appeals should be in writing and addressed to Council in the first instance. The CEO or Authorised Officer will then assess the category pursuant to Sections 12 and refer the appeal to the appropriate external review agency.

The Chief Executive Officer
Hinchinbrook Shire Council
PO BOX 366
Ingham QLD 4850

Email: council@hinchinbrook.qld.gov.au

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Appendix : Further Information

For further advice regarding Public Interest Disclosures please contact:

Internal (employees, volunteers, contractors etc)
A member of the Governance & Assets 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 following websites:

- Queensland Ombudsman
- Queensland Public Sector Ethics

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