

# Public Interest Disclosure Policy

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## 1. TITLE

Public Interest Disclosure Policy

## 2. OBJECTIVE

Council supports the making of Public Interest Disclosures and will take all reasonable steps to protect people who make such disclosures from any Detrimental Action in reprisal for making the disclosure.

This Procedure's objectives are to:

- (a) complement normal communication channels between supervisors and employees;
- (b) encourage the reporting of wrongdoing;
- (c) outline the procedure for making a Public Interest Disclosure;
- (d) enable Council to receive and consider reports from Disclosers appropriately and in compliance with Council's legal and regulatory obligations; and
- (e) ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

This Procedure has been prepared in accordance with the Act, the Regulations and the Guidelines and will be readily available to the public and to all Council employees, contractors and Councillors.

## 3. DEFINITIONS AND ABBREVIATIONS

Term	Meaning
Act	<i>Public Interest Disclosures Act 2012</i>
Corrupt Conduct	Conduct: <ol style="list-style-type: none"><li>(a) of any person that adversely affects the honest performance by a Public Officer or Public Body of his or her or its functions as a Public Officer or Public Body; or</li><li>(b) of a Public Officer or Public Body that constitutes or involves the dishonest performance of his or her or its functions as a Public Officer or Public Body; or</li><li>(c) of a Public Officer or Public Body that constitutes or involves knowingly or recklessly breaching public trust; or</li><li>(d) of a Public Officer or a Public Body that involves the misuse of information or material acquired in the course of the performance of his or her or its functions as a Public Officer or Public Body, whether or not for the benefit of the Public Officer or Public Body or any other person; or</li><li>(e) that could constitute a conspiracy or an attempt to engage in any conduct referred to in the above paragraphs,</li></ol> being conduct that would, if the facts were found proved beyond reasonable doubt at a trial, constitute a Relevant Offence
Council's Office	In the case of personal attendance for delivery of a written Disclosure: Cnr Glen Eira & Hawthorn Roads, Caulfield 3162 In the case of delivery of a written Disclosure by post: PO Box 42, Caulfield South 3162

Detrimental Action	Includes: (a) action causing injury, loss or damage; (b) intimidation or harassment; (c) discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action
Discloser	A person who makes a Disclosure
Disclosure	A report about Improper Conduct or Detrimental Action
IBAC	The Independent Broad-based Anti-corruption Commission established by the IBAC Act
IBAC Act	<i>Independent Broad-based Anti-corruption Commission Act 2011</i>
IBAC Guidelines	(a) the 'Guidelines for making and handling public interest disclosures' issued by IBAC in January 2020 under section 57 of the Act; and (b) the 'Guidelines for public interest disclosure welfare management' issued by IBAC in January 2020 under section 57 of the Act
Improper Conduct	(a) Corrupt Conduct; or (b) conduct of a Public Officer or Public Body engaged in by the Public Officer or Public Body in their capacity as a Public Officer or a Public Body that constitutes: i a criminal offence; ii serious professional misconduct; iii dishonest performance of public functions; iv an intentional or reckless breach of public trust v an intentional or reckless misuse of information or material acquired in the course of the performance of the functions of the public officer or public body; vi a substantial mismanagement of public resources; vii a substantial risk to the health or safety of one or more persons; viii a substantial risk to the environment; or (c) conduct of any person that: i adversely affects the honest performance by a public officer or public body of their functions as a public officer or public body; ii is intended to adversely affect the effective performance or exercise by a public officer or public body of the functions or powers of the public officer or public body and results in the person, or an associate of the person, obtaining: A. a licence, permit, approval, authority or other entitlement under any Act or subordinate instrument; B. an appointment to a statutory office or as a member of the board of any public body under any Act or subordinate instrument; C. a financial benefit or real or personal property; D. any other direct or indirect monetary or proprietary gain,  that the person or associate would not have otherwise obtained; or (d) conduct of any person that could constitute a

	conspiracy or attempt to engage in any of the conduct referred to in the above paragraphs
In Private	Circumstances in which a person making a Disclosure reasonably believes that the only persons who are present or able to listen to the Disclosure at the time it is made are: <ul style="list-style-type: none"> <li>(a) the person making the Disclosure;</li> <li>(b) one or more person to whom the Disclosure can be made in accordance with the Act and the Regulations; and/or</li> <li>(c) an Australian legal practitioner (if any) representing the person making the Disclosure.</li> </ul>
Misdirected Disclosure	A Disclosure made in the manner described in paragraph 4.2.9 of this Procedure
Public Interest Disclosure	A Disclosure made in accordance with Part 2 of the Act
Public Interest Complaint	A Disclosure that has been determined by IBAC to be a Public Interest Complaint under s 26 of the Act
Public Interest Disclosure Coordinator	The person appointed by Council who has the responsibilities set out in paragraph 4.7.2
Public Body	A body of the kind specified in s 6 of the Act, which includes Council
Public Officer	A person of the kind specified in s 6 of the Act, which includes Council's employees, contractors and Councillors
Regulations	<i>Public Interest Disclosures Regulations 2019</i>
Relevant Offence	<ul style="list-style-type: none"> <li>(a) an indictable offence against an Act; or</li> <li>(b) any of the following common law offences committed in Victoria: <ul style="list-style-type: none"> <li>i attempt to pervert the course of justice;</li> <li>ii bribery of a public official;</li> <li>iii perverting the course of justice;</li> <li>iv misconduct in public office.</li> </ul> </li> </ul>
Welfare Manager	The person appointed by the Public Interest Disclosure Coordinator to perform the role described in paragraph 4.10 of this Procedure

## 4. POLICY

### 4.1 What is a Public Interest Disclosure?

4.1.1 Public Interest Disclosures are reports made by individuals concerning conduct engaged in by Council, an employee or contractor of Council or a Councillor that constitutes:

- (a) Improper Conduct; or
- (b) Detrimental Action, taken against a person in reprisal for making a Public Interest Disclosure.

4.1.2 A Disclosure can relate to conduct or action that may have already taken place, may be occurring now, or may happen in the future.

- 4.1.3 Anyone can make a Public Interest Disclosure to Council, including members of the public and Council employees.

### ***Examples of Improper Conduct***

To avoid closure of a town's only industry, an environmental health officer ignores or conceals evidence of illegal dumping of waste.

An agricultural officer delays or declines imposing quarantine to allow a financially distressed farmer to sell diseased stock.

A building inspector tolerates poor practices and structural defects in the work of a leading local builder.

### ***Examples of Corrupt Conduct***

A Council officer takes a bribe or receives a payment other than his or her wages or salary in exchange for the discharge of a public duty.

A Council officer favours unmeritorious applications for jobs or permits by friends and relatives.

A Council officer or Councillor sells confidential information.

### ***Examples of Detrimental Action***

Council refuses the promotion of a person who makes a disclosure because they made the disclosure. Council demotes, transfers, isolates in the workplace or changes the duties of a discloser due to the making of a disclosure.

A person threatens, abuses or carries out other forms of harassment directly or indirectly against the discloser, his or her family or friends.

Council discriminates against the discloser or his or her family and associates in subsequent applications for jobs, permits or tenders.

## **4.2 Making a Disclosure**

- 4.2.1 It is not necessary for a person making a Disclosure to identify:

- (a) the person or Public Body to whom or to which the Disclosure relates; or
- (b) themselves, Disclosures may be made anonymously.

- 4.2.2 An anonymous Disclosure can be made by:

- (a) using an unverifiable email address
- (b) through an anonymous phone call; or
- (c) having a face-to-face conversation or meeting where you refuse to identify yourself (provided the meeting or conversation takes place In Private).

- 4.2.3 A Disclosure may be made orally (e.g. by phone or in person) or in writing (e.g. by letter or email). Disclosures cannot be made by fax.

- 4.2.4 All oral Disclosures must be made In Private.

- 4.2.5 Council may receive Disclosures concerning Council or Council employees and contractors.

- 4.2.6 Disclosures concerning Councilors must be made to IBAC or the Victorian Ombudsman.

- 4.2.7 The following table summarises the kinds of Disclosures that may be received by Council and the person to whom the disclosure may be made:

Subject of the Disclosure	Person/body to whom the Disclosure may be made
Council or an employee or contractor of Council	<ul style="list-style-type: none"> <li>• Council's CEO;</li> <li>• Public Interest Disclosure Coordinator;</li> <li>• Manager or supervisor of the Discloser;</li> <li>• Manager or supervisor of the person who is the subject of the Disclosure;</li> <li>• IBAC;</li> <li>• the Victorian Ombudsman;</li> <li>• the Victorian Inspectorate.</li> </ul>
A Councillor	<ul style="list-style-type: none"> <li>• IBAC; or</li> <li>• the Victorian Ombudsman.</li> </ul>

4.2.8 If the Discloser does not want their complaint to be handled as a Public Interest Disclosure in accordance with the Act and this Procedure, you should state so in writing at the time, or within 28 days, of making the Disclosure.

4.2.9 If Council receives a Disclosure for which it is not the appropriate receiving entity (e.g. a Disclosure about a Councillor) and Council is satisfied that the Discloser honestly believed that Council was the appropriate receiving entity, Council may assess the Disclosure in accordance with this Policy and notify IBAC, the Victorian Inspectorate or the Integrity and Oversight Committee (as applicable and if appropriate). Otherwise, the Discloser will be advised of the correct person to whom, or body to which, the Disclosure should be directed.

### 4.3 Making Disclosures to Council

4.3.1 Disclosures concerning Council and its employees and contractors should be made to Council's Public Interest Disclosure Coordinator by using the following contact details:

By email: *(dedicated email address to be established to be accessed by Disclosure Coordinator)*

By phone: (03) 9524 3333 and request to speak to Disclosure Coordinator)

By post or hand delivery: Council's Office

4.3.2 Letters are to be enclosed within a sealed envelope (and emails to include in subject line) clearly marked:

*CONFIDENTIAL – Attention Public Interest Disclosure Co-ordinator*

4.3.3 A Disclosure may also be made to the manager or supervisor of the Discloser, or a manager or supervisor of the person who is the subject of the Disclosure. The manager or supervisor will then escalate the Disclosure to the Public Interest Disclosure Coordinator.

4.3.4 Where a person is contemplating making a Disclosure and is concerned about approaching the Public Interest Disclosure Coordinator (or relevant manager or supervisor) he or she can call or email the Public Interest Disclosure Coordinator (or relevant manager or supervisor) and request a meeting in a discreet location away from the workplace.

### 4.4 Making Disclosures to alternative recipients

4.4.1 Disclosures about Council, Council employees and contractors may also be made to the bodies specified in paragraph 4.4.3.

4.4.2 Disclosures about Councillors can be made to IBAC or the Victorian Ombudsman using the contact details specified in paragraph 4.4.3.

4.4.3 Disclosures may be made to the following the bodies:

## **IBAC**

In person:  
Level 1, North Tower  
459 Collins Street  
Melbourne VIC 3000

By post:  
GPO Box 24234  
Melbourne, VIC 3001

By phone:  
1300 735 135

Online:  
[www.ibac.vic.gov.au](http://www.ibac.vic.gov.au)  
<https://www.ibac.vic.gov.au/reporting-corruption/report/complaints-form>

## **Victorian Ombudsman**

In person or by post:  
Level 2, 570 Bourke Street  
Melbourne, Victoria 3000

By email:  
[complaints@ombudsman.vic.gov.au](mailto:complaints@ombudsman.vic.gov.au)

By phone:  
9613 6222

Online:  
[www.ombudsman.vic.gov.au](http://www.ombudsman.vic.gov.au)

## **Victorian Inspectorate**

By post:  
PO Box 617 Collins Street West,  
Melbourne, VIC 8007

By phone:  
8614 3232

Online:  
[www.vicinspectorate.vic.gov.au](http://www.vicinspectorate.vic.gov.au)

### **4.5 Receiving and assessing disclosures**

Where a Disclosure is received by the Public Interest Disclosure Coordinator, the Public Interest Disclosure Coordinator will assess whether the disclosure is a Public Interest Disclosure and communicate their findings within 28 days of the receipt of the Disclosure.

#### **4.5.1 *Has the Disclosure been made to the appropriate person?***

Council is only authorised to consider Disclosures concerning Council, Council employees and contractors and Misdirected Disclosures.

If a Disclosure concerns a Councillor, or a Public Body or a Public Officer for which Council is not responsible and the Disclosure is not a Misdirected Disclosure (see paragraph 4.2.9), the Discloser should be directed to disclose the matter to the correct person or body.

#### **4.5.2 *Does the Disclosure contain the essential elements of a Public Interest Disclosure?***

To be a Public Interest Disclosure, the Disclosure must satisfy the following criteria:

- (a) the Disclosure must be made by a natural person (i.e. not by a corporation or a business); and
- (b) the Disclosure must show or tend to show that Improper Conduct or Detrimental Action taken against a person for making a Public Interest Disclosure, has occurred, is occurring or may occur; or
- (c) the Disclosure must disclose sufficient information such that a reasonable person, possessed of the information, could believe that the Improper Conduct or Detrimental Action has occurred, is occurring or may occur?

#### **4.5.3 *Where the Disclosure is considered a Public Interest Disclosure***



If the Public Interest Disclosure Coordinator concludes that the Disclosure is a Public Interest Disclosure, the Public Interest Coordinator must:

- (a) notify IBAC of the Public Interest Disclosure, and provide relevant information regarding the Public Interest Disclosure, for IBAC assessment as to whether it is a Public Interest Complaint; and
- (b) notify the Discloser that the Public Interest Disclosure has been sent to IBAC for assessment.

Once notified to IBAC, IBAC will assess whether the Public Interest Disclosure amounts to a Public Interest Complaint in accordance with the Act and to determine how the matter should be dealt with accordingly. IBAC will notify the Discloser and Council of its decision.

#### 4.5.4 *Where the Disclosure is not considered a Public Interest Disclosure*

If the Public Interest Disclosure Coordinator concludes that the Disclosure is not a Public Interest Disclosure, the Public Interest Coordinator must notify the Discloser that:

- (a) the Public Interest Disclosure Coordinator has concluded that the Disclosure does not disclose Improper Conduct or Detrimental Action; and
- (b) on that basis, the Disclosure has not been sent to IBAC; and
- (c) their identity does not have to be kept confidential, but protections under Part 6 of the Act apply, including that they cannot face adverse workplace action for making the Disclosure and that they are protected from legal actions such as defamation and civil liability.

Additionally, the Public Interest Disclosure Coordinator should consider whether the Disclosure could be dealt with according to Council's normal complaint handling procedures.

## 4.6 Training

- 4.6.1 Employees and Councillors will be provided with all relevant information and given appropriate training to ensure they are familiar with this procedure and the key requirements of the Act, particularly Council's confidentiality obligations and the consequences of breaching the Act.
- 4.6.2 Similarly, Records staff, Customer Service Centre staff, staff in receipt of mail from Council's general email address (mail@gleneira.vic.gov.au) and other employees will be made aware of the general nature of Public Interest Disclosures and the established reporting channels so that identified disclosures are dealt with appropriately.

## 4.7 Roles and responsibilities

### 4.7.1 *Employees, contractors and Councillors*

Employees and Councillors are encouraged to report known or suspected incidents of Improper Conduct or Detrimental Action in accordance with this procedure.

Employees and Councillors have an important role to play in supporting those who have made a Disclosure. They must refrain from any activity that is, or could be perceived to be, victimisation or harassment of a person who makes a Disclosure. They should also protect and maintain the confidentiality of a person they know or suspect to have made a Disclosure.

### 4.7.2 *Public Interest Disclosure Coordinator*

The Public Interest Disclosure Coordinator will:

- (a) manage the reporting system used by Council;
- (b) be a contact point for general advice about the operation of the Act and for integrity agencies such as IBAC;
- (c) make arrangements for a Disclosure to be made privately and discreetly;
- (d) receive any Disclosure made orally (and commit it to writing) or in writing;
- (e) impartially assess any allegation and determine whether it may be a Public Interest Disclosure;
- (f) refer all Public Interest Disclosures to IBAC;
- (g) keep the Discloser advised of any progress concerning the Disclosure;

- (h) receive all phone calls, emails and letters from members of the public or employees seeking to make a Disclosure;
- (i) appoint a Welfare Manager (see paragraph 4.10) or arrange for appropriate welfare support to protect the Discloser from any reprisals;
- (j) establish and manage a confidential records management system;
- (k) collate and publish statistics on Disclosures made (see paragraph 4.9);
- (l) take all necessary steps to ensure the identity of the Discloser and the identity of the person who is the subject of the Disclosure are kept confidential; and
- (n) liaise with the CEO.

#### 4.7.3 *Manager or supervisor in receipt of a Disclosure*

A manager or supervisor who receives a Disclosure will:

- (a) make arrangements for the Disclosure to be made privately and discreetly and, if necessary, away from the workplace;
- (b) commit to writing any Disclosure made orally;
- (c) advise the Public Interest Disclosure Coordinator of the Disclosure immediately and forward all details, emails, letters and any other documents relating to the Disclosure as soon as possible;
- (d) advise the Discloser that the Disclosure has been escalated to the Public Interest Disclosure Coordinator; and
- (e) take all necessary steps to ensure the identity of the Discloser and the identity of the person who is the subject of the Disclosure are kept confidential.

## 4.8 Confidentiality

4.8.1 Council understands that maintaining confidentiality is crucial in ensuring reprisals are not made against a Discloser and will take all reasonable steps to protect the identity of a Discloser and the content of a Public Interest Disclosure made under the Act.

4.8.2 Council is prohibited from disclosing the content of the Public Interest Disclosure and any information likely to lead to the identification of the Discloser unless, among other things:

- (a) it is exercising its functions under the Act;
- (b) the disclosure is for the purpose of obtaining legal advice with respect to Council's rights, liabilities, obligations and privileges under the Act or another relevant Act;
- (c) the disclosure is for the purpose of assisting the Discloser to seek advice or support from a registered health practitioner, trade union or employee assistance program;
- (d) the disclosure is to WorkCover for a workers compensation claim or to the Fair Work Commission for an application;
- (e) with respect to the content of a Public Interest Disclosure, Council discloses the content in accordance with a direction of IBAC or to the extent necessary for the purpose of taking lawful action in relation to the conduct that is the subject of the disclosure including a disciplinary process or action.

4.8.3 The Public Interest Disclosure Coordinator should be consulted before any information concerning the identity of a Discloser and the content of a Public Interest Disclosure is disclosed.

4.8.4 To comply with these obligations and to give effect to Council's commitment to confidentiality, Council will:

- (a) advise relevant staff that it is an offence to breach these confidentiality obligations;
- (b) store all paper files and other material (e.g. recordings) in relation to Public Interest Disclosures securely, accessible only by the Public Interest Disclosure Coordinator and the CEO (or the Welfare Manager in relation to welfare matters);
- (c) ensure that all printed material is kept in files that are clearly marked as a Public Interest Disclosure matter and include a prominent warning on the front of the file that criminal penalties apply to any unauthorised divulging of information concerning a Public Interest Disclosure;
- (d) ensure that all electronic files are password protected;
- (e) ensure that all communications relating to a disclosure are made securely i.e. phone calls and meetings will be conducted privately, sensitive information or documents are not emailed or faxed to a machine to which staff have general access.

## **4.9 Collating and publishing statistics**

- 4.9.1 The Public Interest Disclosure Coordinator will establish a secure register to record the information required to be published in the annual report, and to generally keep account of the status of disclosures.
- 4.9.2 The register will be confidential and will not record any information that may identify the discloser.
- 4.9.3 The register will contain the following information
- (a) the number and types of Disclosures made to Council during the year;
  - (b) the number and types of Disclosures referred by Council to IBAC for assessment and investigation;
  - (c) the number and types of disclosed matters that Council has assessed as not being Public Interest Disclosures;
  - (d) the number and types of disclosed matters that were substantiated by IBAC upon investigation and the action taken by Council on completion of IBAC's investigation; and
  - (e) any recommendations made by IBAC that relate to Council.

## **4.10 Managing the welfare of the Discloser**

- 4.10.1 Council is committed to the protection of Disclosers against Detrimental Action taken in reprisal for the making of Public Interest Disclosures.
- 4.10.2 The Public Interest Disclosure Coordinator is responsible for ensuring Disclosers are protected from direct and indirect detrimental action, and that the culture of the workplace is supportive of Public Interest Disclosures being made.
- 4.10.3 The Public Interest Disclosure Coordinator will ensure the Discloser is kept informed of action taken in relation to his or her Disclosure, and the time frames that apply.
- 4.10.4 The Public Interest Disclosure Coordinator may appoint a Welfare Manager to coordinate any necessary welfare support for a Discloser, or any person who is involved in the investigation of a Disclosure ("cooperators"). The Welfare Manager's role is to monitor the specific needs of the Discloser or cooperator and provide them with practical advice and support.
- 4.10.5 Welfare support will be provided on an ongoing basis, regardless of whether a Welfare Manager is appointed in a particular case. The welfare provided to all Disclosers and cooperators will include:
- (a) provision of relevant information and active support
  - (b) provision of active support;
  - (c) expectations management;
  - (d) maintaining confidentiality;
  - (e) assessing the risks of, and protecting the Discloser or cooperator from, Detrimental Action taken in reprisal for making the Public Interest Disclosure;
  - (f) managing the impact of the investigation on the Discloser, coordinator and the organisation;
  - (g) keeping contemporaneous case management records.
- 4.10.6 If anyone reports an incident involving a Discloser that may amount to Detrimental Action taken in reprisal for the making of a Disclosure:
- (a) details of the incident will be recorded;
  - (b) the Discloser will be advised of their rights under the Act to disclose the incident; and
  - (c) the Public Interest Disclosure Coordinator or the CEO will be notified of the incident.
- 4.10.7 If the Discloser wishes to disclose the incident as a Detrimental Action under the Act, the Public Interest Disclosure Coordinator will treat it as a new Disclosure under the Act, and assess it in accordance with the requirements of the Act and paragraph 4.5 of this Procedure.

## **4.11 Protections available to Disclosers**

- 4.11.1 Part 6 of the Act creates certain protections in relation to the making of a Disclosure, including Misdirected Disclosures, Disclosures that are not reported to IBAC and Disclosures that are assessed by

IBAC as not amounting to a Public Interest Complaint. These protections include:

- (a) immunity from civil or criminal liability arising from making the Disclosure;
- (b) protection from certain statutory confidentiality obligations;
- (c) protection from an action in defamation;
- (d) protection from Detrimental Action in reprisal for making the Disclosure.

4.11.2 However, Disclosers are not entitled to absolute protection. A discloser is not protected against legitimate management action being taken by Council in accordance with the Act, provided the action is not related to the fact of the Discloser's Disclosure. Additionally, a Discloser will not be protected where they are implicated in misconduct that may be related to their Disclosure (see paragraph 4.11.3).

#### 4.11.3 *Discloser implicated in misconduct*

The Act does not protect Disclosers from the reasonable consequences flowing from their involvement in any misconduct, whether or not it is related to their Disclosure.

The CEO will make the final decision on the advice of the Public Interest Disclosure Coordinator as to whether disciplinary or other action will be taken against a Discloser in relation to their own misconduct.

Where disciplinary or other action relates to conduct that is the subject of the Disclosure, the disciplinary or other action will only be taken after the disclosed matter has been appropriately dealt with.

In all cases where disciplinary or other action is being contemplated, the CEO must be satisfied that it has been clearly demonstrated that:

- (a) the intention to proceed with disciplinary action is not causally connected to the making of the Disclosure (as opposed to the content of the Disclosure or other available information);
- (b) there are good and sufficient grounds that would fully justify action against any person who did not make a Disclosure in the same circumstances; and
- (c) there are good and sufficient grounds that justify exercising any discretion to institute disciplinary or other action.

The Public Interest Disclosure Coordinator will thoroughly document the process including recording the reasons why the disciplinary or other action is being taken, and the reasons why the action is not in retribution for the making of the Disclosure.

The Public Interest Disclosure Coordinator will clearly advise the Discloser of the proposed action to be taken, and of any mitigating factors that have been taken into account.

## **4.12 Managing the welfare of the subject of a Public Interest Disclosure**

4.12.1 Council recognises that employees against whom Disclosures are made must also be supported during the handling and investigation of the Disclosure.

4.12.2 Council will take all reasonable steps to protect the confidentiality of the person who is the subject of the Disclosure.

4.12.3 Where the Disclosure has not been substantiated, the fact that the investigation has been carried out, the results of the investigation, and the identity of the person who is the subject of the Disclosure will remain confidential.

4.12.4 Council will give its full support to a person who is the subject of a disclosure where the allegations contained in a disclosure have been, after investigation, determined to be wrong or unsubstantiated. If the matter has been publicly disclosed, the CEO will consider any request by that person to issue a statement of support setting out that the allegations were wrong or unsubstantiated.

## **5. HUMAN RIGHTS CHARTER COMPATIBILITY**

This Policy has been assessed as being compatible with the *Charter of Human Rights and Responsibilities Act*

2006 (Vic).

## **6. ASSOCIATED INTERNAL DOCUMENTS**

Glen Eira City Council Councillor Code of Conduct

Glen Eira City Council Staff Code of Conduct

## **7. EXTERNAL REFERENCES/RESOURCES**

Public Interest Disclosures Act 2012

Public Interest Disclosures Regulations 2019

Independent broad-based anti-corruption Commission web site (Public Interest disclosures):  
<https://www.ibac.vic.gov.au/reporting-corruption/public-interest-disclosures>