# Public Interest Disclosure

| Council Procedure | |
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| **Corporate Plan Link:** | Our Engaged Council |
| **Related Policy:** | Public Interest Disclosure Policy |
| **Procedure Owner:** | City Administration |
| **Responsible Manager:** | General Manager, Governance, Community Engagement and Executive Services |
| **Date Approved by EGM:** | 20 March 2026 |
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| **Version:** | 2.0 |

## Purpose

The objective of the procedure is to set out the management program and process for managing public interest disclosures (PIDs) received by Council in accordance with the *Public Interest Disclosure Act 2010* (PID Act) and Queensland Ombudsman's Public Interest Disclosure Standards.

Council's PID management program encompasses:

- a commitment to encouraging the internal reporting of wrongdoing;
- senior management endorsement of the value to Council of PIDs and the proper management of PIDs;
- a communication strategy to raise awareness among team members about PIDs and Council's PID procedure;
- a training strategy to give team members access to training about how to make a PID and information on the support available to a discloser, and advice on how PIDs will be managed;
- training and awareness about PIDs for leaders and other team members who may receive or manage PIDs, disclosers or workplace issues relating to PIDs;
- ensuring effective systems and procedures are in place so that issues and outcomes from PIDs can inform improvements to service delivery, business processes and internal controls;
- regular review of the PID policy and procedure, and evaluation of the effectiveness of the PID management program.

## Roles and Responsibilities

The CEO has overall responsibility for ensuring that Council develops, implements and maintains a PID management program.

The following are the roles and responsibilities for managing PIDs within Council.

| Role | Responsibilities | Officer |
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| CEO | • Overall responsibility for Council's compliance with the PID Act and effective oversight of the PID management program and procedures;<br>• Delegating responsibilities under the PID Act as appropriate;<br>• Ensuring reasonable procedures are in place to deal with PIDs and ensure these procedures are communicated;<br>• Ensuring disclosures are properly assessed, investigated, and dealt with, including appropriate action taken in relation to any wrongdoing in a disclosure;<br>• Ensuring team members making a disclosure receive support and protection from reprisal;<br>• Ensuring all legislative obligations in relation to investigation, reporting and recording are met;<br>• Reviewing any decisions not to investigate or deal with PIDs on request;<br>• Ensuring all matters involving suspected corrupt conduct are referred to the CCC; and<br>• Continual improvement of Council's policies, procedures and internal controls. | Chief Executive Officer |
| PID Coordinator | • Principal contact for PID issues within Council;<br>• Review and update PID policy annually;<br>• Coordinate PID management program and procedures;<br>• Establish and maintain a confidential filing system for all PID records;<br>• Report data on PIDs to Queensland Ombudsman;<br>• Provide acknowledgement of PID receipt to discloser;<br>• Initial assessment of PIDs received;<br>• Undertake risk assessments in consultation with disclosers and other relevant officers;<br>• Liaise with other agencies about referral of PIDs;<br>• Appoint Investigator and Support Officer to PID matter;<br>• Oversee and coordinate investigations;<br>• Provide general advice and information to discloser on the PID Act and Council policy;<br>• Facilitate updates on progress of investigation and outcome;<br>• Proactively contact discloser throughout PID management process. | General Manager Governance, Community Engagement and Executive Services; and<br>Chief Legal Council |
| PID Support Officer | • Provide advice and information to discloser on the PID Act and Council's PID procedure;<br>• Accept information from the discloser for assessment by the PID Co-ordinator;<br>• Assess any immediate protection and support needs of discloser;<br>• Coordinate and provide support to discloser and any witnesses (support plan) including referral to other sources of support<br>• Establish and maintain a confidential filing system as required;<br>• Facilitate updates to discloser on progress of investigation;<br>• Proactively contact discloser throughout PID management process. | Appointed as required on a case-by-case basis from the Governance Integrity and Ethical Standards Department; Strategy, Performance and Risk Department; People and Capability Department; and/or Legal Services Department. |

| Role | Responsibilities | Officer |
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| Investigator | • Conduct PID investigations as directed by the PID Coordinator;<br>• Provide the PID Coordinator and Support Officer with information about the investigation as required;<br>• Establish and maintain a confidential filing system;<br>• Prepare investigation reports for the delegated decision-maker; | An appropriate internal or external investigator will be appointed for each PID investigated depending upon the type of disclosure and other relevant considerations. |
| Delegated decision-maker | • Review investigation report and determine whether alleged wrongdoing is substantiated. | An appropriate decision-maker will be appointed for each PID investigated. |

All Council leaders must ensure their team members are aware of their responsibilities in making a PID and be able to provide or source advice on the appropriate reporting process.

All team members have a responsibility to prevent, discourage and refrain from any act of reprisal against a person where it is believed that the person has or will make a public interest disclosure.

**Why make a PID?**

Team members who are prepared to speak up about public sector misconduct, misuse 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:
- implementing 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 the protections provided under the PID Act, including:
- confidentiality: the discloser's name and other identifying information will be protected to the extent possible by law;
- protection against reprisal: the discloser is protected from unfair treatment by Council and Council team members as a result of making the PID;
- protection from liability: the discloser cannot be prosecuted for disclosing the information but is not exempt from action if they have engaged in any wrongdoing; and
- protection from defamation: the discloser has a defence against an accusation of defamation by any subject officer.

**What is a PID**

A public interest disclosure is a disclosure about wrongdoing in the public sector that serves the public interest. For an allegation to be considered a public interest disclosure under the PID Act it must be:
- public interest information about serious wrongdoing or danger;
- an appropriate disclosure; and
- made to a proper authority.

**Who can make a PID**

Anyone, including persons external to Council, can make a PID if they have information about:
- ***substantial and specific danger to the health or safety of a person with a disability***
  - e.g. disability service officers physically or sexually abusing clients
  - e.g. inadequate decision-making for the care of a mental health patient
- ***substantial and specific danger to the environment*** (an offence, or contravention of a condition imposed under Queensland environmental legislation as detailed in schedule 2 of the PID Act);
  - e.g. a shipping company discharging oil into the coastal waters of Queensland
  - e.g. any person or business clearing trees without a permit
- ***reprisal because of a belief that a person has made or intends to make a disclosure***
  - e.g. threatening or harassing a discloser or their family

- e.g. discriminating against a discloser in subsequent employment applications.

Only persons internal to Council including the Mayor, Councillors and Council team members can make further disclosures about:

- corrupt conduct;
- maladministration;
- a substantial misuse of public resources; or
- a substantial and specific danger to public health, safety, or the environment.

A person does not need to state that the information (or complaint) is a disclosure for the matter to be assessed under the PID Act.

**What is an appropriate disclosure**

An 'appropriate disclosure' is where:

- the discloser honestly and reasonably believes the information provided tends to show the conduct or danger; and
- the information tends to show the conduct or danger regardless of the discloser's belief.

Information that 'tends to show' wrongdoing or danger must be more than a mere suspicion. There must be information that indicates or supports a view that the wrongdoing or danger has or will occur. The discloser is not required to undertake any investigative action before making a PID.

When making a PID, the discloser has a responsibility to provide honest and accurate information. Deliberately providing false or misleading information is an offence under the PID Act. Protection is not extended to those who intentionally make a PID that they know is false. This is different from information that turns out to be incorrect or unable to be substantiated.

**Who can a PID be disclosed to?**

A PID must be made to a proper authority with responsibility to investigate the information disclosed.

To identify whether Council is the proper authority to make a disclosure to, consideration should be given to who and what the disclosure is about. Council is authorised to receive a PID where:

- the disclosure is about the conduct of Council or its team members (employees); or
- Council is responsible for investigating the particular issue.

Disclosers are encouraged to make a disclosure to Council in the first instance. If the matter is not resolved, or the discloser is concerned about confidentiality, this disclosure may be made to another proper authority.

| Who to contact within Council | Other agencies that can receive PIDs |
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| Any person (including Council team members) can make a disclosure to:<br>• the CEO;<br>• the PID Coordinator (via secure email pids@moretonbay.qld.gov.au); or<br>• via Council's Whistleblower Hotline.<br><br>In addition, Council team members can make a disclosure to any leader within Council (including immediate Supervisor, Manager, General Manager or Executive General Manager).<br><br>A leader receiving a PID must refer it to the PID Coordinator to ensure that it is appropriately assessed and managed in accordance with the PID Act and Council's PID management program. | Disclosures can be made to an agency that has a responsibility for investigating the information disclosed:<br>• Crime and Corruption Commission (CCC) for disclosures about corrupt conduct;<br>• Queensland Ombudsman for disclosures about maladministration;<br>• Queensland Audit Office for disclosures about a substantial misuse of resources;<br>• Department of Families, Seniors, Disability Services and Child Safety for disclosures about danger to the health and safety of a child, young person or person with a disability;<br>• Department of the Environment, Tourism, Science and Innovation disclosures about danger to the environment;<br>• A Member of the Legislative Assembly (MP) for any wrongdoing or danger;<br>• The Chief Judicial Officer of a court or tribunal in relation to a disclosure about wrongdoing by a judicial officer. |

Public Interest Disclosure

A disclosure to Council can be made:
- by phone (07) 3205 0555 Monday to Friday 8:30am-5:00pm;
- by secure email to pids@moretonbay.qld.gov.au;
- by mail to PO Box 159 Caboolture Qld 4510;
- in person at Council's Customer Service Centres;
- via Council's Whistleblower Hotline phone 1300 790 228 or online at https://secured1.yourcall.com.au/ (Org ID: MBRC).

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; or
  - failed to notify the discloser within six months of making the disclosure whether or not the disclosure was to be investigated or otherwise dealt with.

A person who makes a disclosure to a journalist in these circumstances is protected under the PID Act. However, disclosers should be aware that journalists are not bound under the confidentiality provisions of section 65 of the PID Act.

It is recommended that disclosers seek independent legal advice before disclosing a PID to a journalist to ensure they are not breaching the confidentiality provisions of the PID Act. Unauthorised disclosure may expose the discloser to disciplinary and/or civil action.

**How to make a PID**

A PID can be made in any format, verbally or in writing. To enable further assessment and investigation disclosures should:
- be clear and factual;
- avoid speculation, emotive language and embellishment;
- avoid the provision of only vague details.

Supporting information or evidence may include:
- the discloser's name and contact details unless the discloser prefers to remain anonymous;
- the name and position of the person who is the subject of the disclosure;
- information about the wrongdoing or danger, including relevant events, dates and places;
- the names of people who may be able to provide additional information (e.g. any witnesses);
- correspondence or other supporting documents such as file notes or diary of events, where relevant;
- advice about whether anything was done in response to the wrongdoing; and
- any concerns about possible reprisal.

A discloser may use Council's **Public Interest Disclosure Form** or the Whistleblower Hotline report to make a PID.

**Anonymous PIDs**

Anonymous disclosures can be made, however, Council prefers that disclosers identify themselves. This enables the best possible assessment and investigation of the PID. It also ensures appropriate support can be provided to the discloser.

If a discloser chooses to remain anonymous, it is important that as much information as possible is provided to allow for proper assessment and investigation of the PID. Council may not be able to inform anonymous disclosers of the investigation outcome. As a result, some of the protections in the PID Act may not apply.

If the disclosure is anonymous and enough information is provided, Council will act upon the disclosure.

**Confidentiality**

Council will make every effort to protect the confidentiality of PIDs as far as it is legally and reasonably practical to do so. Disclosers should be aware that their identity may need to be disclosed in order to:
- provide natural justice to a person subject to allegations; and/or
- respond to a legal directive, court order or court proceedings.

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

Council team members are required to treat all information held by Council with an appropriate level of confidentiality in accordance with the *Information Privacy Act 2009* and Council's Privacy Policy.

Section 65 of the PID Act makes it an offence for a person to make a record of, or intentionally or recklessly disclose confidential information received in the administration of the PID Act to anyone, except when authorised to do so by the PID Act.

**Deciding whether a matter is a PID**

If there is any doubt as to whether 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. Team members 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.

**Receiving a PID**

Council will receive and assess all disclosures in accordance with the PID Act and PID standards.

In the first instance, all PIDs will be referred to the PID Coordinator for assessment. The PID Coordinator will provide an acknowledgment to the discloser that their disclosure has been received as soon as practicable.

**Assessing a PID**

All disclosures will be assessed by the PID Coordinator to determine whether it meets the requirements of the PID Act. In conjunction with their assessment of the information disclosed, the PID Coordinator will apply the tests set out in the PID Act to determine the appropriateness of that information to be assessed as a disclosure:

- Section 12(3) sets out the subjective test, which stipulates that the discloser must have an honest belief, on reasonable grounds that their information tends to show the conduct or danger concerned.
- Section13(3) sets out the objective test, which is that the information tends to show the conduct or danger, regardless of whether the discloser honestly believes their information tends to show the conduct or danger.

Once the matter has been assessed as a disclosure, Council will inform the discloser in writing:

- that their disclosure has been assessed as a PID;
- the action to be taken by Council in relation to the PID, which could include referring the matter to an external agency, or investigating;
- the likely timeframes for an investigation;
- their involvement in the investigation process;
- the discloser's obligations regarding confidentiality;
- the commitment of Council to maintain confidentiality (except where permitted) and to keep appropriate records;
- the protections the discloser has under the PID Act;
- how they will be advised of progress and outcomes; and
- contact details of the Council support officer they can contact for updates or advice.

Generally, if a 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. However, anonymous PIDs made through the Whistleblower Hotline will be able to receive appropriate updates via a message board.

If a purported PID does not meet the test of being a PID, a written record of the assessment, including factors considered in the determination are to be kept; and that the discloser is provided with written reasons for the determination and informed of their right of review of the decision.

**Referring a PID**

If Council decides there is another proper authority that should 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/or
- that agency has the power to investigate or remedy the matter.

Before referring the PID to another agency, Council will conduct a risk assessment, and may 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, refer a matter to the Crime and Corruption Commission where there is a reasonable suspicion that the matter involves or may involve corrupt conduct (as required by section 38 of the *Crime and Corruption Act 2001*).

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

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

**Declining to take action on a PID**

Under the PID Act, Council may decide not to investigate or deal with a PID in certain 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/or
- another agency with jurisdiction to investigate the information has informed Council that an investigation is not warranted.

If a decision is made not to investigate or deal with a PID, Council will give the discloser written reasons for that decision.

**Investigating a PID**

If a decision is made to investigate a PID, Council will appoint an investigator who will take the following into consideration as part of the investigation process:

- the principles of natural justice;
- obligations under the PID Act to protect confidential information;
- obligations under the PID Act to protect officers from reprisal; and
- the interests of the subject officer.

Should wrongdoing be substantiated as a result of the PID investigation, appropriate action will be taken by Council in accordance with this procedure and Council's Employee Code of Conduct.

For all PIDs, whether substantiated or not, Council will consider whether systemic changes or other improvements are required to policies, procedures, systems and work practices. Council is committed to implementing any recommended changes and ensuring continuous improvement.

**Communication with disclosures**

In accordance with the PID Act, Council will provide reasonable information to a discloser during the management of a PID, including:

- that their information has been received and assessed as a disclosure;

- 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 including any internal and external review rights available to the discloser and the timeframe in which this should occur

**Risk assessment and protection from reprisal**

Council will ensure that all persons involved in disclosures (the discloser or the subject officer) are offered an appropriate level of protection, support and case management. Action will be taken to ensure that, where possible, identities and the details of the disclosure will remain confidential.

Council is responsible for protecting all disclosers from reprisal including members of the public and anonymous disclosers. Upon receiving a PID, Council will conduct 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 a disclosure. This assessment will take into account the actual and reasonably perceived risk of the discloser (or witnesses or affected third parties) suffering detriment and will include consultation with the discloser.

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

Consistent with the assessed level of risk, the PID Coordinator 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;
- manage any allegation of a reprisal as a PID in its own right.

If a discloser feels as though they have been disadvantaged or subjected to a reprisal for making a disclosure, they should raise the issue immediately with the PID Coordinator.

**Support for disclosers**

Council recognises that providing appropriate support to a discloser is an important feature of effective PID management. A discloser's concerns will be taken seriously, and their privacy and confidentiality protected as far as possible throughout any investigation process.

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 prepare a support plan and assist the discloser to access information about the PID management process, protections, confidentiality and any support services (including the Employee Assistance Scheme).

The PID support officer will proactively contact the discloser to offer support throughout the process and until the matter is finalised.

Making a PID does not prevent reasonable management action. That means that a discloser that is a Council team member will continue to be managed in accordance with normal, fair and reasonable management practices during and after the handling of a PID.

### Support for subject officers

Council acknowledges that for team members who are the subject of a PID the experience may be stressful. Council will 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.

### Review rights

Under the PID Act, disclosers have a right of appeal or review regarding the management and/or outcome of their disclosure. Council will advise the discloser of their review rights.

If a decision is made not to investigate or deal with a PID, the discloser may:

- request an internal review in writing to the CEO within 28 days of receiving the written reasons for the decision;
- request an external review by another authority depending on the nature of the disclosure (see table above).

Under the PID Act, a Council team member the subject of a PID has the right to appeal or request a review regarding:

- disciplinary actions resulting from a PID investigation;
- an action or decision taken as a reprisal against that team member.

### Record keeping

In accordance with the PID Act and the *Public Records Act 2023*, Council will ensure that records about disclosures, investigations and related decisions will be kept secure and accessible only to appropriately authorised team members involved in the management of the PID.

A confidential PID Register will be maintained by the Governance, Integrity and Ethical Standards Department to support recording, monitoring and reporting.

### Reporting

The Governance, Integrity and Ethical Standards Department will provide regular reports to the Chief Executive Officer and Council's Audit Committee on the implementation and effectiveness of the PID management program.

Recommendations arising from PID investigations will also be shared with the Executive Leadership Team, Department Managers and Internal Audit team where appropriate for consideration and action to improve policies, processes and/or internal controls.

The Governance, Integrity and Ethical Standards Department will also report the anonymised PID data to the Queensland Ombudsman in their role as the oversight agency, through the PID reporting database in accordance with the *Public Interest Disclosure Standard No. 3/2019*.

## Application

This procedure applies to the Mayor, Councillors and all Council team members. This procedure also applies to anyone external to Council person including a member of the public wishing to make a disclosure about suspected wrongdoing in accordance with the PID Act.

## Related Documents

### Relevant legislation

- *Public Interest Disclosure Act 2010*
- *Local Government Act 2009*
- *Crime and Corruption Act 2001*

- *Ombudsman Act 2001*
- *Public Records Act 2023*
- *Public Sector Ethics Act 1994*

**Council documents**

- Public Interest Disclosure Policy
- Public Interest Disclosure Form
- Fraud and Corruption Control Policy
- Fraud and Corruption Allegation Reporting Form
- Complaint Management Policy
- Enterprise Risk Management Policy
- Employee Code of Conduct
- Privacy Policy

**Other resources**

- Queensland Ombudsman Public Interest Disclosure Standards (01/2019, 02/2019, 03/2019)

## Definitions

| Term | Definition |
|---|---|
| **Council** | City of Moreton Bay or Moreton Bay City Council. |
| **CEO** | Chief Executive Officer of Moreton Bay City Council. |
| **Corrupt conduct** | Defined in section 15 of the *Crime and Corruption Act 2001*. |
| **Detriment** | Defined in schedule 4 of the PID Act and includes:<br>• personal injury or prejudice to safety;<br>• property damage or loss;<br>• intimidation or harassment;<br>• adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business;<br>• financial loss; and<br>• damage to reputation, including, for example, personal, professional or business reputation |
| **Discloser** | A person who makes a public interest disclosure in accordance with the PID Act and the Public Interest Disclosure Policy. |
| **Leader** | Council team members that have supervisory responsibilities of workers. This includes the Chief Executive Officer, Executive General Managers, General Managers, and Department Managers |
| **Maladministration** | Defined in schedule 4 of the PID Act, maladministration is administrative action that:<br>• was taken contrary to law; or<br>• was unreasonable, unjust, oppressive, or improperly discriminatory; or<br>• 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<br>• was taken—<br>  ○ for an improper purpose; or<br>  ○ on irrelevant grounds; or<br>  ○ having regard to irrelevant considerations; or<br>• was an action for which reasons should have been given, but were not given; or<br>• was based wholly or partly on a mistake of law or fact; or<br>• was wrong. |
| **Natural justice** | Referred to as 'procedural fairness' and applies to any decision that can affect the rights, interests or expectations of individuals in a direct or immediate way. Natural justice is at law a safeguard applying to an individual whose rights or interests are being affected. The rules of natural justice, which have been developed to ensure that decision-making is fair and reasonable, are:<br>• avoid bias; and<br>• give a fair hearing.<br>• act only on the basis of logically probative evidence |

| Term | Definition |
|---|---|
| **PID Coordinator** | A Council team member, delegated by the CEO, with responsibility for the implementation of Council's PID management program, including acting as a principal point of contact with the oversight agency. |
| **Proper Authority** | A person or organisation authorised under the PID Act to receive PIDs. For example, a public-sector entity (including a local government) is a proper authority if the disclosure is about the conduct of that entity or its employees. |
| **Public Interest Disclosure or PID** | A disclosure of certain types of wrongdoing or danger specified in the PID Act and made to a proper authority including Council. |
| **Reprisal** | Defined in schedule 4 of the PID Act, reprisal means causing, attempting to cause, or conspiring to cause detriment to another person in the belief that they or someone else:<br>• has made, or intends to make, a disclosure; or<br>• has been, or intends to be, involved in a proceeding under the PID Act against any person.<br>Reprisal under the PID Act is a criminal offence and investigations may be undertaken by the Queensland Police Service. |
| **Subject Officer** | A Council team member who is the subject of allegations of wrongdoing made in a public interest disclosure. |
| **Substantial** | 'Of a significant or considerable degree'. It must be more than trivial or minimal and have some weight or importance. |
| **Team member** | All employees of Council, whether employed on a permanent, temporary, part-time, or casual basis. This definition includes volunteers and employees of businesses and entities contracted to provide services to, or on behalf of Council. |

## Document Control

| Document History | | | Official Version: ECM75130324 | |
|---|---|---|---|---|
| **Version** | **Approval** | **Date** | **Description** | **Document ID** |
| 1.0 | Council | 14.12.2022 | New Procedure (General Meeting (MP. 22/2089)) | 65948068 |
| 2.0 | CEO (75130095) | 20.3.2026 | Updated to reflect feedback from the Office of the Queensland Ombudsman | 72913940 |