



**JUNEE SHIRE COUNCIL**

**PUBLIC INTEREST  
DISCLOSURES POLICY**

## CONTROLLED DOCUMENT INFORMATION

### Authorisation Details:

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### Appendices:

<b>Annexure</b>	<b>Description</b>
A	Public Interest Disclosures Reporting Form
B	Public Interest Disclosures Report Handling Procedure

### Document History:

<b>Version</b>	<b>Version start date and minute no.</b>	<b>Description</b>	<b>Author</b>
1	20 August 2013 06.08.13	First version.	
2	20 December 2023 19.12.23	<ul style="list-style-type: none"><li>Updated policy name from Internal Reporting Policy to Public Interest Disclosures Policy.</li><li>Adapt to new policy framework template.</li><li>To reflect new Model Policy from NSW Ombudsman and recent changes to the Public Interests Disclosures Act 2022.</li><li>To include reporting procedure and form.</li></ul>	Jessica Wood Executive Services Officer.

### Related Document Information, Standards and References:

<b>Related Legislation</b>	Public Interest Disclosures Act 2022 Independent Commission Against Corruption Act 1988 Government Information (Public Access) Act 2009 Ombudsman Act 1974
<b>Related Policies</b>	Code of Conduct Fraud and Corruption Prevention Policy Fraud Control Plan
<b>Other References</b>	NSW Ombudsman Independent Commission Against Corruption Information and Privacy Commission NSW Audit Office Employee Assistance Program

## A. INTRODUCTION

### I. OBJECTIVES

All agencies in NSW are required to have a Policy under section 42 of the *Public Interest Disclosures Act 2022* (PID Act)

June Shire Council takes reports of serious wrongdoing seriously and adheres to the objectives of the PID Act. We have zero tolerance of corruption, maladministration, and the waste of public resources. We encourage a speak up culture, where public officials are encouraged to report any conduct that they reasonably believe involves wrongdoing.

The integrity of Council relies upon our staff, volunteers, contractors, and subcontractors speaking up when they become aware of wrongdoing.

This policy sets out:

- a) How Council will support and protect you if you come forward with a report of serious wrongdoing.
- b) How we will deal with the report and our other responsibilities under the PID Act.
- c) Who to contact if you want to make a report.
- d) How to make a report.
- e) The protections which are available to you under the PID Act.

This Policy also documents our commitment to building a speak up culture. Part of that speak up culture is having in place a framework that facilitates public interest reporting of wrongdoing by:

- a) Protecting those who speak up from detrimental action.
- b) Taking appropriate action to investigate or otherwise deal with reports of wrongdoing.

This Policy should be read in conjunction with Council's Code of Conduct, Fraud and Corruption Prevention Policy and Plan.

The internal reporting system is not intended to be used for staff grievances, which should be raised via normal supervisor and staff communication channels. If a staff member makes a report under this Policy which is substantially a grievance, the matter will be referred to Human Resources to be dealt with as a grievance or dispute matter.

### 2. SCOPE

This policy applies to the following people who are considered public officials for the purpose of this Policy:

- a) A Council employee including permanent, temporary and casual staff.
- b) A Councillor.
- c) A person employed in the service of Council including, labour hire and consultants.
- d) A person providing services or exercising functions on behalf of Council, including a contractor, subcontractor including the employees of the contractor.
- e) A volunteer.

This policy does not apply to residents and other people who have received services from June Shire Council and want to make a complaint about those services. Such complaints can be made by completing Council's online form on our website or by phoning 02 6924 8100.

Other public officials who work in and for the public sector, but do not work for June Shire Council may use this policy if they want information on who they can report wrongdoing to within June Shire Council.

The General Manager, other nominated disclosure officers, managers and supervisors within Council have specific responsibilities under the PID Act. This Policy also provides information on how people in these roles will fulfil their responsibilities.

If you require further information about this Policy, how public interest disclosures will be handled and the PID Act you can:

- a) Confidentially contact a nominated disclosure officer within Council.
- b) Contact the PID Advice Team within the NSW Ombudsman.
- c) Access the NSW Ombudsman's PID guidelines which are available on its website.
- d) Seek independent legal advice.

## B. ROLES AND RESPONSIBILITIES

### I. KEY POSITIONS

#### a) General Manager

The General Manager has ultimate responsibility for maintaining the internal reporting system and workplace reporting culture, and ensuring Junee Shire Council complies with the PID Act.

The General Manager is responsible for:

- i. Fostering a workplace culture where reporting is encouraged.
- ii. Receiving disclosures from public officials.
- iii. Ensuring there is a system in place for assessing disclosures.
- iv. Ensuring Junee Shire Council complies with this Policy and the PID Act.
- v. Ensuring that reports made under Council's Code of Conduct are dealt with in accordance with adopted procedures.
- vi. Ensuring that Council has appropriate systems for:
  - overseeing internal compliance with the PID Act
  - supporting public officials who make voluntary PIDs
  - implementing corrective action if serious wrongdoing is found to have occurred
  - complying with the reporting obligations.

Where the report is about the Disclosure Coordinator the General Manager assumes the responsibilities of the Disclosure Coordinator.

#### b) Disclosure Coordinator

The Disclosure Coordinator has a central role in Junee Shire Council's internal reporting system.

The Disclosure Coordinator can receive and assess reports and is the primary point of contact. Junee Shire Council's Disclosure Coordinator is the **Chief Financial Officer**.

The Disclosure Coordinator is responsible for:

- i. Assessing reports to determine whether or not a report should be treated as a PID, and to decide how each report will be dealt with (either under delegation or in consultation with the General Manager).
- ii. Coordinating Council's response to a report.
- iii. Acknowledging reports and providing updates and feedback to the reporter.
- iv. Assessing whether it is possible and appropriate to keep the reporter's identity confidential.

- v. Assessing the risk of reprisal and workplace conflict related to arise out of a report and develop strategies to manage any risk identified.
- vi. Where required, providing support to staff involved in the reporting or investigating process.

Where the report is about the Disclosure Officer the Disclosure Coordinator assumes the responsibilities of the Disclosure Officer.

c) Disclosure Officer

The Disclosure Officer is an additional point of contact within the internal reporting system.

They can provide advice about the system and the internal reporting policy, receive reports of wrongdoing and assist public officials to make reports.

Junee Shire Councils Disclosure Officer is the **Executive Services Officer**.

The Disclosure Officer is responsible for:

- i. Receiving reports from public officials.
- ii. Receiving reports when they are passed on to them by managers or supervisors.
- iii. Ensuring that any oral reports that have been received are recorded in writing.
- iv. Directing reports to the Disclosure Coordinator for assessment.
- v. Providing six-monthly reports to the NSW Ombudsman in accordance with the PID Act.

d) Mayor

The Mayor can receive reports from public officials about the General Manager. Where the Mayor receives such reports, the Mayor has the same responsibilities as a Disclosure Officer.

e) Managers and Supervisors

The responsibilities of managers and supervisors include receiving reports from employees that report to them or that they supervise and passing on such reports to the disclosure officer.

## 2. COUNCILLORS AND EMPLOYEES

All Councillors and employees must:

- a) Report suspected serious wrongdoing or other misconduct.
- b) Use their best endeavours to assist in an investigation of serious wrongdoing if asked to do so by a person dealing with a voluntary PID.
- c) Treat any person dealing with or investigation reports of serious wrongdoing with respect.

All Councillors and employees must not take detrimental action against any person who has made, may in the future make, or is suspected of having made, a PID.

## 3. GOVERNANCE

The Chief Financial Officer and the Executive Services Officer are responsible for:

- a) Reviewing and updating this policy and supporting systems.
- b) Disseminating of information including providing training and information to staff on the PID Act, affirming the important of reporting wrongdoing and the protections available to them under the PID Act.
- c) Maintaining a secure and confidential process for public officials to make disclosures.

## C. TYPES

### I. Reports, Complaints and Grievances

Public officials should report any suspected wrongdoing within Junee Shire Council. When a public official reports a suspected or possible wrongdoing in the public sector, their report will be a PID if it has certain features which are set out in the PID Act.

Some internal complaints or internal grievances may also be PIDs, if they have the features of a PID. If an internal complaint or grievance is a report of serious wrongdoing, we will consider whether it is a PID. If it is a PID, we will deal with it as set out in this policy. If a staff member makes a report under this policy which is substantially a grievance, this matter may be referred to Human Resources.

There are three types of PIDs in the PID Act. These are:

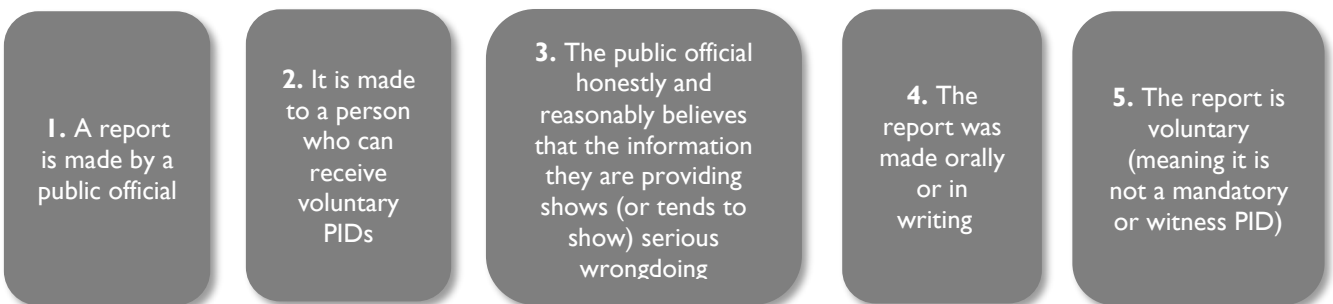
- a) *Voluntary* – This is a PID where a report has been made by the public official because they decide, of their own accord, to come forward and disclose what they know.
- b) *Mandatory* – This is a PID where the public official has made a report about serious wrongdoing because they have a legal obligation to make that report, or because making that report is an ordinary aspect of their role or function in an agency.
- c) *Witness* – This is a PID where a person discloses information during an investigation of a serious wrongdoing following a request or requirement of the investigator.

This Policy primarily relates to making a voluntary PID and how Junee Shire Council will deal with them. People who make a mandatory or witness PID are still entitled to protection. More information about mandatory and witness PIDs can be found in the Ombudsman's guidelines.

Voluntary PIDs are the kind of PIDs most people have in mind when they think about public interest reporting and 'whistleblowing'.

They involve a public official making a report because they have information that they believe shows (or tends to show) serious wrongdoing, where they are not under a legal obligation to make that report and where it is not an ordinary part of their role to report such wrongdoing.

A report is a voluntary PID if it has the following five features, which are set out in sections 24 to 27 of the PID Act:



If the report has all five features, it is a voluntary PID.

You will not be expected to prove that what you reported actually happened or is serious wrongdoing. You do have to honestly believe, on reasonable grounds, that the information you are reporting shows or tends to show serious wrongdoing.

Even though you do not have to prove the serious wrongdoing happened or provide evidence, a mere allegation with no supporting information is unlikely to meet this test. If we make an error and do not identify that you have made a voluntary PID, you will still be entitled to the protections under the PID Act.

## **2. Reportable Categories**

Reports must be of one or more of the following categories of serious wrongdoing to be a voluntary PID as defined by the PID Act:

- a) Corrupt conduct.
- b) Serious maladministration.
- c) A government information contravention.
- d) A local government pecuniary interest contravention.
- e) A privacy contravention.
- f) A serious or substantial waste of public money.

Reports must state what category of serious wrongdoing is being reported.

## **D. REPORTING**

### **I. Form**

Reports can be made as follows:

- a) In writing
- b) Orally

Junee Shire Council has a form that can be used to make a report, a copy of which is annexed to this policy.

Reports must include:

- a) Date time and location of key events.
- b) Name(s) of people involved in the suspected wrongdoing, their role, title and how they were involved.
- c) Your relationship to the person.
- d) Your explanation of the matter you are reporting.
- e) How you became aware of the matter you are reporting.
- f) Possible witnesses.
- g) Other information that supports your report.

### **2. To Whom**

Reports should be provided to the appropriate person listed in section B of this policy.

At Junee Shire Council, we value transparency and take concerns seriously. If you have any concerns or require assistance, please reach out to the Disclosure Coordinator. Your communication will be dealt with the utmost discretion.

### 3. Management of Reports

When a disclosure officer receives a PID report the following steps will be taken:

- a) You will receive an acknowledgment that your report has been received.
- b) We will assess which type of PID category the matter relates to and thereafter advise you of how we intend to deal with it.
- c) In the case the report is deemed to not be a voluntary PID the matter will be dealt with pursuant to our code of conduct and general grievance process. We will advise you of our reason for doing so.
- d) If the matter is deemed to be a voluntary PID and we decide to investigate the matter, we will provide you with updates every three months.
- e) We have the right to internally investigate or to appoint an external investigator.
- f) We have the right to refer the report to another agency if necessary such as ICAC pursuant to Section 11 of the *Independent Commission Against Corruption Act 1988*.
- g) Once an investigation is complete, you will be provided with a summary detailing the findings and any actions taken.

## E. PROTECTIONS

We understand that people making voluntary PIDs may want their identity and the fact that they have made a report to be confidential. When you make a voluntary PID you receive special protections under the PID Act.

We are committed to taking all reasonable steps to protect you from detriment as a result of having made a PID. We are also committed to maintaining your confidentiality as much as possible while the PID is being dealt with.

We will not tolerate any type of detrimental action being taken against you because you have made a report, might make a report or are believed to have made a report. The maker of a voluntary PID is protected in the following ways:

- **Protection from detrimental action**

- A person cannot take detrimental action against another person because they have made a voluntary PID or are considering making a PID. Detrimental action includes bullying, harassment, intimidation or dismissal.
- Once we become aware that a voluntary PID by a person employed or otherwise associated with Junee Shire Council that concerns serious wrongdoing relating to Junee Shire Council has been made, we will undertake a risk assessment and take steps to mitigate the risk of detrimental action occurring against the person who made the voluntary PID.
- It is a criminal offence for someone to take detrimental action against a person because they have made or may make a voluntary PID.
- A person may seek compensation where unlawful detrimental action has been taken against them.
- A person can apply for a court order (injunction) where detrimental action is threatened or has occurred (for example, an order to prevent dismissal or to require reinstatement).
- Note that a person who makes a PID can still be subject to reasonable management action (such as ordinary performance reviews and performance management). Provided such action is not taken because of the PID, it is not detrimental action under the PID Act.

- **Immunity from civil and criminal liability**

Some public officials are often subject to a duty of confidentiality that prevents them disclosing certain information that they obtain or become aware of at work. Sometimes, in order to make a PID, public



officials will need to breach or disregard such confidentiality duties. If that happens, a public official cannot be disciplined, sued or criminally charged for breaching confidentiality.

- **Confidentiality**

Public officials and agencies must not disclose information tending to identify a person as the maker of a voluntary PID unless doing so is permitted by the PID Act.

- **Protection from liability for own past conduct**

The Attorney General can give the maker an undertaking that a disclosure of their own past conduct will not be used against them if a person discloses their own wrongdoing or misconduct while making a report. This undertaking can only be given on application by an integrity agency to the Attorney General.

Under the PID Act, information tending to identify a person as the maker of a voluntary PID (known as identifying information) is not to be disclosed by a public official or agency, except for in these circumstances:

- Where the person consents in writing to the disclosure.
- Where it is generally known that the person is the maker of the voluntary PID because of their voluntary self-identification as the maker.
- When the public official or Council reasonably considers it necessary to disclose the information to protect a person from detriment.
- Where it is necessary the information be disclosed to a person whose interests are affected by the disclosure.
- Where the information has previously been lawfully published.
- When the information is disclosed to a medical practitioner or physiologist for the purpose of providing treatment or counselling to the person disclosing the information.
- When the information is disclosed for the purposes of proceedings before the Court or tribunal.
- When the disclosure of the information is necessary to deal with the disclosure effectively.
- If it is otherwise in the public interest to disclose the identifying information.

If Junee Shire Council becomes aware of an allegation that a detrimental action offence has occurred or may occur, we will:

- Take all steps possible to stop the action and protect the person(s).
- Take appropriate disciplinary action against anyone that has taken detrimental action.
- Refer any evidence of a detrimental action offence to the Commissioner of Police and the ICAC or the Law Enforcement Conduct Commission (whichever is applicable).
- Notify the NSW Ombudsman about the allegation of a detrimental action offence being committed.

We will not disclose identifying information unless it is necessary and authorised under the PID Act and we will do everything we practically can do to not unnecessarily disclose information on the maker of the report.

If confidentiality cannot be maintained or is unlikely to be maintained the Disclosures Coordinator will advise the person who made the report and provide support to the person to reduce any detrimental action.

If you experience adverse treatment or detrimental action, such as bullying or harassment, you should report this immediately. You can report any experience of adverse treatment or detrimental action directly to Junee Shire Council or to an integrity agency.

## F. REVIEWS AND DISPUTE RESOLUTION

### 1. Internal Review

People who make voluntary PIDs can seek an internal review of the following decisions made by Junee Shire Council:

- a) That Council is not required to deal with the report as a voluntary PID.
- b) To stop dealing with the report because Council decided it was not a voluntary PID.
- c) To not investigate the serious wrongdoing and not refer the report to another agency.
- d) To cease investigating the serious wrongdoing without either completing the investigation or referring the report to another agency for investigation.

Council will ensure internal reviews are conducted in compliance with the PID Act.

Applications for review are to be sent to the General Manager and must:

- a) Made in writing in writing.
- b) Lodged within 28 days of the person being informed of Council's decision.
- c) State the reasons why you consider Council's decision should not have been made.
- d) Detail any other relevant information or provide relevant documentation.

The General Manager may nominate a disclosure officer who was not directly involved in the matter to conduct the review.

### 2. Voluntary Dispute Resolution

If a dispute arises between Junee Shire Council and a person who has made a report which is, or may be, a voluntary PID, we may request the NSW Ombudsman conciliate the dispute. Conciliation is a voluntary process and will only be suitable for disputes where Council and the maker of the report are willing to resolve the dispute.

## G. OBLIGATIONS

### 1. Record-keeping

Junee Shire Council must keep full and accurate records with respect to all information received in connection with the PID Act. This ensures that Council complies with its obligations under the *State Records Act 1998*.

All information received in relation to suspected acts of wrongdoing will be stored securely within Council's electronic document management system and managed in accordance with Council's Records Management Policy. Only authorised officers (including the General Manager, Disclosures Coordinator and Disclosures Officer) will have access to these records.

### 2. Reporting

Each year Junee Shire Council will provide an annual return to the NSW Ombudsman which includes:

- a) Information about voluntary PIDs received by Council during each return period (yearly with the start date being 1 July).
- b) Action taken by Council to deal with voluntary PIDs during the return period.
- c) Details of how Council promoted a culture in the workplace where PIDs are encouraged.

### 3. Compliance

Junee Shire Council will provide appropriate training to disclosure officers, manager and supervisors on their roles and responsibilities under the PID Act. All staff will receive annual information and formal training on induction.

This policy will be reviewed regularly to ensure that it remains up to date and effective.

## H. CONTACTS

### I. Contact Us

Reports can be made using the Junee Shire Council PID Reporting Form . The form is a secure and confidential way for public officers to make a PID. Any information provided on the form will be treated with the utmost discretion and will only be shared with those who need to know to investigate the matter.

Public officers who are unsure about whether the wrongdoing they have witnessed or become aware of is serious enough to warrant a PID can contact the Disclosure Coordinator or Disclosure Officer.

To be a PID, a report of serious wrongdoing must generally be made to a person's own manager, supervisor or to a disclosure officer. Contact details are per below:

- a) **Disclosure Coordinator**  
Luke Taberner  
Chief Financial Officer  
e: [luke.taberner@juneensw.gov.au](mailto:luke.taberner@juneensw.gov.au)  
t: 02 6924 8100
- b) **Disclosure Officer**  
Jessica Wood  
Executive Services Officer  
e: [jessica.wood@juneensw.gov.au](mailto:jessica.wood@juneensw.gov.au)  
t: 02 6924 8100

### 2. NSW Integrity Agencies

The PID Act classifies certain agencies as integrity agencies. These are the external agencies to which a public official might wish to make a PID, outside of Junee Shire Council.

Agency	What they investigate	Contact
The NSW Ombudsman	Most kinds of serious maladministration	e. <a href="mailto:info@ombo.nsw.gov.au">info@ombo.nsw.gov.au</a> t. 1800 451 524
The Auditor-General	Serious and substantial waste of public money by auditable agencies	e. <a href="mailto:governance@audit.nsw.gov.au">governance@audit.nsw.gov.au</a> t. 02 9275 7100
Independent Commission Against Corruption	Corrupt conduct and fraud	e. <a href="mailto:icac@icac.nsw.gov.au">icac@icac.nsw.gov.au</a> t. 1800 463 909
The Inspector of the Independent Commission Against Corruption	Serious maladministration by the ICAC	e. <a href="mailto:icac_executive@icac.nsw.gov.au">icac_executive@icac.nsw.gov.au</a> t. 02 9228 3023
Office of the Local Government	Local government pecuniary interest contraventions	e. <a href="mailto:olg@olg.nsw.gov.au">olg@olg.nsw.gov.au</a> t. 02 4428 4100
The Privacy Commissioner	Privacy contraventions	e. <a href="mailto:ipcinfo@ipc.nsw.gov.au">ipcinfo@ipc.nsw.gov.au</a> t. 1800 472 679
The Information Commissioner	Government information contraventions	e. <a href="mailto:ipcinfo@ipc.nsw.gov.au">ipcinfo@ipc.nsw.gov.au</a> t. 1800 472 679

# ANNEXURE A

## JUNEE SHIRE COUNCIL PID REPORT FORM

Public officers can use the form to make a report under the *Public Interest Disclosures Act 2022* and disclose serious wrongdoing that they have witnessed or become aware of in the course of their work.

Completed forms must be sent to persons nominated in section B of this policy. Please retain a copy for your own records.

Details of the reporter		
Full name:		
Position:		<b>Preferred contact method</b>
Telephone number:		<input type="checkbox"/> Telephone
Email:		<input type="checkbox"/> Email
Postal address		<input type="checkbox"/> Post
Details of the wrongdoing being reported		
Category:	corrupt conduct / serious maladministration / government contravention / pecuniary interest contravention / privacy contravention / serious or substantial waste of public money (circle)	
Description, for example: <ul style="list-style-type: none"> <li>• What happened?</li> <li>• Where did this happen?</li> <li>• When did this happen?</li> <li>• Is it still happening?</li> <li>• How did you become aware of this?</li> </ul> <i>Attach an additional page if required.</i>	<hr/>	
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People involved in the alleged wrongdoing		
Name	Position	
<hr/>	<hr/>	
<hr/>	<hr/>	
Other people who may have witnessed or have additional information		
Name	Position	
<hr/>	<hr/>	
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Supporting evidence		
Description of information or evidence		
<hr/>	<input type="checkbox"/> Attached	No. of pages: <hr/>
<hr/>	<input type="checkbox"/> Attached	No. of pages: <hr/>
I honestly believe that the above information shows or tends to show wrongdoing.		
<hr/>		<hr/>
<b>Signature of reporter</b>	<b>Date of report</b>	
Report submitted to: <hr/> by: email / post / in person (circle)		

## ANNEXURE B

### JUNEE SHIRE COUNCIL PID REPORT HANDLING PROCEDURE

Reporting handling procedure to assist with managing a report of wrongdoing by a public official.

#### 1. Report is received

- a) Reports may be received in various ways, including by post, online, by phone, email, social media or in person.
- b) Reports can be received by:
  - i. Mayor (if relating to the General Manager)
  - ii. General Manager
  - iii. Disclosure Coordinator
  - iv. Disclosure Officer
  - v. Manager or Supervisor

#### 2. Record and Acknowledge

- a) Report details to be provided to the Disclosure Coordinator and entered in the PID register.
- b) Within two business days of being notified of the report, the Disclosure Coordinator will either verbally or via written correspondence contact report maker to:
  - i. Acknowledge the report.
  - ii. Arrange for a report form to be completed by the report maker.
  - iii. Provide support that the report maker may need.
  - iv. Agree on the preferred communication method.
  - v. Supply contact information and summary of next steps.
- c) In the case of an anonymous report, the Disclosure Coordinator will arrange for the officer who received the report to complete a report form within two business days of being notified of the report.
- d) The Disclosure Coordinator will file an electronic copy of the report form in Councils electronic records management system ("ERMS") and ensure it is marked confidential.

#### 3. Assess

- a) The Disclosure Coordinator will consider:
  - i. Junee Shire Councils jurisdiction.
  - ii. Involvement of any other organisations.
  - iii. Feasibility of the report makers suggestion.
  - iv. Severity, urgency and complexity.
  - v. Health and safety implications.
  - vi. Impact on the individual, the general public and Junee Shire Council.
  - vii. Potential to escalate.
  - viii. If there is more than one issue, they may need to be dealt with separately.
- b) The Disclosure Coordinator will summarise their assessment in writing a save a copy in Councils ERMS and ensure it is marked confidential.

#### 4. Course of Action

- a) More information required
  - i. If it is deemed that more information is required, the Disclosure Coordinator will contact the report maker and seek further information or clarification.
  - ii. A summary of the information must be detailed in writing and saved in Councils ERMS marked confidential.
- b) Voluntary PID
  - i. The Disclosure Coordinator will advise the report maker in writing of the decision to investigate and provide three monthly updates to the report maker.
  - ii. The Disclosure Coordinator will provide the report maker with contact information for professional support.
  - iii. If confidentiality cannot be maintained, the Disclosure Coordinator will inform the report maker in writing.
  - iv. A final summary of findings and actions will be sent to the report maker within five working days of the investigation concluding.
- c) Not a Voluntary PID

If the report is deemed **not** to be a voluntary PID, the matter will be dealt with pursuant to Councils code of conduct and general grievance process. The Disclosure Coordinator will advise the report maker in writing of the decision.

#### 5. Final Steps

- a) Once the report has been investigated, a summary of the findings and suggested actions will be compiled by the Disclosure Coordinator and reported in writing to the General Manager. The report must be saved to Councils ERMS and marked confidential.
- b) The General Manager will be responsible for the implementation of corrective actions.
- c) The Disclosure Officer will update the status of the report in the PID Register and inform the NSW Ombudsman.

#### 6. Other

- a) The Disclosure Coordinator may nominate the Disclosure Officer to carry out steps on their behalf in this procedure. Nomination must be directed in writing.
- b) Where the report is about the General Manager, the Mayor will have the same responsibilities as the General Manager in this procedure.
- c) Where the report is about the Disclosure Coordinator, the General Manager will have the same responsibilities as the Disclosure Coordinator in this procedure.
- d) Where the report is about the Disclosure Officer, the Disclosure Coordinator, will have the same responsibilities as the Disclosure Officer in this procedure.