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## 1. Background

Ipswich City Council (Council) is committed to fostering an ethical, transparent culture. In pursuit of this, Council values the disclosure of information about suspected wrongdoing in the public sector so that it can be properly assessed and, when appropriate, properly investigated and dealt with. This procedure demonstrates this commitment and ensures that a practical and effective procedure is implemented which complies with the requirements of the *Public Interest Disclosure Act 2010* (the Act) and Public Interest Disclosure Standard No. 1/2019.

## 2. Purpose

By complying with the Act, Ipswich City Council will:

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

## 3. Regulatory Authority

*Public Interest Disclosure Act 2010*

Public Interest Disclosure Standard No. 1/2019

Public Interest Disclosure Standard No. 2/2019

Public Interest Disclosure Standard No. 3/2019

## 4. Human Rights Commitment

Council has considered the human rights protected under the *Human Rights Act 2019 (Qld)* (the Act) when approving and/or amending this procedure. When applying this procedure, Council will act and make decisions in a way that is compatible with human rights and give proper consideration to a human right relevant to the decision in accordance with the Act.

## 5. Roles and Responsibilities

Council's Governance and Public Interest Disclosure Coordinator is the principal contact for PID issues within Council and can provide guidance to employees, managers and supervisors on how to make a PID as well as the process to manage and investigate a PID.

## 6. Key Stakeholders

Chief Executive Officer

Ethical Standards Manager

## 7. Education and Training Requirements

Public Interest Disclosure training is provided to all new employees as part of Council's Induction Program. In addition, all employees undertake bi-annual online training for fraud and corruption which includes PID components to ensure continued awareness of the importance of identifying and reporting wrongdoing.

## 8. What is a PID

A PID is a disclosure of perceived wrongdoing in the public sector that serves the public interest. For an allegation to be considered a PID under the Act, it must be:

- public interest information about serious wrongdoing or danger
- an appropriate disclosure
- made to a proper authority

## 9. Who can make a PID

### 9.1 Any person, including a public sector officer

May make a PID regarding any of the following:

- substantial and specific danger to public health and safety, or to a person with a disability
- substantial and specific danger to the environment caused by the commission of an offence or contravention of a condition in certain environmental legislation
- the conduct of another person that could, if proved, be a reprisal.

### 9.2 Public sector officers

Can also make a PID about:

- corrupt conduct
- maladministration that adversely affects a person's interests in a substantial and specific way
- substantial misuse of public resources
- substantial and specific danger to public health or safety
- substantial and specific danger to the environment.

## 10. Why make a PID?

Public sector misconduct, wastage of public funds, suspected unlawful activity or danger to health, safety or the environment all erode the community's trust in public administration. Employees 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;
- 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 Act, including:

- confidentiality – the discloser's name and other identifying information will be protected to the extent possible;
- protection against reprisal – the discloser is protected from unfair treatment by Council and employees of Council as a result of making the PID;
- immunity from liability – the discloser cannot be prosecuted for disclosing the information but is not exempt from action if they have engaged in wrongdoing;

- protection from defamation – the discloser has a defence against an accusation of defamation by any subject officer.

## 11. Appropriate disclosures

An appropriate disclosure is where:

- the discloser honestly and reasonably believes the information provided tends to show the conduct or danger;
- 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.

## 12. Identifying the proper authority

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 would be authorised to receive a PID where:

- the disclosure is about the conduct of council or its employees
- council is responsible for investigating the particular issue.

## 13. Reporting a PID

A PID must be made to the 'proper authority' to receive disclosures of the type being made. Disclosers are encouraged to make a disclosure to an appropriate officer of Council first. If the matter is not resolved, or the discloser is concerned about confidentiality, the disclosure may be made to another appropriate agency.

Who to contact within Council	Other agencies that can receive PIDs
<p>An officer may make a disclosure to the following positions:</p> <ul style="list-style-type: none"> <li>• An officer's manager or supervisor</li> <li>• Governance and PID Coordinator</li> <li>• Ethical Standards Manager</li> <li>• Chief Audit Executive</li> <li>• Manager, People and Culture</li> <li>• General Managers</li> <li>• Chief Executive Officer</li> </ul>	<p>Disclosures can be made to an agency that has a responsibility for investigating the information disclosed:</p> <ul style="list-style-type: none"> <li>• Crime and Corruption Commission (CCC) for disclosures about corrupt conduct including reprisal.</li> <li>• Queensland Ombudsman for disclosures about maladministration.</li> <li>• Queensland Audit Office for disclosures about a substantial misuse of resources.</li> <li>• Department of Child Safety, Seniors and Disability Services for disclosures about danger to the health and safety of a person with a disability.</li> <li>• Department of Environment and Science for disclosures about danger to the environment.</li> </ul>

	<ul style="list-style-type: none"> <li>• A Member of the Legislative Assembly (MP) for any wrongdoing or danger.</li> <li>• The Chief Judicial Officer of a court or tribunal in relation to a disclosure about wrongdoing by a judicial officer.</li> </ul>
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### 13.1 Making a disclosure to a journalist

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;
- the proper authority investigated the disclosure but did not recommend taking any action;
- the property authority 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 Act. However, disclosers should be aware that journalists are not bound under the confidentiality provisions of section 65 of the Act.

### 13.2 Reporting to a Member of Parliament

You can also make a PID to a Member of Parliament (MP). MPs do not have any authority to investigate PIDs, so they need to decide which public sector entity they believe can appropriately deal with the matter.

If you are concerned about reprisal if details of your PID or your identity are made public, or there are other reasons your confidentiality needs to be maintained, it is essential that you raise your concerns when you make your disclosure.

MPs are required to protect the identity of disclosers, and be careful about when and how to discuss the matter in parliament. However, keep in mind that MPs have the discretion to raise the matter in parliament at any time and your identity may then become public.

## 14. How to make a disclosure

A member of the public or an employee of Council can make a disclosure to the Governance and Public Interest Disclosure Coordinator via the following methods:

**Email:** PIDS@ipswich.qld.gov.au

**Letter:** Ipswich City Council  
Attn: Governance and PID Coordinator  
PO Box 191  
Ipswich Qld 4035

**Phone:** 3810 7865

### 14.1 Other option available to employees

Council has also engaged "FairCall", an independent external intake service, for the purposes of providing another confidential mechanism for employees to report wrongdoings when they are not comfortable reporting such matters internally. Faircall's contact details are listed below:

**Phone:** 1800 270 925  
**Email:** [faircall@kpmg.com.au](mailto:faircall@kpmg.com.au)  
**Website URL:** <https://www.kpmgfaircall.kpmg.com.au/ipswich>  
**Post:** The FairCall Manager  
KPMG Forensic  
PO Box H67  
Australia Square  
SYDNEY NSW 1213

#### **14.2 Can I disclose anonymously?**

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. If the disclosure is anonymous and enough information is provided, Council will act upon the disclosure, noting that the anonymous discloser will not receive any advice of the outcome.

#### **14.3 Do I have to disclose in writing?**

No. You may make a PID in person, by telephone or electronically via email.

#### **14.4 What information should I provide?**

Be clear and factual. Avoid speculation, emotive language or embellishment as they divert attention from the real issues. You may wish to mention:

- your name and contact details (desirable);
- the nature of the wrongdoing;
- who you think did the wrongdoing (if possible);
- when and where the wrongdoing occurred;
- events surrounding the issue;
- if you did anything in response to the wrongdoing;
- witnesses who may be aware of the wrongdoing;
- if you reported the wrongdoing to anyone previously, to whom and when;
- if you believe your information is a PID under the Act;
- if you are concerned about possible reprisal as a result of making your PID.

#### **14.5 Do I need supporting evidence?**

You should not investigate a matter yourself before disclosing; in fact, by doing so, you may hinder any future investigation.

The sooner you raise your concern, the easier it will be for Council to take action. Even if the information you provide turns out to be incorrect or unable to be substantiated, you are still protected by the Act.

It will assist in the assessment and investigation of the disclosure if you provide as much information as possible such as:

- the names of any people who witnessed the wrongdoing or who may be able to verify the allegations or events;
- correspondence or other supporting documents;
- a diary of events and conversations, or file notes;
- dates and times when the wrongdoing occurred.

However, if you deliberately provide false or misleading information, intending that it be acted on as a PID, you may be committing an indictable offence and may be subject to disciplinary action.

## **15. The assessment and investigation process**

All disclosures will be assessed by the Governance and PID Coordinator and/or the Ethical Standards Manager to determine whether it meets the requirements of the Act. This will include the consideration of the following tests 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.
- Section 13(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.

## **16. What information will I be given about the investigation?**

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 proposed 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;
- contact details of the Council support officer if assigned.

Once the investigation has concluded, Council will inform the discloser in writing:

- that the investigation has concluded;
- the outcome of the investigation;
- any proposed action to be taken as a result of the outcome;
- will remind the discloser that all matters disclosed are to remain confidential indefinitely.

## **17. Reprisal**

### **17.1 What is reprisal?**

A person must not cause, or attempt to cause, detriment to someone because, or in the belief, they have made a PID. If they do, they are taking reprisal action.



Examples of reprisal include causing personal injury, damaging property, harming a person's reputation, bullying or harassing someone, or causing financial loss. The Act creates an offence of reprisal, which can be investigated by an appropriate authority.

It is not considered reprisal if a manager takes reasonable management action for reasons not related to someone making a PID. This could include:

- reasonable appraisal of an employee's work;
- reasonable disciplinary action;
- reasonable action to transfer or deploy the employee;
- reasonable action to end employment by way of redundancy or retrenchment.

## **17.2 Risk of reprisal and risk assessments**

As soon as possible after receiving a PID, a risk assessment will be carried out to determine the level of protection and support appropriate for a discloser. The assessment guides provided by the Queensland Ombudsman's Office will be utilised for this purpose.

If a person making a PID has concerns about reprisal being taken against them because of the disclosure, under the Act, the person can be given special protection to prevent this occurring.

If you feel as though you have been disadvantaged or subjected to reprisal for making a disclosure, you should raise the issue with the Governance and PID Coordinator.

It is an offence for an employee to take reprisal action because of a belief that another person has made, or intends to make a PID.

Council's CEO and ELT will ensure protective measures are in place that are proportionate to the risk of reprisal and the potential consequences of reprisal. If the risk is assessed as sufficiently high, the Governance and PID Coordinator will work with the CEO and ELT to prepare a protection plan to protect the discloser.

## **18. Support, Protection and Rights**

### **18.1 Discloser**

Council has a pool of trained PID support officers who can be assigned to provide support to a discloser. The main functions of a support officer's role is to:

- Maintain proactive contact with the discloser to check on their welfare.
- Provide information and referral to Council's employee assistance program.
- Refer concerns about reprisal to the Governance and Public Interest Disclosure Coordinator.
- Assist the discloser to manage their own expectations and mentally prepare for a situation where the outcome is not what they anticipate.
- Assist the discloser to make a practical plan to handle this situation.
- Help the discloser understand that even if their allegations are not substantiated, they did the right thing by reporting the information.

A discloser has immunity from:

- civil liability (e.g. for defamation);
- criminal liability (e.g. for breaching statutory confidentiality provisions);

- disciplinary action, termination of employment, or any other workplace or administrative sanctions as a result of making a PID.

However, a discloser's personal liability for his/her own conduct is not affected by the person's disclosure of that conduct under the Act. Put simply this means that under the Act, the discloser is still liable for their own conduct and actions and may still be subject to disciplinary action associated with those actions and/or conduct.

Protection exists for disclosers about reprisal occurring as a result of making a disclosure. Section 40 and 41 of the Act outlines the grounds for reprisal and states that it is an indictable offence to cause or attempt or conspire to cause detriment to another person because, or in the belief that the other person intends or has made a public interest disclosure.

## **18.2 Subject officer**

Council is committed to protecting the interests of all persons involved in the PID process, including the subject officer. Being named as a subject officer in a PID investigation can be extremely stressful and it is important that the welfare of the officer is managed appropriately.

Tailored support provided by Council's confidential counselling partner, AcaciaEAP will be organised by the Manager, People and Culture at the request of the subject officer. This is completely voluntary and is guided by the subject officer's needs.

A subject officer is entitled to confidentiality and the presumption of innocence and is afforded the following rights:

- to be informed of the content of the disclosure;
- to provide a response to the allegation;
- to be treated fairly and have the matter handled confidentially;
- to have an impartial person hear the matter;
- to seek assistance from their legal representative or union representative
- to feel supported during the process.

Protection exists for subject officers about whom an intentionally false PID is made. It is an offence under Section 66 of the Act to intentionally make a false or misleading statement intending it to be acted upon as a PID.

## **19. Confidentiality**

### **19.1 Responsibility of the PID Coordinator, CEO, GMs, Managers and Supervisors**

It is an offence for a person to make a record of, or intentionally or recklessly disclose confidential information received in the administration of the Act to anyone, except where authorised to do so by the Act.

Strict confidentiality is to be maintained at all times in relation to reporting and investigation of PIDs. All Council records of PIDs will be held and securely filed in Council's electronic Document Records Management System with access restricted to the officers who have the responsibility of managing the PID process.

## 19.2 Responsibility of the discloser

A discloser must maintain the confidentiality and integrity of the process by not discussing it with work colleagues or others unconnected with the matter. All statements and correspondence in regard to the matter should be regarded as strictly confidential.

Please note that the confidentiality provision will not preclude an employee from sharing this information with their union representative.

Where required, interpreters or other assistance will be provided to employees or other persons wanting to make a PID.

## 19.3 Responsibility of the subject officer

As outlined above for disclosers, a subject officer must also maintain the confidentiality and integrity of the process by not discussing any matters with work colleagues or others unconnected with the matter. In addition to this, a subject officer must not:

- attempt to seek out the identity of the discloser; or
- attempt to personally, or have another person on your behalf, influence colleagues to provide incorrect information to the investigator.

This is considered reprisal and is dealt with seriously under the Act.

## 20. PID outcomes

### 20.1 What if my PID is substantiated?

Council is committed to taking action on PIDs where, after investigation, the information has been proven. Depending on the circumstances, if your PID is substantiated:

- action may be taken to stop the matter or prevent it from recurring;
- policies and practices may be implemented or changed;
- mediation or conciliation may be offered;
- disciplinary action may be taken against a person(s) responsible for the matter;
- the matter may be referred to the Commissioner of Police or another person, organisation or entity that has the power to take further action (e.g. initiating legal proceedings against those involved in criminal activity).

### 20.2 What if my PID is not substantiated?

There may be a number of reasons your PID is not substantiated, including a lack of evidence. Make sure you understand these reasons. If you do not know what happened in response to your PID, the reasons are not clear or you have not been provided with sufficient information, you are entitled to ask Council's PID Coordinator.

Even if the details of your disclosure cannot be substantiated, this does not mean your PID is any less valuable. Remember the important role you have played, irrespective of the final outcome.

The information you provide may be useful in helping Council to identify broader problems or prevent similar wrongdoing in the future. Keeping silent can create much bigger problems.

Regardless of the outcome, you will still receive the protections under the Act. Council will continue to support you for having done the right thing by bringing the matter to Council's attention.

### **20.3 Declining to take action on a PID**

Under the 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.

### **21. Review Rights**

A discloser has the right of appeal or review regarding the management and/or outcome of their disclosure. 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. Refer clause 13 above. However, it may decide not to investigate the matter if it is satisfied that the matter has already been investigated properly.

A subject officer has the right of 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.

### **22. Monitoring and review**

This procedure will be reviewed every four (4) years, or earlier should changes occur to the Public Interest Disclosure Act 2010 or the associated Standards.

Council's independent external intake service, FairCall, will provide reports to the Chief Executive Officer containing de-identified information to assist with identifying trends in disclosures and the management of PIDs to allow Council's Legal and Governance Branch (Corporate Services Department) the opportunity to review current business processes.

The FairCall reports as mentioned above will be presented to Council's Audit and Risk Management Committee as a component of the department's legislative compliance reporting.

### **23. Related documents**

Public Interest Disclosure Policy  
Public Interest Disclosure Management Program

## 24. Definitions

<b>Term</b>	<b>Definition</b>
Confidential information	<ul style="list-style-type: none"> <li>(i) information about the identity, occupation, residential or work address or whereabouts of a person — <ul style="list-style-type: none"> <li>i. who makes a public interest disclosure; or</li> <li>ii. against whom a public interest disclosure has been made; and</li> </ul> </li> <li>(ii) information disclosed by a public interest disclosure; and</li> <li>(iii) information about an individual's personal affairs; and</li> <li>(iv) information that, if disclosed, may cause detriment to a person; and</li> <li>(v) does not include information publicly disclosed in a public interest disclosure made to a court, tribunal or other entity that may receive evidence under oath, unless further disclosure of the information is prohibited by law.</li> </ul>
<b>Corrupt conduct</b>	<ol style="list-style-type: none"> <li>1. <b>Corrupt conduct</b> means conduct of a person, regardless of whether the person holds or held an appointment, that <ul style="list-style-type: none"> <li>(a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of— <ul style="list-style-type: none"> <li>(i) a unit of public administration; or</li> <li>(ii) a person holding an appointment; and</li> </ul> </li> <li>(b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that— <ul style="list-style-type: none"> <li>(i) is not honest or is not impartial; or</li> <li>(ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or</li> <li>(iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and</li> </ul> </li> <li>(c) is engaged in for the purpose of providing a benefit to the person or another person or causing a detriment to another person; and</li> <li>(d) would, if proved, be: <ul style="list-style-type: none"> <li>(i) a criminal offence; or</li> <li>(ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.</li> </ul> </li> </ul> </li> <li>2. Without limiting subsection (1), conduct that involves any of the following could be corrupt conduct under subsection (1): <ul style="list-style-type: none"> <li>(a) abuse of public office;</li> <li>(b) bribery, including bribery relating to an election;</li> <li>(c) extortion;</li> <li>(d) obtaining or offering a secret commission;</li> <li>(e) fraud;</li> <li>(f) stealing;</li> <li>(g) forgery;</li> <li>(h) perverting the course of justice;</li> <li>(i) an offence relating to an electoral donation;</li> <li>(j) loss of revenue of the State;</li> <li>(k) sedition;</li> </ul> </li> </ol>

	<p>(l) homicide, serious assault or assault occasioning bodily harm or grievous bodily harm;</p> <p>(m) obtaining a financial benefit from procuring prostitution or from unlawful prostitution engaged in by another person;</p> <p>(n) illegal drug trafficking;</p> <p>(o) illegal gambling.</p>
Detriment	<p>(a) personal injury or prejudice to safety; and</p> <p>(b) property damage or loss; and</p> <p>(c) intimidation or harassment; and</p> <p>(d) adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business; and</p> <p>(e) financial loss; and</p> <p>(f) damage to reputation, including for example, personal, professional or business reputation.</p>
Disability	<p>As defined in section 11 of the <a href="#">Disability Services Act 2006</a>, for the purposes of this policy:</p> <ol style="list-style-type: none"> <li>1. A disability is a person's condition that: <ol style="list-style-type: none"> <li>(a) is attributable to: <ol style="list-style-type: none"> <li>(i) an intellectual, psychiatric, cognitive, neurological, sensory or physical impairment; or</li> <li>(ii) a combination of impairments mentioned in subparagraph (i); and</li> </ol> </li> <li>(b) results in: <ol style="list-style-type: none"> <li>(i) a substantial reduction of the person's capacity for communication, social interaction, learning, mobility or self-care or management; and the person needing support.</li> </ol> </li> </ol> </li> <li>2. For subsection (1), the impairment may result from an acquired brain injury.</li> <li>3. The disability must be permanent or likely to be permanent.</li> <li>4. The disability may be, but need not be, of a chronic episodic nature.</li> </ol>
Maladministration	<p>As defined in schedule 4 of the <a href="#">Public Interest Disclosure Act 2010</a>, maladministration is administrative action that:</p> <ol style="list-style-type: none"> <li>(a) was taken contrary to law; or</li> <li>(b) was unreasonable, unjust, oppressive, or improperly discriminatory; or</li> <li>(c) 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</li> <li>(d) was taken: <ol style="list-style-type: none"> <li>i for an improper purpose; or</li> <li>ii on irrelevant grounds; or</li> <li>iii having regard to irrelevant considerations; or</li> </ol> </li> <li>(e) was an action for which reasons should have been given, but were not given; or</li> <li>(f) was based wholly or partly on a mistake of law or fact; or</li> <li>(g) was wrong.</li> </ol>
Natural justice	<p>Natural justice, also referred to as 'procedural fairness' 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.</p> <p>The rules of natural justice, which have been developed to ensure that decision-making is fair and reasonable, are:</p> <ul style="list-style-type: none"> <li>• avoid bias; and</li> <li>• give a fair hearing; and</li> <li>• act only on the basis of logically probative evidence.</li> </ul>
Public Officer	<p>Public officers are all paid employees and elected representatives of Ipswich City Council. A person on a contract of service <i>eg</i> engaged on a temporary basis to fill a position, is also included in the definition.</p>

	For the purposes of the Act, a person is NOT considered to be a public officer if they are a volunteer, unpaid trainee, work experience student or are employed on a contract for service <i>eg</i> engaged for their specialist skill or expertise on a particular project.
Substantial and specific	Substantial means 'of a significant or considerable degree'. It must be more than trivial or minimal and have some weight or importance.  Specific means "precise or particular". This refers to conduct or detriment that is able to be identified or particularised as opposed to broad or general concerns or criticisms.
Substantiate	To show something to be true, or to support a claim with facts.

## 25. Process Model

[Process Public Interest Disclosures](#)

## 26. Procedure Owner

The General Manager (Corporate Services) is the procedure owner and the Governance and Public Interest Disclosure Coordinator is responsible for authoring and reviewing this procedure.