

Public Interest Disclosure Policy

Policy Number:	KASC-STRAT-039
Responsible Manager:	Chief Executive Officer
Legislation:	Crime and Corruption Act 2001 Human Rights Act 2019 Local Government Act 2009 Ombudsman Act 2001 Public Interest Disclosure Act 2010 Public Records Act 2002 Public Sector Ethics Act 1994
Associated Documents:	Code of Conduct Public Interest Disclosure Procedure Complaints – Administrative Actions Policy Fraud Policy Right to Information Policy Unsatisfactory Performance Policy
Approval Date:	31 May 2023

1. Policy Statement

- 1.1. Council is committed to fostering an ethical and transparent culture. In pursuit of this, Council values the disclosure of information regarding suspected wrongdoing in the public sector so it can be properly assessed and, if necessary, appropriately investigated.
- 1.2. Council will provide support to any employee, Public Officer or other person who makes a disclosure about matters in the public interest.
- 1.3. Council is committed (and obligated) to always comply with the Public Interest Disclosure Act 2010 (PID Act), and in doing so 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; and
 - Ensure protection from reprisal is afforded to persons making PIDs.

In accordance with the PID Act, a Public Interest Disclosure (PID) Procedure and a Public Interest Disclosure Management Program (PID Management Program) have been developed. All public interest disclosures will be managed in accordance with the PID Procedure.

2. Scope

- 2.1. This policy applies to all Councillors, employees and any person making a Public Interest Disclosure with respect to Council its Councillors or employees.

3. Terms and Definitions

3.1. In this policy:

The Act:	Means the Public Disclosure Act 2010
Confidential Information:	Includes: <ul style="list-style-type: none"> • information about the identity, occupation, residential or work address or whereabouts of a person: <ul style="list-style-type: none"> ○ who makes a public interest disclosure; or ○ against whom a public interest disclosure has been made; and • information disclosed by a public interest disclosure; and • information about an individual's personal affairs; and • information that, if disclosed, may cause detriment to a person; and • 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.
Council:	Means Kowanyama Aboriginal Shire Council.
Discloser:	Is a person who makes a Public Interest Disclosure in accordance with the Act.
Detriment:	Includes: <ul style="list-style-type: none"> • personal injury or prejudice to safety; • property damage or loss; • intimidation or harassment; • adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business; • financial loss; and • damage to reputation, including, for example personal, professional, or business reputation.
Maladministration:	Means an administrative action that: <ul style="list-style-type: none"> • was taken contrary to law; or • was unreasonable, unjust, oppressive, or improperly discriminatory; or • 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 circumstances; or • was taken for an improper purpose; or • was taken on irrelevant grounds; or • was taken having regard to irrelevant considerations; or • was an action for which reasons should have been given, but were not given; or was based wholly or partly on a mistake of law or fact; or • was wrong.
Corrupt Conduct:	Under section 15 of the Crime and Corruption Act 2001 (CC Act) corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that: <ol style="list-style-type: none"> a. adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of: <ol style="list-style-type: none"> i. a unit of public administration; or ii. a person holding an appointment; and 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: <ol style="list-style-type: none"> i. is not honest or is not impartial; or

- ii. involves a breach of the trust placed in a person holding an appointment either knowingly or recklessly; or
- 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
- c. is engaged in for the purpose of providing a benefit to the person or another person causing a detriment to another person; and
- d. would, if proved, be:
 - i. a criminal offence; or
 - ii. a disciplinary breach providing reasonable grounds for terminating the person's services if the person is or were the holder of an appointment.
- e. Under the CC Act, conduct includes:
 - neglect, failure, and inaction
 - conspiracy to engage in conduct
 - attempt to engage in conduct

Proper Authority: Means a public sector entity or a member of the Legislative Assembly.

Public Interest Disclosure: Is a disclosure of information to a proper authority in accordance with the Act, and includes all information and help given by the discloser to the proper authority.

Public Interest Disclosure (PID) Officer: Is the Chief Executive Officer or other employee delegated the power to receive Public Interest Disclosure.

Public Sector Entity: Has the meaning in the Act and includes a local government.

Public Health or Safety: includes health and safety of persons:

- under lawful care and control; or
- using community facilities or services provided by the public or private sector; or
- in employment places.

Reprisal: Is where a person causes, or attempts, or conspires to cause, detriment to another person because, or in the belief that:

- the other person or someone else has made, or intends to make, a public interest disclosure; or
- the other person or someone else is, has been, or intends to be, involved in a proceeding under the Act against any person.

Wrongdoing: Is behaviour or an action that fails to conform to the standards of law.

4. Acronyms and Abbreviations

4.1. In this policy:

KASC:	means Kowanyama Aboriginal Shire Council
CEO:	means Chief Executive Officer
CC Act:	means Crime and Corruption Act 2001
PID:	means Public Interest Disclosure

5. Policy

- 5.1. The CEO of Kowanyama Aboriginal Shire Council (Council) intends to comply with s28 of the Public Interest Disclosure Act 2010 by establishing reasonable procedures to ensure that:
 - a. Public officers of Council who make public interest disclosures are given appropriate support.
 - b. Public interest disclosures made to Council are properly assessed and, when appropriate, properly investigated and dealt with.
 - c. Appropriate action is taken in relation to any wrongdoing that is the subject of a public interest disclosure made to Council.
 - d. A management program for public interest disclosures made to Council, consistent with any standard made under section 60, is developed, and implemented.
 - e. Public officers of Council are offered protection from reprisals by Council or other public officers of the Council.
- 5.2. Council will treat all PIDs appropriately, take concerns seriously and will make every attempt to maintain the privacy and confidentiality of a discloser throughout the process. Council will accept PIDs that are made anonymously however this will often make the disclosure more difficult to investigate.
- 5.3. Council strongly encourages disclosers to identify themselves when making a PID. Strict confidentiality is always maintained in relation to the investigation and reporting of PIDs. Staff are not protected from the consequences of their own wrongdoing because they are using the PID mechanism.
- 5.4. Council will assure the discloser that the PID will be dealt with impartially, fairly and in accordance with the principles of natural justice.
- 5.5. Council will ensure confidentiality and the presumption of innocence. All persons involved in the investigation of a PID must maintain confidentiality and integrity of the process by not discussing it with those unconnected with the matter. All correspondence from Council should be regarded as strictly confidential.
- 5.6. Council will also report the required public interest disclosure data to the Queensland Ombudsman as required by Public Interest Disclosure Standard No 3/2019.

6. Types of Corrupt Conduct

- 6.1. Under the Crime and Corruption Act 2001, there are two (2) types of corrupt conduct. Assessment of conduct must satisfy all three elements described under section 15(1) and 15(2) of the CC Act.
 - 6.1.1. Type A - s15(1): corrupt conduct involves conduct that affects, or could affect, a public officer (an employee of a public sector agency) so that the performance of their functions or the exercise of their powers:
 - is not honest or impartial, or
 - knowingly or recklessly breaches public trust, or
 - involves the misuse of agency-related information or material

Common examples of Type A corrupt conduct include fraud and theft, extortion, unauthorised release of information, obtaining or offering a secret commission and nepotism.

- 6.1.2. Type B- s15(2): corrupt conduct involves specific types of conduct that impairs, or could impair, public confidence in public administration.

This may include:

- collusive tendering, or
- fraud relating to an application for a licence, permit or other authority relating to public health or safety; the environment; or the State's natural, cultural, mining or energy resources, or
- dishonestly obtaining public funds or State assets, or
- evading a state tax, levy or duty or fraudulently causing a loss of State revenue, or

- fraudulently obtaining or retaining an appointment

7. Examples of Corrupt Conduct

The CC Act provides examples of conduct that could be corrupt conduct, including:

- abuse of public office
- bribery, including bribery relating to an election
- extortion
- obtaining or offering a secret commission
- fraud, stealing or forgery
- perverting the course of justice
- an offence relating to an electoral donation
- loss of revenue of the state
- sedition
- homicide, serious assault, or assault occasioning bodily harm or grievous bodily harm
- obtaining a financial benefit from procuring prostitution or from unlawful prostitution engaged in by another person
- illegal drug trafficking
- illegal gambling.

8. Public Interest Disclosures (PIDs)

8.1. The Public Interest Disclosure Act 2010 distinguishes between disclosures made by:

- a public officer and
- anyone else

8.2. PIDs made by public officers (e.g., Council) must concern

- a. the conduct of another person that could, if proved, be:
 - corrupt conduct; or
 - maladministration that adversely affects a person's interests in a substantial and specific way; or
- b. a substantial misuse of public resources (other than an alleged misuse based on mere disagreement over policy that may properly be adopted about amounts, purposes, or priorities of expenditure); or
- c. a substantial and specific danger to public health or safety; or
- d. a substantial and specific danger to the environment.

8.3. PIDs made by any person must concern:

- A substantial and specific danger to the health or safety of a person with a 'disability' as defined in the Disability Services Act 1992.
- A substantial and specific danger to the environment.
- A reprisal taken against anybody because of a PID.

8.4. A person has information about the conduct of another person or another matter if either:

- the person honestly believes on reasonable grounds that the information tends to show the conduct or other matter (subjective test) or;
- the information tends to show the conduct or other matter regardless of whether the person honestly believes the information tends to show the conduct or other matter (objective test).

8.5. Some disclosures are not protected by the Public Interest Disclosure Act 2010, including disclosures made to the media (except in special circumstances outlined in Part 4 section 20 of the Act); those made frivolously or vexatiously; those which primarily question the relative merits of government or agency policy; and those

that are made substantially to avoid disciplinary action. Disclosures that are wilfully false constitute an offence under the Public Interest Disclosure Act 2010.

- 8.6. The disclosure cannot be based on a mere disagreement over policy that may properly be adopted about amounts, purposes, and priorities of expenditure.

9. Who to make a PID to?

- 9.1. A Public Interest Disclosure (PID) can be made in person, by telephone or in writing (letter, memorandum, email, or SMS). Council's preferred approach is that a PID is made directly to a PID Coordinator – that is the Chief Executive Officer or other delegate such as the Governance Officer. (Refer below table).
- 9.2. An employee receiving a PID must refer it to a PID Coordinator to ensure that it is appropriately addressed in compliance with the Act. It is also highly recommended that a Councillor receiving a PID do the same. By doing so this should maximise Council's prospects of achieving legislative compliance.
- 9.3. Providing multiple reporting pathways is a crucial element of Council's PID arrangements. While staff are encouraged to disclose internally, they should also be aware of their rights to disclose (or seek review) externally. Whichever option the discloser takes, it is in Council's interest to provide them with clear advice on how to disclose.

Contact:	
Any person, including Employees, can make a disclosure to:	
<ul style="list-style-type: none"> • Chief Executive Officer • Manager Governance • Governance Officer • Any person in an Executive Management delegate position 	
Cairns Office:	Kowanyama Office:
Kowanyama Aboriginal Shire Council 50 Scott Street, Bungalow QLD 4870 07 4040 4556 governance@kowanyama.qld.gov.au	Kowanyama Aboriginal Shire Council Lot 30 Chapman Road, Kowanyama QLD 4892 07 4060 5124 governance@kowanyama.qld.gov.au
Other agencies that can receive a PID:	
<ul style="list-style-type: none"> • Disclosures can be made to an agency that has a responsibility for investigating the information disclosed: • Crime and Corruption Commission (CCC) for disclosures about corrupt conduct including reprisal • Queensland Ombudsman for disclosures about maladministration • Queensland Audit Office for disclosures about a substantial misuse of resources • Department of Child Safety, Youth and Women for disclosures about danger to the health and safety of a child or young person with a disability • Department of Communities, Disability Services and Seniors for disclosures about danger to the health and safety of a person with a disability • Office of the Public Guardian for disclosures about danger to the health and safety of a person with a disability • Department of Environment and Science disclosures about danger to the environment. 	

10. Role of a PID Coordinator

- 10.1. The CEO is committed as per Public Interest Disclosure Standard section 6.1.1, to the appointment of a nominated officer to be responsible for issues related to the management of PIDs and that the officer has

the following characteristics:

- direct access to the CEO in relation to PID matters;
- delegated authority to appropriately manage PIDs; and
- access to resources to properly manage PIDs.

10.2. Notwithstanding the CEO's preferred procedure being for all PIDs to be made to the nominated PID contact person, the law provides people may make a PID to any of the following:

- Council's Chief Executive Officer;
- a Councillor;
- if the person is an officer of Council – another person who, directly or indirectly, supervises or manages the person; or
- an officer of Council who has the function of receiving or taking action on the type of information being disclosed;
- a member of the Legislative Assembly of the State of Queensland.

10.3. People may also choose to make a PID to an external entity such as the Crime and Corruption Commission if it concerns corrupt conduct or the Ombudsman if it concerns maladministration or a waste of public resources. This can be done as a first step or if the discloser is not satisfied with Council's response to a PID.

10.4. Disclosers should be aware when making a PID to Council, that the PID may be referred to the Council's Chief Executive Officer for attention.

11. Can a PID be made Anonymously?

11.1. A PID can be made anonymously. Councillors or employees speaking to a discloser who wishes to make a PID but remain anonymous, should prompt that person to make the disclosure directly to a PID Coordinator. If they choose not to do so, then the person disclosing should be asked to provide as much relevant information as possible so the matter may be effectively investigated.

11.2. In the case of an anonymous disclosure, Council cannot keep an anonymous discloser informed of the progress of an investigation or seek clarification of any of the findings. In addition, the discloser may have difficulty in relying upon the protections under the Act.

12. What information should a Discloser Provide?

12.1. To ensure a meaningful investigation of wrongdoing, people should provide all known information that might be relevant including:

- the name, job title, location of the subject person;
- details of relevant events, dates and places;
- the names of people who may be able to verify or support the allegations; and
- any other evidence that supports the allegations, e.g., documents or pictures.

13. Do Disclosers need Proof?

13.1. The discloser is not required to undertake any investigative action before making a disclosure and does not need to provide any evidence.

13.2. Information may still be a disclosure under the PID Act even if the information turns out to be incorrect or unable to be substantiated provided the discloser had a genuine and reasonable belief that it did occur. This allows for genuine misinterpretations of information to fall within the scope of the PID Act.

13.3. However, knowingly providing false or misleading information may result in prosecution, and disciplinary action for a Council employee.

14. What Action will Council Take?

- 14.1. On initial receipt of a disclosure, an assessment will be made regarding how to best deal with it. The assessment will determine if the disclosure should, for example, be investigated by Council or referred to another authority such as the Crime and Corruption Commission, or whether no action should be taken.
- 14.2. An assessment will be made of the nature of the disclosure and the risks of reprisal to determine the appropriate level of protection to the discloser. Council will consult with the discloser where practicable, if the referral of a disclosure to another entity may create an unacceptable risk of reprisal.
- 14.3. Council may decide to not investigate a PID if:
- the substance of the disclosure has already been investigated or dealt with by another appropriate process; the disclosure should be dealt with by another appropriate process;
 - the age of the information which is the subject of the disclosure makes it impracticable to investigate;
 - the nature of the disclosure is such that it would substantially and unreasonably divert resources to investigate and deal with it; or
 - another entity that has jurisdiction to investigate the disclosure has notified Council that investigation of the disclosure is not warranted.
- 14.4. Council will advise the discloser if it decides not to investigate or deal with a PID. A discloser dissatisfied with that decision may within 28 days after receiving the written reasons, apply in writing to the Chief Executive Officer for a review of the decision.

15. How will the Discloser be Informed?

- 15.1. The discloser will be given reasonable information including confirmation that the disclosure was received, a description of the action proposed or taken in relation to the disclosure and the reasons therefore, and a description of the results of action if taken in relation to the disclosure.
- 15.2. Information may be withheld from the discloser if it may adversely affect a person's safety or the investigation of a possible offence.

16. Disclosure to Journalists

- 16.1. A disclosure to a journalist may be protected if the disclosure is a PID that has already been made to an appropriate agency that:
- decided to not investigate or deal with the disclosure; or
 - investigated the disclosure and decided to not take any action; or
 - did not notify the discloser within 6 months of the PID whether it would be dealt with or investigated.
- 16.2. In addition, the disclosure must be substantially the same information that was provided to the agency.

17. What Support will Council Provide?

- 17.1. When a disclosure is made, Council will act to:
- protect the dignity, wellbeing, career interests and good name of the persons involved;
 - protect the discloser and internal witnesses from reprisal; and
 - firmly address any bullying, harassment, unfair treatment, victimisation, or discrimination that results from a disclosure being made.
- 17.2. Councillors or employees in need of support because of a disclosure are urged to contact the PID Coordinator or Manager Human Resources.
- 17.3. Support provided to disclosers may include:

- providing moral and emotional support;
- advising the discloser about the resources available to handle any concerns the discloser may have as a result of making a PID;
- appointing a mentor, confidante or other support officer to assist the discloser throughout the process;
- referring the discloser to the Employee Assistance Program or arranging for other professional counselling;
- generating support for the discloser in the work unit if appropriate;
- ensuring that any suspicions of victimisation or harassment are dealt with;
- maintaining contact with the discloser; and
- organising a formal end to the discloser's involvement with the support when it is agreed that the discloser no longer requires assistance.

18. Action Against Reprisal

- 18.1. Council is committed to ensuring that no reprisal occurs because of a PID, and that includes reprisal by Councillors or employees. Councillors and employees are required to notify the PID Coordinator if a reprisal is reported or suspected. Suspicion of reprisal by a Councillor or employee constitutes corrupt conduct and must be referred to the Crime and Corruption Commission.
- 18.2. Where Council becomes aware of suspected reprisal, it will take immediate and appropriate steps to protect and prevent detriment to the victim, enable the victim to be aware of their rights, ensure a complete and objective investigation, and keep the victim aware of the progress of the investigation.
- 18.3. The nature of the action that will be taken will depend upon the circumstances. An act of reprisal by a Councillor or employee may result in criminal prosecution and disciplinary action including dismissal with respect to an employee.

19. Preserving Rights of a Subject Officer

- 19.1. Persons who are the subject of a PID are entitled to the presumption of innocence.
- 19.2. Employees who are the subject of a PID have the right to respond to allegations made against them before any adverse finding is made. This is usually done in the form of an interview at which time the subject person has a right to have a suitable support person present.

20. Maintaining Confidentiality

- 20.1. The CEO is obliged by Public Interest Disclosure Standard section 7.1 to ensure Council has a secure and confidential reporting system to record the receipt and management of PIDs.
- 20.2. The Public Interest Disclosure Standard:
- links back to and incorporates the content of the publication "Managing a Public Interest Disclosure Program – A Guide for Public Sector Organisations 2011" and it, in turn, provides the following text: "The PID Act s. 65(3)– (4) provides that confidential information may be disclosed for natural justice obligations. However, before information can be released, two conditions must be met [s. 65(5)]:
- it is essential to release that information to provide natural justice. If it is possible for a subject officer(s) to answer allegations without the source of the allegations being identified, the release of information cannot be said to be essential
 - it is unlikely that a reprisal will be taken against the discloser." and
- a. counsels that one must notify the discloser before revealing their identity for any reason.
- 20.3. Council will advise the discloser if their identity needs to be revealed by Council and seek consent if possible. Council will attempt, as far as possible, to avoid a situation where the discloser's identity will be revealed.

- 20.4. While Council is prepared to take all steps necessary to protect the confidentiality of the information that is disclosed, the discloser can take some steps to minimise the risk of reprisal action. The fewer people who know about the disclosure, both before and after it is made, the more likely it is that Council will be able to keep identities confidential and protect persons from reprisal.
- 20.5. Council encourages disclosers to not talk about their disclosure to work colleagues or other unauthorised persons. The law (see section 65 of the PID Act) mandates that if a person gains confidential information because of the person's involvement in this Act's administration, the person must not:
- 20.5.1. make a record of the information, or
- 20.5.2. intentionally or recklessly disclose the information to anyone other than:
- a. for the PID Act; or
 - b. to discharge a function under another Act including, for example, to investigate something disclosed by a public interest disclosure; or
 - c. for a proceeding in a court or tribunal; or
 - d. if the person to whom the confidential information relates consents in writing to the making of the record or disclosure of the information; or
 - e. if:
 - i. the person cannot reasonably obtain the consent of the person to whom the confidential information relates; and
 - ii. making the record or disclosing the information is unlikely to harm the interests of the person to whom the confidential information relates and is reasonable in all the circumstances; or
 - f. if the person reasonably believes that making the record or disclosing the information is necessary to provide for the safety or welfare of a person; or
 - g. if authorised under a regulation or another Act.
- 20.6. Contravention is an offence.
- 20.6.1. The Act defines the term "confidential information" as:
- a. Includes:
 - i. information about the identity, occupation, residential or work address or whereabouts of a person:
 - who makes a public interest disclosure; or
 - ii. against whom a public interest disclosure has been made; and
 - iii. information disclosed by a public interest disclosure; and
 - iv. information about an individual's personal affairs; and
 - v. information that, if disclosed, may cause detriment to a person; and
 - b. 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.
- 20.7. A person (which could include a Councillor) gains information because of the person's involvement in this Act's administration if the person gains the information because of being involved, or an opportunity given by being involved, in the administration.
- 20.8. It is acknowledged that these confidentiality obligations may impose substantial limitations and constraints on Council's ability to use the information provided by a discloser unless:
- the discloser is willing for their identity to be disclosed; or
 - Council can use the PID as a prompt to obtain evidence independently of the PID that will enable it to prove the conduct or matter the subject of the PID.
- 20.9. When Council has decided to act in relation to any wrongdoing that is the subject of a public interest disclosure, it is obliged by principles of natural justice, to disclose sufficient information to a person whose

rights would otherwise be detrimentally affected as it will enable that person to know the nature of the case (the evidence) and the identity of those who are giving evidence.

- 20.10. At that time Council may provide to the accused person information disclosing, or likely to disclose, the identity of a person who makes a public interest disclosure only if it is:
- essential to do so under the principles of natural justice; and
 - unlikely a reprisal will be taken against the person because of the disclosure.
- 20.11. If Council can and does use the knowledge it gleans from what is in a PID to obtain other evidence sufficient to establish the truth of what is alleged, then it will not be essential to include in the disciplinary processes to which the obligations of natural justice apply, any information disclosing, or likely to disclose, the identity of a person who makes a public interest disclosure.
- 20.12. If a person who faces disciplinary action appeals the action taken by the employer, it should still be possible to maintain confidentiality of the discloser as Council will not have taken that into account as a 'fact' justifying the disciplinary action taken.
- 20.13. The extreme situation that may result in Council releasing to an accused person information disclosing, or likely to disclose, the identity of a person who made a public interest disclosure is theoretically possible provided:
- it has been unable to obtain any other evidence of wrongdoing from any other source and it therefore becomes essential to do so under the principles of natural justice; and
 - Council has formed the opinion it is unlikely a reprisal will be taken against the person because of the disclosure.
- 20.14. The management of the PID will include an assessment of possible reprisal action against the discloser if confidentiality is breached. During an investigation, it may occur that the discloser may be identifiable, for example if the discloser told others about a disclosure or if the allegations are specific to one person or area. In such cases, Council will consider a range of measures available to protect the disclosure including for example, making relevant employees acutely aware of the disciplinary action that can be taken against any reprisal, close management of the dealings between people, or reorganisation of the workplace.

21. Maintaining a Record

- 21.1. Any person entitled under the Act to receive a PID (which could include a Councillor) must keep a proper record of a disclosure, including the name (if known) of the person making the disclosure, the information disclosed, and any action taken on the disclosure. This information is confidential and must be kept on a confidential investigation file and not on personnel, disciplinary or grievance file.
- 21.2. The PID Coordinator is the information custodian, and the information is normally classified in accordance with Council policy as 'protected' and access is restricted to those parties that need to know to fulfil their duty to investigate or make decisions on the information. Guidance should be obtained from the PID Coordinator on how to deal with the information. Those persons are the Chief Executive Officer or Manager Governance.

22. Reporting Requirements

- 22.1. As part of Council's PID Management Program, a secure and confidential reporting system is in place for the receipt and management of PIDs.
- 22.2. Council will ensure reporting is provided to the Queensland Ombudsman as per the Public Interest Disclosure Standard.

23. Policy Review

- 23.1. The policy is to be reviewed in accordance with the Policy Framework.
- 23.2. Kowanyama Aboriginal Shire Council reserves the right to vary, replace, or terminate this policy from time to time.

24. Approval

- 24.1. This policy was duly authorised by the Chief Executive Officer on 31 May 2023 as Kowanyama Aboriginal Shire Council's Public Interest Disclosure Policy and shall hereby supersede any previous policies of the same intent.