



Internal Procedures Guide

Public Interest Disclosure Act 2003

APPROVED BY ELT 27 OCTOBER 2020

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1 ORGANISATIONAL COMMITMENT FOR REPORTING PUBLIC INTEREST INFORMATION

The City of Mandurah (the 'City') does not tolerate corrupt or other improper conduct and is committed to the aims and objectives of the *Public Interest Disclosure Act 2003* (PID Act). The PID Act recognises the value and importance of reporting as a means to identify and address wrongdoing.

The City strongly supports disclosures being made by employees, contractors, volunteers and members of the community about corrupt or improper conduct.

The City does not tolerate any of its employees or contractors taking reprisal action against anyone who makes or proposes to make a public interest disclosure and will take all reasonable steps to protect employees from any detrimental action in reprisal for the making of a public interest disclosure.

The City is committed to responding to the disclosure thoroughly and impartially. It will treat all people in the disclosure process fairly, including those who may be the subject of a disclosure.

The City will provide as much information as possible to people considering making a public interest disclosure. These internal procedures are accessible to all employees and contractors. Copies are available from the designated person appointed as the proper authority (Public Interest Disclosure (PID) Officer) and will be kept on the City's intranet page.

The persons responsible for receiving disclosures of public interest information designated under s. 23(1)(a) of the PID Act will abide by the [PID Code of conduct and integrity](#) in performing their duties.

General information about public interest disclosures and how the City of Mandurah will manage a disclosure is available for external clients and members of the community on the City's website www.mandurah.wa.gov.au

Further information can be obtained from the Public Sector Commission Advisory Line on (08) 6552 8888 for general information about the disclosure process. While these procedures focus on public interest disclosures, the City is committed to dealing with all reports of suspected wrongdoing. The City encourages people to report, if they witness any such behaviour. The City will consider each matter under the appropriate reporting pathway and make every attempt to protect staff members making reports from any reprisals.

2 PURPOSE OF THESE PROCEDURES

These internal procedures provide for the manner in which the City will comply with its obligations under the PID Act, including:

- disclosures of public interest information shall be made to the Public Interest Disclosure Officer (PID Officer).
- the PID Officer shall investigate the information disclosed, or cause that information to be investigated.
- the PID Officer may take action following the completion of the investigation.
- the PID Officer shall report to the discloser as to the progress and outcome of that investigation and the action taken as a consequence.

- the confidentiality of the informant, and any person who may be the subject of a public interest disclosure, shall be maintained.
- records as to public interest disclosures shall be maintained and reporting obligations complied with.

These procedures also outline the roles and responsibilities of;

- the Chief Executive Officer;
- the person designated as the proper authority in accordance with s. 23(1)(a) s. 5(3) (h) referred to in this document as the PID Officer;
- the discloser; and
- the subject of the disclosure.

The Chief Executive Officer must prepare and publish internal procedures under s. 23(1)(e) of the PID Act.

These procedures are to be read in conjunction with:

- [Public Interest Disclosure Act 2003](#)
- [Public Interest Disclosure Regulations 2003](#)
- [Don't be afraid to speak up](#) - Public Sector Commission Guideline

3 SCOPE AND APPLICATION OF INTERNAL PROCEDURES

These procedures apply to all people involved in the public interest disclosure process, including the Chief Executive Officer, PID Officer(s), employees of the City of Mandurah and/or any person making a public interest disclosure and any subject(s) of a disclosure.

These procedures should be read in conjunction with:

- [Public Interest Disclosure Act 2003](#)
- [Public Interest Disclosure Regulations 2003](#)
- [Local Government Act 1995](#)
- [City of Mandurah Code of Conduct for Employees](#)

The behaviour of all employees involved in the public interest disclosure process must accord with our [Code of Conduct for Employees](#) at all times. A breach of the code of conduct may result in disciplinary action.

4 OVERVIEW OF ROLES AND RESPONSIBILITIES OF PARTIES INVOLVED IN THE DISCLOSURE PROCESS AT CITY OF MANDURAH

4.1. Roles and responsibilities under the PID Act

Person/Role	Responsibilities
Chief Executive Officer Principal executive officer (s.23)	<ul style="list-style-type: none"> • Designates the occupant of a specified position (a PID Officer) to receive interest disclosures related to the City (s. 23(1)(a)). • Provides protection from detrimental action or the threat of detrimental action for any employee of the City who makes a public interest disclosure (s. 23(1)(b)). • Ensures the City complies with the PID Act and the Code of Conduct and Integrity established by the Public Sector Commission (ss. 23(1)(c) and (d)).

	<ul style="list-style-type: none"> • Prepares and publishes internal procedures, consistent with those prepared by the Public Sector Commission, detailing how the City will meet its obligations under the PID Act (s. 23(1)(e)). • Provides information (s. 23(1)(f)) to the Public Sector Commissioner on the: <ul style="list-style-type: none"> - number of disclosures received by the City; - results of any investigations conducted as a result of the disclosures; - action, if any taken, as a result of each disclosure; and - any matters as prescribed. • May have a role in enabling an investigation to be undertaken or taking disciplinary action against individuals under functions and powers separately from the PID Act.
Public Interest Disclosure Officer (s 23(1)(a), s. 5(3), s. 7 and s. 18)	<ul style="list-style-type: none"> • As is designated by ss. 5(3)(a-g) or by the Chief Executive Officer of the City, under s. 23(1)(a) the Officer is to receive disclosures related to the City. • Provides information to potential disclosers about their rights and responsibilities consistent with the Code of Conduct and Integrity established under s. 20(1). • Receives and manages public interest disclosures in accordance with the PID Act (s. 5(3)). • Notifies the discloser within three months of the disclosure being made about what action is planned in dealing with the disclosure (s. 10(1)). • Where appropriate, investigates, or causes an investigation of, the matters in the disclosures (s. 8(1)). • Where appropriate, provides information to subjects of a disclosure about their rights, responsibilities, duties and potential offences (s. 9(2), s. 14, s. 15, s. 16 and s. 24). • Where appropriate, takes such action as is necessary and reasonable, within their functions and powers in accordance with s. 9. • Maintains confidentiality of the identity of the discloser and subject(s) of disclosures, in accordance with the requirements of the PID Act (s. 11 and s. 16). • Provides progress reports where requested and a final report to the discloser in accordance with s. 10. • Creates and maintains proper and secure records in relation to the disclosures in accordance with the Code of Conduct and Integrity established under s. 20(1) and the State Records Act 2000. • Completes a PID Register for each disclosure lodged (s. 23(1)(f)). • Acts in accordance with the rules of natural justice (s. 9(2) and s. 16(1)(b)). • Acts in accordance with the Code of Conduct and Integrity established by the Public Sector Commissioner (s. 20(1)) and any authority-specific code of conduct established separately from the PID Act.
The discloser	<ul style="list-style-type: none"> • Makes a public interest disclosure to a proper authority or City's PID Officer if the matter relates to the City (s. 5(1)). • Believes on reasonable grounds the information in their disclosure is, or may be, true (s. 5(2)).

	<ul style="list-style-type: none"> • Does not disclose information subject to legal professional privilege (s. 5(6)). • Does not knowingly and recklessly make a false or misleading disclosure (s. 24(1)). • Maintains confidentiality of the information disclosed and the identity of the person(s) to whom the information relates, in accordance with the requirements of the PID Act (s. 16 and s. 17(1)(b)). • Assists any person investigating the matter to which the disclosure relates by supplying the person with any information requested (s. 17(1)(a)).
The subject of the disclosure (person about whom disclosure is made):	<ul style="list-style-type: none"> • Is afforded the opportunity to make a submission, either orally or in writing, in relation to the matter before preventative or disciplinary action is taken (s. 9(2)). • Maintains confidentiality of the identity of the discloser, in accordance with the requirements of the PID Act (s. 16(1)). • Is to be treated in accordance with the rules of natural justice (s. 16(1)(b)). • Does not take or threaten to take detrimental action (defined in s. 3) against a person because they have made or intend to make a disclosure (s. 14(1)). • Does not incite another person to take detrimental action against another because they have made or intend to make a disclosure (s. 14(2)). • Does not commit an act of victimisation by taking or threatening to take detrimental action against the person making or intending to make a disclosure (s. 15(1)).
An investigating officer:	<ul style="list-style-type: none"> • May investigate matters of public interest information on behalf of a proper authority of the City, in accordance with the terms of reference given to them. • Maintains confidentiality of the identity of the discloser and any persons subject to the disclosure, in accordance with s. 16. • Makes, and keeps secure, comprehensive records of any investigation undertaken.

4.2. Designation of Public Interest Disclosure (PID) Officer

The Officers currently appointed as PID Officers for the City are:

Officer Name: Tahlia Jones

Position Title: Director Business Services

Contact Details: 9550 3782 TahliaL.Jones@mandurah.wa.gov.au

Officer Name: Janet Weber

Position Title: Manager Governance and Legal Services

Contact Details: 9550 3265 Janet.Weber@mandurah.wa.gov.au

Officer Name: Sophie Luxton

Position Title: Governance Legal Specialist

Contact Details: 9550 3278 Sophie.Luxton@mandurah.wa.gov.au

Officer Name: Debi Gilligan

Position Title: Supervisor Purchasing & Administration

Contact Details: 9550 3875 Debi.Gilligan@mandurah.wa.gov.au

Officer Name: Teena Miller
Position Title: Coordinator Library Services
Contact Details: 9550 3651 Teena.Miller@mandurah.wa.gov.au

PID Officers are responsible for receiving disclosures of public interest information relating to matters falling within the sphere of responsibility of the City.

After assuming or beginning to act in the position of PID Officer, the person holding or acting in that position must forward a completed PID Officer's Declaration (see Forms) to the Public Sector Commission as soon as practicable. A copy of the completed PID Officers declaration shall be retained on a file to be kept for that purpose.

5 MANAGING PUBLIC INTEREST DISCLOSURES

The following procedures describe how the City will manage the public interest disclosure process.

5.1. Overarching requirements of the *Public Interest Disclosure Act 2003*

The PID Act has some overarching requirements for handling disclosures. These requirements separate the public interest disclosure process from other reporting or complaint handling processes. The PID Act does not, however, displace the notification or reporting requirements of the *Corruption, Crime and Misconduct Act 2003*, which are paramount. The following section outlines how the City will meet these requirements, as well as expectations of disclosers, and any subject(s) of a disclosure.

5.2. What is 'public interest information'?

The PID Act only applies to disclosures of public interest information (defined in s. 3). Public interest information means information that:

- relates to the performance of a public function by a public authority, public officer or public sector contractor (either before or after the commencement of the PID Act); and
- shows or tends to show that a public authority, a public officer, or a public sector contractor is, has been or proposes to be involved in:
 - improper conduct;
 - an act or omission that constitutes an offence under a written (State) law;
 - substantial unauthorised or irregular use of, or substantial mismanagement of, public resources;
 - an act done or omission that involves a substantial and specific risk of injury to public health;
 - prejudice to public safety;
 - harm to the environment; or
 - a matter of administration that can be investigated under section 14 of the *Parliamentary Commissioner Act 1971* by the Parliamentary Commissioner (Ombudsman Western Australia).

5.3. Confidentiality

Maintaining confidentiality is an important part of managing a disclosure. The confidentiality requirements of the PID Act (s. 16) not only protects the discloser, but also any other people affected by the disclosure.

The confidentiality requirements do not apply to all information in a disclosure, although, the City is committed to maintaining confidentiality around:

- any information that may identify the discloser or any person who may be the subject of a disclosure, including the fact a disclosure has been made; and
- information relating to a disclosure that, if known, may cause detriment.

Throughout the disclosure process and after its completion, the PID Act provides for the disclosers identity and the identity of any persons, that is, any subject of the disclosure to be kept confidential, except in certain circumstances.

Disclosing information which might identify, or tend to identify the disclosers s. 16(1) or any person, that is, the subject(s) (s. 16(3)) of a disclosure, except in accordance with the PID Act, is an offence punishable with a penalty of a \$24 000 fine or imprisonment for two years.

5.4. Confidentiality regarding the discloser

Maintaining confidentiality is an important part of protecting the discloser from any detrimental action in reprisal for making or intending to make a disclosure.

If the discloser consents to having their identity revealed to assist in dealing with the disclosure, a PID Officer will record this using the [Consent to disclosure of identifying information form](#). (APPENDIX 3)

Sometimes a PID Officer may need to identify the discloser, without the discloser's consent s. 16(1) (b)-(f) but only where:

- it is necessary to do so having regard to the rules of natural justice;
- it is necessary to do so to enable the matter to be investigated effectively;
- the City is ordered by a court or any other person or body having authority to hear, receive or examine evidence; or
- the City is required by ss.152 or 153 of the *Corruption, Crime and Misconduct Act 2003*.

Before a discloser is identified for any of the reasons above, a PID Officer will take all reasonable steps to inform the discloser that this will happen and the reasons why. PID Officers will use the [Notification of disclosure of identifying information form](#) (APPENDIX 4) to do this.

If we need to provide information about the identity of the discloser to another person for the reasons above, the PID Officer will inform the other person that further disclosure to a third person may put them at risk of committing an offence.

The PID Officer will also consider whether it is necessary to inform any external investigator about the identity of the discloser. Where it is necessary to provide this identifying information, our PID Officer will notify as described above.

5.5. Confidentiality plan

If confidentiality cannot be maintained, a plan will be developed to support and protect disclosers from any potential risks of detrimental action. Disclosers will be involved in developing this plan.

5.6. Confidentiality regarding the person, that is, the subject of the disclosure

The subject of a disclosure may consent to having their identity revealed to assist with the disclosure process s. 16(3)(a). PID Officers will use the [Consent to disclosure of identifying information form](#) (APPENDIX 3) to record this.

Additionally, PID Officers may need to reveal identifying information about the subject(s) of a disclosure without their consent, s. 16(3)(b)-(g) where:

- it is necessary to do so to enable the matter to be investigated effectively;
- it is necessary to do so in the course of taking action under s. 9;
- there are reasonable grounds to believe that it is necessary to prevent or minimise the risk of injury to any person or damage to any property;
- the City is ordered by a court or any other person or body having authority to hear, receive or examine evidence; or
- the City is required by s. 152 or 153 of the [Corruption, Crime and Misconduct Act 2003](#).

There is no obligation to advise the subject of a disclosure that identifying information will be released in the above circumstances.

5.7. Protections

The PID Act provides a range of protections for disclosers (Part 3). It also requires that the Chief Executive Officer provides protection for any employees who make disclosures (s. 23(1(b))).

The Public Sector Commissions guide - [Don't be afraid to speak up](#) contains general information about the protections provided by the PID Act. The City's PID Officers will be able to expand on this information specific to the City.

The City is committed to ensuring that no detrimental action, including workplace reprisals by managers or other employees, occurs as a result of a person making a disclosure. If any of the above does occur, the discloser can request that the City take action to protect them. Tell the PID Officer who is handling the disclosure immediately.

The PID Act also provides that the discloser may lose the protections provided in s. 13 in some circumstances, including where they on-disclose information or fail, without reasonable excuse, to assist any person investigating the matters of the disclosure.

5.8. Notification requirements

City PID Officers will ensure that all reporting in accordance with the legislative and administrative requirements of the PID Act are complete.

Where a PID Officer decides not to investigate information disclosed under the Act, or discontinues an investigation, the Officer must give the person who made the disclosure reasons for doing so.

Provided it is not an anonymous disclosure, PID Officers will provide the following reports to the discloser:

- within three months of making a disclosure, the action taken, or propose to take, in relation to the disclosure (s. 10(1)); and
- when the disclosure process has concluded, the outcome of the investigation and the reasons for taking any action following the investigation (s. 10(4)).

PID Officers may also provide a progress report during any investigation, either on their initiative or upon disclosers request (ss. 10(2) and (3)).

PID Officers have some limits on what they can include in their reports. Section 11 prevents provision of information that would be likely to adversely affect:

- any person's safety s(1)(a);
- the investigation of an offence or possible offences s(1)(b); or
- confidentiality as to the existence or identity of any other person who made a public interest disclosure s(1)(c).

PID Officers are also prevented from giving any information they must not disclose under ss. 151, 152 or 153 of the *Corruption, Crime and Misconduct Act 2003*.

5.9. Record keeping

During the investigation PID Officers may make comprehensive and contemporaneous records of any discussions and interviews. These records along with any other documentation or files relating to the disclosure, whether paper or electronic, will be stored securely and only accessed by authorised persons.

All corporate public interest disclosure files should have the following text clearly marked:

CONFIDENTIAL

The material in this file relates to a public interest disclosure made under the *Public Interest Disclosure Act 2003*.

Disclosure of information that might identify or tend to identify either the discloser or the subject of the disclosure is an offence, unless the disclosure occurs in accordance with the *Public Interest Disclosure Act 2003*.

Penalty: \$24 000 or imprisonment for two years

5.10. PID Register

To assist with annual reporting to the Public Sector Commission the City will maintain a public interest disclosure register for each financial year.

We will assign a unique register number to each disclosure and record key information about disclosures, any investigation and the outcome in the public interest disclosure register.

This register (paper and/or electronic) is kept strictly confidential and maintained in a secure location.

City of Mandurah [Public Interest Disclosure Register](#) (APPENDIX 5).

All reporting requirements to the Public Sector Commission required under the PID Act will be based on extracts from the fields shown in the Register.

6 HOW TO MAKE A PUBLIC INTEREST DISCLOSURE

6.1. Before you make a disclosure

It is strongly encouraged that anyone thinking about making a public interest disclosure firstly seeks advice from a PID Officer before they do. A disclosure must be made to a proper authority (PID Officer) for it to be covered by the PID Act.

PID Officers will be able to provide more detailed information about the City disclosure process and what people can expect from it.

Further information can be obtained from the Public Sector Commission via the Advisory Line on (08) 6552 8888 for general information about the disclosure process. Disclosers may choose to report a PID directly to the Public Sector Commissioner, contact the Advisory Line on (08) 6552 8888 for further information. A number of other requirements apply to the discloser, so it is important to understand the rights and responsibilities in the process. This information is outlined generally in [Don't be afraid to speak up](#), available from the Public Sector Commission website at www.publicsector.wa.gov.au and the [City's intranet page](#).

At the City the occupants of the following designated position(s) are specified with the authority as the person(s) responsible for receiving disclosures of public interest information in accordance with s. 23(1)(a).

PID Officers for the City are:

Officer Name: Tahlia Jones
Position Title: Director Business Services
Contact Details: 9550 3782 TahliaL.Jones@mandurah.wa.gov.au

Officer Name: Janet Weber
Position Title: Manager Governance & Legal Services
Contact Details: 9550 3265 Janet.Weber@mandurah.wa.gov.au

Officer Name: Sophie Luxton
Position Title: Governance Legal Specialist
Contact Details: 9550 3278 Sophie.luxton@mandurah.wa.gov.au

Officer Name: Debi Gilligan
Position Title: Supervisor Purchasing & Administration
Contact Details: 9550 3875 Debi.Gilligan@mandurah.wa.gov.au

Officer Name: Teena Miller
Position Title: Coordinator Library Services
Contact Details: 9550 3651 Teena.Miller@mandurah.wa.gov.au

Initial discussions between the discloser and the PID Officer should be general in nature and should not discuss the specific details of the disclosure until the discloser understands their rights and responsibilities under the PID Act. PID Officers will also let the discloser know that they need to make the disclosure voluntarily and consciously – the City will never force a person to make a disclosure. This is because disclosures cannot be withdrawn once made. Once the City receives a disclosure, PID Officers are obliged to take action and may continue to look into the matters within disclosures irrespective of the disclosers continued approval.

Initial discussions with PID Officers may help in deciding whether to make a public interest disclosure and also enable PID Officers to ascertain if the information would be covered by the PID Act. If the information appears not to be the type covered by the PID Act, PID Officers will discuss other mechanisms through which issues may be made, for example, the City's general complaints or grievance resolution process.

Some other avenues for reporting your information include:

- Corruption and Crime Commission for serious misconduct
- Public Sector Commission for minor misconduct
- Western Australia Police for criminal matters
- Ombudsman Western Australia for matters governing administration affecting individuals
- Equal Opportunity Commission Western Australia for matters regarding discrimination
- public authority involved in the matter.

6.2. What is ‘sphere of responsibility’?

Under s. 5(3)(h) the PID Officer for an authority can receive information relating to a matter which falls within the ‘sphere of responsibility’ for their public authority. ‘Sphere of responsibility’ is not defined in the PID Act but, for the City, may include:

- matters that relate to the City;
- a public officer or public sector contractor of the City; or
- a matter or person that the City has a function or power to investigate.

The proper authority to which disclosures must be made depends on the type of disclosure information. Where the information is outside of the City’s PID Officer’s sphere of responsibility, it may need to be made to another proper authority for it to be considered as a public interest disclosure and for the discloser to receive the protections of the PID Act.

A list of proper authorities and the information they can receive is outlined below:

Category of public interest information	Appropriate proper authority (pursuant to the PID Act)
Offences under State law	A police officer or the Corruption and Crime Commission (s5(3)(a))
Substantial unauthorised or irregular use of, or substantial mismanagement of, public resources	Auditor general (s5(3)(b)) or the PID Officer of the public authority concerned (s5(3)(h))
Matters of administration affecting someone in their personal capacity falling within the jurisdiction of the Ombudsman Western Australia	Ombudsman Western Australia (s5(3)(c)) or the PID Officer of the public authority concerned (s5(3)(h))
A police officer	Commissioner of Police or the Corruption and Crime Commission (s5(3)(d))
A judicial officer	Chief Justice (s5(3)(e))
A Member of the Legislative Assembly	Speaker of the Legislative Assembly (s5(3)(f))
A Member of the Legislative Council	President of the Legislative Council (s5(3)(f))
A public officer who is not a Member of Parliament, a Minister, a judicial officer or a commissioned or other officer specified in schedule 1 of the <i>Parliamentary Commissioner Act 1971</i>	Ombudsman Western Australia or the Public Sector Commissioner (s5(3)(g)) or the PID Officer of the public authority concerned (s5(3)(h))
A public authority or an officer of the public authority	PID Officer of the public authority (s5(3)(h))

6.3. Making the disclosure

A discloser needs to clearly identify that they are making a public interest disclosure. For the City of Mandurah Public Interest Disclosure Guidelines Page 10

purposes of accountability and certainty, persons wishing to make a disclosure of public interest information under the PID Act are encouraged to do so in writing. [Public Interest Disclosure Lodgement Form](#) (APPENDIX 1).

There is no requirement to use the form. The form will help to define the details of the disclosure. A discloser may fill out the form themselves or the City's PID Officer may complete the form if they are speaking with the discloser and then have them sign the form to acknowledge they are making a disclosure voluntarily and consciously.

Anonymous Disclosures:

The City must accept anonymous disclosures, but if a discloser decides to make an anonymous disclosure they should understand that it may be more difficult for the PID Officer to investigate or take action about the disclosure. This is because they cannot come back to seek any further information. The City is not required to provide any reports about the progress or final outcome of the disclosure, if the discloser chooses to remain anonymous.

An anonymous disclosure may not prevent the discloser from being identified during an investigation. Additionally, if a PID Officer does not know who made the disclosure, it will be difficult for them to ensure the discloser is protected and to prevent any reprisal or detrimental action.

On completion of the PID Lodgement form, the PID Officer should create a separate file for the Public Interest Disclosure.

The making of a public interest disclosure should also be recorded in the Public Interest Disclosure Register, described at 5.10 of these guidelines, for reporting to the Commissioner for Public Sector Standards.

6.4. Determining whether the matter is an appropriate disclosure

Once a PID Officer has received the disclosure they will assess whether it meets the requirements under the PID Act. It may be that the PID Officer undertakes initial inquiries and decides not to take the matter any further, as it does not constitute an appropriate public interest disclosure.

If the disclosure is not one to which the PID Act applies, the PID Officer will let the discloser know the reasons for their decision (unless it was an anonymous disclosure) and make proper and adequate records about it. Some matters raised within the disclosure may not be matters to which the PID Act applies and the PID Officer may discuss with the discloser other pathways to report these matters.

If the disclosure, or part of the disclosure, is one to which the PID Act applies, the PID Officer will ensure proper and adequate records are made and will communicate with the discloser further, unless it is an anonymous disclosure.

The PID Officer will notify the discloser within three months about what the City plans to do in dealing with the disclosure, unless it is an anonymous disclosure.

6.5. Determining whether public interest disclosures will be investigated

After assessing the disclosure as one to which the PID Act applies, a PID Officer will consider whether it will be investigated, guided by the requirements in s. 8. The reasons a PID Officer may not investigate the disclosure include:

- the matter is trivial;
- the disclosure is vexatious or frivolous;
- there is no reasonable prospect of obtaining sufficient evidence due to the time that has elapsed since the matter(s) occurred; or
- the matter is being or has been adequately or properly investigated by another proper authority, s. 5(3).

PID Officers will make proper and adequate records of their decision and reasons about whether to investigate or not.

6.6. Referring public interest matters

Where a PID Officer assesses the disclosure as one to which the PID Act applies, but they do not have the functions or power to investigate one or more matters within the disclosure, they will refer the information to the appropriate authority for investigation as provided for under the PID Act.

Alternatively, a discloser may also be able to make a disclosure directly to this new authority, if they wish to receive reports from them about the disclosure. For example, a PID Officer may need to refer an allegation of an offence supported by evidence to the Western Australia Police for investigation.

6.7. Investigating the disclosure

PID Officers will investigate, or cause to be investigated, any matters in the disclosure within the sphere of responsibility. PID Officers may cause the disclosure to be investigated by engaging a suitably skilled staff member within the City or an externally contracted investigator.

If causing the disclosure to be investigated, PID Officers will ensure that the person undertaking the investigation understands the requirements of the PID Act, in particular the confidentiality requirements and protections for disclosers. PID Officers will only provide the name of the discloser and that of the subject of the disclosure to the investigator in accordance with s. 16 of the PID Act.

When investigating the disclosure, PID Officers or investigators are limited by the functions and powers derived from operating legislation. The PID Act does not provide for any additional investigative powers.

If the disclosure is an employee, they are expected to cooperate with any investigation into the disclosure to maintain the protections under the PID Act. A discloser is also expected to act in accordance with the City's Code of Conduct for Employees at all times.

Employees who are the subject of the disclosure can clarify the process and what to expect with a PID Officer.

PID Officers may also decide to discontinue an investigation, in accordance with s. 8(2). If this happens, they will give the discloser reasons for their decision in accordance with s. 8(3), unless they made an anonymous disclosure. PID Officers may also notify any subject(s) of the disclosure, if they discontinue the investigation.

To ensure the disclosure is adequately and properly investigated PID Officers, or other investigators, will be guided by the procedures below.

6.8. Internal investigation procedures

In conducting an investigation, PID Officers should:

- develop a terms of reference for the investigation, clarifying the key issues in the disclosure;
- ensure the objectives of the investigation include:
 - collecting and collating information related to the disclosure
 - considering the information collected
 - drawing conclusions objectively and impartially;
- specify a date by which the investigation should be completed and provide a report to the discloser about the final outcome, bearing in mind that the discloser may be able to disclose to a journalist if the PID Officer:
 - does not notify the discloser within three months of them making their disclosure about how they plan to deal with the disclosure
 - discontinues an investigation
 - does not complete the investigation within six months
 - does not provide a final report to the discloser about the outcome and any action taken, including the reasons for that action;
- inform the subject of the disclosure about their rights and obligations under the PID Act, the PID Officer's code of conduct and integrity, the [City of Mandurah Code of Conduct for Employees](#) and the law;
- maintain procedural fairness for the person who is the subject of the disclosure;
- make contemporaneous notes of discussions and interviews and, where practicable and appropriate, record discussions and interviews on audio or videotape (ensuring people are made aware they are being recorded); and
- ensure strict security to maintain the confidentiality requirements of the PID Act.

6.9. What are the responsibilities of the subject of a disclosure?

A subject of a disclosure (a 'subject') is a person of interest about whom an allegation of a public interest disclosure has been made.

PID Officers will treat the subject fairly and impartially throughout the process, and inform them of their rights and obligations. PID Officers will generally keep the parties involved informed during any investigation, although information cannot be released to the subject that may prejudice an investigation. As an employee it is expected that subjects will act in accordance with the City's [Code of Conduct for Employees](#) at all times.

The PID Act provides the subject with some rights and obligations as a person subject to a disclosure. Firstly, the subject has a right to have their identity kept confidential under s. 16(3), unless one of the following conditions apply:

- the subject consents to their identity being disclosed;
- it is necessary to enable the matter to be investigated effectively;
- it is necessary to do so in taking action within s. 9;
- there are reasonable grounds to believe that it is necessary to prevent or minimise the risk of injury to any person or damage to any property;
- is made in accordance with a court order or other body having authority to hear evidence;
- or
- it is made in accordance with ss. 152 or 153 of the [Corruption, Crime and Misconduct Act 2003](#).

PID Officers will also provide appropriate natural justice. This means that, before any disciplinary or other action against the person under s. 9 is taken, we will give the subject the

opportunity to:

- be informed of the substance of the allegations and
- make a submission either verbally or in writing in relation to the matter.

Subjects of a disclosure must not identify or tend to identify the identity of the discloser or a person who they think might be the discloser, as they also have rights to confidentiality under the PID Act. It is an offence under s. 16 to identify or tend to identify any person who has made a disclosure under the PID Act.

Subjects must not engage in reprisal action, threaten anyone with reprisal action or have someone else conduct this action on their behalf because someone has made, or intends to make, a disclosure. It is still an offence to conduct this action against any person you believe has made the disclosure even if they were not the individual who actually made the disclosure. This is an offence under s. 14(1) of the PID Act.

6.10. Taking action

City PID Officers will take or recommend action where they form the opinion that a person may be, may have been or may in the future be involved in conduct which may be the subject of a public interest disclosure. Usually, PID Officers will form this opinion at the conclusion of an investigation, although there may be instances where they need to take immediate action and the PID Act enables them to do this.

Action PID Officers may take or recommend under s. 9 includes, but is not limited to:

- preventing the matter disclosed from continuing or occurring;
- referring the matter to the Western Australia Police or other appropriate body; or
- taking disciplinary action against a person responsible for the matter.

The options above are not mutually exclusive. PID Officers may take more than one action depending on the circumstances. For example, PID Officers may seek to terminate the employment of an employee caught stealing and refer the matter to the Western Australia Police, in this example the offence may also be referred to the Corruption and Crime Commission as serious misconduct.

In taking action PID Officers and/or the City is limited by the powers and functions derived from our operating legislation. The PID Act does not provide for any additional powers to take action. The City is also guided by what is necessary and reasonable in the circumstances.

Before taking any action the City will give the subject an opportunity to respond, either verbally or in writing, to ensure procedural fairness.

6.11. Confidentiality and record keeping when taking action

The City will maintain confidentiality in accordance with the PID Act when taking action.

PID Officers will keep appropriate records about any action taken, as well as recording a summary of this action in the [City of Mandurah public interest disclosure register](#) (APPENDIX 5).

6.12. After the public interest disclosure process has been finalised

The PID Act places no further obligations on the City or PID Officers after the disclosure process is complete. The confidentiality requirements of the PID Act, however, continue to

apply to all people involved with the disclosure.

The PID Act does not provide for appeals to the outcome of the disclosure process. Disclosers may be able to make another disclosure to another proper authority, if the information relates to their functions or sphere of responsibility (s. 5). See [Don't be afraid to speak up](#) for the correct proper authority for your disclosure.

However, this 'new' proper authority may be able to decline to investigate the disclosure under s. 8, if they consider the matter(s) has already been properly or adequately investigated (as a public interest disclosure).

7 MAKING A DISCLOSURE TO A JOURNALIST - FOLLOWING PID PROCESS

The PID Act provides for certain circumstances where a discloser may be able to make a protected disclosure to a journalist s. 7A(d). These circumstances apply where the discloser has first made a disclosure to the PID Officer or another proper authority named in the PID Act (outlined in s. 5 or [Don't be afraid to speak up](#)).

Importantly, the PID Act states that to attract the privileges and protections of the PID Act when disclosing to a journalist, the discloser must disclose information that is substantially the same as what was disclosed in the original disclosure and the PID Officer that received the original disclosure:

- did not notify the discloser within three months of making the disclosure about actions they propose to take or have already taken;
- refused to investigate, or discontinued the investigation of, a matter raised in the disclosure;
- did not complete an investigation within six months of the discloser making the disclosure;
- completed an investigation but did not recommend that action be taken; or
- did not provide the discloser with a report stating the outcome of any investigation or any action proposed or taken and the reasons for those actions.

If a discloser is considering making a disclosure to a journalist because they believe their circumstances meet one or more of the requirements outlined above, we would encourage the discloser to discuss this with a PID Officer prior to disclosure to a journalist.

It is also recommended that the discloser seek their own legal advice before taking any action in relation to matters that have been disclosed under the PID Act.

If a discloser makes an anonymous disclosure they may not be able to demonstrate they meet the above requirements and we are not obliged to provide the discloser with any notifications about what happens to the disclosure.

8 REPORTING REQUIREMENTS

Under the PID Act the City will need to report to the Commissioner each year as outlined below.

8.1. Principal Executive Officer (CEO) Report

Under section 23(1)(f) of the PID Act, the City is required to report annually to the Commissioner for Public Sector Standards:

- the number of public interest disclosures received by the City;
- the results of any investigations conducted as a result of the disclosures;
- the action, if any taken, as a result of each disclosure; and
- any other matters as prescribed.

8.2. Report Format and Submission

The Public Sector Commission's annual survey program addresses the information required to be reported (as outlined in 8.1) as well as the City's compliance with the PID Act and PID Officers Code of Conduct and Integrity.

The survey will be provided electronically to the City each year by the Commissioner and will be able to be submitted online. The report will cover the period of 1 July in any year to 30 June in the subsequent year.

Where there has been no action on a disclosure in the reporting period the format of the report will provide for a simple nil return. Where action relating to one or more disclosures has occurred, all data required will be obtainable as a simple extract from the Public Interest Disclosure Register.

9 CONTACT DETAILS AND FURTHER INFORMATION

- [City of Mandurah Intranet PID page](#)
- Public Sector Commission: www.publicsector.wa.gov.au
- Public Sector Commission: [Guide for Disclosers; Don't be afraid to speak up](#)

City of Mandurah Public Interest Disclosure Officers:

Officer Name: Tahlia Jones
 Position Title: Director Business Services
 Contact Details: 9550 3782 TahliaL.Jones@mandurah.wa.gov.au

Officer Name: Janet Weber
 Position Title: Manager Governance and Legal Services
 Contact Details: 9550 3265 Janet.Weber@mandurah.wa.gov.au

Officer Name: Sophie Luxton
 Position Title: Governance Legal Specialist
 Contact Details: 9550 3278 Sophie.Luxton@mandurah.wa.gov.au

Officer Name: Debi Gilligan
 Position Title: Supervisor Purchasing & Administration
 Contact Details: 9550 3875 Debi.Gilligan@mandurah.wa.gov.au

Officer Name: Teena Miller
 Position Title: Coordinator Library Services
 Contact Details: 9550 3651 Teena.Miller@mandurah.wa.gov.au

APPENDIX 1



CITY OF MANDURAH

PUBLIC INTEREST DISCLOSURE LODGEMENT FORM

Public Interest Disclosure Act 2003

City of Mandurah strongly encourages anyone thinking about making a public interest disclosure to seek out a nominated proper authority to discuss their issues first.

The City's Public Interest Disclosure Officer(s) are:

Position	Director Business Services
Name of PID Officer	Tahlia Jones
Contact details	9550 3782 TahliaL.Jones@mandurah.wa.gov.au
Position	Manager Governance and Legal Services
Name of PID Officer	Janet Weber
Contact details	9550 3265 Janet.Weber@mandurah.wa.gov.au
Position	Governance Legal Specialist
Name of PID Officer	Sophie Luxton
Contact details	9550 3278 Sophie.Luxton@mandurah.wa.gov.au
Position	Supervisor Purchasing & Administration
Name of PID Officer	Debi Gilligan
Contact details	9550 3875 Debi.Gilligan@mandurah.wa.gov.au
Position	Coordinator Library Services
Name of PID Officer	Teena Miller
Contact details	9550 3651 Teena.Miller@mandurah.wa.gov.au

Ensure you understand your rights and responsibilities under the *Public Interest Disclosure Act 2003* (PID Act) before you sign this lodgement form. You may wish to seek external legal advice about those rights and responsibilities. Lodge your public interest disclosure form with City of Mandurah's proper authority (PID Officer), not the Public Sector Commission.

Personal details

Family name					
Given name					
Title	<input type="checkbox"/> Mr	<input type="checkbox"/> Ms	<input type="checkbox"/> Mrs	<input type="checkbox"/> Dr	<input type="checkbox"/> Other
Address					
Work phone					
Mobile					

Email	
<input type="checkbox"/>	<p>I wish to make an anonymous public interest disclosure. I understand that:</p> <ul style="list-style-type: none"> • I will not receive any information about what happens to this disclosure • it may be more difficult for the proper authority to look into the matter(s) as they cannot come back to me for further information • it may be more difficult for the proper authority/public authority to protect me • this anonymous disclosure may not prevent me from being identified during any investigation or when action is being taken.

Categories of public interest information	
Tick relevant box(es)	
Improper conduct	<input type="checkbox"/>
An offence under written State law	<input type="checkbox"/>
Substantial unauthorised or irregular use of, or substantial mismanagement of, public resources	<input type="checkbox"/>
Conduct involving a substantial and specific risk of injury to public health, or prejudice to public safety or harm to the environment	<input type="checkbox"/>
Administration matter(s) affecting you personally	<input type="checkbox"/>

Disclosure details	
Name of the public authority(ies) the disclosure relates to	
Do you work for a public authority?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, which public authority and what is your position title?
Does the disclosure relate to one or more individuals?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide name(s) and position(s) held by person(s) in the public authority
When did the alleged events occur?	
Summary of the matters to disclose	

Additional information	
Description of any documents provided or names of witnesses	
Have you reported this information to any other person or agency?	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p>If yes, did you report this information as a Public Interest Disclosure matter?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide details</p>
--	--

You should read the following information and sign this form prior to lodgement.

Acknowledgement

I believe on reasonable grounds that the information contained in this disclosure is or may be true. I have been informed and I am aware that:

- I will commit an offence under section 24 of the PID Act, if I know that the information contained in this disclosure is false or misleading in a material particular, or I am reckless as to whether it is false or misleading in a material particular.
Penalty: \$12 000 or imprisonment for one (1) year.
- I will forfeit the protection provided by section 13 of the PID Act, if I fail, without reasonable excuse, to assist a person investigating the matter by supplying requested information (s17).
- I will forfeit the protection provided by section 13 of the PID Act, if I subsequently disclose this information to any person other than a proper authority under the PID Act (s17).
- I will commit an offence, if I subsequently make a disclosure of information that might identify or tend to identify anyone as a person in respect of whom this disclosure has been made under the PID Act, except in accordance with section 16(3) of the PID Act.
Penalty: \$24 000 or imprisonment for two (2) years.
- I cannot withdraw my disclosure after I have made it.

Authorisation	
Discloser's signature	
Date	



ASSESSMENT AND CASE MANAGEMENT FORM FOR A PUBLIC INTEREST DISCLOSURE

Public Interest Disclosure Act 2003 (PID Act)

Part 1: Receiving the disclosure: Assessment of whether the information is a valid disclosure for the purposes of the PID Act

Assessment of disclosure	Decision	Notes
Does the disclosure relate to a public authority, a public officer or a public sector contractor? (s. 8)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Does the information relate to the performance of a public function? (s. 8)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Does the information show or tend to show matters of public interest information? ¹ (s. 3)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Does the information show or tend to show public interest information for which the person receiving the information is the proper authority (Public Interest Disclosure (PID Officer))? (s. 5(3)(h) and s. 23(1)(a))	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Does the discloser believe on reasonable grounds that the information is, or may be, true? (s. 5(2))	<input type="checkbox"/> Yes <input type="checkbox"/> No	
After being informed of the consequences does the discloser wish to disclose the information under the PID Act, that is, make a public interest disclosure? (s. 5(1))	<input type="checkbox"/> Yes <input type="checkbox"/> No	

¹ Matter to which public interest information can relate:

- improper conduct
- an offence against State law
- a substantial unauthorised or irregular use of public resources
- a substantial mismanagement of public resources
- conduct involving a substantial and specific risk of injury to public health, prejudice to public safety or harm to the environment
- conduct relating to a matter of administration affecting someone in their personal capacity that falls within the jurisdiction of the Ombudsman.

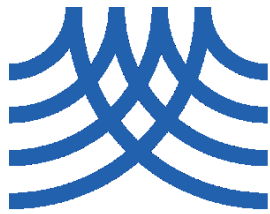
Note for proper authority/PID Officer: If any of the 'No' boxes have been ticked, then the disclosure is unlikely to be one to which the PID Act applies. Make proper and secure records about your determination of whether the disclosure is a valid public interest disclosure under the PID Act. Inform the discloser of your determination and reasons (s. 10).

Confirmation			
I [insert name], the proper authority (Public Interest Disclosure Officer) for City of Mandurah, confirm that the disclosure made to me on [insert date] by [insert discloser's name, if appropriate] shows or tends to show that the matters described are public interest information. I have registered these matters as a disclosure under the PID Act in the public interest disclosure register of City of Mandurah with the registered number [insert number].			
Signed (proper authority)		Date	

Case Management note for the proper authority/PID Officer	Decision
I have created a case file which complies with the recordkeeping plan of City of Mandurah, as required by the <i>State Records Act 2000</i> .	<input type="checkbox"/> Yes <input type="checkbox"/> No
I have notified the discloser of the proposed action to be taken or the action taken in relation to the disclosure in accordance with s. 10(1) of the PID Act (if applicable, at this point of the enquiry).	<input type="checkbox"/> Yes <input type="checkbox"/> No
This has been in accordance with the requirements of s. 11 and s. 16 of the PID Act.	<input type="checkbox"/> Yes <input type="checkbox"/> No
I have recorded the action(s) in the public interest disclosure register.	<input type="checkbox"/> Yes <input type="checkbox"/> No

APPENDIX 3

OFFICE USE ONLY Register No: # Date: / /
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CITY OF MANDURAH

CONSENT TO DISCLOSURE OF IDENTIFYING INFORMATION FORM

Public Interest Disclosure Act 2003

Personal details		
Family name		
Given name		
Disclosure No.		(to be completed by proper authority/Public Interest Disclosure (PID) Officer)

Consent	
<p>Consent to disclosure of identifying information by discloser</p> <p>I consent to the disclosure of information that might identify or tend to identify me as a person who has made an appropriate disclosure of public interest information under section 16(1)(a) of the <i>Public Interest Disclosure Act 2003</i>.</p>	<input type="checkbox"/>
<p>Consent to disclosure of identifying information by subject</p> <p>I consent to the disclosure of information that might identify or tend to identify me as a person in respect of whom a disclosure of public interest information has been made (subject) under section 16(3)(a) of the <i>Public Interest Disclosure Act 2003</i>.</p>	<input type="checkbox"/>

Limitations on consent	
This consent only applies to disclosures made to the following persons	
This consent only applies to the following information	

Authorisation	
Signature of discloser/subject: (delete as appropriate)	
Date	
Signature of proper authority/PID Officer	
Date	

APPENDIX 4

OFFICE USE ONLY Register No: # Date: / /
--



CITY OF MANDURAH

NOTIFICATION OF DISCLOSURE OF IDENTIFYING INFORMATION FORM
Public Interest Disclosure Act 2003

To					
Title	<input type="checkbox"/> Mr	<input type="checkbox"/> Ms	<input type="checkbox"/> Mrs	<input type="checkbox"/> Dr	<input type="checkbox"/> Other:
Given name					
Family name					
Provided by	<input type="checkbox"/> email <input type="checkbox"/> mail <input type="checkbox"/> in person				

I intend to make a disclosure of information that might identify or tend to identify you as a person who has made an appropriate disclosure of public interest information under section 16 of the *Public Interest Disclosure Act 2003*.

The disclosure of this information

Is necessary, having regard to the rules of natural justice (section 16(1)(b))	<input type="checkbox"/>
Is necessary to enable the matter to be investigated effectively (section 16(1)(c))	<input type="checkbox"/>
The reason(s) why the disclosure of this information is necessary is (specify reason(s))	

Important: A person making an identifying disclosure for these reasons must take all reasonable steps to provide this information to the discloser within a reasonable time before making the disclosure in accordance with section 16(2).

Authorisation

Signature of person proposing to make disclosure	
Name	
Position	
Contact details	
Date	



OFFICE USE ONLY
Register No: #
Date: / /

PUBLIC INTEREST DISCLOSURE REGISTER

To assist with maintaining information related to the management of a public interest disclosure your PID Officer/s may choose to use this register.

If using this register, it must be kept securely. Disclosure of information that might identify or tend to identify either the discloser or a person in respect of whom a disclosure has been made (subject of a disclosure) is an offence, unless the disclosure occurs in accordance with section 16 of the PID Act. The penalty is \$24,000 or imprisonment for two years.

1. Record numbers	
1.1	Unique register code
1.2	File number

2. Person making the disclosure (discloser)	
2.1	Date the disclosure was received by the proper authority <i>DD/MM/YYYY</i>
2.2	Was it an anonymous disclosure? <i>(If an anonymous disclosure is made, the public authority is relieved of its obligation to notify the discloser under section 10 of the PID Act).</i>
2.3	Relationship of the discloser to the public authority about which the disclosure was made
2.4	Was the disclosure made to more than one proper authority? (section 5(4) of the PID Act)

2.5	Where the disclosure was made to more than one proper authority, did they enter into a written arrangement under regulation 3 ('joint action') of the Public Interest Disclosure Regulations 2003?	
2.6	Description of the arrangements made	

3. Type of disclosure

3.1	Type of public interest information contained in the disclosure (section 3 of the PID Act)	
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4. Communication with the discloser, the investigation process and action taken (Note: public authority is relieved of its obligation to notify an anonymous discloser under section 10 of the PID Act)

4.1	Date decision was made to investigate the disclosure	<i>DD/MM/YYYY</i>	
4.2	Date any investigation was commenced	<i>DD/MM/YYYY</i>	
4.3	Date advice of action taken or proposed to be taken in relation to the disclosure was provided to the discloser (section 10(1) of the PID Act)	<i>DD/MM/YYYY</i>	
4.4	If the disclosure was not investigated or it was discontinued, what reason/s were given to the person who made the disclosure and on what date were they notified? (section 8 of the PID Act)		<i>DD/MM/YYYY</i>
4.5	Number of progress reports requested by and provided to the discloser (section 10 of the PID Act)		
4.6	Briefly describe the results of any investigation conducted and action, if any, taken as a result of the investigation (section 23(f) of the PID Act)		
4.7	Was a final report provided to discloser and on what date (section 10 of the PID Act)		<i>DD/MM/YYYY</i>

4.8	Were any matters contained in the disclosure referred to another person or body with the power to investigate? (section 9 of the PID Act)		DD/MM/YYYY
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5. Disclosure of identity of discloser

5.1	Was the discloser's identity disclosed? (section 16 of the PID Act)		DD/MM/YYYY
5.2	Briefly describe the reason for disclosure (section 16(1) of the PID Act)		
5.3	Was the discloser advised and given a reason before their identity was disclosed? (section 16(2) of the PID Act)		DD/MM/YYYY

6. Allegations of unlawful disclosure of discloser's identity

6.1	Did the discloser raise any allegations of non-compliance with section 16 of the PID Act, and to whom were these allegations raised?		DD/MM/YYYY
6.2	Briefly describe any action taken in relation to the allegations		

7. Disclosure of identity of persons named in the disclosure (subject of the disclosure)

7.1	Was the subject's identity disclosed? (section 16 of the PID Act)		DD/MM/YYYY
7.2	Briefly describe the reason for disclosure (section 16(3) of the PID Act)		

8. Allegations of unlawful disclosure of identity of person named in disclosure (subject of the disclosure)

8.1	Did the subject raise any allegations of non-compliance with section 16 of the PID Act, and to whom were these allegations raised?		DD/MM/YYYY
8.2	Briefly describe any action taken in relation to the allegations		

9. Order or injunction application at Supreme Court			
9.1	Did the discloser apply for an order or injunction because of a belief that detrimental action had or may be taken? (section 15A of the PID Act)		DD/MM/YYYY
9.2	Briefly describe the outcome of the application		
10. Request for relocation			
10.1	Did the discloser request relocation because of a belief that detrimental action had or may be taken? (section 15B of the PID Act)		DD/MM/YYYY
10.2	Briefly describe the outcome of the request		
11. Allegations of victimisation			
11.1	Were allegations of victimisation raised by the discloser?		DD/MM/YYYY
11.2	Briefly describe the nature of the victimisation allegations		
11.3	Which body were these allegations raised with?		
11.4	If the allegations were handled internally by the proper authority, what was the outcome? (related to section 23 of the PID Act)		
11.5	If known, what was the outcome of any complaint lodged with the Equal Opportunity Commission? (section 15 of the PID Act)		
12. Allegations of non-compliance with the PID Officer's Code of Conduct and Integrity			
12.1	Have there been allegations of non-compliance with the PID Officer's Code of Conduct and Integrity? (section 20 of the PID Act)		DD/MM/YYYY
12.2	Briefly describe who made the allegations and any actions which occurred in relation to the allegations <i>(Please ensure you do not provide any information that may identify or tend to identify the discloser or subject of the disclosure)</i>		
13. Allegations of non-compliance with the PID Act			
13.1	Have there been any allegations of non-compliance with the PID Act?		DD/MM/YYYY

13.2	Briefly describe who made the allegations and any action occurred as a result of the allegations <i>(Please ensure you do not provide any information that may identify or tend to identify the discloser or subject of the disclosure.)</i>	
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14. Disclosure to a journalist (if known)		
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14.1	If known, has the discloser made a disclosure of substantially the same information to a journalist? (section 7A of the PID Act)	<i>DD/MM/YYYY</i>
14.2	If known, why was a disclosure of substantially the same information made to a journalist?	
14.3	Briefly describe the disclosure to the journalist and any action that has occurred	

