



Function: GOVERNANCE

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Related Policy: PUBLIC INTEREST DISCLOSURE POLICY

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PUBLIC INTEREST DISCLOSURE PROCEDURE

1. Introduction

- 1.1. Council's *Public Interest Disclosure Procedure* (Procedure), is to be read in conjunction with the *Public Interest Disclosure Policy* (Policy).
- 1.2. The Procedure outlines the roles, responsibilities and processes for receiving and handling appropriate Disclosures of Public Interest Information (Disclosures), to ensure Council:
 - 1.2.1. Properly fulfils its responsibilities under the *Public Interest Disclosure Act* (PID Act) and the *Independent Commissioner Against Corruption Act* (ICAC Act);
 - 1.2.2. Appropriately encourages and facilitates Disclosures, including environmental and health information regarding a location within the area of the Copper Coast Council;
 - 1.2.3. Provides a process by which Disclosures may be made so that they are properly investigated;
 - 1.2.4. Provides appropriate protection for those who make Disclosures in accordance with the PID Act; and
 - 1.2.5. Recognises the need to appropriately support Informants, the Responsible Officer and, Public Officers affected by any appropriate Disclosure of Public Interest Information.

2. Role and Responsibilities

- 2.1. The Principal Officer is responsible for:
 - 2.1.1. Ensuring that at least two or more appropriately qualified officers or employees of the Council are designated as Responsible Officers of the Council for the purposes of the *PID Act* and undertake training required by the *PID Regulations*;
 - 2.1.2. Ensuring that the name and contact details of each Responsible Officer of Council are made available to officers and employees of the council; and
 - 2.1.3. The preparation and maintenance of this Procedure in accordance with the requirements of the *PID Act* and the *ICAC-OPI Directions and Guidelines*, in particular the *ICAC-OPI PID Guidelines*.
- 2.2. The Responsible Officer is responsible for:
 - 2.2.1. Receiving appropriate Disclosures relating to the Council and ensuring compliance with the *PID Act*, the *Policy* and this *Procedure*;
 - 2.2.2. Liaising as required with the Informant and any Independent Assessor in relation to any investigation process undertaken in accordance with the *Procedure*, and will ensure that the Informant is provided with support and protection as necessary and appropriate in the circumstances of the Disclosure;

- 2.2.3. Seeking legal advice from Council's lawyers, SAPOL, Ombudsman (if warranted) in relation to the most appropriate course of action to pursue; and is authorised to incur costs in accordance with Council's Budget for that purpose.
- 2.2.4. Making appropriate recommendations to Council's Principal Officer in relation to dealing with Disclosures; including suggesting changes to the *Policy and this Procedure*;
- 2.2.5. Provide advice to officer and employees of the Council in relation to the administration of the *PID Act*;
- 2.2.6. Complete any training courses approved by the Commissioner for the purposes of the *PID Regulations*; and
- 2.2.7. May carry out any other functions relating to the *PID Act*.
- 2.3. A Council elected member, employee or officer of the Council is responsible for
 - 2.3.1. Ensuring they comply with the *Policy and this Procedure* when dealing with any Disclosure; and immediately referring the following Disclosures made to them to the Responsible Officer of:
 - 2.3.1.1. Environmental and health information by a member of the public,
 - 2.3.1.2. Public interest information by a public officer.

3. Informant Options

- 3.1. The *PID Act* does not restrict a person from making a Disclosure to another Relevant Authority, external to the Council. (eg the Ombudsman or the *Office for Public Integrity* (OPI)). This is a choice to be made by the Informant at his/her discretion.
- 3.2. Where the Informant chooses to make a Disclosure direct with Council relating to:
 - 3.2.1. An Elected member or a staff member, including the Chief Executive Officer (or person acting in that position), should be made to a Responsible Officer;
 - 3.2.2. A person appointed as a Responsible Officer should be made to another appointed Responsible Officer; or failing this, to a Relevant Authority external to the Council;
 - 3.2.3. Public administration information about a Public Officer who is an elected member, officer or employee may be made to a Responsible Officer, or to the person responsible (either in fact, or as may be designated by the *PID Act*) for the management or supervision of the Public Officer the subject of the Disclosure;
- 3.3. Any Disclosure relating to Maladministration or Misconduct in public administration may be required to reported to the *OPI* in accordance with the *ICAC Act*;
 - 3.3.1. If there is a reasonable suspicion of Corruption, or of Maladministration or Misconduct that is serious or systemic, it must be reported to the *OPI* in accordance with the *ICAC-OPI Directions and Guidelines*;
 - 3.3.2. If a Disclosure contains allegations of Fraud or Corruption, the Informant should report the matter in accordance with the Council's *Fraud, Corruption, Misconduct and Maladministration Prevention Policy*, which provides that if the Disclosure relates to:
 - 3.3.2.1. Corruption in public administration – it will be reported to the *OPI*;
 - 3.3.2.2. Fraud – it may be reported to the Responsible Officer or direct to SAPOL.

4. Receipt of a Disclosure

- 4.1. The Disclosure Notification Process flowchart is at Appendix A to this *Procedure*.
- 4.2. Disclosures should generally, and wherever possible, be directed in the first instance to the Responsible Officer, who has the responsibility for receiving appropriate Disclosures relating to the Council.
- 4.3. If an elected member, employee or officer receives a Disclosure of public interest information regarding a location within the Council area, the recipient of that Disclosure will:
 - 4.3.1. Ask the Informant whether they consent to the details of their identity being provided to the Responsible Officer, and in doing so advise the Informant that a failure to provide that consent may mean that the Disclosure cannot be properly investigated; and
 - 4.3.2. Refer the Disclosure to the Responsible Officer and, in doing so, comply with the wishes of the Informant with respect to whether details of their identity may be divulged.
- 4.4. A Disclosure can be received by Council:
 - In person 51 Taylor Street, Kadina SA 5554
 - Telephone (08) 8828 1200
 - Email info@coppercoast.sa.gov.au
 - Website: www.coppercoast.sa.gov.au
 - Address CONFIDENTIAL
Responsible Officer
Public Interest Disclosure
PO Box 396, KADINA SA 5554
- 4.5. Where a Disclosure is made in person or received in writing, it must be placed in a sealed envelope and envelope addressed in accordance with Clause 4.4.
- 4.6. Where a Disclosure is made by telephone, the:
 - 4.6.1. Council employee receiving the call must forward the call to a Responsible Officer in confidence. The Responsible Officer must take notes of the conversation and request the Informant to arrange a time to verify and sign the notes.
 - 4.6.2. Recipient must place the notes in an envelope, seal and address the envelope in accordance with Clause 4.4.
- 4.7. Any Disclosure received must be forwarded to the Records Manager promptly to ensure confidentiality, recording and allocation to the appropriate Responsible Officer.
- 4.8. Where a Disclosure is made by email, the Records Manager will process in accordance with Clause 4.9.
- 4.9. The following steps will be taken to ensure that a Disclosure is received securely as detailed in Council's *Record Management Policy* where:
 - 4.9.1. A Disclosure received electronically and/or hard copy will be recorded in Council's electronic records system and allocate to the Responsible Officer.
 - 4.9.2. The electronic records will be issued with a security number allowing access only by the Responsible Officer.
 - 4.9.3. All hard copy documents will be stored in a lockable cabinet by the Responsible Officer, who will store the key in a secure manner.

4.10. Upon the receipt of a Disclosure (whether directly, or by referral from an elected member, employee or officer), the Responsible Officer will deal with the Disclosure in accordance with the processes with the authority granted by the *PID Act*, the *Policy and this Procedure*:

4.10.1. Immediately undertake a Preliminary Assessment in accordance with Clause 6 of this Procedure; and

4.10.2. As soon as practicable thereafter, in accordance with Clause 7 of this Procedure:

- a) Notify the *OPI* of the Disclosure; and
- b) Confirm receipt of the Disclosure with the Informant; and

Subject to the outcome of the Preliminary Assessment, then take appropriate action, including, where required:

- c) Appointing an Independent Assessor to further investigate the Disclosure in accordance with Clause 6.2 and 9.1 of this Procedure; and
- d) Notifying the Informant of the outcome of any action, including any investigation in accordance with Clause 10.1 of this Procedure; and
- e) Notifying the *OPI* of the outcome of any action taken in accordance with Clause 10.5 of this Procedure; and/or
- f) Reporting the outcome of any action taken to the Minister in accordance with Clause 10.6 of this Procedure; and
- g) Preparing and issuing a final report to the Principal Officer in accordance with Clause 11 of this Procedure.

5. Confidentiality

5.1. The identity of an Informant will be maintained as confidential in accordance with the *PID Act*.

5.2. A recipient of an appropriate Disclosure may only divulge the identity of an Informant where:

5.2.1. the recipient believes on reasonable grounds that it is necessary to divulge the identity of the Informant in order to prevent or minimise an imminent risk of serious physical injury or death to any person, **and** the identity of the Informant is then divulged to a person or authority that the recipient believes on reasonable grounds is the most appropriate authority or person to be able to take action to prevent or minimise the imminent risk of serious physical injury or death to any person;

5.2.2. the recipient has been issued with a notice from the *OPI* advising that the identity of the Informant is required by the *OPI*, in which case the recipient must disclose the identity of the Informant to the *OPI*;

5.2.3. doing so is necessary for the matter to be properly investigated (but only to the extent necessary to ensure proper investigation); or

5.2.4. the Informant consents to his/her identity being disclosed

5.3. The *PID Act* does not expressly require any other information relating to a Disclosure (including, for example, the nature of the allegations) to be maintained as confidential, but in considering whether to further disclose other information provided as part of an appropriate Disclosure the Council should be mindful of the prohibition against Victimisation in the *PID Act*.

- 5.4. An Informant may wish to remain anonymous, but in that event must ensure that the allegation is sufficiently supported by the provision of necessary details and evidence to enable the matter to be properly investigated.

6. Preliminary Assessment

- 6.1. Where the identity of the Informant is known to the Responsible Officer or is reasonably ascertainable, the Responsible Officer will acknowledge receipt of the Disclosure within two (2) days and in doing so, will provide a copy of the *Policy* to the Informant.
- 6.2. Upon receipt of a Disclosure, the Responsible Officer will undertake a preliminary assessment to determine:
 - 6.2.1. If the content of the Disclosure suggests there is an imminent risk of serious physical injury or death to any person or the public generally;
 - 6.2.2. If the matter/s the subject of the Disclosure involve corruption in public administration, or serious or systemic misconduct or maladministration in public administration; or
 - 6.2.3. If the information disclosed justifies further action, including a decision as to whether the Disclosure:
 - 6.2.3.1. Is frivolous, vexatious or trivial (in which case, no further action will be taken in relation to the Disclosure);
 - 6.2.3.2. Involves a matter which has already been investigated or acted upon by a Relevant Authority and there is no reason to re-examine the matter or there is other good reason why no action should be taken in respect of the matter (in which case, no further action will be taken in relation to the Disclosure);
 - 6.2.3.3. Requires referral to an external Relevant Authority to Council; or
 - 6.2.3.4. Warrants referral to an Independent Assessor for a formal investigation and report to Council.
- 6.3. Where the Disclosure relates to public administration information about a public officer who is an elected member, officer or employee of the Council and it is made to the person responsible for the management or supervision of the public officer the subject of the Disclosure (the Supervisor), the Supervisor will conduct the Preliminary Assessment instead of the Responsible Officer, and will then report the outcome of his/her determination following the Preliminary Assessment to the Responsible Officer to action.
- 6.4. The Responsible Officer must report the outcome of his/her determination following the Preliminary Assessment to the Chief Executive Officer (unless the Disclosure relates to the Chief Executive Officer). Any report prepared in accordance with this Clause will not disclose particulars that will or are likely to lead to the identification of the Informant, unless the circumstances in Clause 6.2 of this *Procedure* apply.
- 6.5. Where the Responsible Officer (or Supervisor) determines that the content of the Disclosure suggests there is an imminent risk of serious physical injury or death to any person or to the public generally, the Responsible Officer (or Supervisor) must immediately communicate such information as may be necessary to mitigate that risk to the most appropriate agency (eg: South Australia Police, SafeWork SA, SA Ambulance, Environment Protection Authority). In doing so, the Responsible Officer or Supervisor must also have regard to Clause 6.2.1 of this *Procedure*.

- 6.6. Where the Responsible Officer (or Supervisor) forms a reasonable suspicion that the matter/s the subject of the Disclosure involve corruption in public administration, or serious or systemic misconduct or maladministration in public administration, the Responsible Officer (or Supervisor) must comply with his/her reporting obligations under the *ICAC Act* in accordance with the *ICAC-OPI Directions and Guidelines*.
- 6.7. Where the Responsible Officer determines the Disclosure warrants referral to an external body or another Relevant Authority, the Responsible Officer will undertake the referral, including ensuring that such information as is necessary to enable action to be taken is communicated to the most appropriate person or relevant authority to take that action. Where the Preliminary Assessment is being undertaken by the Supervisor, the Supervisor will include this recommendation in his/her report to the Responsible Officer for the Responsible Officer to action.
- 6.8. Where the Responsible Officer determines the Disclosure warrants further investigation, the Responsible Officer will, having regard to available resources, appoint the Independent Assessor and refer the Disclosure to the Independent Assessor for investigation. Where the Preliminary Assessment is being undertaken by the Supervisor, the Supervisor will include this recommendation in his/her report to the Responsible Officer for the Responsible Officer to action.
- 6.9. Where the Responsible Officer determines the Disclosure requires any other action to ensure the matter the subject of the Disclosure is properly addressed, the Responsible Officer will include in his/her determination details of that other recommended action. Where the Preliminary Assessment is being undertaken by the Supervisor, the Supervisor will include this recommendation in his/her report to the Responsible Officer for the Responsible Officer to action.

7. Notification of Preliminary Assessment

- 7.1. If the identity of the Informant is known to the Responsible Officer or is reasonably ascertainable, the Responsible Officer will notify the Informant of the outcome of his/her determination in writing as soon as is reasonably practicable after the Preliminary Assessment has been made, and in any event within thirty (30) days of receipt of the Disclosure. The Responsible Officer must advise the Informant of:
 - 7.1.1. Any action that has been, or will be, taken in relation to the Disclosure; or
 - 7.1.2. If no action is being taken in relation to the Disclosure, the reason/s why.
- 7.2. If the Responsible Officer fails to notify the Informant in accordance with Clause 6.1 above, the Informant may be entitled to protection in relation to any subsequent Disclosure of that information to a journalist or Member of Parliament in accordance with the *PID Act*.
- 7.3. If the Informant is dissatisfied with the Responsible Officer's determination, it is open to him/her to report the Disclosure to another Relevant Authority external to the Council.
- 7.4. As soon as reasonably practicable following the Preliminary Assessment and notification to the Informant, the Responsible Officer must use the dedicated online notification form at www.icac.sa.gov.au to notify OPI of the Disclosure (Initial Notification), and in doing so must ensure that the details required by *Guideline 1.4 of the ICAC OPI PID Guidelines* are included in the Initial Notification.
- 7.5. The Responsible Officer will retain the unique reference number issued by the *OPI* upon making the Initial Notification, and will ensure that reference number is provided to any other person or authority to whom the Disclosure is referred.

8. Information to Elected Members

- 8.1. As a matter of discretion, the Chief Executive Officer may inform Elected Members, on a confidential basis, of the fact that an investigation of a Disclosure took place and the outcome of the investigation.
- 8.2. Factors the Chief Executive Officer will take into account in determining whether to inform the Elected Members under Clause 8.1 above and the level of detail provided in doing so are to include:
 - 8.2.1. If known, the identity of the Informant, and whether the Informant has consented to his/her identity being divulged;
 - 8.2.2. If applicable, the identity of any person the subject of the Disclosure;
 - 8.2.3. The impact (if any) of the investigation upon the Council's achievement of its objectives under its Strategic Plan and/or policies; and
 - 8.2.4. The impact of any action taken to finalise the matter upon the Council's operations and/or budget.
- 8.3. In the event the Disclosure and/or any subsequent investigation process is confined to issues that impact only upon Council staff and human resource processes, the Chief Executive Officer will not inform the Elected Members of the fact of the Disclosure and/or investigation (since these matters fall outside the roles and responsibilities of Elected Members under the *Local Government Act 1999*).

9. Investigation Procedure

- 9.1. Where the Responsible Officer determines, following a Preliminary Assessment, that a Disclosure warrants referral to an Independent Assessor for a formal investigation and report to Council, the Responsible Officer will appoint an Independent Assessor in accordance with this Clause to investigate the Disclosure.
- 9.2. The Independent Assessor will be appointed on a case-by-case basis depending on the nature of the Disclosure. Councils does not have a pre-approved persons list who may be appointed as an Independent Assessor in which the Responsible Officer can refer too. *Council will give consideration to preparing a pre-approved Independent Assessor persons list prior to the next Procedure review.*
- 9.3. The objectives of the investigation process are:
 - 9.3.1. In appropriate circumstances, to investigate the substance of the Disclosure and to determine whether there is evidence in support of the matters raised or, alternatively, to refute the report made;
 - 9.3.2. To collate information relating to the allegation as quickly as possible. This may involve taking steps to protect or preserve documents, materials and equipment;
 - 9.3.3. To consider the information collected and to draw conclusions objectively and impartially;
 - 9.3.4. To observe procedural fairness in the treatment of any person who is subject of the Disclosure; and
 - 9.3.5. To make recommendations arising from the conclusions drawn concerning remedial or other appropriate action.
- 9.4. The Independent Assessor will observe the principles of natural justice throughout the investigation process. The investigation will be conducted in an efficient manner and will involve a thorough and balanced assessment of the available evidence and any other factors deemed relevant to making a fair and reasonable judgement about the matter.

- 9.5. Upon receipt of a Disclosure referral under this Clause, the Independent Assessor will bring the fact of the Disclosure to the attention of the person who is the subject of it in writing within five (5) days, and provide them with an opportunity to respond to the Disclosure within a reasonable timeframe (either in writing or in person). The full details of any allegations contained in the Disclosure need not be brought to the person's attention if the Independent Assessor considers that doing so will compromise the investigation.
- 9.6. During any interview with the Independent Assessor, the person who is the subject of a Disclosure may be accompanied by any person providing support to him/her (including a lawyer) as he/she considers fit. Any costs incurred in relation to obtaining the assistance of a support person are the personal expenses of the person subject of the Disclosure. The support person is bound by a duty of confidentiality in relation to any matter discussed during such interview.
- 9.7. The investigation will be undertaken in confidence. So long as the identity of the Informant is known to the Responsible Officer or is reasonably ascertainable, the Independent Assessor will keep the identity of the Informant confidential unless the circumstances in Clause 5 of this *Procedure* apply.
- 9.8. The Independent Assessor will keep the Responsible Officer informed of the expected timeframes for completion of the investigation and the provision of his/her investigation report to the Responsible Officer.
- 9.9. Upon finalising an investigation the Independent Assessor must prepare an investigation report to the Responsible Officer that will contain the following details:
 - 9.9.1. The allegation(s);
 - 9.9.2. An account of all relevant information received including any rejected evidence, and the reasons why the rejection occurred;
 - 9.9.3. The conclusions reached and the basis for them; and
 - 9.9.4. Any recommendations arising from the conclusions, including any remedial action which should be taken by the Council.
 - 9.9.5. The report is to be accompanied by:
 - 9.9.5.1. The transcript or other record of any verbal evidence taken, including tape recordings; and
 - 9.9.5.2. All documents, statements or other exhibits received by the Independent Assessor and accepted as evidence during the course of the investigation.
- 9.10. Any report prepared in accordance with this Clause will not disclose particulars that will or are likely to lead to the identification of the Informant, unless the circumstances in Clause 5 of this *Procedure* apply.
- 9.11. The Responsible Officer must take whatever action is, in his/her discretion, considered appropriate in the circumstances having regard to the matters identified in the Independent Assessor's report.

10. Notification of Further Action

- 10.1. So long as the identity of the Informant is known to the Responsible Officer or is reasonably ascertainable, the Responsible Officer will notify the Informant of the outcome of his/her determination in writing as soon as is reasonably practicable after the Further Action has been taken and, in any event, within either:
 - 10.1.1. Ninety (90) days of receipt of the Disclosure; or

- 10.1.2. Such longer period as may be specified by written notice given by the Responsible Officer within that ninety (90) day period.
- 10.2. In doing so the Responsible Officer must advise the Informant of:
- 10.2.1. Any action that has been, or will be, taken in relation to the Disclosure; or
 - 10.2.2. If no action is being taken in relation to the Disclosure, the reason/s why.
- 10.3. If the Responsible Officer fails to notify the Informant in accordance with clauses 10.1 and 10.2 above, the Informant may be entitled to protection in relation to any subsequent Disclosure of that information to a journalist or Member of Parliament in accordance with the *PID Act*.
- 10.4. If the Informant is dissatisfied with the Responsible Officer's determination or the action taken it is open to him/her to report the Disclosure to another Relevant Authority external to the Council.
- 10.5. As soon as reasonably practicable following the Preliminary Assessment and notification to the Informant, the Responsible Officer must use the dedicated online notification form at www.icac.sa.gov.au to notify *OPI* of the action taken in relation to the Disclosure and, in doing so, must ensure that the details required by *Guideline 2 of the ICAC OPI PID Guidelines* are included in the Further Notification.
- 10.6. If the Disclosure came to the Council by way of a referral from a Minister, the Responsible Officer must ensure that the Minister is also notified of the action taken in relation to the Disclosure, and the outcome of any such action. The Minister should be notified in accordance with this clause following the Preliminary Assessment if the Responsible Officer determines that no action is to be taken.

11. Final Report and Recommendation

- 11.1. Upon finalising any action required in relation to a Disclosure, the Responsible Officer must prepare a report that will contain the following details:
- 11.1.1. The subject of the Disclosure;
 - 11.1.2. An account of the steps taken by the Responsible Officer in accordance with this Procedure, including, where appropriate, enclosing a copy of any Independent Assessor's report;
 - 11.1.3. Conclusions reached as a result of the steps taken in response to the Disclosure and the basis for them; and
 - 11.1.4. Any recommendations arising from the conclusions, including any remedial action which should be taken by the Council.
- 11.2. Any report prepared in accordance with this Clause will not disclose particulars that will or are likely to lead to the identification of the Informant, unless the circumstances in Clause 5 of this Procedure apply.
- 11.3. The Responsible Officer's Report must be provided to the Chief Executive Officer to action as he/she considers appropriate.
- 11.4. The Chief Executive Officer may, in his/her discretion, inform the Elected members, on a confidential basis, about a Disclosure in accordance with Clause 8 of this Procedure.

12. Secure Handling and Storage of Information

- 12.1. The Responsible Officer must ensure accurate records of an appropriate Disclosure are securely and confidentially maintained including notes of all discussions, phone calls, and interviews.

- 12.2. The Responsible Officer must ensure all information relating to an appropriate Disclosure is maintained as confidential and as such, will be solely responsible for the secure storage of this information, and stored separately from Council's records.
- 12.3. In performing his/her duties, the Responsible Officer will maintain a confidential file of information (including written documents, disks, tapes, film or other objects that contain information) that relates to a Disclosure and/or is a product of the associated investigation/reporting process. All such information will remain confidential, recorded in a register securely stored in a lockable cabinet.
- 12.4. In the event that a person's appointment as a Responsible Officer is terminated, the person must provide this information to the newly-appointed Responsible Officer and having done so will continue to be bound by a duty of confidentiality in respect of an Informant's identity and the information received as a result of the Disclosure.
- 12.5. Although the Responsible Officer is ultimately responsible to ensure public interest information will be securely received and stored, the security and confidentiality obligations outlined in this Clause also apply to any Independent Assessor appointed pursuant to this Procedure in relation to any Investigation.

13. Protection for the Informant

- 13.1. Relevantly for the purposes of the *PID Act, Policy and this Procedure* provides for protection for Informants where Disclosures are made:
 - 13.1.1. By a member of the public or a public officer about environmental and health information which the Informant reasonably believes to be true or which the Informant believes may be true and is of sufficient significance to warrant Disclosure, regarding a location within the area of a particular Council; and/or
 - 13.1.2. By a public officer with a reasonable suspicion about public administration information regarding either a location within a Council area or a public officer who is an elected member, officer or employee of the Council.
- 13.2. Although the *PID Act* does not provide any protection to people who knowingly make Disclosures that are false or misleading in a material particular, an Informant who makes an appropriate Disclosure will ordinarily be protected by:
 - 13.2.1. Immunity from criminal or civil liability;
 - 13.2.2. A prohibition on Disclosure of his/her identity, other than in limited specific circumstances;
 - 13.2.3. A prohibition against Victimisation; and
 - 13.2.4. A prohibition against hindering, obstructing or preventing an Informant from making an appropriate Disclosure.
- 13.3. A person who personally commits an act of Victimisation against an Informant is guilty of an offence and may be prosecuted.
- 13.4. Council will take action as appropriate in the circumstances of the relevant Disclosure/s to protect Informants from Victimisation, and/or from being hindered or obstructed in making a Disclosure. Such action may include acting in accordance with the following risk minimisation steps:
 - 13.4.1. Referring the matter to the SA Police;
 - 13.4.2. Disciplinary action by the Council or the Chief Executive Officer for any failure to act otherwise than in accordance with the *PID Policy* or this Procedure (including divulging the identity of an Informant) in relation to a Disclosure.
- 13.5. If an Informant believes that his/her Disclosure is dealt with appropriately or in accordance with the Act, Policy or Procedure, he/she should contact the Responsible Officer in the first instance.

Appendix A - Notification Process Flowchart

