

Reasonable procedures to deal with public interest disclosures

Public Interest Disclosure Act 2010, section 28

Non-State Schools Accreditation Board

established on 21 September 2001 under the *Education (Accreditation of Non-State Schools) Act 2001* (repealed 1 January 2018), and continued in existence from 1 January 2018 under the *Education (Accreditation of Non-State Schools) Act 2017*

includes

committees of the Board, and authorised persons appointed by the Board, under the *Education (Accreditation of Non-State Schools) Act 2017*

and

Non-State Schools Eligibility for Government Funding Committee, other committees of the Board, and authorised persons appointed by the Board, under the *Education (Accreditation of Non-State Schools) Act 2001* (repealed 1 January 2018)

Further information about public interest disclosures is available from the Board Secretariat on telephone (07) 3513 6773.

Approved by Chairperson:	7 March 2019
Last reviewed:	1 August 2019
For review:	1 August 2020



Table of contents

1.	Commencement.....	1
2.	Dictionary	1
3.	Commitment of, and value to, the Board of PIDs	2
4.	Obligation to establish procedures	2
5.	Coverage of the procedures	3
6.	Types of PIDs that can be made	3
7.	Roles and responsibilities	4
8.	How a person may make a PID	5
9.	Management of PIDs	6
10.	Assessment of PIDs.....	6
11.	Referral of PIDs.....	7
12.	Decision to take no action.....	7
13.	Investigation of PIDs	8
14.	Provision of support	8
15.	Protection from reprisal.....	9
16.	Prevention of reprisal	9
17.	Confidentiality concerning a PID.....	10
18.	Person who made a PID, or referring entity, to be informed	10
19.	Recording and reporting PIDs	11
20.	Use of data arising from PIDs.....	11
21.	Report to journalist.....	11
22.	Other policies and procedures.....	12
23.	PID management program.....	12
	Schedule 1: Statement of duties of PID Coordinator	13
	Schedule 2: Statement of duties of PID Support Officer	14
	Schedule 3: Board PID management program.....	15

Reasonable procedures to deal with public interest disclosures

Public Interest Disclosure Act 2010, section 28

1. Commencement

These procedures commence on 7 March 2019.

2. Dictionary

2.1 Terms defined in the PID Act have the same meaning in these procedures and the following additional definitions also apply.

Accreditation Act 2001 means the *Education (Accreditation of Non-State Schools) Act 2001* (repealed 1 January 2018).

Accreditation Act 2017 means the *Education (Accreditation of Non-State Schools) Act 2017*.

authorised person means a person appointed by the Board under the Accreditation Act 2001 and the Accreditation Act 2017.

Board means the Non-State Schools Accreditation Board established under the Accreditation Act 2001 and continued in existence under the Accreditation Act 2017.

Board Secretariat means the part of the department that provides support to the Board by authority of section 120 of the Accreditation Act 2017.

Chairperson is the Chairperson of the Board under the Accreditation Act 2017 and chief executive officer of the Board under the PID Act.

committee of the Board means a Board committee established under the Accreditation Act 2001 and the Accreditation Act 2017.

corrupt conduct has the meaning given in section 15 of the *Crime and Corruption Act 2001*.

department means the Department of Education.

Deputy Chairperson is the Deputy Chairperson of the Board under the Accreditation Act 2017.

Executive Director means the Executive Director of the Board Secretariat.

Funding Committee means the Non-State Schools Eligibility for Government Funding Committee established under the accreditation Act 2001, and ceasing on 1 January 2018 by authority of the Accreditation Act 2017.

Manager means the Manager (Intelligence and Reporting) of the Board Secretariat.

member means a member of the Board, the Funding Committee, or a committee of the Board.

oversight agency means the Office of the Ombudsman established under the *Ombudsman Act 2001*.

PID Act means the *Public Interest Disclosure Act 2010*.

PID means a public interest disclosure under the PID Act.

procedures mean these *Reasonable Procedures to Deal with Public Interest Disclosures* made by the Chairperson under section 28 of the PID Act.

standards mean the following standards made by the oversight agency under section 60 of the PID Act:

- (a) standard No. 1/2019 (Public Interest Disclosure Management Program), effective date 1 March 2019;
 - (b) standard No. 2/2019 (Assessing, Investigating and Dealing with Public Interest Disclosures), effective date 1 March 2019; and
 - (c) standard No. 3/2019 (Public Interest Disclosure data Recording and Reporting), effective date 1 March 2019.
- 2.2 The legislative and policy basis for these procedures is the PID Act and the standards.
- 2.3 These procedures are to be read in the context of the PID Act and standards but where there is an inconsistency between these procedures and either the PID Act or the Standard, the PID Act or Standard applies to the extent of the inconsistency.

3. Commitment of, and value to, the Board of PIDs

- 3.1 The Board is committed:
- (a) to creating and maintaining an organisational climate that encourages and facilitates PIDs of wrongdoing in the public sector;
 - (b) to ensuring that any disclosures are properly assessed and, when appropriate, properly investigated and dealt with;
 - (c) to providing appropriate support to public officers of the Board who make a PID;
 - (d) to ensuring that appropriate consideration is given to the interests of persons who are the subject of a PID; and
 - (e) to affording protection from reprisals to persons making a PID.
- 3.2 The Board is committed to ensuring that its public officers are given access to appropriate education and training relating to PIDs.
- 3.3 The value to the Board of these commitments may be realized by the early identification of any wrongdoing, which in turn assist the Board in making high-quality and transparent decisions under the Accreditation Act 2017.

4. Obligation to establish procedures

- 4.1 The Chairperson is required under section 28 of the PID Act to establish reasonable procedures to ensure that:
- (a) a public officer of the Board who makes a PID is given appropriate support; and
 - (b) a PID made to the Board is properly assessed and, when appropriate, properly

investigated and dealt with; and

- (c) appropriate action is taken in relation to any wrongdoing that is the subject of a PID made to the Board; and
 - (d) a management program for PIDs made to the Board, consistent with any standard made under section 60 of the PID Act is developed and implemented; and
 - (e) public officers of the Board are offered protection from reprisals by the Board or other members or other public officers.
- 4.2 The Chairperson must ensure the procedures are published, as soon as practicable after the procedures are made, on a website that is maintained by the Board and readily accessible to the public.
- 4.3 A hard copy of the procedures will be provided upon request.

5. Coverage of the procedures

- 5.1 These procedures apply to the Board's public officers (members and authorised persons) and other persons (including members of the public) who make PIDs to the Board.
- 5.2 The officers of the Board Secretariat are public officers of the department within the meaning of section 7 of the PID Act and:
- (a) in so far as they make PIDs as a public officer, they are covered by the reasonable procedures of the department;
 - (b) they are covered by these procedures to the extent that they:
 - (i) are involved in the management of PIDs in accordance with these procedures; or
 - (ii) may make a PID to the Board under section 12 of the PID Act.
- 5.3 If officers of the Board Secretariat gain information because of their involvement in the PID Act's administration, they must preserve the confidentiality of that information in accordance with section 65 of the PID Act and standards.

6. Types of PIDs that can be made

- 6.1 A public officer may make a PID if they have information about:
- (a) the conduct of another person that could, if proved, be corrupt conduct or maladministration that adversely affects a person's interests in a substantial and specific way;
 - (b) a substantial misuse of public resources (other than an alleged misuse based on mere disagreement over policy that may properly be adopted about amounts, purposes or priorities of expenditure); or
 - (c) a substantial and specific danger to public health or safety or the environment.
- 6.2 A person has information about the conduct of another public officer or another matter if:
- (a) the person honestly believes on reasonable grounds that the information tends to show the conduct or other matter; or

- (b) the information tends to show the conduct or other matter, regardless of whether the person honestly believes the information tends to show the conduct or other matter.
- 6.3 A person, whether or not they are a public officer, may make a PID if the person has information about:
- (a) a substantial and specific danger to the health or safety of a person with a disability; or
 - (b) the commission of an offence against a provision mentioned in the PID Act, schedule 2, if the commission of the offence is or would be a substantial and specific danger to the environment; or
 - (c) a contravention of a condition imposed under a provision mentioned in the PID Act, schedule 2, if the contravention is or would be a substantial and specific danger to the environment; or
 - (d) the conduct of another person that could, if proved, be a reprisal.
- 6.4 A person, whether or not they are a public officer, has information about the conduct of another public officer or other matter if:
- (a) the person honestly believes on reasonable grounds that the information tends to show the conduct or other matter; or
 - (b) the information tends to show the conduct or other matter, regardless of whether the person honestly believes the information tends to show the conduct or other matter.

7. Roles and responsibilities

- 7.1 The Chairperson has overall responsibility under the PID Act for the Board's compliance with the Act, including:
- (a) receiving PIDs;
 - (b) establishing these procedures to deal with PIDs;
 - (c) keeping records of disclosures;
 - (d) providing disclosure information to the oversight agency;
 - (e) delegating responsibilities under the PID Act as they consider appropriate;
 - (f) appointing a PID Coordinator and a PID Support Officer and determining a statement of duties for each; and
 - (g) ensuring effective management and oversight of the PID management program and these procedures.
- 7.2 The Executive Director is the PID Coordinator under standard No. 1/2019 and the Executive Director's key responsibility is to administer the PID management program.
- 7.3 Schedule 1 to these procedures sets out the statement of duties of the PID Coordinator.

- 7.4 The Manager, or if the Manager is not independent of any investigation of a PID, another person appointed by the Chairperson, is the PID Support Officer under standard No. 1/2019.
- 7.5 The key responsibility of the PID Support Officer is to provide support to a discloser, subject officer or witness who is involved in a PID
- 7.6 Schedule 2 to these procedures sets out the statement of duties of the PID Support Officer.

8. How a person may make a PID

- 8.1 This section applies to public officers or any other person who makes a PID to the Board.
- 8.2 The person may make a PID in any way, including anonymously.
- 8.3 The names of all current members of the Board are shown on the Board's website at www.nssab.qld.edu.au.
- 8.4 A member of the Board may be contacted for the purposes of making a PID by writing to the member concerned, and marking the material clearly as confidential and as a PID, at the address shown below:

by letter posted to:

Non-State Schools Accreditation Board
PO Box 15347
CITY EAST QLD 4002

by email to:

nssab.admin@qed.qld.gov.au

- 8.5 The Executive Director may be contacted for the purposes of making a PID by writing to the Executive Director, and marking the material clearly as confidential and as a PID, at the address shown below:

by letter posted to:

Executive Director
Non-State Schools Accreditation Board Secretariat
PO Box 15347
CITY EAST QLD 4002

by email to:

nssab.admin@qed.qld.gov.au

- 8.6 A PID may be made in person at the Board's place of business at:
Level 8
Education House
30 Mary Street
Brisbane
- 8.7 The Executive Director may be contacted by telephone on (07) 3034 5956 for the purposes of making a PID verbally.

9. Management of PIDs

- 9.1 The Chairperson is responsible for overseeing the management of a PID. However, if the Chairperson is the subject of the PID, the Deputy Chairperson is responsible for overseeing the management of the PID.
- 9.2 A reference to the Chairperson in these procedures is taken to include a reference to the Deputy Chairperson if appropriate.
- 9.3 PIDs will be managed in accordance with these procedures and the following principles:
 - (a) a PID is to be managed in a way that is consistent with the PID Act and the standards;
 - (b) anonymous disclosures will be received and managed in the same way as identified disclosures, and will not be rejected because they are anonymous;
 - (c) a person making the PID is offered the protections covered by sections 36 to 45 of the PID Act; and
 - (d) the Board is committed to apply the principles of natural justice and procedural fairness in managing PIDs.

10. Assessment of PIDs

- 10.1 The Executive Director is responsible for assessing a PID under the PID Act in a manner consistent with standard No. 2/2019.
- 10.2 In assessing a PID, the Executive Director is to determine:
 - (a) if the public officer, or another person, making the PID is able to receive the protection of the PID Act;
 - (b) if the disclosure concerns a matter about which a PID can be made;
 - (c) if the disclosure has been made to an individual or entity who may receive a PID; and
 - (d) if the disclosure has been made in accordance with these procedures or the PID Act.
- 10.3 If there is doubt whether a disclosure is a PID, the Executive Director is to assume the disclosure is protected by the PID Act, and accordingly manage the disclosure as if it were a PID.
- 10.4 Assessment of PIDs will be completed as soon as practicable after receipt and will not take into account irrelevant considerations such as:
 - (a) how the PID is received;
 - (b) whether the PID is made anonymously;
 - (c) whether the information identifies conduct of a particular person; or
 - (d) the discloser identifies the information as a PID.
- 10.5 A written record of the assessment decision will be made and kept by the Board.

11. Referral of PIDs

- 11.1 The Board may refer a PID received by it to another public sector entity in accordance with section 31 of the PID Act.
- 11.2 The Board must determine if the PID is to be referred to another entity because it is about:
- (a) the conduct of the referral entity or a public officer of the referral entity; or
 - (b) the conduct of an entity (including itself), or another matter, that the referral entity has the power to investigate or remedy.
- 11.3 Any referral must be in accordance with the relevant legislative and administrative requirements, including that:
- (a) a referral risk assessment must be undertaken; and
 - (b) a PID will not be referred to another agency if there is an unacceptable risk that a reprisal would happen because of the referral.
- 11.4 The Board will inform the discloser in writing of any referral of a PID.

12. Decision to take no action

- 12.1 The Board may decide not to investigate or deal with a PID if one of the following circumstances in s 30 of the PID Act applies:
- (a) the substance of the disclosure has already been investigated or dealt with by another appropriate process;
 - (b) the Board reasonably considers that the PID should be dealt with by another appropriate process;
 - (c) the age of the information the subject of the PID makes it impracticable to investigate;
 - (d) the Board reasonably considers that the PID is too trivial to warrant investigation and that dealing with the PID would substantially and unreasonably divert the resources of the Board; or
 - (e) another entity that has jurisdiction to investigate the disclosure has notified the Board that investigation of the disclosure is not warranted.
- 12.2 If the Board decides not to investigate or deal with a PID, then it must:
- (a) record the information relied on in making that decision;
 - (b) record the ground or grounds upon which the decision is made; and
 - (c) give written reasons of that decision to the person making the PID in accordance with section 30 of the PID Act and standard No. 2/2019.
- 12.3 The person may apply to the Chairperson for review of that decision within 28 days after receiving the written reasons.
- 12.4 The Board will implement a process for managing requests to the Chairperson for review of decisions not to investigate or deal with a PID. Requests for review must be assessed

to determine if they are validly made and a review must be conducted by the Chairperson in accordance with standard No. 2/2019. Written reasons explaining the review decision must be provided.

13. Investigation of PIDs

- 13.1 The Board, if the Board considers it warranted in the circumstances, may engage an individual with suitable training and experience to conduct an investigation of a PID.
- 13.2 The Board must develop terms of reference for an investigation of a PID in accordance with standard No. 2/2019. The terms of reference must address the following matters:
- (a) the need to afford natural justice to persons directly affected by the disclosure;
 - (b) the need to conduct an assessment of the risk of reprisal;
 - (c) reasonable steps to protect the discloser and others from reprisal;
 - (d) confidentiality requirements under s 65 of the PID Act;
 - (e) the application of standards made under s 60 of the PID Act;
 - (f) the need for the investigator to document a decision as to whether and what information should be disclosed in the conduct of an investigation; and
 - (g) the need for the investigator to document the decision regarding disclosure.
- 13.3 At the conclusion of an investigation, the Board must:
- (a) consider any systemic issues that gave rise to the PID or were identified during an investigation and any action that should be taken to address them; and
 - (b) evaluate whether there is any evidence of a breach of an offence provision under the PID Act and, if so, take appropriate action.

14. Provision of support

- 14.1 As soon as possible after receiving a PID, the Board will assess the level of protection and support required by a discloser. Where feasible, a person's need for support should be assessed in consultation with the discloser and other relevant stakeholders.
- 14.2 A PID Support Officer will support the discloser.
- 14.3 If it has been determined that a discloser will require support, the Board will offer an appropriate level of support. This may include:
- (a) acknowledging that making the PID was the appropriate course of action by the discloser, and is valued by the Board;
 - (b) making a clear statement that the Board will support the discloser;
 - (c) keeping the discloser informed, including likely timeframes and how the discloser may be informed of progress and outcomes;
 - (d) appointing an appropriate person (separate from the investigation function) with sufficient authority to ensure the discloser has appropriate support and protection from reprisals;

- (e) regularly checking on the discloser's wellbeing, where this is warranted; and
- (f) where the health of the disclosure becomes a concern, liaising with the appropriate health services.

14.4 In this determination, account is to be taken of any consequences if reprisals do occur.

15. Protection from reprisal

- 15.1 As soon as possible after receiving a PID, the Executive Director will assess the risk of a reprisal to the discloser and others associated with the discloser (including those who may wrongly be suspected of being a discloser). The assessment will occur in accordance with standard No. 2/2019.
- 15.2 If the risk is assessed as sufficiently high, the Chairperson will prepare a protection plan to protect the discloser, witnesses and others associated with the disclosure (if relevant). The discloser will be consulted as far as practicable in developing the risk management plan. The Board will review the risk management plan and its implementation on a regular basis.
- 15.3 The Chairperson will ensure protective measures are in place that are proportionate to the risk of reprisal, and the potential consequences of a reprisal.
- 15.4 The Chairperson is to ensure effective systems and procedures are in place to monitor for any signs of reprisal action.
- 15.5 In the event of a reprisal being alleged or suspected, the Chairperson is to act in the interest of the discloser by:
 - (a) attending to the safety of the discloser or affected third parties as a matter of priority;
 - (b) reviewing the risk assessment of reprisal and any protective measures needed; and
 - (c) managing any allegation of a reprisal as a PID in its own right.

16. Prevention of reprisal

- 16.1 The Chairperson will take reasonable steps to prevent reprisal of disclosers who are members of the public, including by:
 - (a) assigning a PID Support Officer to the discloser who is independent of the investigation;
 - (b) providing appropriate support information to the discloser;
 - (c) conducting and recording a risk assessment relating to reprisal;
 - (d) if necessary, developing and implementing a risk management plan for the discloser.
- 16.2 The Chairperson will take reasonable steps to prevent reprisal of disclosers who are public officers of other entities, including by:
 - (a) assigning a PID Support Officer to the discloser who is independent of the investigation;

- (b) providing appropriate support information to the discloser;
- (c) conducting and recording a risk assessment relating to reprisal;
- (d) if necessary, developing and implementing a risk management plan for the discloser.

17. Confidentiality concerning a PID

- 17.1 In handling a PID, confidentiality is important both for protecting the discloser from reprisal as well as to protect other persons affected by the PID.
- 17.2 The identity of the discloser, the nature of the disclosure, the subject matter of the disclosure and the identity of the member or an authorised person is to be treated as confidential information.
- 17.3 This information is not to be disclosed to another person, except in accordance with section 65 of the PID Act or other legislation.

18. Person who made a PID, or referring entity, to be informed

- 18.1 The Board will give the person who made the disclosure reasonable information about the disclosure consistent with section 32 of the PID Act and standard No. 2/2019, including:
- (a) acknowledgement of receipt of a PID;
 - (b) confirmation the disclosure has been assessed as a PID;
 - (c) the protections under the PID Act that apply
 - (d) confirmation of confidentiality protections;
 - (e) the action the Board proposes to take;
 - (f) the person's likely involvement in any action the Board proposes to take;
 - (g) how the person will be kept informed;
 - (h) the arrangements the Board has in place to support the person;
 - (i) the name and contact details of the PID Support Officer assigned to the person; and
 - (j) the results of any action taken by the Board.
- 18.2 The Board will give an entity who has referred a PID to the Board reasonable information about the disclosure consistent with section 32 of the PID Act and standard No. 2/2019, including:
- (a) acknowledgement of receipt of a PID;
 - (b) the action the Board proposes to take;
 - (c) the results of any action taken by the Board.
- 18.3 The Board will give to an entity to which it has referred a PID reasonable information about the disclosure consistent with section 32 of the PID Act and standard No. 2/2019, including confirmation that:

- (a) the disclosure has been assessed as a PID; and
- (b) the PID has been referred as soon as practicable.

19. Recording and reporting PIDs

19.1 The Chairperson is responsible for:

- (a) keeping proper records of PIDs; and
- (b) overseeing implementation of record keeping procedures and reporting arrangements, including:
 - (i) the conduct of at least quarterly audits of records;
 - (ii) limitation of access to records to the PID Coordinator and at least two officers; and
 - (iii) submission of mandatory data to the oversight agency; and
 - (iv) the establishment of procedures and processes for record-keeping.

19.2 Each PID is to be recorded and reported:

- (a) as a separate PID, irrespective of whether two or more PIDs are made about an identical matter; and
- (b) otherwise in a way that is consistent with section 29 of the PID Act and standard No. 3/2019.

19.3 The PID Coordinator will give the information required by the PID Act and the standards to the oversight agency.

20. Use of data arising from PIDs

20.1 The Board is to take account of summary information about any PIDs provided when considering improvements to systems, service delivery, business processes, internal controls, policies and procedures.

20.2 The Chairperson, or as the case may be the Deputy Chairperson, is to provide sufficient summary information about any PIDs to the Board to inform the Board's consideration of improvements.

21. Report to journalist

21.1 A person may make a disclosure of information that was the subject of a PID to a journalist under section 20 of the PID Act if:

- (a) the person made the PID to the Board in accordance with the PID Act; and
- (b) the Board or an entity to which the PID was referred:
 - (i) decided not to investigate or deal with the PID;
 - (ii) investigated the PID but did not recommend the taking of any action in relation to it; or

- (iii) did not notify the person, within 6 months after the date the PID was made, whether or not the PID was to be investigated or dealt with.

21.2 Disclosure to a journalist under section 20 of the PID Act is treated as a PID and the person retains the protections under the PID Act.

22. Other policies and procedures

22.1 The Board has the following other relevant policies and procedures that relate to the PID procedure:

- (a) *Policy for managing compliance concerns raised about non-State schools, governing bodies, or unaccredited places*
- (b) *Procedures for managing compliance concerns raised about non-State schools, governing bodies, or unaccredited places*
- (c) *Policy for managing complaints about the Board, a committee of the Board, a member of the Board or committee, or a person appointed by the Board as an authorised person*
- (d) *Procedures for managing complaints about the Board, a committee of the Board, a member of the Board or committee, or a person appointed by the Board as an authorised person;*

22.2 A copy of the above listed policy and procedures is available on the Board's website (www.nssab.qld.edu.au) under the 'Complaints' tab.

23. PID management program

23.1 The Board's PID management program is established under section 28(1)(d) of the PID Act and standard No. 1/2019.

23.2 Schedule 3 to these procedures sets out the Board's PID management program.

Schedule 1: Statement of duties of PID Coordinator

1. Operational oversight of the PID management program.
2. Implement processes to oversee PID assessments to ensure consistent application of the PID Act, and fair and reasonable decision making.
3. Implement processes to co-ordinate the support and protections offered to disclosers and other persons associated with PIDs (for example, witnesses).
4. Assessment of PIDs.
5. Assessment of risk of reprisal.
6. Provide quarterly reports on the implementation and oversight of the PID management program to the Chairperson, and the Board.
7. Analyse PIDs to identify systemic issues and trends to inform recommendations regarding improvements in service delivery, business processes and internal controls to the Chairperson, and the Board.
8. Assist the Chairperson to conduct an annual review of these procedures, and the effectiveness of the PID management program, and report to the Board.
9. Act as principal point of contact with the oversight agency.

Schedule 2: Statement of duties of PID Support Officer

1. Assist the PID Coordinator.
2. Provide support to a discloser, subject officer or witness who is involved in the management of a PID.
3. Coordinate the provision of training to members and authorised officers, and officers of the Board Secretariat, about the PID Act, the standards, the procedures, and the PID management program.

Schedule 3: Board PID management program

1. This Board PID management program:
 - (a) is established under the PID Act, section 28(1)(d);
 - (b) takes account of standard No. 1/2019;
 - (c) incorporates the standards; and
 - (d) incorporates these procedures.
2. This PID management program is developed and documented proportionate to the nature and size of the Board and the statutory functions of the Board and authorised persons.
3. Members and authorised persons are to build the Board's commitment to the PID Act by modelling behaviours and creating an environment in which the making of a PID is valued and taken seriously.
4. Members and authorised persons are to build the Board's commitment to the PID Act by supporting the following three elements in regard to PIDs:
 - (a) structural elements, including:
 - (i) management's commitment; and
 - (ii) effective policy and procedures;
 - (b) operational elements, including:
 - (i) setting up a reporting system;
 - (ii) assessing and taking action on PIDs;
 - (iii) discloser support and protection; and
 - (iv) reporting obligations; and
 - (c) maintenance elements, including:
 - (i) education and training;
 - (ii) visibility and communication; and
 - (iii) review mechanism.
5. The Board supports:
 - (a) individuals coming forward with information about wrongdoing;
 - (b) a discloser coming forward with information about wrongdoing irrespective of:
 - (i) whether the discloser is able to identify a particular person to whom the information disclosed relates;
 - (ii) when the event happened, or will or may happen;
 - (c) protection of the dignity, wellbeing, career interests and good name of all persons

involved;

- (d) protection of a discloser from any adverse action taken as a result of making the disclosure;
- (e) responding to a disclosure thoroughly and impartially;
- (f) where appropriate, report the disclosure to any relevant law enforcement agency;
- (g) where some form of wrongdoing has been found, taking appropriate action to deal with it; and
- (h) keeping the discloser informed of the progress and outcome.

Ref: 19/382303