



Western Sydney  
Parklands Trust



Parramatta Park Trust

# **Public Interest Disclosures Policy and Procedures**

**August 2015**

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# 1. Introduction

The purpose of this policy is to:

- outline Parramatta Park and Western Sydney Parklands Trust's (PPT/WSPT) commitment to the objectives of the [Public Interest Disclosures Act 1994](#) (the Act)
- encourage disclosure of corrupt conduct, maladministration, serious and substantial waste of public money and government information contravention
- describe the procedures to be followed in connection with public interest disclosures
- inform all of PPT/WSPT's public officials of their rights and responsibilities in connection with public interest disclosures.

This policy will assist in reducing the following risks:

- misuse of position or authority
- corrupt behaviour
- maladministration
- serious and substantial waste of public money
- government information contravention
- damage to the reputation of PPT/WSPT
- detrimental effect on morale and performance
- reprisal action against a public official who has made a public interest disclosure.

## 2. Summary

In order to be protected by the Act, a disclosure must be made in accordance with the provisions of the Act. Disclosures can be made to the PPT/WSPT Executive Director, or nominated Disclosure Officers (all PPT/WSPT Directors and above).

A disclosure may also be made to the Independent Commission Against Corruption concerning corrupt conduct, the Ombudsman concerning maladministration, the Auditor-General concerning serious and substantial waste of public money, or the Information Commissioner concerning a failure to exercise functions properly in accordance with the *Government Information (Public Access) Act 2009* (GIPA Act).

The identity of a public official who discloses wrongdoing in accordance with the Act will be kept confidential except where disclosure is permitted by the Act. PPT/WSPT will take all reasonable steps to provide protection to public officials who make public

interest disclosures from any detrimental action taken against them substantially in reprisal for making a public interest disclosure.

Under the Act, it is an offence to take detrimental action that is substantially in reprisal for a public official making a public interest disclosure, with a penalty of fines and up to 2 years imprisonment.

A disclosure is not protected as a public interest disclosure if it is made solely or substantially to avoid disciplinary action or principally involves questioning the merits of government policy.

### 3. Scope and application

This document applies to Parramatta Park and Western Sydney Parklands Trusts.

This policy and procedures covers public interest disclosures made by “public officials” (including PPT/WSPT employees who are permanent, temporary or casual and including individual consultants engaged by a public authority to provide services to or on behalf of the public authority) under the Act and should be read in conjunction with that legislation.

The document covers public interest disclosures about PPT/WSPT or any of its officers.

This policy and procedures is based on the Ombudsman’s guidelines.

### 4. Definitions

**Corrupt conduct** is defined in the *Independent Commission Against Corruption Act 1988* (ICAC Act, s.7, 8 and 9). Corrupt conduct includes the dishonest or partial exercise of official functions by a public official. It also includes conduct such as taking or offering bribes, public officials dishonestly using influence, blackmail, fraud and election bribery.

**Maladministration** is defined in the Act as conduct that involves action or inaction of a serious nature that is: contrary to law; unreasonable, unjust, oppressive or improperly discriminatory; or based wholly or partly on improper motives.

**Government information contravention** is defined in the Act as a failure to exercise functions in accordance with the GIPA Act.

**Public authority** is defined in the Act as any public authority whose conduct or activities may be investigated by an investigating authority (such as ICAC, the Ombudsman, the Auditor-General, the Information Commissioner or a local government investigating authority) and includes (without limitation) a Division of the Government Service, a State owned corporation and any subsidiary of a State owned corporation, a local government authority, the Police Force, the Police Integrity Commission, the Inspector of the Police Integrity Commission and the Departments of Parliament.

Government departments and agencies and local councils are public authorities.

**Public interest disclosure** is a disclosure made in accordance with the Act.

**Public official** is defined in the Act as an individual who is an employee of, or otherwise in the service of, a public authority, and includes (without limitation) each of the following:

- a person employed under the *Public Sector Employment and Management Act 2002*;
- a member of Parliament, but not for the purposes of a disclosure made by the member;
- a person employed by either or both of the President of the Legislative Council or the Speaker of the Legislative Assembly;
- any other individual having public official functions or acting in a public official capacity whose conduct and activities may be investigated by an investigating authority;
- an individual in the service of the Crown;
- an individual who is engaged by a public authority under a contract to provide services to or on behalf of the public authority.

## 5. Relevant legislation, policy and procedures

*Government Information (Public Access) Act 2009*

*Independent Commission Against Corruption Act 1988*

*Ombudsman Act 1974*

*Privacy and Personal Information Protection Act 1998*

*Public Interest Disclosures Act 1994*

*Public Finance and Audit Act 1983*

*Public Sector Employment and Management Act 2002*

*Premier's memorandum M2011-12 — 'Strengthening Whistleblower Protections'*

The Ombudsman and ICAC have produced publications that provide useful guidance, including:

- [Public Interest Disclosures](#) web page, NSW Ombudsman  
Guidance on implementing the Public Interest Disclosures Act.
- [Blowing the Whistle – the Public Interest Disclosures Act](#) web page, Independent Commission Against Corruption  
Guidance on implementing the Public Interest Disclosures Act.
- [Section 11 Report Guidelines for Principal Officers](#), June 2011, Independent Commission Against Corruption

Guidance on obligations to report suspected corrupt conduct to the ICAC.

- [\*A Guide to Conducting Internal Investigations – Fact Finder\*](#), July 2009, Independent Commission Against Corruption

Guidance for those involved in planning, conducting and reporting on internal investigations.

In addition, the Ombudsman and ICAC regularly conduct courses on better management of complaint handling, corruption prevention and public interest disclosures.

## 6. Policy

Parramatta Park and Western Sydney Parklands Trusts (PPT/WSPT) do not tolerate corrupt conduct, maladministration, serious and substantial waste of public money or government information contraventions. PPT/WSPT is committed to the objectives of the Act.

PPT/WSPT recognises the value and importance of the contributions of public officials to enhance administrative and management practices and supports public interest disclosures being made by public officials that disclose corrupt conduct, maladministration, serious and substantial waste of public money or government information contraventions by PPT/WSPT or any of its officers.

PPT/WSPT will take all reasonable steps to provide protection to public officials who make such disclosures from any detrimental action in reprisal for the making of the disclosure.

PPT/WSPT will deal with reports thoroughly and impartially and will take appropriate action to rectify any wrongdoing found.

The Act is designed to deal with voluntary disclosures about serious matters involving public administration.

## 7. Procedural guidelines

### 7.1 Public interest disclosures

A disclosure made in accordance with this document will be protected under the Act as a public interest disclosure if it:

- a) is made by a public official;
- b) is made to the following persons;
  - i) the PPT/WSPT Executive Director, or
  - ii) the Public Interest Disclosure Co-ordinator (PPT/WSPT Director Finance and Business Development), or

iii) nominated Disclosure Officers (all PPT/WSPT Directors and above).

in accordance with the requirements in section 7.2 of this document, and

- c) is a disclosure of information that the person making the disclosure honestly believes, on reasonable grounds, shows or tends to show corrupt conduct, maladministration, serious and substantial waste of public money or government information contravention by PPT/WSPT or any of its officers, and
- d) is made voluntarily.

Section 9 of the Act sets out when a disclosure is made voluntarily for the purpose of the Act.

For the purpose of determining whether a disclosure is protected by the Act, an assertion by the public official as to what the public official believes in connection with the disclosure is, in the absence of evidence to the contrary, evidence of the belief asserted and that the belief is an honest belief.

Protection is not available for disclosures which:

- a) principally question the merits of government policy, or
- b) are made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

It is a criminal offence under the Act for a public official to wilfully make a false statement, mislead, or attempt to mislead an investigating authority, public authority or public official when making a disclosure to them.

## **7.2 Internal reporting procedures**

Internal disclosures can be made to the Executive Director or the Public Interest Disclosure Co-ordinator or nominated Disclosure Officers.

Any supervisor who receives a disclosure that he or she believes may be a public interest disclosure must refer the public official making the disclosure to one of the people listed above as, to be protected under the Act, these are the only people who can receive a public interest disclosure in PPT/WSPT.

Public officials who are contemplating making a disclosure may request a private meeting away from the workplace if they are concerned about publicly approaching the Executive Director, the Public Interest Disclosure Co-ordinator, or the nominated Disclosure Officers in the workplace.

The disclosure can be in writing or made verbally. A disclosure in writing is preferred as this can help to avoid any confusion or misinterpretation.

If a disclosure is made verbally, the person receiving the disclosure must make a comprehensive record of the disclosure and ask the person making the disclosure to sign this record. The public official should keep a copy of this record.

There may be some situations where a public official does not want to identify him or herself when making a disclosure. Although anonymous disclosures will still be dealt with appropriately by PPT/WSPT, identification is necessary if a

disclosure is to be protected under the Act. Identification also allows PPT/WSPT to provide appropriate support, as well as feedback about the outcome of any investigation into the allegations.

It is also important to realise that an anonymous disclosure may not prevent a person who made a disclosure being identified by some people. If PPT/WSPT does not know who made the disclosure, it may not be possible to prevent reprisal action.

### **7.3 External reporting procedures**

A public interest disclosure can be made to an “investigating authority.” This can be done first or at any stage after the initial disclosure to PPT/WSPT. If the disclosure is about the Executive Director then it should be made to an investigating authority at the outset.

Disclosures can also be made to a Member of Parliament or a journalist, but only in limited circumstances, explained further below.

#### ***Investigating authorities***

Under the Act, some of the investigating authorities that public officials can make public interest disclosures to, and the categories of wrongdoing each authority can deal with, are:

- the Independent Commission Against Corruption — for corrupt conduct
- the Ombudsman — for maladministration
- the Auditor-General — for serious and substantial waste of public money
- the Information Commissioner — for disclosures about a government information contravention.

The relevant authority should be contacted for advice about how to make a public interest disclosure to it. Contact details for each of these investigating authorities are provided at section 8 of this policy.

Public officials should be aware that it is very likely the investigating authority will discuss the case with PPT/WSPT. PPT/WSPT will assist and co-operate with the investigating authority and will provide appropriate support and assistance to PPT/WSPT’s public officials who report wrongdoing to an investigating authority.

#### ***Members of Parliament or journalists***

To have the protections of the Act, public officials reporting wrongdoing to a Member of Parliament or a journalist must have already made substantially the same disclosure to the Executive Director, the Public Interest Disclosure Co-ordinator, a nominated Disclosure Officer, a public authority, an officer of a public authority, or an investigating authority in accordance with the Act.

Also PPT/WSPT, public authority, officer of a public authority, or investigating authority that received the disclosure must have either:

- decided not to investigate the matter, or
- decided to investigate the matter but not completed the investigation within six months of the original report, or

- investigated the matter but not recommended any action as a result, or
- not notified the person who made the report, within six months of the report being made, whether the matter is to be investigated.

The public official must have reasonable grounds for believing the disclosure is substantially true and must be able to prove the disclosure is in fact substantially true.

A disclosure to a person or an organisation not listed above or not listed in the Act will not be protected under the Act.

## 7.4 Managing disclosures

The Public Interest Disclosure Co-ordinator will oversee the management and investigation of any disclosures, unless the matter pertains to their own conduct in which case the Executive Director will manage the matter.

After a public interest disclosure is received, the following procedures will be initiated:

- Within 45 days, written acknowledgement of receipt of the disclosure and a copy of this policy will be sent to the public official who made the disclosure. The acknowledgement will notify the public official who made the public interest disclosure that he or she should maintain the confidentiality of his or her disclosure.
- Where a verbal disclosure is made, the person receiving the disclosure in accordance with section 7.2 of this document will make a written record of the disclosure with the public official making the disclosure and ask the person making the disclosure to sign the written record.
- The Public Interest Disclosure Co-ordinator will consider whether or not the disclosure meets the requirements for protection under the Act.
- The Public Interest Disclosure Co-ordinator will inform the Executive Director of the circumstances of the disclosure. See section 7.5 of this document for the confidentiality obligations.
- When a disclosure is received, a thorough risk assessment will be conducted. This will help to identify any risks to the public official who reported the wrongdoing, as well as strategies to deal with those risks.
- The Executive Director and the Public Interest Disclosure Co-ordinator will determine how the matter is to be actioned. Depending on the circumstances, appropriate action may include:
  - a) nomination of an appropriate person to take responsibility for dealing with the disclosure
  - b) preliminary or informal investigation
  - c) formal investigation

- d) prosecution or disciplinary action
  - e) referral to an investigating authority for investigation or other appropriate action
  - f) referral to the Commissioner of Police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct).
- Procedural fairness will generally require that officers who are the subject of disclosures be informed of the substance of the claims against them and be given a reasonable opportunity to respond.
  - A confidential report on any matter that is investigated will be prepared by the person designated to undertake the investigation and submitted to the Executive Director as quickly as possible.
  - The Public Interest Disclosure Co-ordinator will be responsible for keeping the public official who made the disclosure informed as to any action taken or proposed to be taken in respect of the disclosure.
  - The result of any decisions and/or further action in relation to the disclosure will be made known to the public official who made the disclosure as quickly as possible and within the six months required by the Act.
  - If a decision is taken not to investigate the matter or refer it to an investigating authority the public official who made the disclosure will be notified of that decision.

## 7.5 Confidentiality

A person to whom a public interest disclosure is made or referred is not to disclose information that might identify or tend to identify the person who has made the disclosure unless:

- a) the person consents in writing to the disclosure of that information, or it is generally known that the person has made the public interest disclosure (otherwise than by making the public interest disclosure) as a result of the person having voluntarily identified themselves as the person who made the disclosure, or
- b) it is essential, having regard to the principles of natural justice, that the identifying information be disclosed to a person whom the information provided by the disclosure may concern, or
- c) the Executive Director is of the opinion that disclosure of the identifying information is necessary to investigate the matter effectively or it is otherwise in the public interest to do so.

The public official who made the public interest disclosure will be informed if it becomes necessary to disclose his or her identity in accordance with paragraph b) or c) above.

Any person who breaches these confidentiality obligations may be subject to disciplinary action.

Under the GIPA Act, information is exempt from release if it might identify or tend to identify a person who has made a public interest disclosure.

A public official who makes a public interest disclosure should maintain the confidentiality of his or her disclosure. In the acknowledgement of the receipt of a public interest disclosure, PPT/WSPT will notify the public official of the need to maintain confidentiality.

## **7.6 Feedback to public officials who disclose wrongdoing**

Public officials who disclose wrongdoing will be advised in writing, within 45 days of the person making the disclosure, of what is happening in response to their disclosure and will be given:

- an acknowledgement that the disclosure has been received
- a copy of the policy and procedures
- the timeframe for when further updates will be received
- the name and contact details of the people who can advise what is happening.

Within 10 working days of a decision about how the disclosure will be dealt with, the public official will be given:

- information about the action that will be taken in response to the disclosure
- likely timeframes for any investigation
- information about the resources available within PPT/WSPT to handle any concerns the public official may have
- information about external agencies and services for support.

During any investigation, the public official will be given:

- information on the ongoing nature of the investigation
- information about the progress of the investigation and reasons for any delay
- advice if his or her identity needs to be disclosed for the purposes of investigating the matter and an opportunity to talk about this.

At the end of any investigation, the public official will be given:

- enough information to show that adequate and appropriate action was taken and/or is proposed to be taken in response to the disclosure and any problem that was identified
- advice about whether the public official may be involved as a witness in any further matters, such as disciplinary or criminal proceedings.

## 7.7 Protection against reprisals

The Act provides protection for a public official who makes a public interest disclosure by imposing penalties on anyone who takes detrimental action against the public official substantially in reprisal for that person making the disclosure.

PPT/WSPT will not tolerate any reprisals against public officials who make a public interest disclosure. The criminal penalties that can be imposed include imprisonment or fines. Detrimental action is also misconduct that justifies disciplinary action. People who take detrimental action against someone who has made a public interest disclosure can also be required to pay damages for any loss suffered by that person.

Detrimental action means action causing, comprising or involving any of the following:

- injury, damage or loss
- intimidation or harassment
- discrimination, disadvantage or adverse treatment in relation to employment
- dismissal from, or prejudice in, employment
- disciplinary proceedings.

### ***Responding to reprisals***

PPT/WSPT will act to protect public officials who report wrongdoing from reprisals.

If a public official believes that detrimental action has been or is being taken against them or someone else who has reported wrongdoing in reprisal for making a report, they should tell their supervisor, the Public Interest Disclosure Coordinator or the Executive Director immediately.

All supervisors must report to the Public Interest Disclosure Co-ordinator or the Executive Director any suspicions they hold that detrimental action in reprisal against a public official reporting wrongdoing is occurring.

If the Public Interest Disclosure Co-ordinator suspects or is referred concerns that there may be reprisal action against a public official who has made a disclosure of wrongdoing, they will:

- ensure a senior and experienced member of staff, who has not been involved in dealing with the initial disclosure, will investigate the suspected reprisal
- report the results of that investigation to the Executive Director for a decision
- if it has been established that reprisal action is occurring against someone who has made a disclosure of wrongdoing, take all necessary possible steps to stop that activity and protect the public official who made the disclosure.

PPT/WSPT will ensure that any evidence of detrimental action taken against a public official that is substantially in reprisal for that person making a public

interest disclosure is referred to the Commissioner of Police, or the Independent Commission Against Corruption.

Public officials who report reprisal action will be kept informed of the progress of any investigation and the outcome.

If appropriate in the circumstances, the Executive Director may consider issuing specific directions to help protect against reprisals, including:

- issuing warnings to those alleged to have taken reprisal action against the public official who made the disclosure of wrongdoing
- relocate within the current workplace, the public official who made the disclosure of wrongdoing or the person alleged to have taken reprisal action
- transferring the public official who made the disclosure or the person alleged to have taken reprisal action to another position for which they are qualified
- granting the public official who made the disclosure or the person the subject of the disclosure leave of absence during the investigation of the disclosure.

Any directions in relation to the public official who made the disclosure will be made in consultation with the public official.

Public officials who have reported wrongdoing and feel that any reprisal action is not being dealt with effectively should contact the Ombudsman or the ICAC, depending on the type of wrongdoing reported. Contact details for these investigating authorities are included at section 8 of this policy.

### ***Protection against legal action***

A public official who makes a disclosure in accordance with the Act, will not be subject to any liability and no action, claim or demand can be taken for making the disclosure. No confidentiality or secrecy obligations will have been breached and the defence of absolute privilege in defamation will be available.

## **7.8 Support for those disclosing wrongdoing**

If any public official who discloses wrongdoing about PPT/WSPT or its officers believes that he or she needs further support from PPT/WSPT, the Executive Director or the Public Interest Disclosure Co-ordinator should be contacted.

## **7.9 Support for the subject of a disclosure**

PPT/WSPT is also committed to ensuring that a person who is the subject of a disclosure of wrongdoing is treated fairly and reasonably. This person will be:

- treated fairly and impartially
- told their rights and obligations under PPT/WSPT's policies and procedures
- kept informed during any investigation
- given the opportunity to respond to any allegation made against them

- told the result of any investigation.

## 7.10 Reports to the Ombudsman

An annual report on PPT/WSPT's obligations under the Act is to be prepared and a copy provided to the Ombudsman.

Also 6 monthly reports are to be provided to the Ombudsman. The reporting period is 6 months ending on 30 June and 31 December in any year and the report is to be provided within 30 days after the end of the 6 month period.

Reports are to provide statistical information on compliance with PPT/WSPT's obligations under the Act. The regulations may make provision for the statistical information to be provided.

## 8. Contact details of investigating authorities

The contact details for investigating authorities that public officials can make a public interest disclosure to, or seek advice from, are listed below.

### **For disclosures about corrupt conduct:**

Independent Commission Against Corruption (ICAC)

Phone: 02 8281 5999

Toll free: 1800 463 909

Facsimile: 02 9264 5364

Email: [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au)

Web: [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au)

Address: Level 21, 133 Castlereagh Street, Sydney NSW 2000

### **For disclosures about maladministration:**

NSW Ombudsman

Phone: 02 9286 1000

Toll free: 1800 451 524

Tel. typewriter (TTY): 02 9264 8050

Facsimile: 02 9283 2911

Email: [nswombo@ombo.nsw.gov.au](mailto:nswombo@ombo.nsw.gov.au)

Web: [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au)

Address: Level 24, 580 George Street, Sydney NSW 2000

### **For disclosures about serious and substantial waste:**

Auditor-General of the NSW Audit Office

Phone: 02 9275 7100

Facsimile: 02 9275 7200

Email: [mail@audit.nsw.gov.au](mailto:mail@audit.nsw.gov.au)

Web: [www.audit.nsw.gov.au](http://www.audit.nsw.gov.au)

Address: Level 15, 1 Margaret Street,

### **For disclosures about government information contravention:**

Information Commissioner

Toll free: 1800 463 626

Facsimile: 02 8114 3756

Email: [ocinfo@oic.nsw.gov.au](mailto:ocinfo@oic.nsw.gov.au)

Web: [www.oic.nsw.gov.au](http://www.oic.nsw.gov.au)

Address: Level 11, 1 Castlereagh Street,

## 9. Accountabilities

### 9.1 Responsibilities

#### **PPT/WSPT's public officials**

- report incidences of corrupt conduct, maladministration, serious and substantial waste of public money or government information contravention in accordance with this policy and procedures;
- support those who have made public interest disclosures, including abstaining from any activity that is or could be perceived to be victimisation or harassment of those who make disclosures; and
- maintain the confidentiality of public officials they know or suspect to have made public interest disclosures.

#### **PPT/WSPT's Executive and senior managers/supervisors**

- ensure that all public officials for whom they have responsibility are aware of the roles and responsibilities of this policy and procedures
- support public officials who make public interest disclosures and take all reasonable steps to protect them from victimisation, harassment or any other form of reprisal
- report to the Public Interest Disclosure Co-ordinator or the Executive Director any suspicions of reprisal action against a public official
- maintain the confidentiality of public officials known or suspected to have made public interest disclosures
- act fairly in relation to any officer who is the subject of a disclosure which is under consideration or investigation.

#### **PPT/WSPT Executive Director and Public Interest Disclosure Co-ordinator and Nominated Officers**

- deal with disclosures impartially
- clearly explain the process and what will happen in relation to any information received
- comply with the confidentiality obligations in section 7.5 of this document

- support public officials who make public interest disclosures and take all reasonable steps to protect them from victimisation, harassment or any other form of reprisal
- ensure officers who are the subject of a disclosure are treated fairly and reasonably
- assess each disclosure to determine whether the disclosure appears to be a public interest disclosure within the meaning of the Act
- forward disclosures to the Public Interest Disclosure Co-ordinator for recording and assessment
- if considered appropriate, determine the appropriate action to be taken in relation to the disclosure
- if considered appropriate, carry out or co-ordinate any internal investigation arising out of a disclosure
- report on the findings of any investigation and recommend or determine any further action.

The Public Interest Disclosure Coordinator may undertake all the functions of a Disclosure Officer, as listed above.

#### **PPT/WSPT Executive Director**

- ensures PPT/WSPT's public officials are aware of the procedures for making public interest disclosures and of the protections provided by the Act
- provide information to the Ombudsman in compliance with the Act
- report actual or suspected corrupt conduct to the ICAC, and to the Police in the case of potential criminal offences.

The Executive Director may undertake all the functions of a Disclosure Officer or the Public Interest Disclosure Co-ordinator as listed above.

## **9.2 Policy review**

Reviews to this policy will be undertaken if changes in legislation, policy or other areas result in a need for amendment of this policy.