

Integrity and Oversight Committee

Public Interest Disclosure procedures

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1. Introduction

This publication provides a detailed account of what public interest disclosures (PIDs) are, how to make a PID about Integrity Oversight Victoria (IOV) and how they are handled by the Integrity and Oversight Committee (IOC).

For a brief overview of the essential information, please read [*Essential information for disclosers*](#).

The *Public Interest Disclosures Act 2012* (Vic) (PID Act) provides protections for people ('whistleblowers') who make disclosures about improper conduct in the Victorian public sector.

The PID Act authorises the IOC to:

- receive assessable disclosures about IOV or an IOV officer;
- assess those disclosures;
- determine whether those disclosures are public interest complaints (PICs);
- engage an independent investigator to investigate any disclosure determined by the Committee to be a PIC; and
- promote the purposes of the Act.¹

Generally, an entity that may receive disclosures under the PID Act must establish procedures to facilitate the making, handling, and notifications (where appropriate) of those disclosures.

While it is not mandatory for the Committee to do so,² the following procedures³ have been developed in the interests of transparency and to assist the Committee to fulfil its statutory functions under the Act. These procedures are consistent with the Act, regulations and the guidelines issued by the Independent Broad-based Anti-corruption Commission (IBAC).

2. Key definitions

2.1 Improper conduct

Improper conduct means—

- (a) corrupt conduct; or
- (b) conduct of a public officer or public body in their capacity as a public officer or public body that constitutes:
 - (i) a criminal offence; or
 - (ii) serious professional misconduct; or
 - (iii) dishonest performance of public functions; or
 - (iv) an intentional or reckless breach of public trust; or
 - (v) an intentional or reckless misuse of information or material acquired in the course of the performance of the functions of the public officer or public body; or
 - (vi) a substantial mismanagement of public resources; or
 - (vii) a substantial risk to the health or safety of one or more persons; or
 - (viii) a substantial risk to the environment; or
- (c) conduct of any person that—
 - (i) adversely affects the honest performance by a public officer or public body of their functions as a public officer or public body; or

¹ PID Act s 56A.

² PID Act s 58(2)(d).

³ Note that these procedures do not deal with internal disclosures about ministerial officers, parliamentary officers, parliamentary advisers and electorate officers. These disclosures must be made directly to IBAC.

- (ii) is intended to adversely affect the effective performance or exercise by a public officer or public body of the functions or powers of the public officer or public body and results in the person, or an associate of the person, obtaining—
 - (A) a licence, permit, approval, authority or other entitlement under any Act or subordinate instrument; or
 - (B) an appointment to a statutory office or as a member of the board of any public body under any Act or subordinate instrument; or
 - (C) a financial benefit or real or personal property; or
 - (D) any other direct or indirect monetary or proprietary gain—that the person or associate would not have otherwise obtained; or:
- (d) conduct of any person that could constitute a conspiracy or attempt to engage in any of the conduct referred to in paragraph (a), (b) or (c).⁴

Improper conduct *excludes* conduct that is trivial.⁵

2.2 Corrupt conduct

Corrupt conduct means conduct—

- (a) of any person that adversely affects the honest performance by a public officer or public body of his or her or its functions as a public officer or public body; or
- (b) of a public officer or public body that constitutes or involves the dishonest performance of his or her or its functions as a public officer or public body; or
- (c) of a public officer or public body that constitutes or involves knowingly or recklessly breaching public trust; or
- (d) of a public officer or a public body that involves the misuse of information or material acquired in the course of the performance of his or her or its functions as a public officer or public body, whether or not for the benefit of the public officer or public body or any other person; or
- (da) of a person (the **first person**) intended to adversely affect the effective performance or exercise by a public officer or public body of the functions or powers of the public officer or public body and result in the first person or an associate of the first person obtaining—
 - (i) a licence, permit, approval, authority or other entitlement under any Act or subordinate instrument; or
 - (ii) an appointment to a statutory office or as a member of the board of any public body under any Act or subordinate instrument; or
 - (iii) a financial benefit or real or personal property; or
 - (iv) any other direct or indirect monetary or proprietary gain—that they would not have otherwise obtained; or
- (e) that could constitute a conspiracy or an attempt to engage in any conduct referred to in paragraph (a), (b), (c), (d) or (da)—
 - being conduct that would constitute a **relevant offence**.⁶

To be a relevant offence, the conduct must constitute an indictable offence against an Act, an attempt to pervert the course of justice, bribery of a public official, perverting the course of justice or misconduct in public office.⁷

⁴ PID Act s 4(1).

⁵ PID Act s 4(2).

⁶ *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) (IBAC Act) s 4(1).

⁷ IBAC Act s 3(1).

2.3 Detrimental action

Detrimental action includes—

- (a) action causing injury, loss or damage;
- (b) intimidation or harassment;
- (c) discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action.⁸

3. Receiving a disclosure

3.1 The Committee's jurisdiction to determine a disclosure

The Committee has jurisdiction to determine whether a public interest disclosure (PID) is a PIC if it relates to IOV or an IOV officer.

An IOV officer includes the Chief Integrity Inspector.⁹

3.2 To whom can a disclosure be made?

A PID about IOV or an IOV officer must be made to the Committee or a Presiding Officer of the Parliament of Victoria.¹⁰ A Presiding Officer means the Speaker of the Legislative Assembly or the President of the Legislative Council.¹¹

A PID may be made orally or in writing.¹² A disclosure made in writing must be addressed to the relevant entity, or a permitted person who can receive a disclosure on behalf of the entity.¹³ A written disclosure must be sent by post or electronically, or delivered to or left at the office of the relevant entity or permitted person.¹⁴

3.2.1 The Committee

A PID made in writing must be addressed to the Committee, or any member of the Committee, who are permitted persons for the purposes of the PID Act.¹⁵

The Committee's Secretariat (staff) will, on behalf of the Committee or any member of the Committee, acknowledge receipt of the disclosure in writing (where a postal or email address has been provided) within a reasonable time after the disclosure is received.¹⁶

3.2.2 Presiding Officer

While a Presiding Officer can receive a disclosure about IOV or an IOV officer, they cannot exercise any discretion in relation to investigating it.

Upon receipt of a disclosure, a Presiding Officer must, no later than 28 days after the disclosure is made, notify the disclosure to the Committee for assessment¹⁷ and advise the person who made the

⁸ PID Act s 3.

⁹ *Integrity Oversight Victoria Act 2011* (Vic) (IOV Act) s 3(1).

¹⁰ PID Act s 14(a).

¹¹ PID Act s 3.

¹² PID Act s 12(3).

¹³ PID Act s 12(4).

¹⁴ PID Act s 12(4).

¹⁵ A permitted person means any member of the Committee: PID Act Schedule 2, Item 8.

¹⁶ While there is no statutory obligation for the Committee to formally acknowledge receipt of the disclosure, under s 56A(3) of the PID Act it has power to do all things that are necessary or convenient to be done for, or in connection with, the performance of its functions under the Act.

¹⁷ PID Act s 21(2), 4(a).

disclosure that the disclosure has been made to the Committee.¹⁸ If the Presiding Officer is not satisfied that the disclosure is a PID it must notify the discloser in writing within 28 days of the disclosure, that the Presiding Officer does not consider the disclosure to be a PID and it has not been notified to the Committee.¹⁹

4. Assessing a disclosure

The Committee is to assess every disclosure received as a *potential* PID.

4.1 What is a public interest disclosure?

To be a PID, the disclosure must be made by a natural person and contain:

- (a) information that shows or tends to show—
 - (i) a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct; or
 - (ii) a public officer or public body has taken, is taking or proposes to take detrimental action against a person in contravention of section 45; or
- (b) information that the person reasonably believes shows or tends to show—
 - (i) a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct; or
 - (ii) a public officer or public body has taken, is taking or proposes to take detrimental action against a person in contravention of section 45.²⁰

A disclosure is *not* a PID if the person making the disclosure expressly states in writing that the disclosure is not a PID.²¹ Consequently, in this circumstance the disclosure is not required to be notified or assessed under the PID Act.²²

If a disclosure is not a PID, it will be dealt with in accordance with the Committee's jurisdiction under the *Parliamentary Committees Act 2003* (Vic)—see 5.4 below.

4.2 Is the disclosure a public interest complaint?

If a PID that relates to IOV or an IOV officer is made or notified to the Committee, the Committee must assess the disclosure to determine whether the disclosure is a PIC.²³

Following an assessment, the Committee must determine that—

- (a) the disclosure is a public interest complaint if it considers that—
 - (i) the disclosure shows or tends to show—
 - A. a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct; or
 - B. a public officer or public body has taken, is taking or proposes to take detrimental action against a person in contravention of section 45; or

¹⁸ PID Act s 24(2).

¹⁹ PID Act s 24(3-4).

²⁰ PID Act s 9(1). Note that, under s 9(3) of the PID Act, a disclosure cannot be made about the Office of the Special Investigations Monitor, the Special Investigations Monitor, a court, an investigating panel or a member of an investigating panel.

²¹ PID Act s 19(1).

²² If a statement under s 19(1) is made by the person making a disclosure, the Committee must provide the entity it may have notified with the person's statement no later than 28 days after the disclosure is made: s 19(2).

²³ PID Act s 31B(1).

- (ii) the person who made the disclosure believes on reasonable grounds that the disclosure shows or tends to show—
 - A. a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct; or
 - B. a public officer or public body has taken, is taking or proposes to take detrimental action against a person in contravention of section 45; or
- (b) the disclosure is not a public interest complaint.²⁴

A determination must be made within a reasonable time after the disclosure is made or notified to the Committee.²⁵

5. Following an assessment

5.1 Advice to notifying entity

If a disclosure has been notified to the Committee, the Committee must advise the notifying entity of the Committee's determination in writing within a reasonable time after the determination is made.²⁶

5.2 Advice to person who made a disclosure determined to be public interest complaint

If the Committee has determined that the disclosure is a PIC, the Committee must advise the person who made the disclosure, in writing and within a reasonable time after the determination is made, that—

- (a) the Committee has determined that the disclosure is a PIC; and
- (b) the protections under Part 6 apply to the disclosure.²⁷

The advice must include a written statement containing the prescribed matters relating to the rights, protections and obligations under the PID Act of a person who has made a PID.²⁸

See 8 of these procedures, below, for further information on confidentiality obligations.

5.3 Advice to person who made a disclosure determined not to be public interest complaint

The following provision applies where a person who has made a disclosure has indicated to the Committee, or it otherwise appears to the Committee, that the person wishes to receive the protections that apply to a PID under the PID Act.

²⁴ PID Act s 31B(2).

²⁵ PID Act s 31B(3).

²⁶ PID Act ss 27, 31B(5).

²⁷ The protections will not apply if the person making a disclosure has contravened s 72 of the PID Act.

²⁸ PID Act ss 28 and 31B(5). The prescribed matters include a copy of s 72 and Parts 6 and 7 of the Act as well as an explanation of the effect of those provisions: PID Act s 28(3); *Public Interest Disclosures Regulations 2019* (Vic) regulation 6. The protections under Part 6 include: immunity from civil or criminal liability as well as administrative action (including disciplinary action) for making the disclosure, immunity from committing an offence under the *Constitution Act 1975* (Vic) or any other Act that imposes confidentiality obligations or otherwise restricts the disclosure of information, immunity from breaching any other obligation (made by oath or rule of law or practice) requiring the maintenance of confidentiality or otherwise restricting the disclosure of information, protection from an action for defamation, and protections from detrimental action taken in reprisal for making a PID.

If the Committee has determined that the disclosure is not a PIC, the Committee must advise the person who made the disclosure, in writing and within a reasonable time after the determination is made, that—

- (a) the Committee has determined that the disclosure is not a public interest complaint; and
- (b) as a consequence of that determination—
 - (i) the disclosure will not be investigated as a public interest complaint; and
 - (ii) the confidentiality provisions under Part 7 of the Act no longer apply in relation to the disclosure; but
- (c) the protections under Part 6 apply to the disclosure.

The advice must state the reasons why the Committee has determined that the disclosure is not a PIC.²⁹

5.4 Advice regarding alternative procedures

If the Committee has determined that the disclosure is not a PIC but considers that the matter which is the subject of the disclosure may be dealt with by another entity, the Committee may advise the person who has made the disclosure that—

- (a) the matter may be dealt with by that entity other than as a public interest complaint; and
- (b) if the person wishes to pursue the matter, the person should make a complaint directly to that entity.³⁰

5.5 Anonymous disclosures

If a PID is made anonymously, the provisions at 5.2 to 5.4 of these procedures do not apply.³¹

6. Misdirected disclosures

6.1 Public interest disclosures

A PID received by the Committee that does not relate to IOV or an IOV officer is a misdirected disclosure.³²

If the Committee receives a misdirected disclosure, it must, no later than 28 days after the disclosure is made, notify the disclosure to the appropriate entity for assessment.³³

The Committee must advise the person who made the disclosure that the disclosure has been notified to the appropriate entity for assessment.³⁴

The appropriate entities to which a PID must be notified are—

- IOV—if the disclosure relates to IBAC, an IBAC Officer or a Public Interest Monitor;
or
- IBAC—if the disclosure relates to any other person or body.³⁵

²⁹ PID Act s 29, 31B(5).

³⁰ PID Act s 30, 31B(5).

³¹ PID Act s 12A(2).

³² PID Act s 18(1).

³³ PID Act s 21(2).

³⁴ PID Act s 24(2).

³⁵ PID Act s 21(4).

6.2 Disclosures that are not public interest disclosures

The following provision applies where a person who has made a disclosure has indicated to the Committee, or it otherwise appears to the Committee, that the person wishes to receive the protections that apply to a PID under the PID Act.

If the Committee receives a disclosure and does not notify the disclosure to the appropriate entity, it must advise the person who made the disclosure that—

- (a) the Committee considers that—
 - (i) the disclosure does not show and does not tend to show—
 - (A) a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct; or
 - (B) a public officer or public body has taken, is taking or proposes to take detrimental action against a person in contravention of section 45; and
 - (b) consequently, the disclosure has not been notified for assessment under the Act; but
- (c) the protections under Part 6 apply to the disclosure.

The advice must be in writing and be given no later than 28 days after the disclosure is made to the Committee.³⁶

7. Investigating a public interest complaint

If the Committee determines that a disclosure is a PIC, the Committee must engage an independent person to investigate the disclosure, subject to the exception at 7.3 of these procedures.³⁷

7.1 Appointing the investigator

The different processes for appointing an independent person to investigate the PIC are set out in the table below.

Where a PIC relates to IOV or an IOV officer (excluding the Inspector), the Committee must—	Where a PIC relates to the Inspector, the Committee must—
<ul style="list-style-type: none">engage an independent person to investigate the PIC relating to IOV or an IOV officer under s 30 of the <i>Parliamentary Committees Act 2003</i> (Vic); andnotify the Attorney-General of its PIC determination and the Chief Integrity Inspector (unless the Committee reasonably believes notifying the Chief Integrity Inspector could prejudice the investigation).³⁸	<ul style="list-style-type: none">notify the Attorney-General that the Committee has received a public interest disclosure relating to the Chief Integrity Inspector that the Committee has determined to be a PIC;request the Minister to recommend one or more independent persons to investigate the public interest complaint; andprovide the Minister with sufficient information about the nature of the disclosure to enable such a recommendation to be made.³⁹
	the Attorney-General must— <ul style="list-style-type: none">within 30 days of receiving the notification recommend to the Committee one or more independent persons who, in the opinion of the Minister, are suitable to investigate the PIC.⁴⁰
	the Committee must—

³⁶ PID Act ss 24(3)–(5).

³⁷ PID Act s 33A.

³⁸ PID Act s 33D.

³⁹ The information must not identify the person who made the public interest disclosure: PID Act s 33B.

⁴⁰ PID Act s 33B(3).

	<ul style="list-style-type: none"> • within 30 days after the Minister's recommendation is received by the Committee: <ul style="list-style-type: none"> ○ engage one of the persons recommended by the Minister to investigate the PIC under s 30 of the <i>Parliamentary Committees Act 2003</i> (Vic), and write to the Minister advising of this decision; or ○ decide to accept none of the persons recommended by the Minister. • if the Committee decides not to accept any of the persons recommended by the Minister, the Committee must request the Minister recommend one or more additional persons to investigate the public interest complaint.⁴¹
	<p>the Attorney-General must—</p> <ul style="list-style-type: none"> • recommend one or more additional persons to investigate the public interest complaint within 30 days of receiving another request from the Committee.⁴²

The independent person is to investigate whether IOV or an IOV officer has engaged in improper conduct or detrimental action. The PID Act does not set out how a PIC is to be investigated by the independent person.

Before proceeding with the investigation, the Committee (or the person engaged to investigate the complaint) will seek written consent to disclose information likely to lead to the identification of the person who made the disclosure, from the person who made the disclosure.⁴³

Once the investigation is complete, the independent person must report the findings of the investigation to the Committee and the Attorney-General and, where appropriate, the Chief Integrity Inspector.⁴⁴

7.2 Upon completion of investigation

The Committee may cause the report to be transmitted to each House of Parliament.⁴⁵

The Committee must *not* include in a report transmitted to each House of Parliament:

- information that the Committee considers would prejudice any criminal proceeding, criminal investigation or investigation by IBAC, IOV or the Victorian Ombudsman;
- a finding or opinion of guilt in relation to the commission of a criminal offence;
- a recommendation or opinion that a person should be prosecuted for a criminal offence; or
- information that is likely to lead to the identification of a person who has made an assessable disclosure (unless an applicable exemption applies).⁴⁶

⁴¹ PID Act s 33C.

⁴² The above process applies until a recommendation by the Minister is accepted by the Committee: PID Act ss 33B–33C.

⁴³ PID Act s 53(2)(ab).

⁴⁴ PID Act ss 71A(2)–(3).

⁴⁵ PID Act s 71A(4).

⁴⁶ PID Act ss 71A(5), 53(2)(a), (c), (d).

7.3 Committee's discretion not to investigate

The Committee may decide not to investigate a disclosure if the subject matter of the PIC has already been investigated **or** the discloser has made the PIC more than 12 months after becoming aware of the disclosed matter and fails to give a satisfactory explanation for the delay.⁴⁷

If the Committee decides not to investigate the matter, it must, within a reasonable time after receiving the public interest complaint, inform the person who made the PID of the refusal to investigate the PIC and the reason for that refusal.⁴⁸

8. Confidentiality

8.1 The Committee

The Act requires a person or body who receives information in the performance of duties or functions under the Act not to disclose that information except in limited circumstances.

The confidentiality obligations are set out in ss 52–54 of the PID Act. A breach of these provisions constitutes an offence punishable by a maximum fine of 120 penalty units or 12 months imprisonment or both in the case of a natural person, or 600 penalty units in the case of a body corporate.⁴⁹

The prohibition applies to—

- content or information about the content of a disclosure; and
- information likely to lead to the identification of a person who has made a disclosure.⁵⁰

Information received in the course of performing functions under the Act is to be secured and managed in accordance with Parliament's *Information Security Policy* (IT-POL-102).

8.2 Disclosers

A person making a disclosure is not restricted from disclosing the subject matter of their PID. However, the protections will not apply where the person contravenes s 72 of the PID Act in relation to the information disclosed.

9. External disclosures

A person⁵¹ who has been advised by the Committee that their disclosure has been determined to be a PIC may make an external disclosure to a person or body that is not an entity to whom a PID may be made under the PID Act if:

- the Committee does not notify the person about any action taken in response to the disclosure within six months and has not responded to a request for advice within 30 days;
- the investigation of the disclosure has not been completed within 12 months and the Committee has not responded to a request for advice within 30 days; or
- the investigation of the disclosure has not been completed within 12 months, the person has received an update within 30 days of requesting it, but has not received any further update

⁴⁷ PID Act s 33E(1).

⁴⁸ PID Act s 33E(2).

⁴⁹ PID Act s 52(2).

⁵⁰ PID Act ss 52–53.

⁵¹ The person must not be anonymous: PID Act s 38A(2)(a).

advising that the investigation has been completed within a further six months of that response.⁵²

10. Managing the welfare of disclosers

The Committee will, in carrying out its functions under the PID Act, consider the welfare of a person making a disclosure, as the circumstances require.

The Committee will, where appropriate, consult with the Director, People and Capability unit, Department of Parliamentary Service, to assess and facilitate the welfare and protection needs of a person who has made a disclosure.

11. Annual reporting

While the annual reporting requirements in the PID Act s 70 do not apply to the Committee,⁵³ the Secretariat will maintain a register of information for parliamentary reporting purposes.⁵⁴ This includes:

- the number and types of disclosures made to the Committee during the year;
- the number of disclosures notified to IBAC or IOV
- the number of disclosures that were investigated, substantiated upon investigation and the action taken on completion of the investigation.

The register will be confidential and will not record any information that may identify a discloser.

12. Essential information for disclosers

The IOC is authorised to receive PIDs about IOV or an IOV officer. When a PID is made to the Committee or a Committee member, the Committee's Secretariat (staff) will, on behalf of the Committee, acknowledge receipt of the disclosure in writing.

If the Committee receives a PID that is not about IOV or an IOV officer it must either notify the appropriate entity within 28 days, and then advise the discloser, or notify the discloser that the Committee does not consider the disclosure to be a PID and the disclosure has not been notified to the appropriate entity, but that protections under Part 6 of the PID Act apply to the disclosure.

When a PID is made to the Committee about IOV or an IOV officer it must assess if it meets the criteria of a PIC.

After the assessment, the Committee will notify the discloser of their assessment that:

- (1) The disclosure is determined not to be a PIC and will not be investigated, but the protections under Part 6 of the PID Act apply to the disclosure. The Committee may advise the discloser if the matter is not a PIC that the matter may be dealt with by another entity, and, if they wish to pursue the matter, they should make the complaint directly to that entity.; **or**
- (2) The disclosure is determined to be a PIC and outline the protections under Part 6 of the PID Act.

⁵² Exceptions to external disclosures are set out in PID Act s 38A(3–5).

⁵³ See PID Act s 6 (definition of 'public body').

⁵⁴ For example, the Department of the Legislative Council's annual report. The report must not include any information that is likely to lead to the identification of a person who has made a disclosure but may include information to which ss 53(2)(a), (c) or (d) applies: PID Act s 71.

The Committee may decide not to investigate a PIC if it has already been investigated, or the discloser has made the PIC more than 12 months after becoming aware of the matter and has not provided a satisfactory reason for the delay. If the Committee decides not to investigate, it will advise the discloser in writing.

If the Committee assesses that the disclosure is a PIC that requires investigation, it must appoint an independent investigator, and notify the Attorney-General and Chief Integrity Inspector (unless the Committee reasonably believes notifying the Chief Integrity Inspector could prejudice the investigation) of its PIC determination.

The independent person will investigate whether IOV or an IOV officer has engaged in improper conduct or detrimental action, and report their findings to the Committee, the Attorney-General and, where appropriate, the Chief Integrity Inspector.

Before proceeding with the investigation, the Committee or the independent investigator will seek written consent from the discloser, to disclose information that may identify them.

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