



Context and purpose

The University is committed to a culture of transparency in which people are encouraged and supported to disclose information in the public interest. All disclosures of information in the public interest regarding the University will be handled in the context of the *Public Interest Disclosure Act 2018 (PID Act 2018)* to ensure appropriate protections are afforded to informants (whistleblowers).

Council Policy C-X (Policy) sets out the principles to be applied by the University in handling disclosures of information in the public interest concerning the University. This Procedure gives effect to those principles.

This Procedure applies to any person making a disclosure of information in accordance with the provisions of the Policy.

Procedure

A. Making a Disclosure

1. Where an individual wishes to make a confidential disclosure, they may do so through the independent Whistleblower Service Provider, through any of the secure disclosure channels e.g. phone, email, online. Details of this service can be found on the Addressing Workplace Concerns page on the University intranet site.
2. The informant is encouraged to determine whether they are making the disclosure as a public officer and to consider any relevant obligations to report suspected corruption in public administration to the Office of Public Integrity.
3. The independent Whistleblower Service Provider will then report all disclosures confidentially to the University's Responsible Officer, who will make appropriate determinations regarding investigation.
4. Disclosures of conduct can also be reported to members of the South Australian Parliament, members of the South Australian judiciary, South Australian Police officers, Councillors (elected members of local governments), public service employees, the Office of Public Integrity (OPI) and others listed under schedule 1 of the *Independent Commission Against Corruption (ICAC) Act 2012*.

B. Investigating Disclosures

5. Upon receiving a disclosure from the independent Whistleblower Service Provider, the Responsible Officer will assess the information as soon as practical and determine appropriate action in a timely manner in accordance with Section 7 of the *PID Act 2018*.
6. The Responsible Officer will ensure procedural fairness and make all reasonable attempts to ensure that investigations are conducted confidentially for the informant and the person(s) subject to the investigation.
7. Where the outcome of an investigation concludes that the informant knowingly made a false report, the person concerned may be subject to disciplinary action in accordance with any relevant industrial instrument, University policies, or procedures.
8. Following the conclusion of an investigation, the Responsible Officer will provide a report of the investigation to the Principal Officer (Vice Chancellor) and, if requested, the informant, including any evidence which may have been collected throughout the course of the investigation and will include any recommendations where appropriate to the outcome to ensure repeated behaviour does not occur.
9. In line with Section 7 of the *PID Act 2018*, the Responsible Officer will provide the OPI with information relating to disclosures received and information relating to the outcome of any action taken.

10. Where a disclosure of information in the public interest is made in a manner consistent with this Procedure, the disclosure and the informant will be afforded protections in accordance with the applicable legislation (being either the *PID Act 2018* or the *Corporations Act 2001*).
11. The Responsible Officer will determine and support the protection needs of the informant, which may include:
 - 11.1. Advising the individual of the legislative and administrative protections available to the individual.
 - 11.2. Listening and responding to any concerns regarding making a disclosure.
 - 11.3. Ensuring all information remains confidential in relation to the informants' concerns and identity unless consent to disclose has been provided.
 - 11.4. Maintaining their support throughout the investigation and ensuring expectations of the process and outcomes are reasonable and clearly explained.
 - 11.5. Accurate record keeping of all aspects of the case management process, including all follow-up action.

C. Complaints

12. There is no place for any activity that is, or could be perceived as, victimisation or harassment of a person they know or suspect to have made, or intends to make a disclosure under this Policy.
13. Complaints about a breach of confidentiality or victimisation regarding a disclosure of reportable conduct, may be reported to the Independent Whistleblower Service Provider, or directed to the Responsible Officer.
14. Complaints of breaches will be investigated by the University in accordance with the relevant industrial instrument, University policies and procedures.

Related Documentation:

- > [Public Interest Disclosures \(Whistleblowing\) Policy](#)
- > [Corporations Act 2001 \(Cth\)](#)
- > [Public Interest Disclosure Act 2018 \(SA\)](#)
- > [Addressing Workplace Concerns](#)
- > [Independent Commission Against Corruption \(ICAC\) Act 2012](#)

Officer Responsible for Update and Review: Head: Risk and Assurance Services

Approving Authority: Council

Commencement Date: 2 May 2024

Review Date: 2 May 2027