

QMS-PRO-08

PROTECTED DISCLOSURE



1. PURPOSE

The purpose of this procedure is to establish clear processes and accountabilities for the disclosure of improper conduct or detrimental action.

2. SCOPE

The Melbourne Market Authority (MMA) is a public body within the meaning given to those words in the *Protected Disclosure Act 2012* (“the Act”). MMA Employees, including Board members, managers, general staff and contractors, are “public officers” for the purposes of the Act.

This document complies with the requirements of the Act and with the *Protected Disclosure Regulations 2013 (Vic)* (‘the Regulations’).

It further complies with the *Independent Broad-based Anti-corruption Commission Act 2011 (Vic)* (‘the IBAC Act’), which sets out the powers of IBAC. This document also complies with guidelines issued by IBAC under the Act (‘the IBAC guidelines’).

This document is consistent with the *Code of Conduct for Victorian Public Sector Employees* (‘the Code of Conduct’), which provides guidance on the general standards of ethical conduct expected of Employees in the Victorian Public Service (VPS). The Code of Conduct requires that MMA officers and Employees:

- make decisions and provide advice on merit without bias, caprice, favouritism or self-interest;
- seek to achieve the best use of resources; and
- report improper conduct and unethical behaviour.

This document is available to the public, as required by section 59(4) of the Act.

3. DEFINITIONS

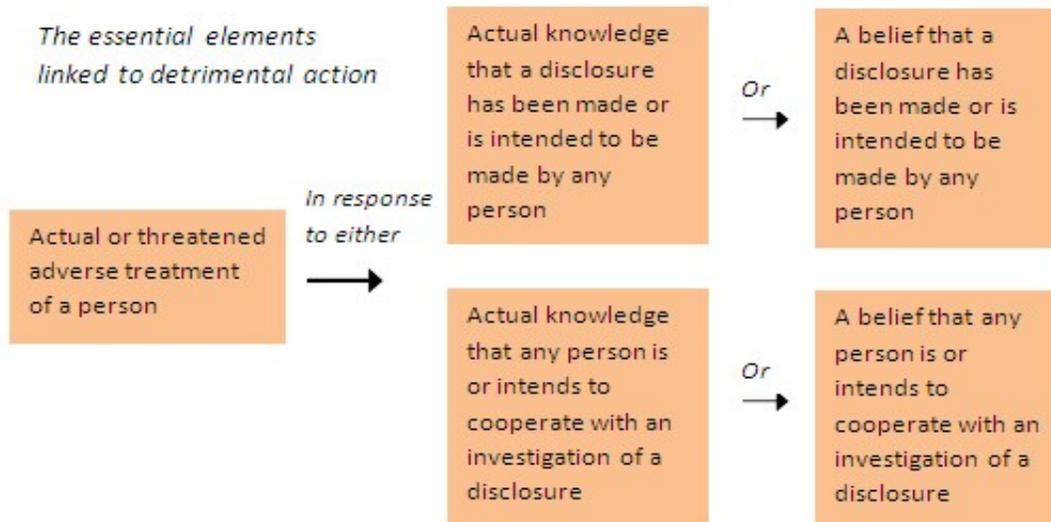
Assessable disclosure refers to a disclosure that has been considered by MMA and determined to meet the requirements of a protected disclosure and, as such, requires notification to IBAC.

Detrimental action refers to action taken, or threatened, against another person in reprisal for someone making a protected disclosure. The detrimental action need not be taken against the person making the disclosure, but against any person and can include inciting someone else to take the action.

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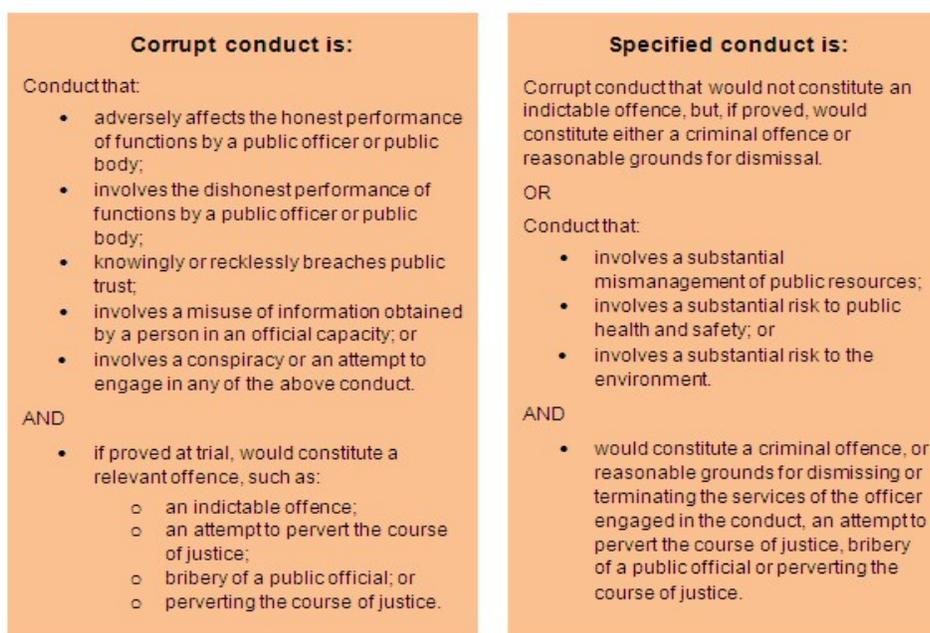


Detrimental action is **not** legitimate management action where there are good and sufficient grounds that would justify the action against any other person in the same circumstances.

The Act makes it a punishable offence for a person to take detrimental action, which is defined as:

- action causing injury, loss or damage;
- intimidation or harassment; or
- discrimination, disadvantage or adverse treatment in relation to a person’s employment, career, profession, trade or business, including taking inappropriate or unwarranted disciplinary action.

Improper conduct refers to corrupt conduct or specified conduct.



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Protected disclosure refers to a report made by a natural person or group of people about past, present or proposed improper conduct by MMA or an Employee. A disclosure can also be made about detrimental action taken against a person by MMA or an Employee in reprisal for a disclosure.

For a disclosure to be a protected disclosure it must be made in accordance with the requirements of Part 2 of the Act and in accordance with the procedures set out in section 9 of the Regulations.

A complaint or allegation that is already in the public domain will not normally be a protected disclosure. The term disclosure is interpreted under the Act in the ordinary sense of the word as a revelation to the person receiving it.

4. PROCEDURE

MMA recognises the value of transparency and accountability in its administrative and management practices and supports the disclosure of improper conduct or detrimental action. MMA will appropriately protect people who notify MMA about improper conduct or detrimental action within MMA and will manage their disclosures confidentially.

MMA does not tolerate improper conduct by its staff members, nor the taking of reprisals against those who come forward to disclose such conduct. Any victimisation of, or reprisal against, another person connected with or involved in a protected disclosure matter may lead to disciplinary action.

MMA will comply with the Act and the corresponding Regulations and IBAC guidelines.

The Act has three key purposes:

- To encourage and assist people to make a disclosure of improper conduct and detrimental action by public officers and public bodies.
- To provide certain protections for people who make a disclosure, or those who may suffer detrimental action in reprisal for a disclosure.
- To provide for the confidentiality of the content of a disclosure and the identity of a person making a disclosure.

These procedures, required by law, establish a system for reporting disclosures of improper conduct or detrimental action by MMA or its Employees or Board members. MMA has nominated a General Counsel as the Protected Disclosure Coordinator who is responsible for assessing if disclosures made to MMA are assessable disclosures and for managing the welfare of people involved in protected disclosures.

In compliance with the IBAC guidelines, MMA will:

- identify people who can receive disclosures
- provide a secure process for receiving verbal or written disclosures
- provide education and training for the Protected Disclosure Coordinator and their alternate in the receipt, handling, assessing and notifying of protected disclosures, and welfare management of people associated with a disclosure
- advise those who are able to accept a disclosure of the process for accepting disclosures and referring them to the Protected Disclosure Coordinator

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- develop secure information management systems for the receipt, storage, assessment and notification of protected disclosures, including an internal reporting structure and identification of the roles and responsibilities of those in the reporting structure
- develop a secure means of notifying IBAC of assessable disclosures
- publish the number of assessable disclosures notified to IBAC in the Department's annual report.

MMA is committed to promoting this policy and procedures, along with the Act, Regulations and IBAC guidelines, to all Employees, and to encouraging a workplace culture that supports the making of protected disclosures.

4.1. Protected Disclosure Act 2012

The Protected Disclosure Act 2012 (Vic) ('the Act') came into effect on 10 February 2013, replacing the whistleblowers Protection Act 2001 (Vic) and amending the Ombudsman Act 1973 (Vic). The Act facilitates disclosures of improper conduct and detrimental action by public officers and public bodies and establishes a system for investigating matters.

Whistle blower protection has been integrated into the new Victorian integrity system, which comprises the Independent Broad-based Anti-corruption Commission (IBAC), a body established to promote integrity and accountability across the Victorian public sector, the Victorian Inspectorate (VI), whose role is to oversee both IBAC and the Victorian Ombudsman, and the new Accountability and Oversight Parliamentary Committee.

4.2. Offences under the *Protected Disclosure Act*

The Act sets out a number of offences relating to breaches of the requirements of the Act. These offences can be punished monetarily, by a term of imprisonment or both.

Key offences to be aware of include:

- it is an offence for a person to take detrimental action against another person in reprisal for a protected disclosure
- it is an offence for a person to disclose the content, or information about the content, of a disclosure that has been notified to IBAC, or to disclose information likely to lead to the identification of the person who made the disclosure
- it is an offence for a person to make a false disclosure, with the intent it be acted on as a disclosed matter, or to knowingly provide further
- information that is false or misleading about a protected disclosure they have made
- it is an offence for a person to disclose that a disclosure has been notified to IBAC for assessment, or to disclose that IBAC has determined a disclosure to be a protected disclosure complaint, unless permitted to do so by the Act

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- it is an offence to falsely claim that a matter is the subject of disclosure that IBAC has determined to be a protected disclosure complaint. It is vital that anyone making a protected disclosure or receiving information about a protected disclosure familiarises themselves with the specific offences and penalties involved. These can be found in summary form in QMS-PRO-08.2 Penalties under the Protected Disclosure Act.

4.3. Who can make a disclosure?

Any person can make a disclosure about improper conduct engaged in, or detrimental action taken by, MMA or one of its Employees. Therefore, you may make a disclosure if you are a member of the public or an Employee of MMA.

A disclosure may be made by an individual or a group of individuals. A company or business cannot make a disclosure.

When making a disclosure, you do not need to specifically refer to the Act, or the protections under the Act, for your disclosure to be a protected disclosure.

You may ask someone else to make a disclosure on your behalf. However, if someone makes a disclosure on your behalf, only they will receive the full protection of the Act in relation to that disclosure. Your protection will be limited to confidentiality and protection against detrimental action taken against you in reprisal for the disclosure.

4.4. Who do I make a disclosure to?

The Act only allows certain people and entities to receive disclosures and their ability to receive disclosures depends upon whom the disclosure is made about. As such, MMA may only receive disclosures about MMA or its Employees.

If your disclosure is made to a person or entity that is unable to receive your disclosure, it will not be a protected disclosure and you will not be protected under the Act. Therefore it is important to determine if you are making your disclosure to the correct person or body.

If in doubt, disclosures should be made to IBAC, unless the disclosure is about IBAC or one of its officers, in which case it should be made to the Victorian Inspectorate.

4.4.1. Disclosures about the MMA and its Employees

If your disclosure concerns MMA or one of its Employees, you may make your disclosure to one of the internal contacts listed below or directly to IBAC.

Internal contacts

Within MMA, disclosures may be made to:

- the Protected Disclosure Coordinator or their alternate
- the Chief Executive Officer
- your manager or supervisor, if you are an Employee of the MMA
- the manager or supervisor of the person who is the subject of your disclosure.

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The Protected Disclosure Coordinator is authorised to manage disclosures made to MMA about improper conduct or detrimental action by MMA or its Employees, and will ultimately receive all disclosures for assessment, regardless of whom they are made to initially. As such, the Protected Disclosure Coordinator is the recommended person to whom disclosures should be made:

*Protected Disclosure Coordinator
MMA General Counsel
55 Produce Drive
Epping, Melbourne, Victoria, 3076
Phone: (+61 3) 9258 6143*

If the Protected Disclosure Coordinator is unavailable, the alternate will take on their functions:

*Protected Disclosure Coordinator
Business/Commercial Manager
55 Produce Drive
Epping, Melbourne, Victoria, 3076
Phone: (+61 3) 9258 6105*

External contact

A disclosure about improper conduct or detrimental action by the Department or its staff members may also be made directly to IBAC:

*The Independent Broad-based Anti-corruption Commission (IBAC) Victoria
Level 1, North Tower, 459 Collins Street,
Melbourne, VIC 3000
Phone: 1300 735 135
Mail: IBAC, GPO Box 24234, Melbourne, VIC 3001
Internet: www.ibac.vic.gov.au*

Email: see the website above for the secure email disclosure process, which also provides for anonymous disclosures

4.5. How do I make a disclosure?

Your disclosure must be made in private to someone who is listed above (in 4.4) as able to receive a disclosure. You may make a protected disclosure verbally (in person, by phone or by leaving a voicemail message) or in writing (by post, personal delivery or email). You may not make a disclosure to MMA by fax, as this is not a suitably private or secure means of communication.

You may make your disclosure anonymously, however this may impact upon the ability to investigate the disclosure and you will not be notified of the outcome of any investigation.

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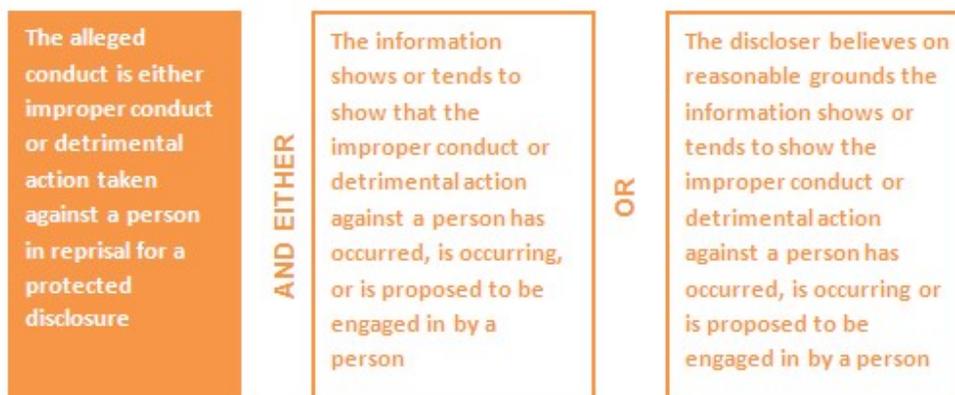
Where you are contemplating making a disclosure and are concerned about approaching someone who is able to receive disclosures in the workplace, you can request a meeting in a discreet location away from the workplace.

4.6. What can I make a disclosure about?

Your disclosure must be about the conduct of MMA or its Employees in their capacity as a public body or public officer. Therefore, there must be a link between the alleged improper conduct and/or detrimental action and the person or body's functions as a public officer or public body.

The conduct may be improper conduct or detrimental action, as defined in this document in **Error! Reference source not found.**

The following diagram clarifies the information required to support a disclosure:



As stated in the above diagram, you may make a disclosure if you believe (as opposed to know) on reasonable grounds that improper conduct or detrimental action has occurred, is occurring or is likely to occur. However, this requires you to have information that would lead a reasonable person to believe that the information shows, or tends to show, improper conduct or detrimental action.

4.7. What will happen after I make a disclosure?

Please note the following relates to disclosures made directly to MMA. Disclosures made directly to IBAC will be handled in accordance with IBAC's guidelines and procedures.

4.7.1. Receipt of disclosure

Where a disclosure is made to anyone other than the Protected Disclosure Coordinator, they will be responsible only for receiving and promptly referring the disclosure and any supporting evidence to the Protected Disclosure Coordinator. They should inform you at the time you make your disclosure that it will be referred to the Protected Disclosure Coordinator for assessment. They must ensure confidentiality is maintained in the referral process.

4.7.2. Acknowledgement of disclosure

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The receipt of your disclosure to MMA will be acknowledged by the Protected Disclosure Coordinator, or their alternate, verbally or in writing (if a postal or email address is known). You will be advised of the key steps in the process of handling your disclosure, including the timeframes involved.

4.7.3. Assessment of disclosure

Following the acknowledgement of your disclosure, the Protected Disclosure Coordinator, or their alternate, will assess if your disclosure meets the requirements of the Act and is an assessable disclosure.

Notification when a disclosure is considered an assessable disclosure

Where your disclosure is determined to meet the requirements of the Act, the Protected Disclosure Coordinator will notify you in writing within 28 days after your disclosure was made that:

- IBAC has been notified; and
- it is an offence under section 74 of the Act to disclose that the disclosure has been notified to IBAC.

Notification when a disclosure is not considered an assessable disclosure

Where the Protected Disclosure Coordinator does not consider your disclosure to be a protected disclosure, the matter does not need to be dealt with under the Act. You will be notified within 28 days after your disclosure was made that:

- MMA does not consider the disclosure to be a protected disclosure matter;
- IBAC has not been notified of the disclosure; and
- the protections provided under Part 6 of the Act still apply.

Should this determination be made, you may request that MMA deal with your disclosure as a complaint under QMS-PRO-07 Customer Feedback and Improvement Reporting Procedure.

4.7.4. Notification to IBAC

Where your disclosure has been determined to be an assessable disclosure, the Protected Disclosure Coordinator will notify IBAC in writing within 28 days after your disclosure was made.

4.7.5. Assessment of your disclosure by IBAC

Once IBAC is notified, it must assess whether, in its view, your disclosure is a protected disclosure. Additional information from you and/or MMA may be sought to make this determination.

If IBAC determines your disclosure is a protected disclosure, it becomes a protected disclosure complaint and IBAC must determine which actions to take.

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Actions open to IBAC

Under section 58 of the IBAC Act, IBAC may dismiss, investigate or refer a matter to the Victorian Inspectorate or the Ombudsman. There is no power for IBAC to refer a protected disclosure complaint back to MMA for investigation.

IBAC will provide you with a written statement of advice, which must include a copy of certain sections and Parts of the Act, along with an explanation of the effect of those sections and Parts. The prescribed sections and Parts are:

- section 72 – Offence to make false disclosure or provide further false information;
- section 74 – Offence to disclose certain advice;
- Part 6 – Protection of person making protected disclosure; and
- Part 7 – Confidentiality of disclosures.
- Once a disclosure has been declared a protected disclosure complaint by IBAC, section 55(4) of the IBAC Act states that you cannot withdraw it. However, IBAC has discretion, under section 68(2)(e) of the IBAC Act, to dismiss a protected disclosure complaint if you request that it not be investigated.

Where IBAC determines your complaint is not a protected disclosure

If IBAC determines your disclosure is not a protected disclosure complaint, IBAC must notify you in writing, within a reasonable time that:

- IBAC has determined your disclosure is not a protected disclosure complaint;
- the disclosure will not be investigated as a protected disclosure complaint; and
- the confidentiality provisions under Part 7 of the Act no longer apply in relation to the disclosure.

IBAC will also notify MMA of its determination.

Regardless of whether IBAC determines your disclosure is a protected disclosure or not, you will still receive the protections under the Act. This includes protection from detrimental action taken in reprisal for you making the disclosure.

IBAC may also advise you that you may wish to refer your disclosure back to the MMA to be dealt with as a complaint under the QMS-PRO-07 Customer Feedback and Improvement Reporting Procedure.

4.7.6. When urgent action is required while an assessment is being made

In some circumstances a disclosure may be about actions that pose an immediate threat to the health and safety of individuals, the need to preserve property, or may consist of allegations of serious criminal conduct.

In these cases, MMA can take immediate action while considering whether or not your disclosure is an assessable disclosure requiring notification to IBAC or while waiting on IBAC's decision on a matter.

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It may be necessary to report criminal conduct to Victoria Police for immediate investigation or to take management action against an Employee to prevent future conduct.

4.8. What protections will I receive?

Certain protections are provided to disclosers under Part 6 of the Act. These protections apply from the time your disclosure is made, whether to MMA or directly to IBAC. They also apply regardless of whether or not the MMA notifies your disclosure to IBAC or whether or not IBAC or the Victorian Inspectorate determines your disclosure to be a protected disclosure complaint.

These protections include:

- immunity from any civil or criminal liability or administrative action (including disciplinary action) for making the disclosure (section 39 of the Act)
- immunity from committing an offence against the *Constitution Act 1975* or any other Act that imposes obligations of confidentiality or any other restriction on the disclosure of information (section 40 of the Act)
- immunity from breaching any other obligation (made by oath, rule of law or practice) requiring the maintenance of confidentiality or otherwise restricting confidentiality (section 40 of the Act)
- you cannot be held liable for defamation in relation to information included in a protected disclosure (section 41 of the Act).

However, as stated in section 4.3 of this document, you will not receive these protections if someone else made the disclosure on your behalf. Instead, these protections apply to them.

These protections do not apply if you make a false disclosure or knowingly provide false information and you may face appropriate disciplinary action for a false disclosure. Further, you are not protected against legitimate management action and will still be held liable, where appropriate, for your own conduct disclosed as part of the protected disclosure.

In addition to the above protections, MMA recognises that the welfare and protection against detrimental action of people making genuine protected disclosures is essential for the effective implementation of the Act.

4.9. Welfare Management

MMA is committed to the protection of people making genuine protected disclosures and to protect the welfare of people who have cooperated or intend to cooperate with an investigation of a protected disclosure complaint, including members of the public who may be clients or users of MMA's property or services. As an employer, MMA has legislative and administrative obligations to ensure the health and wellbeing of staff members.

On a case by case basis, MMA will consider the appointment of a welfare manager for any person making a protected disclosure, following due consideration of any risks faced by either an internal or external discloser. MMA will also consider the welfare needs of people who may be involved in the investigation, such as witnesses or anyone about whom a disclosure is made.

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In most circumstances, a welfare manager will only be required where a protected disclosure complaint proceeds to investigation and there is concern regarding the likelihood of detrimental action being taken, but each case will be assessed on its merits.

4.10. Commitment to protection against detrimental action

MMA will inform all staff members that it is a criminal offence to take detrimental action in reprisal for a protected disclosure and that detrimental action itself can be grounds for a disclosure under the Act.

As noted earlier in this document, the detrimental action need not be taken against the person who made a disclosure, but against any person and can include inciting someone else to take the action.

4.10.1. Occurrence of detrimental action

If you experience an incident of harassment, discrimination or adverse treatment that would amount to detrimental action apparently taken in reprisal for the making of a protected disclosure, you should report this to the Protected Disclosure Coordinator, who will:

- record details of the incident;
- advise you of your rights under the Act; and
- where the detrimental action is of a serious nature likely to amount to a criminal offence, consideration will be given to reporting the matter to the police.

The Protected Disclosure Coordinator will assess the report as a new disclosure under the Act. If satisfied it is an assessable disclosure, they will notify IBAC and inform you of this notification. If not, you will be informed that your disclosure has not been notified to IBAC and you may request it be dealt with as a complaint under MMA's QMS-PRO-07 Customer Feedback and Improvement Reporting Procedure.

4.10.2. Transfer of staff members

If you are a staff member of MMA who has made a disclosure, and you believe on reasonable grounds that detrimental action is being taken against you in reprisal for a disclosure, you may request a transfer of employment under section 51 of the Act.

If granted, you may be transferred internally to another part of MMA or to a public service body or public entity on similar terms and conditions of employment. This will only happen if you request or consent to a transfer and the following conditions must be satisfied:

- the Chief Executive Officer of MMA has reasonable grounds to suspect detrimental action will be, is being, or has been taken against the staff member
- the Chief Executive Officer of MMA considers that the transfer will avoid, reduce or eliminate the risk of detrimental action
- if transfer to another public entity or a public service body is proposed, the head of that public entity or public service entity consents to the transfer.

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The transfer can be temporary or permanent and, if you are moved to another public body, your service in the new body is regarded as continuous with your pre-transfer service.

4.11. What if I am implicated in the conduct I disclose?

If you are implicated in improper conduct you disclose, you are not protected from any reasonable consequences flowing from your actions. You will still be held liable for your own involvement, as making a disclosure does not give you immunity for your own wrongdoing.

Where disciplinary or other action, such as performance management, relates to conduct that is the subject of your disclosure, the disciplinary or other action will only be taken after the disclosed matter has been appropriately dealt with (provided urgent action, as stipulated in 4.7.6, is not required).

In all cases where disciplinary action is being contemplated, the Chief Executive Officer must be able to clearly demonstrate that:

- the fact a person has made a protected disclosure is not a substantial reason for their taking of the action against the Employee
- there are good and sufficient grounds that would fully justify action against any other person in the same circumstances
- there are good and sufficient grounds that justify exercising any discretion to institute disciplinary action.

While MMA policy normally requires disciplinary action to be determined by a manager, in circumstances involving a protected disclosure matter, the Chief Executive Officer will pursue the matter due to the need to limit those who know about the disclosure.

In the event of disciplinary action, the Protected Disclosure Coordinator will thoroughly document the process, including recording the reasons why the action is being taken, and the reasons why the action is not retribution for making the disclosure. The Protected Disclosure Coordinator will ensure all factors, including any mitigating circumstances, are taken into consideration and will clearly advise you of the proposed action to be taken, and that mitigating circumstances may be considered.

4.12. What happens if a disclosure is made against me?

MMA recognises that Employees against whom disclosures are made must also be supported and that the complaint is only an allegation until resolved.

If you are the subject of a disclosure that MMA is aware about, it will take all reasonable steps to ensure your confidentiality during the assessment and investigation process. If you are made aware that a disclosure has been made about you, MMA may provide you with welfare support, as your circumstances require.

It is possible you may never be told you are the subject of a disclosure; for example, if the disclosure is not determined to be a protected disclosure complaint, if the disclosure is dismissed or if MMA is not authorised to tell you,

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due to the limitations in the Act on disclosing the content of a protected disclosure.

MMA may give you information about a disclosure made about you if directed or authorised to do so by IBAC, or for the purpose of taking action with respect to the alleged conduct, including disciplinary action. IBAC or another investigating entity may also inform you of an investigation, for the purpose of conducting that investigation or any actions they propose to take as a result.

If you are the subject of a disclosure, you must be afforded natural justice prior to a decision being made about your conduct. Natural justice means if a decision is to be made about your conduct, you have a right to:

- be informed about the substance of the allegations against you
- be given an opportunity to answer the allegations before a final decision is made
- be informed about the substance of any adverse comment that may be included in any report arising from an investigation
- have your defence set out fairly in any report.

The responsibility for this consultation process will fall to the investigating entity that is carrying out the investigation, whether IBAC, the Victorian Inspectorate, Victoria Police or the Victorian Ombudsman.

Where a disclosure about you is not pursued due to lack of substance or where the allegations are investigated and found to be wrong or unsubstantiated, MMA will ensure there are no adverse consequences arising out of the disclosure or investigation. The fact that a disclosure has been made, the results of an investigation (when one is undertaken) and your identity will remain confidential. However, if a matter has been publicly disclosed or the information pertaining to a disclosure has become well-known across MMA or the area where you work, the Chief Executive Officer will consider any request from you to issue a statement of support setting out that the matter was not pursued or the allegations were clearly wrong or unsubstantiated.

4.13. Confidentiality

There are a number of confidentiality obligations which arise under the Act and other laws relating to the receipt and investigation of protected disclosures.

If you repeat your disclosure to someone who is not provided for in these procedures, or permitted in the Act, you may lose the protections provided for under the Act. If you are considering disclosing information about your disclosure, you may wish to speak to the Protected Disclosure Coordinator, The Business/Commercial Manager and/or obtain legal advice first.

The Act prohibits the disclosure of information received in relation to a disclosure that has been notified to IBAC by MMA, except in certain limited circumstances.

MMA will only disclose information about you or your disclosure in accordance with the law, including the Act. The Act prohibits disclosing information that is likely to lead to your identification, unless permitted to do so in accordance with the Act.

IBAC or the relevant investigating entity may disclose your identity and the content of your disclosure if it is necessary for the purposes of their investigative action. In such circumstances,

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the public body or public officer to whom the information is disclosed is bound by the same confidentiality requirements.

MMA will ensure all files related to protected disclosures are secure and only accessible by the Protected Disclosure Coordinator and their alternate. All printed material will be kept in files clearly marked as Protected Disclosure Act matter and warn of the criminal penalties that apply to any unauthorised divulging of information concerning a protected disclosure. All electronic files will be stored in SharePoint in a secure designated directory, accessible only by the Protected Disclosure Coordinator and their alternate. All materials relevant to an investigation by IBAC or another investigating entity will be stored securely with the protected disclosure files.

5. SUPPORT, ADVICE & OTHER REFERENCES

- Information Privacy Act 2000
- Public Administration Act 2004
- Protected Disclosure Act 2012
- Protected Disclosure Regulations 2013
- Independent Broad-based Anti-corruption Commission Act 2011
- IBAC Guidelines for making and handling protected disclosures
- IBAC Guidelines for protected disclosure welfare management
- Code of Conduct for Victorian Public Sector Employees (2007)
- Equal employment opportunity guidelines
- Fair and reasonable treatment guidelines
- Reasonable avenues of redress guidelines

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QMS-PRO-08

PROTECTED DISCLOSURE



6. RELATED DOCUMENTS

6.1. Attachments

QMS-PRO-08.1 Protected Disclosure Flowchart

6.2. Related Documents

QMS-POL-06 Privacy Policy

QMS-PRO-03 Record Management

QMS-PRO-07 Customer Feedback and Improvement Reporting Procedure

QMS-PRO-20 Gifts, Benefits and Hospitality Policy

7. AUDIT REFERENCES

7.1 ISO9001

Record	Retention	Location	Archived	Disposed
Disclosure Records	1 Year	Hard Copy	1 Year	30 Years