

## Public Interest Disclosure Policy and Procedures

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## 1. Purpose

A public interest disclosure is a disclosure that relates to improper conduct (including corrupt conduct) or detrimental action by a public officer or a public body.

If a public interest disclosure is assessed by the [Independent Broad-based Anti-corruption Commission](#) (IBAC) as meeting the requirements for a 'public interest complaint' a discloser's identity will be protected, and the discloser may also be entitled to certain legal immunities that would otherwise not apply to them.

Fire Rescue Victoria (FRV) encourages employees and members of the public to report known or suspected incidences of improper conduct, or detrimental action.

The purpose of this policy and procedures is to document FRV's requirements and procedures for making disclosures of improper conduct or detrimental action directly to IBAC – FRV is not an organisation authorised to receive and investigate public interest disclosures.

The policy and procedures have been prepared in accordance with the [Public Interest Disclosure Act 2012](#) (the PID Act) and the guidelines of IBAC made under section 57 of the [Independent Broad-based Anti-corruption Commission Act 2011](#) (IBAC Act).

The policy and procedures are published on FRV's intranet on both the FRV Doctrine site and the Compliance and Integrity site, as well as FRV's public facing website.

## 2. Scope and Application

The policy and procedures apply to all workplace participants (collectively referred to as 'employees' throughout this document).

For the purposes of the policy and procedures 'employees' include the Fire Rescue Commissioner, Deputy Fire Rescue Commissioners and Deputy Secretary Corporate Regulations and Strategic Services, all employees including secondees, contractors, consultants and any individuals or groups undertaking activity for or on behalf of FRV.

To make a public interest disclosure, you must contact [IBAC](#). FRV is not an organisation authorised to receive and investigate a public interest disclosure. An employee or member of the public seeking information about making a public interest disclosure can contact [IBAC](#) or FRV's [Public Interest Disclosure Coordinator](#) (a function assigned to the role of FRV's Manager, Governance and Compliance).

A public interest disclosure is a disclosure by any individual about:

- Improper conduct (such as corrupt or criminal conduct) of FRV or its employees (or another public body or public officers); and/or

- Detrimental action by FRV or its employees (or by another public body or public officers) against a person in reprisal for them (or another person) having made a public interest disclosure or cooperated with the investigation of a public interest disclosure.

A disclosure can relate to conduct or action that:

- May have already taken place;
- May be occurring now;
- Or may happen in the future.

### 3. Definitions

#### 3.1 Corrupt Conduct (IBAC Act, s 4)

**Corrupt conduct means conduct –**

- Of any person that adversely affects the honest performance by a public officer or public body of their official functions.
- Of a public officer that:
  - a) Constitutes or involves a dishonest performance of their official functions;
  - b) Constitutes or involves knowingly or recklessly breaching public trust; or
  - c) Involves misuse of information or material that was obtained in their official capacity.
- Intended to adversely affect the effective performance of a public officer or public body which leads to a benefit as described in the Act:
- That could constitute a conspiracy or attempt to engage in any of the above conduct.

#### 3.2 Detrimental Action (PID Act, s 3)

**Detrimental action may include –**

- Action causing injury, loss or damage.
- Intimidation or harassment.
- Discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including taking disciplinary action.

#### ***Examples of detrimental action***

A public body demotes, transfers, isolates in the workplace or changes the duties of a person who has made a disclosure due to the making of the disclosure.

A public officer threatens, abuses or carries out other forms of harassment directly or indirectly against the person who makes a disclosure and their family or friends.

A public body discriminates against the person who makes a disclosure or their family and associates in subsequent applications for jobs, permits or tenders.

### 3.3 Discloser

- A person who makes a disclosure of improper conduct or detrimental action.

### 3.4 Employee

- Includes the Fire Rescue Commissioner, Deputy Fire Rescue Commissioners and Deputy Secretary Corporate Regulations and Strategic Services, all employees including secondees, contractors, consultants and any individuals or groups undertaking activity for or on behalf of FRV.

### 3.5 IBAC

- The Independent Broad-based Anti-corruption Commission, established under the IBAC Act.

### 3.6 IBAC Act

- [Independent Broad-based Anti-corruption Commission Act 2011](#)

### 3.7 Improper conduct

**Improper Conduct is defined to include –**

- Corrupt conduct (within the meaning of the IBAC Act, s 4, referred to above).
- Any of the following conduct by a public officer or public body in their capacity as a public officer or public body:
  - A criminal offence or serious professional misconduct or intentional or reckless breach of public trust.
  - Intentional or reckless misuse of information acquired in the performance of their official capacity.
  - Substantial mismanagement of public resources.
  - Substantial risk to the health or safety of a person or persons.
  - Substantial risk to the environment; and/or
- **Conduct of any person that:**
  - Adversely affects the honest performance by a public officer of their functions.
  - Is intended to adversely affect the effective performance by a public officer of their functions for the benefit of the person engaging in the conduct.

#### ***Examples of improper conduct***

A public officer takes a bribe or receives a payment other than their wages in exchange for the discharge of a public duty.

A public officer sells confidential information (either for money, favours, or another reason).

A public officer favours unmeritorious applications for jobs by friends and relatives.

### 3.8 Investigating entity

- IBAC, the Victorian Ombudsman, the Chief Commissioner of Police and the Victorian Inspectorate. Only these entities can investigate a public interest complaint.

### 3.9 PID Act

- [Public Interest Disclosures Act 2012](#)

### 3.10 Public interest disclosure coordinator

- FRV's public interest disclosure coordinator is FRV's Manager, Governance and Compliance. The Public Interest Disclosure Coordinator has the roles and responsibilities set out in the table in section 4 below.

### 3.11 Public body

- A public body is defined in the PID Act, s 6 IBAC Acts, s 6 as:
  - A public sector body within the meaning of s 4(1) of the *Public Administration Act 2004*;
  - A body, whether corporate or unincorporated, established by or under an act for a public purpose, including a university;
  - The electoral boundaries commission constituted under the *Electoral Boundaries Commission Act 1982*;
  - A council;
  - A body that is performing a public function on behalf of the state or a public body or public officer;
  - IBAC;
  - The Victorian Inspectorate;
  - Any other body or entity prescribed for the purposes of this definition.

### 3.12 Public officer

- A public officer is defined in the PID act, s 6, IBAC Act, s 6 and includes:
  - A person employed in any capacity or holding any office in the public sector within the meaning of section 4(1) of the *Public Administration Act*.

### 3.13 Ombudsman

- Victorian Ombudsman

## 4. Responsibilities

All employees must become familiar with the policy and procedures and report known or suspected incidents of improper conduct or detrimental action directly to IBAC.

FRV has assigned a [Public Interest Disclosure Coordinator](#) to be a contact point for general information about public interest disclosures (a function of the role of FRV’s Manager, Governance and Compliance).

Person	Roles and Responsibilities
<b>Employees</b>	<p>Become familiar with the policy and procedures as they are published by FRV.</p> <p>Report known or suspected incidents of improper conduct or detrimental action directly to IBAC (refer to Section 5.2 below for contact details). Maintain the confidentiality of information about a disclosure that they become aware of exists.</p> <p>For general information about public interest disclosures, speak with FRV’s <a href="#">Public Interest Disclosure Coordinator</a>.</p>
<b>Public Interest Disclosure Coordinator</b>	<p>FRV’s <a href="#">Public Interest Disclosure Coordinator</a> is the Manager, Governance and Compliance, who will:</p> <ul style="list-style-type: none"> <li>▪ Give general information about the making of disclosures;</li> <li>▪ Notify IBAC of potential public interest disclosures;</li> <li>▪ Assist IBAC and/or the Victorian Ombudsman with public interest complaint enquiries and investigations upon request;</li> <li>▪ Support the welfare of disclosers and others involved in investigations;</li> <li>▪ Ensure employees are aware of the public interest disclosure legislation; and</li> <li>▪ Ensure procedures are reviewed regularly.</li> </ul> <p><i>Note: FRV and FRV’s <a href="#">Public Interest Disclosure Coordinator</a> are not authorised to receive public interest disclosures.</i></p>
<b>Fire Rescue Commissioner</b>	<p>Ensure the policy and procedures are readily available to the public and FRV employees.</p> <p>Ensure a safe working environment.</p> <p>Make mandatory notifications to IBAC.</p> <p>Report on how individuals access FRV’s the procedures in its Annual Report (Part 9 of the PID Act).</p>

## 5. Policy Principles and Procedures

### 5.1 Making and receiving public interest disclosures at FRV

The PID Act only permits specific people and entities to receive public interest disclosures. FRV cannot receive public interest disclosures, they must be directly reported to [IBAC](#) or in some cases the [Ombudsman](#).

Some key points about making a disclosure are:

- a) Only an individual or a group of individuals can make a disclosure. A company or business cannot (although its employees can).
- b) A person can ask someone else to make a disclosure on their behalf. However, only the person who made the disclosure themselves will receive the full protection of the PID Act.
- c) It is not necessary for a person making a disclosure to refer to the PID Act or to say that they want their disclosure to be a public interest disclosure for it to be treated as a disclosure under the Act and have the protections under the Act.
- d) A person making a disclosure can say they do not want the disclosure to be treated as a public interest disclosure, but they must do so in writing within 28 days of making the disclosure.
- e) A disclosure may be a public interest disclosure even if it is a complaint, notification or disclosure etc. made under another Act.
- f) A disclosure can be made anonymously, but a person who makes an anonymous disclosure will not be notified of the outcome of their disclosure.

## 5.2 Procedure for making a public interest disclosure

The PID Act requires that a public interest disclosure be made in particular ways. If a public interest disclosure is made in the wrong way, it will not be given the protections available under the PID Act.

In order for a public interest disclosure to get the protections available under the PID Act, it must be made in accordance with these procedures as follows:

- A disclosure may be made orally or in writing (letter or email) directly to IBAC. You may not make a public interest disclosure by fax.
- A public interest disclosure must be made in private, so it is important that only the person to whom you are making the disclosure can hear or receive your disclosure. For example, if you make your disclosure by email, your disclosure should be sent only to the email address of the person to whom you are making the disclosure, rather than a group email. You are not precluded from making a joint simultaneous disclosure with a group of individuals.
- If you are making your disclosure orally, the person receiving your disclosure may take notes of your discussion. The person receiving your disclosure may also want to record the conversation but can only do so with your prior permission. You do not have to identify yourself when making a disclosure.
- If your disclosure is anonymous, this may affect how the disclosure is investigated and you will not be notified of the outcome of any investigation. This will also affect IBAC's ability to protect the discloser from adverse measures if the discloser's identity becomes known. If you cannot be identified from the disclosure, the disclosure will be treated as an anonymous disclosure.

Public interest disclosures must be directly reported to [IBAC](#) or in some cases the Ombudsman who investigates disclosures on behalf of IBAC (FRV cannot receive public interest disclosures). Contact details for IBAC and the Ombudsman are set out below:

### Independent Broad-based Anti-Corruption Commission

IBAC  
Assessment and Review Unit  
GPO Box 24234 MELBOURNE  
VIC 3001  
Email: [submit@ibac.vic.gov.au](mailto:submit@ibac.vic.gov.au)  
Telephone: 1300 735 135  
Website / Make a report: [www.ibac.vic.gov.au](http://www.ibac.vic.gov.au)

### Victorian Ombudsman

Victorian Ombudsman  
Level 9, North Tower  
2/570 Bourke Street MELBOURNE, VIC 3000  
Telephone: (03) 9613 6222 / 1800 806 314 (Regional Only)  
Website: <https://www.ombudsman.vic.gov.au>



### 5.3 What happens after a disclosure is made?

Disclosures made to IBAC or the Ombudsman will be handled in accordance with IBAC's guidelines and processes.

Any disclosures inadvertently received by FRV will be acknowledged orally or in writing (if a postal or email address is known) and IBAC will be notified.

#### **Assessment by IBAC**

IBAC is responsible for identifying, investigating, exposing and preventing serious corrupt conduct across the whole of the Victorian public sector.

**Information about the key steps involved in the process for handling your disclosure, including the timeframes involved, will be provided by IBAC.**

IBAC must assess within a reasonable time whether (in its view) the disclosure is a public interest disclosure (in which case, it will generally become a 'public interest complaint'). It may seek additional information from the discloser and/or FRV to make its decision.

If IBAC determines that a disclosure is a public interest disclosure, it must decide to either:

- a) Dismiss the disclosure;
- b) Investigate the disclosure; or
- c) Refer the disclosure to the Victorian Ombudsman to investigate the disclosure.

IBAC must notify FRV and, generally, the discloser of its determination.

If IBAC or the Victorian Ombudsman investigates a disclosure, they will generally provide FRV and the discloser further information about the progress of the investigation. They may also issue confidentiality notices to the discloser or others who might be asked to provide information in relation to their investigations.

#### **5.4 Protections a person will receive when making a public interest disclosure**

The PID Act sets out the protections provided to persons who make a disclosure in accordance with the Act. These include:

- a) Immunity from civil or criminal liability as well as administrative action (including disciplinary action) for making the disclosure;
- b) Immunity from committing an offence under the *Constitution Act 1975* or any other Act that imposes obligations of confidentiality or otherwise restricts the disclosure of information;
- c) 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; and
- d) Protection from an action for defamation.

These protections apply to a person who makes a public interest disclosure in accordance with the PID Act from the time the person makes the disclosure until IBAC determines that the disclosure is not a public interest complaint. The protections apply in a similar way to a person who makes a misdirected disclosure.

The protections in the Act do not apply if a discloser provides false or misleading information or claim that a matter is the subject of a public interest disclosure knowing that claim to be false.

The protections will apply to further information relating to a public interest disclosure that is provided to IBAC.

A discloser will also be protected by the obligations in relation to the confidentiality of a public interest disclosure and the provisions relating to detrimental action (see below).

#### **5.5 Welfare Management**

FRV recognises that the welfare and protection from detrimental action of persons who make public interest disclosures is essential for the effective implementation of the PID Act and is relevant to FRV's obligation to create a safe working environment under the *Occupational Health and Safety Act 2004*, the *Charter of Human Rights and Responsibilities Act 2006*, the Public Administration Act and the common law.

FRV will provide welfare support to a discloser or a witness in an investigation as the circumstances require.

FRV will also consider appointing a welfare manager when a person has made a public interest disclosure or is cooperating, or intending to cooperate, with an investigation of a public interest disclosure.

FRV may appoint an internal person as welfare manager (for example, a Peer Support Officer or the Public Interest Disclosure Coordinator) or engage a contractor to provide welfare services. FRV will also refer an employee to its Employee Assistance Program (EAP).

If a person seeking welfare has received a confidentiality notice from IBAC or the Ombudsman, they can still access the EAP unless IBAC or the Ombudsman has made a direction that a specific restricted matter specified in the confidentiality notice must not be disclosed to the EAP.

If a welfare manager is appointed to look after a discloser or witness, the welfare manager will only be required to provide reasonable support and should discuss the reasonable expectations with the person(s) they are supporting.

### **Protection from detrimental action**

FRV will take precautions to prevent its employees from taking detrimental action in reprisal for a public interest disclosure. This includes identifying, assessing, controlling and monitoring risks of reprisals faced by disclosers and witnesses.

The precautions taken by FRV will depend on individual circumstances and the disclosers and witnesses will, where possible, be consulted about any action that is taken.

A disclosure of detrimental action taken in reprisal for a public interest disclosure is itself a public interest disclosure and will be assessed as a new disclosure in accordance with these procedures.

Where the detrimental action is of a serious nature that is likely to amount to a criminal offence, FRV may consider reporting the matter to the police.

A FRV employee who has made a public interest disclosure and who believes on reasonable grounds that detrimental action will be, is being, or has been taken against them contrary to the PID Act may request a transfer.

All requests of this nature will be considered, but a number of conditions must be satisfied before they are granted, including:

- a) the Fire Rescue Commissioner should be satisfied there are reasonable grounds to suspect detrimental action will be, is being, or has been taken against the employee contrary to the PID Act;
- b) the Fire Rescue Commissioner must consider that the transfer will avoid, reduce or eliminate the risk of detrimental action; and
- c) the head of any 'receiving' government agency must consent to the transfer of employment within FRV or to another government agency on terms and conditions that are no less favourable overall to them.

The PID Act creates a number of remedies for people who sustain injury, loss or damage as a result of detrimental action taken against them in reprisal for a public interest disclosure. They include civil proceedings for damages and injunctions. A criminal offence is also created.

Nevertheless, a person who makes a public interest disclosure is still liable for their own conduct, even if conduct is the subject of the public interest disclosure. Making a disclosure does not provide a person with immunity for their own wrongdoing.

## 5.6 Employees who are subject to public interest disclosures

Until matters the subject of a public interest disclosure are dismissed or determined, information about a person who is the subject of a disclosure only constitutes an allegation.

Whether a person who is the subject of a disclosure is informed about an allegation made against them depends on the circumstances. It is possible the subject may never be told about the disclosure if it is not determined to be a public interest disclosure or complaint, or if a decision is made to dismiss the matter.

Nevertheless, there will be circumstances when the subject of a disclosure will be given information about the content of an allegation made against them, particularly where IBAC or another investigating entity investigates a public interest complaint or where FRV takes action in respect of the conduct. Where this occurs, FRV will provide welfare support as appropriate, including through a referral to EAP.

FRV will take reasonable steps to ensure the confidentiality of an employee who is the subject of a disclosure during an assessment of a disclosure and any subsequent investigation. Where a disclosure is dismissed, or investigations do not substantiate the allegations, confidentiality should be maintained in relation to the subject's identity, as well as the fact of the investigation and any results.

If an employee has been the subject of allegations that are wrong or unsubstantiated, then FRV or IBAC (or other investigating entity) will take steps to ensure there are no adverse consequences for the employee arising out of the disclosure or its investigation. This is particularly crucial where information has been publicly disclosed that has identified the employee but is also important where such information has become well known across the area where the employee works.

## 5.7 Legal assistance

If an employee is contacted by IBAC or the Victorian Ombudsman and would like to access independent legal advice or representation, the employee may contact the Public Interest Disclosure Coordinator. Subject to any confidentiality restrictions imposed by IBAC or the Victorian Ombudsman, General Counsel or the employee's relevant support body, including the United Firefighters Union, may be contacted on a strictly confidential basis for assistance in arranging that advice or representation.

## 5.8 Confidentiality

There are a number of confidentiality obligations under the PID Act and IBAC Act, relating to the receipt and investigation of public interest disclosures.

From when FRV determines that a public interest disclosure must be notified to IBAC (when it becomes an 'assessable disclosure'):

- a) Confidentiality obligations are imposed on persons or bodies who receive the disclosure or information about the content of the disclosure; and
- b) A person or body must not disclose information likely to lead to the identification of the person who made the disclosure.

If IBAC determines that a public interest disclosure is not a public interest complaint, these obligations cease from that determination.

There are a number of confidentiality obligations under the PID Act and other laws relating to the receipt and investigation of public interest disclosures.

There are exceptions to the confidentiality obligations which include:

- a) Information about the content of an assessable disclosure may be disclosed to the extent necessary for the purpose of taking lawful action in relation to the conduct that is the subject of the assessable disclosure including a disciplinary process or action;
- b) Information about the content of an assessable disclosure may be disclosed with a direction or authorisation given by the investigating entity that is investigating the disclosure;
- c) Where disclosure is necessary for the purpose of the exercise of functions under the PID Act;
- d) For the purpose of obtaining legal advice or representation in relation to the person's rights, liabilities, obligations and privileges under specified Acts (including the IBAC and PID Acts);
- e) Disclosure to a registered health practitioner, trade union or Employee Assistance Program for the purposes of assisting the person who made the disclosure to receive advice or support in relation to the disclosure;
- f) Disclosures by an investigating entity where necessary for the purpose of the exercise of functions under the PID Act or IBAC Act relating to the investigation.

The recipient in these circumstances will also be subject to confidentiality obligations.

In addition to the confidentiality obligations under the PID Act, after an investigation is initiated, IBAC and other investigating bodies (e.g. The Ombudsman) may issue a confidentiality notice to a person, including the discloser and other persons involved in the investigation, that specifies certain 'restricted matters' that the person must not disclose.

However, even where a confidentiality notice is in place, exceptions apply to allow restricted matters to be disclosed in specified circumstances, including:

- a) For the purpose of obtaining legal advice or representation in relation to the person's rights, liabilities, obligations and privileges under specified Acts (including the IBAC and PID Acts); and
- b) unless IBAC or the Ombudsman make a direction that a particular restricted matter must not be disclosed to that person — to the spouse, domestic partner, employer or manager of the person who received the notice and other persons for the purpose of assisting the recipient to seek advice and support in respect of the investigation.

The recipient in these circumstances will also be subject to confidentiality obligations and must be given a copy of the confidentiality notice.

There are a number of offences set out in the PID Act relating to breaches of the requirements of the Act, including:

- a) It is an offence to take detrimental action against another person in reprisal for a public interest disclosure;
- b) It is an offence to disclose the content, or information about the content, of a disclosure that has been notified to IBAC by FRV or information which is likely to lead to the identification of the person who made that disclosure unless permitted to by the PID Act;
- c) It is an offence for any person to:
  - i. Provide false or misleading information, or further information that relates to a public interest disclosure, that the person knows to be false or misleading in a material particular, intending that the information be acted on as a public interest disclosure;
  - ii. Claim that a matter is the subject of a public interest disclosure knowing the claim to be false; and
  - iii. Falsely claim that a matter is the subject of a disclosure that IBAC has determined to be a public interest complaint

FRV does not have any authority under the PID Act or IBAC Act to accept public interest disclosures and conduct an investigation of a public interest disclosure itself.

If the matter is being handled by IBAC or the Ombudsman, they will be responsible for ensuring the provision of procedural fairness and, in accordance with the requirements of the PID Act and their respective investigation and reporting functions and powers, where a decision is to be made about the person's conduct, the person must:

- be informed about the allegations against them;
- be given the opportunity to answer the allegations before a final decision is made;
- be informed about any adverse comment that may be included in any final report arising from an investigation and have the opportunity to provide feedback on the adverse comment; and

- have their response to the allegations and feedback on any adverse comment about them set out fairly in any report.

## 5.9 Information Security, reporting and review

### Information Security

To ensure the confidentiality of public interest disclosures:

- a) The Public Interest Disclosure Coordinator must ensure that all central files relating to a public interest disclosure, whether paper or electronic, are kept in a locked receptacle or appropriately secure system that can only be accessed by the Public Interest Disclosure Coordinator.
- b) All printed material held in FRV concerning public interest disclosure matters must be kept in files that are clearly marked as a Public Interest Disclosure Act matter, and warn of the criminal penalties that apply to any unauthorised person disclosing information concerning a public interest disclosure, including the content of a public interest disclosure or the identity of a discloser.
- c) The Public Interest Disclosure Coordinator must ensure that all electronic public interest disclosure records that are registered in FRV's records management systems, have:
  - (i) Adequate security restrictions on all files.
  - (ii) No ability for high level data administrators to view them.
  - (iii) All electronic files that are stored outside FRV's computer network (such as on an approved portable storage device) must be given password protection.
- d) All employees must take care to preserve the confidentiality of information in relation to public interest disclosures. For example:
  - (i) Care must be taken when emailing information relevant to a public interest disclosure. For example, ensure that only the discloser has access to the email account.
  - (ii) All phone calls and meetings in relation to a public interest disclosure must be conducted in private.
  - (iii) Hard copy documents for transmission should be placed in two successive windowless envelopes which are sealed and marked "private and confidential" and "to be opened by addressee only", and personally delivered wherever possible.

### Review

The policy and procedures are reviewed at a frequency of no less than three years to ensure they meet the objectives of the Public Interest Disclosures Act and accord with IBAC's guidelines.



## 6. Supporting Documents

- *Public Interest Disclosures Act 2012 (Vic)*
- *Protected Disclosure Regulations 2013 (Vic)*
- *Independent Broad-based Anti-corruption Commission Act 2011*
- Guidelines established by IBAC under s 57 of the *Protected Disclosure Act 2012*
- *Freedom of Information Act 1982 (Vic)*
- *Charter of Human Rights and Responsibilities Act 2006 (Vic)*
- *Occupational Health and Safety Act 2004*
- *Public Administration Act 2004*
- FRV Fraud Corruption and Other Losses Policy
- FRV Conflict of Interest Policy
- FRV Gifts Benefits and Hospitality Policy
- FRV Privacy Policy

## 7. Document Information

### 7.1 Document Control

<b>Doctrine Number</b>	(Use by PPOG only)
<b>Doc ID</b>	(Use by PPOG only)
<b>Approval Authority</b>	Operational Consultative Committee
<b>Issue Date</b>	(Required) dd Mmm yy
<b>Effective Date</b>	(Required) dd Mmm yy
<b>Review Frequency</b>	Triennially
<b>Custodian</b>	(Required) Position Title or Department
<b>Subject Matter Advisor</b>	(Optional) Position Title or Department
<b>Writer</b>	(Optional) Position Title or Department

### 7.2 Version Control

Version	Date Amended	Date Approved	Next Date	Review	Nature of Amendment
1	Policy developed	13 August 2013	-		Policy developed
2	2018	July 2019	-		Policy review. Resolution BRD 07/2019
3	June 2020	1 July 2020	-		Policy republished as FRV.



				1 July 2020.
4	Under review	January 2024	January 2027	Policy review, incorporating amended legislation.