

Public interest disclosure policy

Human rights

Decision makers must act and make decisions in a way that is compatible with human rights and give proper consideration to a human right relevant to a decision, as required by section 58 of the *Human Rights Act 2019*. For further information please refer to the department's Human rights intranet [page](#).

1. Purpose

This policy establishes the underlying principles and obligations of the Department of Housing and Public Works (the department) concerning public interest disclosures (PIDs) under the [Public Interest Disclosure Act 2010](#).

2. Authority

Under the [Public Interest Disclosure Act 2010](#) the department is required to facilitate the disclosure, in the public interest, of information about wrongdoing in the public sector and to provide protection for those who make disclosures.

Under section 28 of the [Public Interest Disclosure Act 2010](#), the department must ensure:

- public officers who make PIDs are given appropriate support; and
- PIDs made to the department are properly assessed and, when appropriate, properly investigated and dealt with
- appropriate action is taken in relation to any wrongdoing that is the subject of a PID
- public officers are offered protection from reprisals, and
- a PID management program is developed and implemented, consistent with [Public Interest Disclosure standards](#)

This policy has been developed in accordance with the [Public Interest Disclosure Act 2010](#) and the [Public Interest Disclosure standards](#) issued by the Queensland Ombudsman, which require agencies to have reasonable procedures to deal with PIDs.

3. Policy statement

The department is committed to fostering an ethical and transparent culture. It values the disclosure of information about suspected wrongdoing in the public sector, ensuring such disclosures are properly assessed and, where necessary, appropriately investigated. The department is also committed to taking appropriate action on disclosures, provided sufficient information is available to support the process.

The department will ensure disclosers are supported and protected from reprisal action for making a PID and that appropriate consideration is given to persons who are the subject of a PID. The department is also committed to developing, implementing and maintaining a PID management program.

This policy forms part of the department's overall approach to integrity management and should be read in conjunction with other department policies and procedures, refer to [Appendix A](#).

4. Scope

This policy applies to all employees working for the department regardless of whether they are permanent, temporary, full-time, part-time or casual employees and/or on secondment from another department. It also applies to other persons who perform work for the department including contractors, students gaining work experience and volunteers. For the purposes of this policy, the term contractor includes on-hired temporary labour services (agency staff).

5. Making a PID

Under the [Public Interest Disclosure Act 2010](#), **any person**, including an **employee**, can make a disclosure about a:

- substantial and specific danger to the health or safety of a person with a disability
- the commission of an offence, or contravention of a condition imposed under a provision of legislation mentioned in Schedule 2 of the [Public Interest Disclosure Act 2010](#), if the offence or contravention would be a substantial and specific danger to the environment
- reprisal because of a belief that a person has made or intends to make a disclosure.

Employees can make a disclosure about the following public interest matters:

- corrupt conduct
- maladministration that adversely affects a person's interests in a substantial and specific way
- a substantial misuse of public resources
- a substantial and specific danger to public health or safety
- a substantial and specific danger to the environment.

Disclosers are encouraged to report PIDs directly to the department's Integrity Services Unit. disclosers can report PIDs externally to another proper authority, either as a first step or if they are unhappy with the department's initial response.

Disclosures can be made in any way, including anonymously, either verbally or in writing. Disclosers are, however, encouraged to give their contact details so the department can contact them to provide support, obtain any further information and provide outcome advice.

Under the [Public Interest Disclosure Act 2010](#), a discloser may disclose substantially the same information to a journalist after they have made a PID to the department or another entity under certain circumstances (refer to the Public interest disclosure procedure for more information).

Additional contact information is provided in [Appendix A](#).

Protection from reprisal

Making a PID about suspected wrongdoing is the right thing to do. Disclosers should not suffer harm or detriment because they have spoken up, or someone believes they may have spoken up. This type of action is called reprisal and is an offence under the [Public Interest Disclosure Act 2010](#).

The department will protect persons who make a PID, or are involved in a PID investigation, from reprisal. When a disclosure is made, the department will assess the risks to the discloser and offer support.

Allegations of reprisal are taken very seriously and will be assessed and appropriate action taken, which may include referral to the Crime and Corruption Commission and/or the Queensland Police Service.

6. Delegations

Delegations ([Resource centre - Delegations \(sharepoint.com\)](#)) are to be exercised in accordance with the department's Human Resource, Financial and Contract, Legal, Property, Building Industry, Procurement, Project Commencement, and Administrative Delegations. It is recommended that delegate authority levels are confirmed prior to exercising any powers in relation to this policy and supporting procedures.

7. Roles and responsibilities

Role	Responsibilities
Director-General (DG) (accountable officer)	<ul style="list-style-type: none"> » overall responsibility for the department's compliance with, and delegates responsibilities under, the Public Interest Disclosure Act 2010 as considered appropriate, including: <ul style="list-style-type: none"> – receiving and assessing PIDs – establishing reasonable procedures to deal with PIDs – keeping a record of disclosures – reviewing the department's decisions not to investigate or deal with PIDs on request, and – providing disclosure information to the Office of the Queensland Ombudsman » leads a workplace culture that encourages, supports and raises awareness about disclosures and the appropriate management of PIDs » ensures that the department develops, implements and maintains a PID management program » appoints a PID Coordinator of the department <ul style="list-style-type: none"> – PID Coordinator responsibilities are outlined in Section 4 of the Public interest disclosure procedure.
Integrity Services Unit	<ul style="list-style-type: none"> » develop and deliver awareness and education initiatives in relation to PIDs, including protections afforded to disclosers » assess disclosures, record, report and manage PIDs in accordance with the Public Interest Disclosure Act 2010, the Public Interest Disclosure standards and the Public interest disclosure procedure » liaise with other agencies about the referral of PIDs » undertake and manage investigations of PIDs and any allegations of reprisal.

Divisional heads, managers, and supervisors	<ul style="list-style-type: none"> » raise awareness with staff about PIDs and encourage the reporting of wrongdoing » respond to a reported PID in accordance with this policy and the PID procedure » ensure all new employees and agency staff complete an induction process, including the completion of mandatory training in relation to public sector ethics and the Code of Conduct for the Queensland Public Service » in response to a PID and in consultation with the Integrity Services Unit: <ul style="list-style-type: none"> – provide support to the discloser – monitor for reprisal – maintain appropriate confidentiality – keep appropriate records » ensure that PIDs are properly investigated and appropriate action is taken with respect to any wrongdoing which is the subject of a PID.
All employees and persons who perform work for the department	<ul style="list-style-type: none"> » report suspected wrongdoing, including any breaches of this policy, to the Integrity Services Unit, or an external agency if appropriate. (refer to the PID Procedure for further information) » maintain appropriate confidentiality in relation to a PID » refrain from taking reprisal action in relation to a PID » undertake mandatory public sector ethics training provided by the department, including training in relation to the Code of Conduct for the Queensland Public Service.

Reporting requirements

The Integrity Services Unit is responsible for providing statistical reports on PIDs to the Deputy Director-General, Corporate Services and the Board of Management, in addition to other reporting as required including to the Queensland Ombudsman as the oversight agency for the [Public Interest Disclosure Act 2010](#).

8. Human rights

A *Record for Assessing Compatibility with Human Rights* has been completed to demonstrate how human rights have been considered in the development of this policy. The outcome of the assessment is:

- » The policy has been reviewed for compatibility with human rights under the *Human Rights Act 2019* (the Act). The policy has been found to engage and limit human rights but only to the extent that is lawful, reasonable, and demonstrably justifiable in accordance with section 13 of the Act therefore, it is reasonable to conclude that the policy is compatible with human rights.

9. Contact

For further information, please contact:

- Integrity Services Unit
- Email: integrityservices@housing.qld.gov.au

10. Storage of information

All information should be managed in accordance with the [Public Records Act 2023](#), and the whole-of-Government [Records governance policy](#). In addition, personal information should be managed in accordance with the [Information Privacy Act 2009](#).

11. Document control

Document owner	Director, Integrity Services Unit			
Contact details	integrityservices@housing.qld.gov.au			
Next review	June, 2028			
Supersedes	Public interest disclosure policy v1.1 (ISU:PY:2023:04)			
Version	Issue Date	Reason	Author	Approver
1.0	01 April 2022	New document	Director, Integrity Services Unit	Deputy Director-General, Strategy and Corporate Services
1.1	29 August 2023	Minor update – update to reflect changes due to MoG (May 2023)	Director, Integrity Services Unit	Deputy Director-General, Strategy and Corporate Services
1.2	19 June 2025	Minor update – updated to reflect changes due to MoG (November 2024)	Director, Integrity Services Unit	Executive Director, Professional Standards and Performance

Licence

Public interest disclosure policy © The State of Queensland (Department of Housing and Public Works) 2024.



<http://creativecommons.org/licenses/by/4.0/deed.en>

This work is licensed under a Creative Commons Attribution 4.0 Australia Licence. You are free to copy, communicate and adapt this work, as long as you attribute by citing 'Public interest disclosure policy, State of Queensland (Department of Housing and Public Works) 2024'.

Appendix A: Additional contacts and information

Additional contacts

Contact	Information
Director-General, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: directorgeneral@housing.qld.gov.au » Phone: (07) 3017 5801 » Postal address: GPO Box 2457, Brisbane QLD 4001
Deputy Director-General, Corporate Services, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: ODDGCorporateServices@housing.qld.gov.au » Phone: (07) 3008 3800 » Postal address: GPO Box 2457, Brisbane QLD 4001
Chief Human Resources Officer, Corporate Services, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: CHRO@housing.qld.gov.au » Phone: (07) 3008 3039 » Postal address: GPO Box 2457, Brisbane QLD 4001
Director, Integrity Services Unit, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: integrityservices@housing.qld.gov.au » Phone: (07) 3109 4863 » Postal address: GPO Box 2457, Brisbane QLD 4001
Complaints Section, Crime and Corruption Commission	<ul style="list-style-type: none"> » Report corruption: Report corruption CCC - Crime and Corruption Commission Queensland » Phone: (07) 3360 6060 » Fax: (07) 3360 6333 » Toll Free: 1800 061 611 (outside Brisbane, within Queensland) » Postal Address: GPO Box 3123, Brisbane QLD 4001 » Website: www.ccc.qld.gov.au
Queensland Ombudsman	<ul style="list-style-type: none"> » Email: ombudsman@ombudsman.qld.gov.au » Phone: (07) 3005 7000 » Toll Free: 1800 068 908 » Postal address: GPO Box 3314, Brisbane QLD 4001
Queensland Audit Office	<ul style="list-style-type: none"> » Email: requestforaudit@qao.qld.gov.au (for financial waste and mismanagement) » Email: gao@qao.qld.gov.au (complaints about QAO conduct) » Phone: » Postal address: PO Box 15396, City East 4002 » Website: www.qao.qld.gov.au

Information

In addition to the documents mentioned in section 2 Authority, the requirements set out in this document are consistent with relevant Government legislation, regulations, directives, information standards and/or policies at the time of publication. Supporting information is available.

Examples are:

Legislation and regulations

- [Anti-Discrimination Act 1991](#)
- [Crime and Corruption Act 2001](#)
- [Disability Services Act 2006](#)
- [Human Rights Act 2019](#)
- [Industrial Relations Act 1999](#)
- [Information Privacy Act 2009](#)
- [Integrity Act 2009](#)
- [Public Interest Disclosure Act 2010](#)
- [Public Records Act 2023](#)
- [Public Sector Act 2022](#)
- [Public Sector Ethics Act 1994](#)
- [Right to Information Act 2009](#)

Queensland Government

- [Code of Conduct for the Queensland Public Service](#)
- [Public Interest Disclosure Standard No. 1/2019 – Public Interest Disclosure Management Program](#)
- [Public Interest Disclosure Standard No. 2/2019 – Assessing, Investigating and Dealing with Public Interest Disclosures](#)
- [Public Interest Disclosure Standard No. 3/2019 – Public Interest Disclosure Data Recording and Reporting](#)
- [Making a public interest disclosure - A guide for individuals working in the public sector, 2011](#)
- [Handling a public interest disclosure - A guide for public sector managers and supervisors, 2011](#)

Department of Housing and Public Works

- [Conflict of interest policy](#)
- [Conflict of interest procedure](#)
- [Corrupt conduct prevention policy](#)
- [Corrupt conduct prevention procedure](#)
- [Customer complaints management policy](#)
- [Customer complaints management procedure](#)
- [Employee complaints policy](#)
- [Enterprise risk management framework](#)
- [Fraud and corruption control policy](#)
- [Fraud and corruption control plan](#)
- [Integrity framework](#)
- [Public interest disclosure procedure](#)
- [Risk management policy](#)
- [Standard of conduct policy](#) (For contractors, subcontractors, consultants, students and volunteers)
- [Workplace behaviour policy](#)

Appendix B: Definitions

The key terms referred to in this policy and the [Public interest disclosure procedure](#) are as follows:

Term	Definition
Administrative action	<p>A specific meaning under Schedule 4 of the Public Interest Disclosure Act 2010, as follows:</p> <ul style="list-style-type: none"> (a) means any action about a matter of administration, including, for example— <ul style="list-style-type: none"> (i) a decision and an act; and (ii) a failure to make a decision or do an act, including a failure to provide a written statement of reasons for a decision; and (iii) the formulation of a proposal or intention; and (iv) the making of a recommendation, including a recommendation made to a Minister; and (v) an action taken because of a recommendation made to a Minister; and (b) does not include an operational action of a police officer or of an officer of the Crime and Corruption Commission.
Confidential information	<p>A specific meaning under section 65 of the Public Interest Disclosure Act 2010, as follows:</p> <ul style="list-style-type: none"> (a) includes — <ul style="list-style-type: none"> (i) information about the identity, occupation, residential or work address or whereabouts of a person — <ul style="list-style-type: none"> (A) who makes a public interest disclosure; or (B) against whom a public interest disclosure has been made; and (ii) information disclosed by a public interest disclosure; and (iii) information about an individual's personal affairs; and (iv) information that, if disclosed, may cause detriment to a person; and (b) does not include information publicly disclosed in a public interest disclosure made to a court, tribunal or other entity that may receive evidence under oath, unless further disclosure of the information is prohibited by law.
Corrupt conduct	<p>A specific meaning under section 15 of the Crime and Corruption Act 2001, as follows:</p> <p>Corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that—</p> <ul style="list-style-type: none"> (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of— <ul style="list-style-type: none"> (i) a unit of public administration; or (ii) a person holding an appointment; and (b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that— <ul style="list-style-type: none"> (i) is not honest or is not impartial; or (ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or

- (iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and

(c) would, if proved, be—

- (i) a criminal offence; or
- (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.

Corrupt conduct also means conduct of a person, regardless of whether the person holds or held an appointment, that—

(a) impairs, or could impair, public confidence in public administration; and

(b) involves, or could involve, any of the following—

- (i) collusive tendering;
- (ii) fraud relating to an application for a licence, permit or other authority under an Act with a purpose or object of any of the following (however described)—

- (A) protecting health or safety of persons;
- (B) protecting the environment;
- (C) protecting or managing the use of the State's natural, cultural, mining or energy resources;

(iii) dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets;

(iv) evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue;

(v) fraudulently obtaining or retaining an appointment; and

(c) would, if proved, be—

- (i) a criminal offence; or
- (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.

Detriment

A specific meaning under Schedule 4 of the [Public Interest Disclosure Act 2010](#), as follows:
includes —

- (a) personal injury or prejudice to safety; and
- (b) property damage or loss; and
- (c) intimidation or harassment; and
- (d) adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business; and
- (e) financial loss; and
- (f) damage to reputation, including, for example, personal, professional or business reputation.

Disability

A specific meaning under section 11 of the [Disability Services Act 2006](#), as follows:

(1) A disability is a person's condition that—

(a) is attributable to—

- (i) an intellectual, psychiatric, cognitive, neurological, sensory or physical impairment; or

	<ul style="list-style-type: none"> (ii) a combination of impairments mentioned in subparagraph (i); and (b) results in— <ul style="list-style-type: none"> (i) a substantial reduction of the person's capacity for communication, social interaction, learning, mobility or self care or management; and (ii) the person needing support. (2) For subsection (1), the impairment may result from an acquired brain injury. (3) The disability must be permanent or likely to be permanent. (4) The disability may be, but need not be, of a chronic episodic nature.
Discloser	A person or employee who makes a disclosure in accordance with the Public Interest Disclosure Act 2010 .
Divisional Heads	All Deputy Directors-General.
Employee	<p>A person employed in the department under the Public Sector Act 2022 as a public service officer, general employee or temporary employee and/or a person on secondment from another department/agency.</p> <p>For clarity, labour hire or agency staff who perform work for the department are not engaged under a contract of service and are not 'employees' of the department for the purposes of this policy but are still 'persons' covered by this policy.</p>
Investigation	Includes any enquiry undertaken to establish whether the information provided in a PID can be substantiated, including a review or audit.
Journalist	A person engaged in the occupation of writing or editing material intended for publication in the print or electronic news media.
Natural justice	<p>Natural justice, also referred to as 'procedural fairness' applies to any decision that can affect the rights, interests or expectations of individuals in a direct or immediate way. Natural justice is at law a safeguard applying to an individual whose rights or interests are being affected.</p> <p>The rules of natural justice, which have been developed to ensure that decision-making is fair and reasonable, are:</p> <ul style="list-style-type: none"> » avoid bias » give a fair hearing, and » act only on the basis of logically probative evidence.
Maladministration	<p>A specific meaning under Schedule 4 of the Public Interest Disclosure Act 2010, as follows:</p> <p>maladministration is administrative action that—</p> <ul style="list-style-type: none"> (a) was taken contrary to law; or (b) was unreasonable, unjust, oppressive, or improperly discriminatory; or (c) was in accordance with a rule of law or a provision of an Act or a practice that is or may be unreasonable, unjust, oppressive, or improperly discriminatory in the particular circumstances; or (d) was taken— <ul style="list-style-type: none"> (i) for an improper purpose; or (ii) on irrelevant grounds; or (iii) having regard to irrelevant considerations; or

	<p>(e) was an action for which reasons should have been given, but were not given; or</p> <p>(f) was based wholly or partly on a mistake of law or fact; or</p> <p>(g) was wrong.</p>
Manager/supervisor	Any person whose duties involve or include managing or supervising others in the carrying out of their duties, irrespective of their formal title.
Organisational support	<p>For the purposes of this policy and the Public interest disclosure procedure, organisational support means actions such as, but not limited to:</p> <ul style="list-style-type: none"> » providing moral and emotional support » advising disclosers about agency resources available to handle any concerns they have as a result of making their disclosure » appointing a mentor, confidante or other support officer to assist the discloser through the process » referring the discloser to the agency's Employee Assistance Program or arranging for other professional counselling » generating support for the discloser in their work unit where appropriate » ensuring that any suspicions of victimisation or harassment are dealt with » maintaining contact with the discloser » negotiating with the discloser and their support officer a formal end to their involvement with the support program when it is agreed that they no longer need assistance.
Proper authority	<p>A specific meaning under section 5 of the Public Interest Disclosure Act 2010, as follows being:</p> <p>(a) a public sector entity; or</p> <p>(b) a member of the Legislative Assembly.</p>
Public interest disclosure (PID)	<p>A specific meaning under sections 11, 12 and 13 of the Public Interest Disclosure Act 2010, as follows:</p> <p>11 Meaning of <i>public interest disclosure</i></p> <p>A <i>public interest disclosure</i> is a disclosure under Chapter 2 and includes all information and help given by the discloser to a proper authority for the disclosure.</p> <p>12 Disclosure by any person</p> <p>(1) This section applies if a person (whether or not the person is a public officer) has information about—</p> <ul style="list-style-type: none"> (a) a substantial and specific danger to the health or safety of a person with a disability; or (b) the commission of an offence against a provision mentioned in schedule 2, if the commission of the offence is or would be a substantial and specific danger to the environment; or (c) a contravention of a condition imposed under a provision mentioned in schedule 2, if the contravention is or would be a substantial and specific danger to the environment; or (d) the conduct of another person that could, if proved, be a reprisal. <p>(2) The person may make a disclosure under section 17 in relation to the information to a proper authority.</p>

- (3) For subsection (1), a person has information about the conduct of another person or another matter if—
- (4) the person honestly believes on reasonable grounds that the information tends to show the conduct or other matter; or
- (5) the information tends to show the conduct or other matter, regardless of whether the person honestly believes the information tends to show the conduct or other matter.

13 Disclosure by a public officer

- (1) This section applies if a person who is a public officer has information about—
 - (a) the conduct of another person that could, if proved, be—
 - (b) corrupt conduct; or
 - (c) maladministration that adversely affects a person's interests in a substantial and specific way; or
 - (d) a substantial misuse of public resources (other than an alleged misuse based on mere disagreement over policy that may properly be adopted about amounts, purposes or priorities of expenditure); or
 - (e) a substantial and specific danger to public health or safety; or
 - (f) a substantial and specific danger to the environment.
- (2) The person may make a disclosure under section 17 in relation to the information to a proper authority.
- (3) For subsection (1), a person has information about the conduct of another person or another matter if—
 - (a) the person honestly believes on reasonable grounds that the information tends to show the conduct or other matter; or
 - (b) the information tends to show the conduct or other matter, regardless of whether the person honestly believes the information tends to show the conduct or other matter.
- (4) If the other person is a commission officer, subsection (1)(a)(i) applies as though the Crime and Corruption Commission were a unit of public administration.

Public officer

A specific meaning under section 7 of the [Public Interest Disclosure Act 2010](#), as follows:

7 Meaning of public officer

- (1) A **public officer**, of a public sector entity, is an employee, member or officer of the entity.
- (2) Also—
 - (a) the Minister responsible for the administration of a department is a public officer of the department; and
 - (b) a member of a school council is a public officer of the department in which the [Education \(General Provisions\) Act 2006](#) is administered; and
 - (c) a Ministerial staff member employed in the office of a Minister is a public officer of each department administered by the Minister; and
 - (d) a Ministerial staff member employed in the office of an Assistant Minister is a public officer of each department for which the Assistant Minister is given responsibility under her or his functions.

Reasonable belief

A view which is objectively fair or sensible.

Reasonable management action	<p>A specific meaning under section 45(3) of the Public Interest Disclosure Act 2010, as follows:</p> <p>reasonable management action, taken by a manager in relation to an employee, includes any of the following taken by the manager—</p> <ul style="list-style-type: none"> (a) a reasonable appraisal of the employee's work performance; (b) a reasonable requirement that the employee undertake counselling; (c) a reasonable suspension of the employee from the employment workplace; (d) a reasonable disciplinary action; (e) a reasonable action to transfer or deploy the employee; (f) a reasonable action to end the employee's employment by way of redundancy or retrenchment; (g) a reasonable action in relation to an action mentioned in paragraphs (a) to (f); (h) a reasonable action in relation to the employee's failure to obtain a promotion, reclassification, transfer or benefit, or to retain a benefit, in relation to the employee's employment.
Reprisal and grounds for reprisal	<p>A specific meaning under section 40 of the Public Interest Disclosure Act 2010, as follows:</p> <p>40 Reprisal and grounds for reprisal</p> <ul style="list-style-type: none"> (1) A person must not cause, or attempt or conspire to cause, detriment to another person because, or in the belief that— <ul style="list-style-type: none"> (a) the other person or someone else has made, or intends to make, a public interest disclosure; or (b) the other person or someone else is, has been, or intends to be, involved in a proceeding under the Act against any person. (2) An attempt to cause detriment includes an attempt to induce a person to cause detriment. (3) A contravention of subsection (1) is a reprisal or the taking of a reprisal. (4) A ground mentioned in subsection (1) as the ground for a reprisal is the unlawful ground for the reprisal. (5) For the contravention mentioned in subsection (3) to happen, it is sufficient if the unlawful ground is a substantial ground for the act or omission that is the reprisal, even if there is another ground for the act or omission.
Subject officer	An officer who is the subject of allegations of wrongdoing made in a disclosure.
Substantial and specific	<p>Substantial means 'of a significant or considerable degree'. It must be more than trivial or minimal and have some weight or importance.</p> <p>Specific means 'precise or particular'. This refers to conduct or detriment that is able to be identified or particularised as opposed to broad or general concerns or criticisms.</p>