

From: [REDACTED]
To: [ICAC:Whistleblower Project](#)
Subject: Whistle Blower Project Feedback
Date: Thursday, 13 November 2025 9:58:37 AM

[REDACTED]

Whistle Blower Project
Independent Commission Against Corruption
GPO Box 11066,
Adelaide, South Australia, 5001

By Email: whistleblowerproject@icac.sa.gov.au

Thank you for inviting me to provide feedback on the current Public Interest Disclosure legislation through the Whistleblower Project. To date, my organisation has not received any disclosures, and as such have limited the response to reflect areas of concern within the projects proposal that are likely to effect us into the future.

From an operational point of view, of most concern is section 5 (d) of the current legislation.

where the information relates to a location within the area of a particular council established under the Local Government Act 1999—a member, officer or employee of that council; or

The only questions addressing this within the project outline are under section 1 where it asks

- if significant environmental and health and safety disclosures should still be covered, and
- whether the definition of relevant authority should be broadened so people don't think they have made a disclosure when they have not.

It is my opinion that broadening the definition is more likely to lead to confusion and suggest if a more appropriate response would be to reduce the definition and require all notification to go through whichever agency is considered the owner of the legislation following this review i.e. OPI, ICAC, the Ombudsman. This would make reporting much less confusing and could even be achieved by an app or website such as Crime Stoppers, which is a single point for members of the public to access and triggers investigations by the appropriate agency. The more user friendly, safe and easy reporting is made, the more likely whistleblowers are to come forward.

If section 5 (d) is to remain, I would like to see the relevant authority be reduced from a 'member, officer or employee of that council' to the nominated person/s of the council with a requirement for the nominated person/s to be easily available and advertised on a

website nominated by the CEO. The current wording could lead to disclosures not being acted on or reported. The proposed wording will remove uncertainty for the whistleblower and ensures Council can action and report disclosures as required.

If significant environmental and health and safety disclosures are removed from the legislation, and or relevant authority definitions are changed this point may be irrelevant.

I would also like to support the continued protection of disclosers who acted in good faith and do not have a history of repeated reporting, or continue to report the same, or substantially the same information. Otherwise it adds another barrier to people reporting.

I apologise for the late reply, but hope you will still consider my feedback.

Your sincerely
Mary Irwin