



Evaluation of the Department of Human Services

Part of the Whistleblower
Project

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This report has been prepared in accordance with sections 40(3) and 41(2) of the *Independent Commission Against Corruption Act 2012* (SA).

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Acknowledgement

ICAC acknowledges that the land on which we work is the traditional lands for the Kaurna people and that we respect their spiritual relationship with their Country.

We also acknowledge the Kaurna people as the custodians of the Adelaide region and that their cultural and heritage beliefs are still as important to the living Kaurna people today.

We pay our respects to Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples.



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Letter of transmittal

15 September 2026

The Hon Reggie Martin MLC

President of the Legislative Council
Parliament House
North Terrace
ADELAIDE SA 5000

The Hon Nat Cook MP

Speaker of the House of Assembly
Parliament House
North Terrace
ADELAIDE SA 5000

Dear President and Speaker

In accordance with sections 40(3) and 41(2) of the *Independent Commission Against Corruption Act 2012* (SA) (ICAC Act), I present the report entitled *Evaluation of the Department of Human Services: Part of the Whistleblower Project*. This report forms part of the Independent Commission Against Corruption's Whistleblower Project.

Sections 40(4) and 41(3) of the ICAC Act require that the report be laid before the respective Houses of Parliament on the first sitting day after receiving it.

Yours sincerely



Emma Townsend
COMMISSIONER
Independent Commission Against Corruption

Table of commonly used abbreviations

Term	Definition
Disclosers	A person who makes an appropriate disclosure of information raising a potential issue of corruption, misconduct or maladministration in public administration in accordance with the PID Act
DHS	Department of Human Services
ICAC	Independent Commission Against Corruption
ICAC Act	<i>Independent Commission Against Corruption Act 2012 (SA)</i>
IMU	Incident Management Unit
OCPSE	Office of the Commissioner for Public Sector Employment
OPI	Office for Public Integrity
PID Act	<i>Public Interest Disclosure Act 2018 (SA)</i>
PID Guidelines	Public Interest Disclosure Guidelines published by ICAC in accordance with s 14 of the PID Act
PID Regulations	<i>Public Interest Disclosure Regulations 2019 (SA)</i>
Public interest disclosure	An appropriate disclosure of public administration information under s 5(4) of the PID Act
Public interest disclosure procedure	The document required to be prepared and maintained by the principal officer of a public sector agency or council under s 12(4) of the PID Act
Whistleblower Project final report	The report entitled <i>Doing right by those who call out the wrong: A review of South Australia's whistleblower protection regime</i> published by ICAC in June 2026

Commissioner's foreword

The Department of Human Services (**DHS**) delivers crucial services, funding and policies across the community to protect and improve safety, wellbeing and quality of life. Its broad responsibilities and varied functions mean it has significant interaction and involvement with different sectors of the community, including vulnerable populations. Its work has a wide-ranging impact on all South Australians. Due to the nature of their work, many employees at DHS are faced with difficult decisions or confronting situations requiring immediate and appropriate action. Like with any public sector agency, maintaining the integrity of DHS' workforce is central to the effective performance of its functions.



Public sector agencies and councils play an integral role in identifying and responding to threats to integrity in public administration. Often, public officers are the first to hear about suspected wrongdoing within their agency and, in many cases, are best placed to make disclosures of suspected wrongdoing. Therefore, every endeavour should be made by public sector agencies and councils to create an environment where public officers feel encouraged, supported and safe to speak up.

A strong, visible commitment to promoting integrity, addressing wrongdoing and protecting those who speak up should be evident in each agency and council. It should be consistently demonstrated and reinforced by leadership at every level. Practically, this commitment will be underpinned by effective internal practices, policies and procedures to facilitate the receipt and management of disclosures in line with the *Public Interest Disclosure Act 2018* (SA) (**PID Act**).

This report contains 13 recommendations to improve the practices, policies and procedures of DHS relating to the reporting of corruption, misconduct or maladministration in public administration. While many of the recommendations made in this report are specific to DHS, it is envisaged that they may also be applicable to other public sector agencies and councils.

This evaluation, along with a separate evaluation of South Australia Police, was commenced as part of the Independent Commission Against Corruption's (**ICAC**) broader Whistleblower Project. That project examined the adequacy of South Australia's current whistleblower regime to encourage, support and protect those who report wrongdoing in public administration. A report on the Whistleblower Project entitled *Doing right by those who call out the wrong: A review of South Australia's whistleblower protection regime* (**Whistleblower Project final report**) was tabled in Parliament in June 2026. That report makes a number of recommendations for legislative change

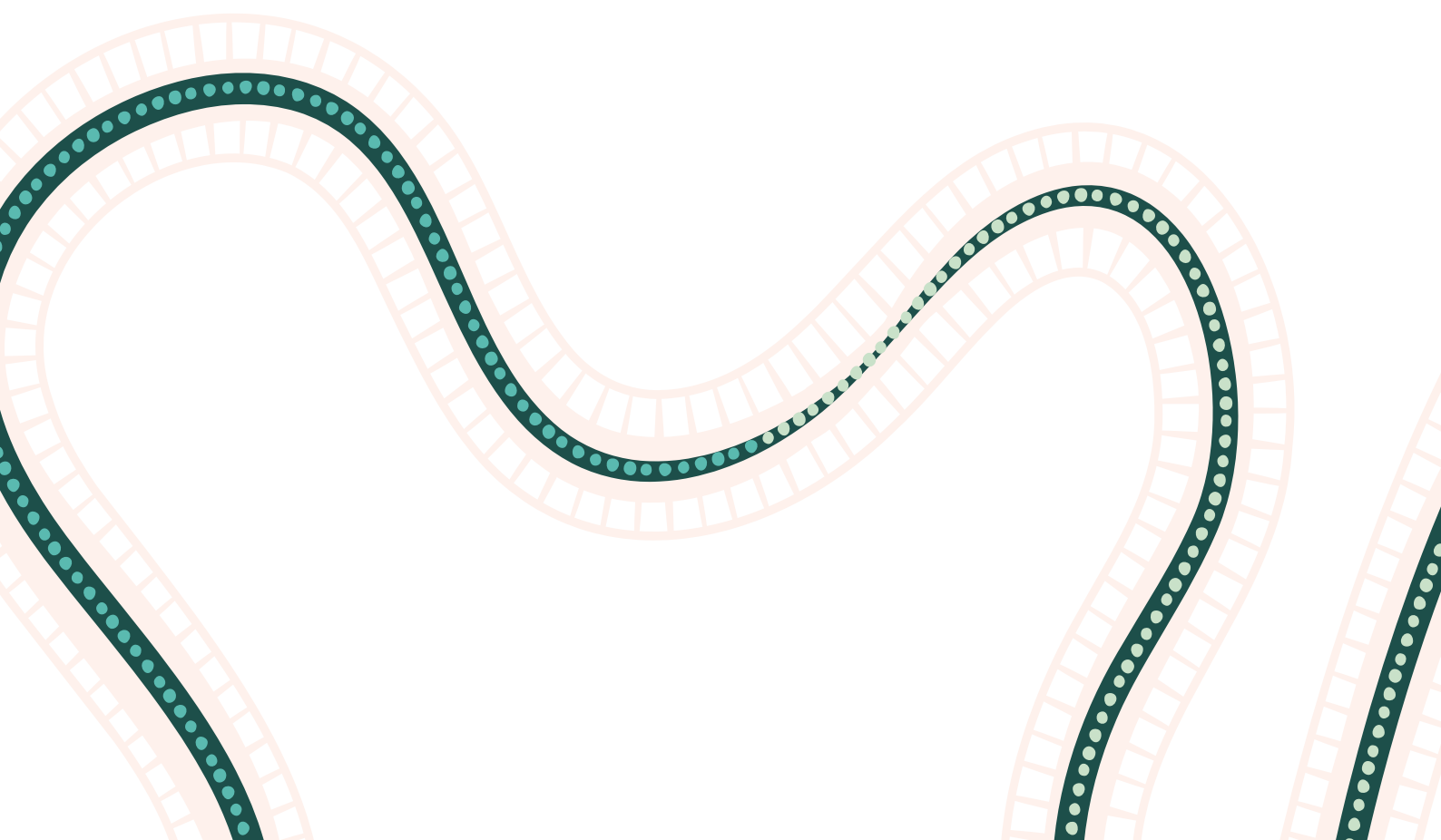
but also contains several observations and general recommendations for public sector agencies and councils arising from this evaluation.

It is important to note that DHS was not selected for evaluation due to any identified deficiencies in its existing arrangements, but to provide practical case studies to assist ICAC to develop recommendations applicable across the public sector.

I would like to thank the staff of DHS for their assistance and engagement throughout this evaluation and for their interest in, and commitment to, continuous improvement. I am encouraged to find that DHS' practices, policies, and procedures contain many positive and promising features that support the reporting of suspected wrongdoing.



Emma Townsend
COMMISSIONER
Independent Commission Against Corruption



Recommendations

Recommendation	1
Review and update the DHS public interest disclosure procedure flowchart for completeness, clarity and useability, including to: i. provide information about alternative complaint and reporting pathways for information that does not fall within the definition of “public interest information” ii. refer to all possible relevant authorities and provide contact details iii. list all obligations that apply to a recipient of a disclosure of public interest information under the PID Act and PID Guidelines iv. separate the pathways for environmental and health information and public administration information.	
Recommendation	2
Review and update general corporate documents relating to fraud and corruption risks to: i. include information about when and where to report suspected wrongdoing ii. further integrate information about the PID Act, DHS’ public interest disclosure procedure and flowchart, as well as reporting obligations and pathways where relevant iii. ensure references to ICAC or the OPI are up-to-date reflecting the 2021 legislative changes to the ICAC Act.	
Recommendation	3
Consider developing an audit program to regularly review whether the systems and processes in place for making, assessing and recording public interest disclosures are compliant with the PID Act and PID Guidelines.	
Recommendation	4
Consider strengthening the integration of the PID Act framework within other internal policies and procedures relating to the making of complaints and reports. This should include referring to the PID Act in those other internal policies and procedures and, where possible, providing guidance about interrelationship.	

Recommendation	5
That the Chief Executive of DHS, as the principal officer of the agency, consider whether additional responsible officers should be designated under section 12 of the PID Act to improve accessibility across the agency. Particular consideration should be given to the seniority and location of persons designated as responsible officers.	
Recommendation	6
Consider ways to further communicate and increase awareness that, in certain circumstances, managers and supervisors may be relevant authorities under the PID Act.	
Recommendation	7
Review information regarding public interest disclosures and reporting obligations across the various communication methods DHS employs to ensure it is up-to-date, accurate and consistent.	
Recommendation	8
Review communications on public interest disclosures and consider increasing education and awareness initiatives, including through the use of emails, meetings, training and intranet articles. Consideration be given to reaching all potential groups that may be eligible for protections under the PID Act and aligning communications with relevant awareness weeks or world acknowledgment days.	
Recommendation	9
Consider including questions in Teamgage to ascertain employee knowledge and awareness of reporting obligations and types of wrongdoing, as well as employee preparedness to make reports including under the PID Act.	
Recommendation	10
Ensure any training provided to DHS employees relating to fraud and corruption is up-to-date and accurate, including training provided by other public sector agencies.	

Recommendation**11**

Consider making fraud and corruption training mandatory for key roles more likely to become aware of wrongdoing or more likely to receive reports of suspected wrongdoing.

Recommendation**12**

Consider whether DHS has sufficient practices in place to ensure disclosers are not victimised for speaking up and further communicate this messaging to ensure disclosers feel encouraged and supported to report suspected wrongdoing.

Recommendation**13**

Review and update the public interest disclosure procedure to ensure it complies with section 12 of the PID Act and Guideline 4 of the PID Guidelines. Amendments may be made to:

- i. ensure that it is accurate and clear
- ii. clarify that external disclosures need not “relate to DHS or a DHS employee” to qualify for protection under the PID Act
- iii. specify that in addition to the OPI and OCPSE, Ombudsman SA is a relevant authority under the PID Act
- iv. specify that in addition to the OPI, Ombudsman SA can receive disclosures of misconduct or maladministration in public administration
- v. outline the arrangements in place to ensure disclosures made via general repositories are received by a responsible officer in a confidential manner
- vi. outline how DHS protects the confidentiality of informants in the assessment, management and investigation of disclosures (where an exception to confidentiality does not apply), including where information relating to public interest disclosures will be securely stored
- vii. outline the measures in place to prevent and respond to victimisation and other detrimental action
- viii. specify that in addition to the OPI and OCPSE, complaints about victimisation can also be made to Ombudsman SA and Equal Opportunity SA
- ix. provide information about support avenues available for staff.



Chapter 1: Introduction

The *Independent Commission Against Corruption Act 2012* (SA) (**ICAC Act**) enables ICAC to evaluate the practices, policies and procedures of inquiry agencies and public authorities with a view to making recommendations for the purposes of preventing or minimising corruption in public administration.¹

DHS supports South Australians by delivering services and programs that promote safety, inclusion, wellbeing, and community participation. As part of the Whistleblower Project, an evaluation of this key agency was commenced to provide insight into the practical operation of the current whistleblower scheme in South Australia. The aim of the evaluation was to explore what more can be done by DHS and other public sector agencies to improve the management of whistleblowing and create an organisational climate which encourages and facilitates whistleblowing.

This report reiterates some of the recommendations made in the Whistleblower Project final report that are relevant to DHS. It also contains additional recommendations intended to assist DHS with the receipt and management of reports about corruption, misconduct or maladministration in public administration.

1.1 Evaluation terms of reference

The evaluation examined whether DHS' practices, policies and procedures:

1. adequately and appropriately protect the identity of individuals who provide information about suspected corruption, misconduct or maladministration in public administration
2. adequately and appropriately protect those individuals from reprisals or other adverse action being taken because they have made a disclosure
3. foster an environment in which employees feel encouraged and supported to report corruption, misconduct or maladministration in public administration.

The evaluation also considered related issues, including how agencies balance the protection of whistleblowers with the need to take appropriate disciplinary action where required and any opportunities for DHS to improve the management of whistleblowing.

¹ *Independent Commission Against Corruption Act 2012* (SA) ss 7(1)(b), 40-41 ('ICAC Act').

1.2 Evaluation approach

The evaluation involved the review and analysis of information from a range of sources, including:

- a review of DHS' internal policies, procedures, supporting documents and training materials relating to public interest disclosures; complaint and report management; corruption, misconduct and maladministration; and organisational culture
- submissions from external stakeholders who may hold relevant data or information relating to DHS including the Office for Public Integrity (**OPI**), Ombudsman SA, Equal Opportunity SA and the Office of the Commissioner for Public Sector Employment (**OCPSE**)
- interviews with select senior staff within DHS²
- information gathered as part of the broader Whistleblower Project, including through a discussion paper consultation and public forum.

DHS, the OPI and Ombudsman SA were provided with a draft version of this report for review. Feedback has been incorporated where appropriate throughout this report, and a copy of DHS' response is at Appendix 2.

² Due to the scope and purpose of the evaluation, ICAC did not conduct interviews with employees below management level and did not seek to conduct a wide-ranging review of reporting culture within DHS.

Chapter 2: Whistleblowing and the legislative scheme

2.1 Introduction to whistleblowing

Whistleblowers are critical to the detection of wrongdoing in public administration and, therefore, the maintenance of public integrity. Research shows that those within organisations remain the single most important way in which wrongdoing is brought to light.³ It follows that the effective management of whistleblowing, and a comprehensive whistleblower protection regime, is integral to any effective public integrity framework.

All Australian jurisdictions and many countries around the world have enacted legislation to protect whistleblowers. Many of those laws require government agencies, corporations and not-for-profit organisations to create policies and procedures relating to the receipt and management of disclosures within their agency or organisation. A snapshot of the legislative scheme in South Australia is set out below.

2.2 Legislative scheme

The *Public Interest Disclosure Act 2018* (SA) aims to encourage and facilitate the disclosure of information about corruption, misconduct and maladministration in public administration and to ensure that there is appropriate oversight of public interest disclosures.⁴ To meet those aims, the PID Act offers protections to disclosers and requires agencies assessing and investigating disclosures to keep the discloser and the OPI informed about the action taken in relation to the disclosure.

The protections in the PID Act apply to appropriate disclosures of public interest information. There are two types of public interest information: “environmental and health information” and “public administration information”.⁵ Public administration information means “information that raises a potential issue of corruption, misconduct or maladministration in public administration”.⁶ Given the functions of ICAC, this evaluation, and the Whistleblower Project more broadly, focuses on disclosures of public administration information.

³ AJ Brown and K Pender, *Protecting Australia's Whistleblowers: The Federal Roadmap* (Report, 2022) 2.

⁴ *Public Interest Disclosure Act 2018* (SA) s 3 ('PID Act').

⁵ *Ibid* s 4.

⁶ *Ibid*. Corruption in public administration is defined in s 5 of the *ICAC Act* (n 1). Misconduct and maladministration in public administration are defined in s 4 of the *Ombudsman Act 1972* (SA) ('*Ombudsman Act*').

A disclosure is an “appropriate disclosure of public administration information” if:

- the disclosure is made by a “public officer”
- the disclosure is made to a “relevant authority”
- the public officer “reasonably suspects that the information raises a potential issue of corruption, misconduct or maladministration in public administration”.⁷

If the above criteria are met, the protections available to a discloser include:

- immunity from any liability as a result of making the disclosure⁸
- protection of identity (including a criminal penalty for a breach of confidentiality, unless one of the exceptions in the PID Act or PID Guidelines applies),⁹ and
- protection from victimisation (including criminal penalties and civil remedies for retaliatory action).¹⁰

The Public Interest Disclosure Regulations 2019 (SA) (**PID Regulations**) prescribe training requirements for certain persons designated as ‘responsible officers’ who may receive disclosures under the PID Act. The *Public Interest Disclosure Guidelines* (**PID Guidelines**) address the manner in which disclosures are to be received and assessed, notification obligations, the circumstances in which an informant’s identity may be disclosed, and what must be included in procedural documents required to be prepared and maintained by agencies under the PID Act relating to making and dealing with disclosures.

An overview of the scheme created by the PID Act, as it relates to public administration information, is contained in Appendix 3.¹¹

The PID Act forms part of a broader legislative framework aimed at protecting those who report suspected wrongdoing. For example, the ICAC Act and the *Ombudsman Act 1972* (SA) include certain protections for those who make complaints or reports, or assist with investigations, under those Acts. Such protections may apply regardless of whether the person who made the complaint or report is a public officer.

7 *PID Act* (n 4) s 5(4).

8 *Ibid* s 5(1).

9 *Ibid* s 8.

10 *Ibid* s 9.

11 This is also annexed to the Whistleblower Project final report as Appendix A.

2.3 Reporting requirements

While the PID Act aims to encourage the disclosure of information relating to corruption, misconduct or maladministration in public administration, other instruments create obligations or expectations that such information will be reported to certain authorities. The PID Act should be considered in conjunction with these instruments.

The OPI *Directions and Guidelines for public officers, public authorities and inquiry agencies*,¹² impose an obligation on all public officers to report any matter that is reasonably suspected of involving corruption in public administration to the OPI.

Ombudsman SA's *Directions and Guidelines*¹³ state that public officers and public authorities are expected to report to Ombudsman SA any matter that is reasonably suspected of involving misconduct or maladministration in public administration, unless the public officer or public authority knows that the conduct has already been reported to Ombudsman SA or the OPI (or has otherwise come to the attention of either).

The obligation to report to the OPI and the expectations set by Ombudsman SA would apply to all of DHS' workforce. Under Schedule 1 of the ICAC Act, DHS is a public authority and its employees and contractors are public officers.

¹² Office for Public Integrity *Directions and Guidelines for public officers, public authorities and inquiry agencies 2023* (SA) issued pursuant to the ICAC Act (n 1) s 18B.

¹³ Ombudsman SA *Directions and Guidelines 2023* (SA) issued pursuant to the Ombudsman Act (n 6) s 12D(1).



Chapter 3: Overview of DHS

3.1 Functions and structure

DHS is responsible for commissioning human services within the not-for-profit sector and delivers programs, services and funding to support and improve the wellbeing and safety of South Australians. This includes:

- providing care and support services to vulnerable members of the community including people living with disability and children and young people
- conducting employment-related screening
- delivering concessions and rebates to assist with cost-of-living pressures
- delivering services in adult safeguarding, youth justice, family safety and support and homelessness.¹⁴

Such programs and services are delivered across South Australia, including Adelaide and regional and remote communities.¹⁵ In addition to its role in the delivery of programs and services, DHS leads important government reforms in the areas of disability inclusion, intensive family support, ageing well and women's equality and safety.¹⁶ It also has lead policy responsibility in relation to women, youth and volunteers in South Australia.¹⁷

DHS is comprised of nine overarching divisions and 38 directorates which sit under the Chief Executive or Deputy Chief Executive.¹⁸ A copy of DHS' organisational chart, as at 1 July 2026, is at Appendix 4.

3.2 Workforce

DHS' workforce is made up of employees and contractors. DHS is also assisted by students on placement and volunteers. As of early 2026, DHS had approximately 3,290 employees, 110 contractors,¹⁹ 16 students and 151 volunteers.²⁰ Most of the volunteers within DHS are engaged by the Women's Information Service or the Community Visitor Scheme. DHS also engages the services of Lived Experience Network members (up to 15), known as System Advisors, within the Child Safety and Family Support Division.²¹

¹⁴ Department of Human Services, *Department of Human Services 2024-25 Annual Report* (Report, 30 September 2025) 8.

¹⁵ Ibid 9.

¹⁶ Ibid 8.

¹⁷ Department of Human Services, *About us* (Web Page, 2026) < <https://dhs.sa.gov.au/about-us> >.

¹⁸ DHS Organisational Chart effective 1 July 2026.

¹⁹ As at 15 April 2026. This figure reflects those with a contract with DHS (excluding employees, volunteers and students) including labour hire staff, independent contractors and individuals working for non-government or not-for-profit organisations. This number does not include staff from commissioned services delivered by external organisations under a formal funding agreement with DHS, EXH088.

²⁰ EXH084; EXH085.

²¹ Lived Experience Network members are reimbursed for their time and travel as an honorarium payment. They are not considered DHS employees, EXH085.

DHS' workforce is diverse, with over 100 different cultures represented²² and different levels of English proficiency.²³ Publicly available data from the *OCPSE Workforce Information Report Data Dashboard* indicates that approximately 40 per cent of DHS employees are from a culturally and linguistically diverse (**CALD**) background.²⁴ By comparison, CALD employees make up approximately 17 per cent of the public sector workforce overall.²⁵

DHS' workforce is also physically dispersed across numerous sites. A significant proportion of DHS staff, including those working in Disability Services, do not work in a typical corporate environment and are not centrally located. These workers commonly work in houses across metropolitan Adelaide and regional South Australia.²⁶ It is due to DHS' size, diverse workforce and public facing functions that it was identified as a suitable vehicle to examine issues relating to whistleblower protections across the public sector.

22 EXH071.

23 DHS has confirmed that its recruitment processes assess and require appropriate English reading and writing capability for roles, EXH089.

24 As of 2025.

25 Office of the Commissioner for Public Sector Employment, *Workforce Information Report 2024-25* (Report, September 2025) 30.

26 EXH094.



Chapter 4: Policies, procedures and supporting documents

4.1 Public interest disclosure guidance

Public interest disclosure procedure

Section 12(4) of the PID Act requires the principal officer²⁷ of a public sector agency or council to ensure the agency or council has a document setting out the procedures related to making and dealing with appropriate disclosures of public interest information. That document must be publicly available.

The DHS Public Interest Disclosure Procedure²⁸ approved on 1 May 2024 (**the procedure**)²⁹ outlines the steps involved when making and dealing with a disclosure that engages or may engage the PID Act. The procedure was developed in consultation with DHS' responsible officers, and provided to Directors across DHS, Human Resources staff, and the Organisational Development and Learning directorate for review. It is available on the DHS intranet and public facing website. The procedure applies to all DHS staff and where a member of the public, a client, stakeholder or an individual in a non-government organisation makes an appropriate disclosure consistent with the PID Act.³⁰

The procedure details DHS' commitment to maintaining a strong and fair public administration by ensuring that staff are informed about their rights and the process for making and receiving public interest disclosures, as well as ensuring that disclosers are protected.³¹

The PID Act and the PID Guidelines specify the mandatory content of an agency's public interest disclosure procedure.

Section 12(5) of the PID Act states that the document must include:

- clear obligations on the public sector agency and its officers and employees to take action to protect informants
- risk management steps for assessing and minimising detrimental action against people because of public interest disclosures and detriment to people against whom allegations are made in a disclosure.

²⁷ As defined in the *PID Act* (n 4) s 4.

²⁸ EXH006.

²⁹ Prior to March 2024, DHS had a public interest disclosure policy. It was updated as a procedure to more accurately reflect reporting obligations.

³⁰ Only public officers as defined in the *JCAC Act* (n 1) can make disclosures of public administration information under the *PID Act* (n 4). However, any person can make a disclosure of environmental and health information under the *PID Act* (n 4).

³¹ EXH006, see page 5.

Guideline 4 of the PID Guidelines requires the principal officer of a public sector agency to make sure an agency's procedure includes a clear statement of their expectations in respect of the operation and implementation of the PID Act. This statement must show a commitment to protecting informants and to genuinely and efficiently considering and acting on information provided in a public interest disclosure. Guideline 4 further mandates that the document outline:

- how the public sector agency will receive public interest disclosures
- the criteria that will be applied in the assessment of a public interest disclosure
- how details of the assessment of the disclosure will be securely stored and the person in the agency who might be advised of the assessment
- how an informant will be kept informed as to action taken in relation to a disclosure
- the persons in the agency who can be contacted if the informant believes that their disclosure is not being dealt with appropriately.

The evaluation team observed that whilst the procedure includes much of the information required by the PID Act and Guideline 4, there are areas that may be strengthened. Opportunities for enhancement are discussed throughout this report within the relevant chapters. This report includes a recommendation³² that DHS generally review and update its procedure to ensure it is accurate, clear and compliant with section 12 of the PID Act and Guideline 4 of the PID Guidelines.

Public interest disclosure procedure flowchart

To accompany the procedure, DHS has developed a public interest disclosure procedure flowchart (Appendix 5).³³ The flowchart provides guidance for employees who wish to make a public interest disclosure and those who may receive a disclosure. The use of a flowchart as a visual aid for staff to help them understand DHS' public interest disclosure procedure and the PID Act can be a valuable resource. However, ensuring that the information in the flowchart accurately reflects legislative obligations is essential. The evaluation team has identified opportunities to improve DHS' flowchart so that it is more comprehensive, clearer and easier to use.

The flowchart asks the reader to consider whether the information they wish to disclose is "public interest information under [the] PID Act"; if it is not, the flowchart instructs the reader to "stop". Although the information may not be public interest information, the likelihood of alternative action being required is high. Instead, it would be more helpful to redirect the reader to other complaint pathways available, rather than advising them to take no action. For example, in the case of suspected misconduct by a DHS employee not reaching the threshold of being reportable under the PID Act, a fellow DHS employee may nevertheless have a separate reporting obligation under the Code of Ethics for the South Australian public sector. In these circumstances, a report may be made to the relevant DHS Executive Director or Executive Director, People and Culture.

³² This recommendation is made at the conclusion of this report, see recommendation 13.

³³ EXH005.

If information is considered to be “public interest information”, the flowchart instructs the reader to contact a DHS responsible officer via a generic email address, phone number or postal address, or contact the OPI or OCPSE to make a report. It would be beneficial to include, or allude to, other possible relevant authorities that may receive disclosures, including managers and supervisors, and provide a hyperlink to further contact details. The addition of these details will mean that those considering making a disclosure are as well-informed as possible about the various pathways available to them.

The flowchart does not reference all the obligations a disclosure recipient has under the PID Act. Section 7 of the PID Act provides that upon receiving a disclosure, the recipient must assess the information and:

- take action³⁴ in relation to the disclosure (in accordance with the PID Guidelines)
- take reasonable steps to notify the informant³⁵ that an assessment has been made and the action being taken (or the reasons why no action is being taken)
- provide the OPI with information relating to the disclosure in accordance with the PID Guidelines.³⁶

The flowchart includes the obligation to notify the OPI but does not refer to the requirement to notify the informant of the initial assessment. The flowchart only references the obligation to notify the informant of the outcome of an investigation under section 7(3)(a) of the PID Act. Whilst the flowchart is intended to be a high-level summary and guide, it is recommended that this obligation to notify the informant of the initial assessment be included.

DHS may wish to otherwise review the flowchart for completeness. For example, the flowchart in its current form appears to imply that if there is an imminent risk of serious injury or death, no further action needs to be taken in relation to the disclosure beyond notifying an appropriate agency such as South Australia Police. The flowchart should make clear that other action may still need to be taken in relation to the disclosure under the PID Act.

DHS may also consider creating separate flowcharts for environmental and health information and public administration information to avoid confusion and ensure the distinction is clear.

Recommendation	1
Review and update the DHS public interest disclosure procedure flowchart for completeness, clarity and useability, including to: i. provide information about alternative complaint and reporting pathways for information that does not fall within the definition of “public interest information” ii. refer to all possible relevant authorities and provide contact details iii. list all obligations that apply to a recipient of a disclosure of public interest information under the PID Act and PID Guidelines iv. separate the pathways for environmental and health information and public administration information.	

³⁴ *PID Act* (n 4) s 7(1)(a). Section 7(2) of the *PID Act* (n 4) provides that no action need be taken if the information does not justify taking further action or if the information relates to a matter that has already been investigated or acted upon by a relevant authority and there is no reason to re-examine the matter or there is other good reason why no action should be taken.

³⁵ *Ibid* s 7(1)(b). This subsection applies if the informant's identity is known.

³⁶ *Ibid* s 7(1)(c).

4.2 Fraud and corruption controls

A strong pro-reporting culture and a zero tolerance for unethical behaviour is echoed throughout DHS’ practices, policies and procedures. DHS staff must adhere to a range of policies and procedures designed to mitigate against the risk of corruption and fraud. These include:

- Fraud and Corruption Control Framework
- Conflict of Interest Policy
- Gifts and Benefits Policy and Guidelines
- Risk Management Framework and Policy
- Information Security Policy
- Data Governance Policy
- Data Breach Response Procedure
- Respectful Treatment at Work Policy and Factsheet.

These documents are generally informative, provide important direction to employees and emphasise DHS’ strong stance against improper conduct. However, many of the documents do not refer to reporting obligations and pathways, or to the PID Act, at all.³⁷ While some do, they often do so in a way that lacks detail³⁸ and accuracy.³⁹ It would be beneficial to further embed such references and review existing ones for consistency and accuracy.

Recommendation	2
Review and update general corporate documents relating to fraud and corruption risks to: i. include information about when and where to report suspected wrongdoing ii. further integrate information about the PID Act, DHS’ public interest disclosure procedure and flowchart, as well as reporting obligations and pathways where relevant iii. ensure references to ICAC or the OPI are up-to-date reflecting the 2021 legislative changes to the ICAC Act.	

37 EXH047; EXH048; EXH051; EXH052; EXH053.

38 EXH046.

39 For example, EXH050 refers to reporting obligations contained in ICAC’s Directions and Guidelines (and includes an expired hyperlink), but such directions and guidelines are now published by the OPI and Ombudsman SA. EXH054 and EXH055 state that DHS staff are required to report corruption, misconduct and maladministration “in accordance with the PID Act”, however this is not accurate. The obligation to report corruption and the expectation to report misconduct and maladministration comes from directions and guidelines issued by the OPI and Ombudsman SA. Further, staff have the option to report under the *PID Act* (to attract protections) but it is not mandatory.

Within the Office of the Chief Executive and Governance directorate sits the Internal Risk and Audit team which has responsibility for preparing audit plans and audit reports across DHS. Part of its role includes identifying gaps in current controls, monitoring and planning for risk, providing assurance, and formulating recommendations for improvement.⁴⁰ A standard objective of each audit is to “determine whether the current control environment provides effective protection against fraud and maladministration”.⁴¹ At present, there are no audits within the audit plan that relate to the PID Act.⁴² There may be an opportunity for DHS to consider whether regular audits could be conducted to assess the extent to which DHS’ systems and processes facilitate compliance with the PID Act. This would allow for regular reviews of DHS’ existing framework and practices. Alternatively, broader audits on complaint handling in DHS could assess whether appropriate arrangements are in place to support the identification of potential public interest disclosures.

Recommendation	3
Consider developing an audit program to regularly review whether the systems and processes in place for making, assessing and recording public interest disclosures are compliant with the PID Act and PID Guidelines.	

40 EXH090.
41 EXH050.
42 EXH090.



Chapter 5: Internal reporting pathways and overlapping schemes

DHS has several policies and procedures governing the making and handling of reports about different types of conduct. The following table sets out some of those policies and procedures as well as the types of conduct they deal with.

Policy/procedure	Type of conduct
Critical Client Incident Policy and Critical Client Incident Reporting Procedure	Critical Client Incidents - defined as "an event (or alleged event) that occurs as a result of, or during, the delivery of services directly provided by DHS or a service provider and has caused, or is likely to cause, significant negative impact to the health and/or safety of a client". This may include unexpected death, serious injury, alleged assault of a client or unlawful or criminal activity involving a worker that has caused, or has the potential to cause, injury or impact on the health and/or safety of a client. ⁴³
Grievance Resolution Procedure	Grievances – includes workplace issues (inappropriate or culturally unsafe behaviour, violence, bullying, racism, sexual harassment and unlawful discrimination) and employment decisions (e.g. improper selection process, promotion, termination of employment). ⁴⁴
Managing Incidents in the Workplace Procedure	Incidents – defined as "an event or behaviour that fails to meet an acceptable level of care or performance that poses a risk to the health and safety of a client or staff member". This includes a client receiving a minor injury, client medication errors, inappropriate interactions or failure to provide adequate care or supervision. ⁴⁵
Reporting Harm of Children and Young People Procedure	Applies where a DHS worker has a reasonable suspicion that a child or young person has been or is at risk of harm. ⁴⁶

The above policies and procedures apply across all divisions of DHS and generally apply to all employees, consultants, contractors, students and volunteers who become aware of certain conduct. Some divisions or directorates, including Disability Services and Youth Justice, have additional reporting policies and procedures specific to the work of those divisions or directorates. Each business unit with direct customer service responsibilities also has its own procedure for general complaint handling, as required by DHS' Customer Feedback and Complaints Policy⁴⁷ and Premier and Cabinet Circular *Complaint Management in the South Australian Public Sector* (PC039).⁴⁸

⁴³ EXH007.

⁴⁴ EXH013.

⁴⁵ EXH015.

⁴⁶ EXH016.

⁴⁷ EXH011.

⁴⁸ Department of the Premier and Cabinet, *Premier and Cabinet Circular PC039 – Complaint Management in the South Australian Public Sector* (at November 2023) 4.

Given the breadth and nature of DHS' functions, DHS staff are also required to comply with a range of Commonwealth and State regulatory schemes as part of their roles. For instance, DHS staff have obligations under the *Children and Young People (Safety) Act 2017* (SA),⁴⁹ *Criminal Law Consolidation Act 1935* (SA)⁵⁰ and *National Disability Insurance Scheme Act 2013* (Cth)⁵¹ to make reports relating to the safety of children and young people as well as National Disability Insurance Scheme clients.⁵² DHS' policies and procedures, such as the Reporting Harm of Children and Young People Procedure, aim to ensure compliance with those regulatory schemes.⁵³

Many policies and procedures, including those identified in the table above, require staff members to notify DHS' Incident Management Unit (**IMU**) of incidents,⁵⁴ or at least consider whether the IMU should be notified or consulted about the action to be taken. Any staff member, consultant, contractor, service provider, student on placement, volunteer or member of the public may also refer a matter to the IMU if they believe an investigation is required.⁵⁵ The IMU is responsible for the management of various incidents across DHS and provides advice on reporting obligations and what action should be taken in response to reports.⁵⁶ Matters can be referred to the IMU via email to a general IMU inbox or Critical Client Incident inbox (if the incident is a Critical Client Incident) or via the DHS Hazard and Incident Reporting System.⁵⁷ Incidents referred to the IMU are assessed by a panel of senior DHS staff (known as the Triage Panel) to determine an appropriate course of action.⁵⁸ In some cases, the IMU may conduct formal misconduct investigations and disciplinary processes.⁵⁹

It is evident that DHS has established different reporting pathways for different types of conduct. Each policy or procedure contains different directions about who to report to, what action may be taken and what rights or obligations arise. While these policies or procedures sit alongside the public interest disclosure procedure, there are circumstances in which there is the clear potential for overlap between the subject matter of those procedures. For example, complaints regarding employment decisions, harassment, discrimination, child safety and client care could also fall within the ambit of public administration information if a potential issue of corruption, misconduct or maladministration in public administration is raised. In some cases, reports may be complex and involve several types of potential wrongdoing.⁶⁰

As acknowledged in the Whistleblower Project final report, the existence of multiple, possibly overlapping, reporting pathways increases the risk that those who may otherwise be eligible for protection may not qualify for protection under the PID Act. For example, a staff member who would otherwise be eligible for protection may not have the benefit of those protections if they have used a reporting pathway that meant their disclosure was not made to a 'relevant authority'. Reports of public administration information may not be dealt with appropriately if the reporter and the recipient of the report are not alive to the PID Act or public interest disclosure procedure.

49 Section 31 requires the reporting of a suspicion that a child or young person may be at risk where the suspicion was formed in the course of the person's employment.

50 Section 64A provides that it is an offence if a prescribed person fails to report suspected child sexual abuse to police. Staff within DHS would fall within the definition of a 'prescribed person'.

51 See, for example, section 73Z which provides for the reporting of 'reportable incidents' in accordance with the National Disability Insurance Scheme Rules.

52 EXH008.

53 EXH016.

54 For example, managers or supervisors have an obligation to advise the IMU of 'reportable incidents' under the Managing Incidents in the Workplace Procedure.

55 EXH028.

56 EXH091; EXH032.

57 EXH028.

58 EXH028; EXH029.

59 EXH028.

60 Transparency International, *Internal whistleblowing systems: Best practice principles for public and private organisations* (Report, September 2022) 15 ('*TI best practice guide for internal systems*').

“Whistleblowing procedures can get lost in the welter of policies and procedures that every public sector organisation must have in place to meet its governance obligations.”⁶¹

Peter Roberts, A J Brown and Jane Olsen, *Whistling While They Work*

It can be challenging for reporters to differentiate between the scope of various procedures and determine the appropriate procedure to follow. Clear information and awareness training is key to effectively guiding individuals toward the most appropriate channel.⁶² However, it is equally important that policies and procedures do not operate in isolation and that an integrated approach is taken.

Information from the evaluation indicates that the PID Act is not ‘front-of-mind’ for those drafting and reviewing DHS policies and procedures or developing complaint systems such as the grievance portal, used to receive workplace grievances.⁶³ It was acknowledged that work could be done within DHS to better integrate information about the PID Act into other complaint or reporting pathways.⁶⁴ This would assist in ensuring that consideration is given to the PID Act in the context of other pathways and the public interest disclosure procedure is not forgotten.

It is recognised that in some cases, it is necessary for DHS to take immediate action to address conduct, such as where it has a legislative obligation under a Commonwealth or State scheme to report a risk of harm to an external authority. There may be tension between the protections of the PID Act (e.g. to ensure confidentiality) and the need to address a safety concern or mitigate a risk of harm.⁶⁵ This was raised during the evaluation.⁶⁶ The Whistleblower Project final report includes a recommendation to amend the PID Act to allow information to be disclosed where there is a risk of physical or psychological harm.⁶⁷ This would allow for better harmonisation between the PID Act and the reporting obligations of agencies where there is a risk of harm.

Recommendation

4

Consider strengthening the integration of the PID Act framework within other internal policies and procedures relating to the making of complaints and reports. This should include referring to the PID Act in those other internal policies and procedures and, where possible, providing guidance about interrelationship.

61 Peter Roberts, A J Brown and Jane Olsen, *Whistling while they work: a good-practice guide for managing internal reporting of wrongdoing in public sector organisations* (Report, 2011) 28 (*‘Whistling While They Work’*).

62 *TI best practice guide for internal systems* (n 60) 15.

63 It is noted that the Whistleblower Project final report includes a discussion about whether personal workplace grievances should be protected and recommends that conduct solely related to personal workplace grievances should be excluded from South Australia’s whistleblower laws except where such conduct may be particularly serious or may amount to victimisation.

64 EXH093; EXH091.

65 This would apply where it is necessary to divulge the identity of the reporter, directly or indirectly, to take action to address conduct.

66 EXH091.

67 See recommendation 44 of the Whistleblower Project final report.

As stated above, in agency environments where there are multiple (and possibly overlapping) reporting pathways, education and awareness is particularly important. The evaluation team was informed that responsible officers in DHS are rarely, if ever, approached by staff to provide information or advice about the public interest disclosure process.⁶⁸ The infrequency with which responsible officers are approached could suggest DHS staff are making internal reports that are likely to engage the PID Act without realising.⁶⁹ Where DHS staff do not turn their minds to whether their disclosures are likely to engage the PID Act, it is all the more important that recipients of such reports are aware of that possibility. Interviews revealed that many of those with responsibilities under the PID Act would need to consult or rely on the PID Act and/or DHS’ public interest disclosure procedure if they received a public interest disclosure.⁷⁰ This is due, in combination, to the passage of time since their completion of relevant training and because they rarely receive public interest disclosures and therefore have limited interaction with the PID Act.⁷¹ It is also reflective of the complexity of the PID Act.

It was expressed in interviews that staff may be more confident using external reporting pathways, such as the OPI.⁷² In OCPSE’s 2024 People Matter Employee Survey (**People Matter Survey**), 90 per cent of DHS respondents stated that they knew how to report suspected unethical conduct. However, DHS’ annual reports record that only one disclosure of public interest information was made to a responsible officer of DHS between 2021 and 2025.⁷³ By comparison, data provided by the OPI shows that between mid-2022 and mid-2025, 58 reports were made to the OPI by DHS employees.⁷⁴



According to DHS annual reports and data provided by OPI.

This suggests that there is an opportunity for DHS to increase awareness of the PID Act and its public interest disclosure procedure across the agency, specifically in relation to internal reporting. This is discussed further in Chapter 7.

68 EXH090; EXH094; EXH093.

69 EXH091; EXH094.

70 EXH094; EXH090; EXH091.

71 EXH094; EXH090; EXH091.

72 EXH094; EXH093.

73 Department of Human Services, *Department of Human Services 2021-22 Annual Report* (Report, 30 September 2022) 52; Department of Human Services, *Department of Human Services 2022-23 Annual Report* (Report, 29 September 2023) 48; Department of Human Services, *Department of Human Services 2023-24 Annual Report* (Report, 30 September 2024) 54; Department of Human Services, *Department of Human Services 2024-25 Annual Report* (Report, 30 September 2025) 58.

74 EXH100.



Chapter 6: Receipt and management of reports

6.1 Receipt of reports

DHS' public interest disclosure procedure⁷⁵ outlines DHS' commitment to having comprehensive procedures in place for receiving and assessing public interest information and ensuring that staff are informed about the correct process for disclosing and receiving such information. The procedure explains how to make a disclosure "related to DHS or a DHS employee", including who can receive a public interest disclosure and how such disclosures may be received.

The procedure provides that an informant may make an external disclosure to a relevant authority including the OPI or the OCPSE, or an internal disclosure by "contacting DHS". Internal disclosures may be made to a responsible officer within DHS or to the person responsible for the management or supervision of "the DHS employee". The procedure includes the position titles of those designated as "responsible officers" within DHS, and a hyperlink to the intranet page containing their contact details.

Disclosures about DHS can also be made internally by emailing a "PID inbox" dedicated to receiving public interest disclosures, or by contacting a general telephone number or postal address specified in the procedure. Disclosures made via post are to be addressed to "Public Interest Disclosure Responsible Officer" and marked as "OFFICIAL: Sensitive". These particular channels are available to everyone, including those who do not have access to the DHS intranet.⁷⁶

The PID Act does not require external disclosures to relate to the relevant agency within which the discloser is employed.⁷⁷ For instance, a DHS employee may make an external report to the OPI about an agency or officer unconnected with DHS. Consideration may be given to amending the wording of DHS' public interest disclosure procedure to clarify that external disclosures need not "relate to DHS or a DHS employee" to attract protections under the PID Act.

In relation to external disclosures, DHS' public interest disclosure procedure states that an external disclosure relating to DHS can be made to the OPI and OCPSE as relevant authorities. Whilst the procedure refers to the existence of other relevant authorities in section 5(5) of the PID Act, it may be worthwhile for the procedure to also make reference to Ombudsman SA as a relevant authority given its role in receiving and investigating complaints of misconduct and maladministration in public administration.

⁷⁵ EXH006.

⁷⁶ Noting that DHS' public interest disclosure procedure is publicly available on the DHS website.

⁷⁷ The Whistleblower Project final report discusses whether there should be a connection between the disclosure and the public officer's role. It makes a recommendation to require such a connection to be eligible for whistleblower protections, see recommendation 1.

Accessible reporting channels

It is imperative that reporting channels are accessible to those who may use them. Transparency International recommends that when establishing channels for reporting, organisations should consider the various circumstances of whistleblowers and address factors such as language barriers, literacy levels, disabilities and internet access.⁷⁸

DHS provides a range of avenues for the making of public interest disclosures. As recognised in the Whistleblower Project final report, allowing reports to be made in writing (online via email or offline via post) and orally (by phone or in person) increases the accessibility of the whistleblower scheme and enables those with different communication abilities and preferences to bring matters to light in a manner suited to their individual needs. DHS' public interest disclosure procedure also contemplates that some prospective disclosers may have accessibility needs and includes contact details for support services including translation services and the National Relay Service.⁷⁹ Dedicated central repositories, including general inboxes, simplify the making of disclosures by removing the need for a prospective discloser to identify, and locate the details for, a particular responsible officer. DHS is to be commended for its efforts in ensuring that the channels available for making reports are accessible to its diverse and dispersed workforce.

Anonymous reporting channels

The evaluation team was informed that those looking to make complaints or reports generally in DHS often express a desire to remain anonymous or for some other kind of protection in terms of confidentiality.⁸⁰ This is consistent with data from ICAC's 2021 and 2024 Public Integrity Surveys, which suggests that close to 80 per cent of all South Australian public officers prefer to report anonymously. Transparency International recommends that at least one internal whistleblowing channel enable anonymous reporting, and a safe channel for communication between anonymous reporters and the person handling their report exists.⁸¹ International guidance echoes this.⁸²

While the PID Act does not expressly state that reports may be made anonymously in South Australia, it contemplates that in some circumstances, the identity of a reporter may not be known.⁸³ It is observed in the Whistleblower Project final report that anonymous disclosures are already made and received under the current regime.⁸⁴

Many of the existing reporting channels available at DHS allow for anonymous reporting. For instance, anonymous reports may be made by post, or by email to the PID inbox, relevant responsible officer or manager or supervisor (if a de-identified email address is used to make the disclosure). Anonymous disclosures may also be made via phone, for example by using a blocked number, but there is a risk that a person may be identified by voice.

⁷⁸ *TI best practice guide for internal systems* (n 60) 25.

⁷⁹ EXH006.

⁸⁰ EXH091.

⁸¹ *TI best practice guide for internal systems* (n 60) 25.

⁸² G20, *High-Level Principles for the Effective Protection of Whistleblowers*, 2019, principle 5.

⁸³ See *PID Act* (n 4) ss 6(b)(ii), 7(1)(b), 7(3)(a).

⁸⁴ The Whistleblower Project final report recommends that South Australia's whistleblower laws expressly state that disclosures may be anonymous, see recommendation 54.

The possibility of using an online portal to receive public interest disclosures was raised during the evaluation. The evaluation team was informed that DHS currently has a grievance portal that allows staff to lodge grievances⁸⁵ by filling out an electronic form.⁸⁶ Employees are required to provide their name and employee number before submitting a grievance through the portal but can indicate a preference to remain anonymous.⁸⁷ Where there is a preference to remain anonymous, only restricted human resources administrators have access to the grievance and the complainant's identity.⁸⁸

The grievance portal is not currently designed to receive disclosures of public administration information and there is no reference to public interest disclosures or the PID Act in the form itself.⁸⁹ However, the Grievance Resolution Procedure does refer to public interest disclosures by stating that disclosures of public interest information under the PID Act (disclosures relating to potential corruption, misconduct or maladministration) are managed in accordance with DHS' public interest disclosure procedure.⁹⁰ The evaluation team was informed that the grievance portal could be modified to allow for the receipt of such disclosures.⁹¹ However, this portal may not be the best platform to anonymously receive public interest disclosures due to a lack of absolute anonymity. During the evaluation, it was acknowledged that it is hard for people to feel protected if they are required to disclose their identity.⁹²

The potential use of online portals to anonymously receive disclosures and facilitate ongoing communication with anonymous disclosers was discussed in the Whistleblower Project final report. It was ultimately recommended that the appropriateness and suitability of relevant tools be reviewed by a designated oversight body for South Australia's whistleblower laws, with a view to providing guidance to other recipients of public interest disclosures; this includes agencies such as DHS.⁹³

In light of the above, recommendations have not been made in this report for DHS to establish or introduce a new anonymous reporting channel.

Relevant authorities

Within DHS, internal reports made to responsible officers or to certain managers and supervisors may qualify for the protections in the PID Act. Both classes of persons are relevant authorities under the PID Act.⁹⁴

Section 12 of the PID Act requires the principal officer of a public sector agency or council to designate at least one staff member as a responsible officer. The principal officer has discretion to determine the number of responsible officers, and who they will be (provided there is at least one). The only requirement imposed by the PID Act and the PID Regulations is that the persons designated as responsible officers must complete any training courses approved by ICAC.⁹⁵

85 A grievance is defined in EXH013 to include workplace issues (e.g. bullying, racism, violence, discrimination) or review of an employment decision (e.g. improper selection process, promotion, termination of employment).

86 EXH093.

87 EXH081.

88 EXH081; EXH084.

89 EXH093.

90 EXH013.

91 EXH093.

92 Ibid.

93 See recommendation 47 of the Whistleblower Project final report.

94 *PID Act* (n 4) s 5(5)(a)(ii).

95 *Public Interest Disclosure Regulations 2019* (SA) reg 4.

DHS currently has six responsible officers designated under section 12 of the PID Act. Those staff members occupy the following senior positions in DHS:⁹⁶

- Chief Financial Officer
- Executive Director, People and Culture⁹⁷
- Director, Office of the Chief Executive and Governance
- Director, People and Partnerships
- Manager, Incident Management Unit
- Manager, Internal Audit and Risk.

All current responsible officers hold a management or executive role within DHS. The evaluation team was informed that responsible officers are selected based on their position, as opposed to employees volunteering to be a responsible officer.⁹⁸ The positions selected are those that are seen as most likely to receive and manage complaints and reports as part of their role (i.e. staff in human resources, auditing and risk and internal investigations).⁹⁹ It is acknowledged that these individuals may be relevant authorities, irrespective of their designation as responsible officers, in their capacities as managers or supervisors.¹⁰⁰

Those interviewed as part of the evaluation generally agreed that it would be beneficial to have some responsible officers below management level, as this would increase accessibility and alleviate any fears or anxieties associated with reporting to management.¹⁰¹ It was expressed that responsible officers in less senior positions would likely receive more reports.¹⁰² However, one interviewee raised that designating a junior staff member as a responsible officer may put unnecessary pressure on them or make them feel compromised.¹⁰³ It may be that a middle ground can be found, whereby consideration could be given to designating appropriate staff below management level as responsible officers.

In addition to the role of responsible officers, their location is also relevant to the issue of accessibility. The evaluation team was informed that all of DHS' current responsible officers are centrally located within DHS' corporate office in Adelaide's central business district.¹⁰⁴ While their contact details are located on the DHS Intranet, which is accessible to staff, students, volunteers and some contractors and consultants, not all of DHS' workforce has consistent access to a computer or the internet.¹⁰⁵ Given DHS' workforce is physically dispersed across South Australia, consideration may be given to having responsible officers in sites or workplaces other than the main corporate office. It was expressed to the evaluation team that this could be possible.¹⁰⁶

96 EXH006; EXH062.

97 This directorate is now named 'Workforce Development and Integrity'.

98 EXH091.

99 EXH090; EXH091; EXH093.

100 PID Act (n 4) s 5(5)(a)(ii).

101 EXH090; EXH091; EXH093.

102 EXH093.

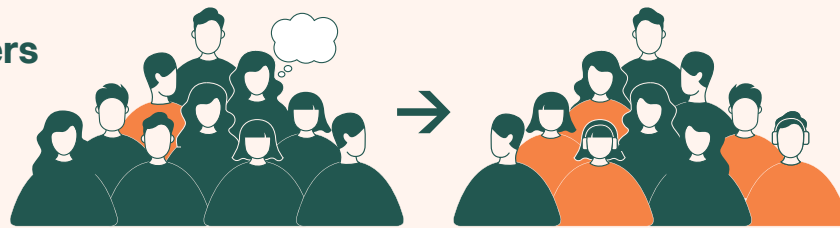
103 EXH094.

104 EXH094; EXH090; EXH091; EXH093.

105 EXH094; EXH095.

106 EXH094.

Agencies may benefit from additional responsible officers at different levels of seniority and in accessible locations.



Recommendation

5

That the Chief Executive of DHS, as the principal officer of the agency, consider whether additional responsible officers should be designated under section 12 of the PID Act to improve accessibility across the agency. Particular consideration should be given to the seniority and location of persons designated as responsible officers.

Information received during the evaluation suggested that it may not be widely known in DHS that, in certain circumstances, managers and supervisors may receive disclosures of public administration information. The evaluation team was informed that managers and supervisors themselves are probably not aware that public interest disclosures can be reported to them.¹⁰⁷ Information from the evaluation indicates that DHS currently has around 300 staff at management level.¹⁰⁸

While this category of relevant authority is mentioned in DHS' public interest disclosure procedure, the procedure is ambiguous as to whether the disclosure may be made to the manager of the reporter, or the manager of the person the subject of the report.¹⁰⁹ It is acknowledged that some ambiguity may arise from the PID Act itself. The Whistleblower Project final report makes a recommendation to address this by including both the manager of the reporter and the manager of the person the subject of the report, as relevant authorities.¹¹⁰ In the interim, it may be suitable for DHS to increase awareness of this category of relevant authority including by ensuring the public interest disclosure procedure flowchart refers to managers and supervisors.

It is understandable that, given there may be some ambiguity in the PID Act, an agency may want to encourage reporting to another, more certain, relevant authority such as a responsible officer.¹¹¹ However, it is still important that staff are aware that reports may be made to managers and supervisors, and managers and supervisors are aware that they may be a relevant authority under the PID Act. As noted in the Whistleblower Project final report, managers and supervisors provide an important channel for making disclosures. Evidence suggests reporters are more likely to report to their own manager or other internal management compared to other channels.¹¹² It is therefore essential that managers and supervisors are equipped to identify when the PID Act might apply or when they should seek further information or advice about the application of the PID Act. This is particularly the case where they may receive and manage complaints under other reporting pathways.

¹⁰⁷ EXH092.

¹⁰⁸ EXH095.

¹⁰⁹ See EXH006. As noted in the Whistleblower Project final report, it seems that disclosures may be made to the manager of the person who is the subject of the report.

¹¹⁰ See recommendation 19 of the Whistleblower Project final report.

¹¹¹ It is not suggested that this is the approach taken by DHS.

¹¹² Human Rights Law Centre and Transparency International Australia, Submission No 27 to Independent Commission Against Corruption South Australia, *Whistleblower Project* (12 November 2025) 18. See https://www.icac.sa.gov.au/_data/assets/pdf_file/0003/1227270/HRLC-and-Transparency-International-submission-2025.pdf

The Whistleblower Project final report makes recommendations around training (including refresher training) for managers and supervisors and other relevant authorities, including on the appropriate identification and handling of public interest disclosures.¹¹³ While this would no doubt increase awareness among managers and supervisors of their potential obligations under the PID Act, there are also measures DHS can implement internally to assist. For instance, it was suggested by one staff member during the evaluation that there could be communication pieces to staff or messaging could be incorporated into existing management training.¹¹⁴ The evaluation team was also informed about a workshop-style managers' forum, held quarterly, attended by managers across DHS.¹¹⁵ This may be another suitable opportunity for DHS to communicate to managers and supervisors that they may receive disclosures, and therefore have obligations, under the PID Act.

Recommendation

6

Consider ways to further communicate and increase awareness that, in certain circumstances, managers and supervisors may be relevant authorities under the PID Act.

DHS' public interest disclosure procedure states that relevant authorities are encouraged to report misconduct or maladministration in public administration to the OPI. As discussed in Chapter 2.3, Ombudsman SA's Directions and Guidelines create an expectation that such matters are reported to Ombudsman SA.¹¹⁶ As such, the procedure should be amended to accurately reflect current reporting obligations and expectations. These obligations and expectations apply not only to relevant authorities, but also to disclosers.

6.2 Ensuring confidentiality

Receiving disclosures

As set out in Chapter 4, Guideline 4 of the PID Guidelines requires agencies to include in their public interest disclosure procedure the ways in which disclosures will be received. This includes information about:

- the precise way a disclosure can be securely received (e.g. URL links, telephone numbers, email addresses and postal addresses)
- the steps in place to ensure public interest information is securely received and stored
- the person who will have responsibility for ensuring compliance with those steps.

¹¹³ See recommendations 45, 54 and 55 of the Whistleblower Project final report.

¹¹⁴ EXH092.

¹¹⁵ EXH095.

¹¹⁶ Unless the public officer or public authority knows that the conduct has already been reported to Ombudsman SA or the OPI or has otherwise come to the attention of either.

As mentioned, DHS' public interest disclosure procedure sets out a variety of ways in which a disclosure may be received; by phone, email, post or in person. In relation to disclosures via post, specific instructions are included for addressing and marking envelopes to ensure disclosures are confidentially received by the appropriate persons within DHS.¹¹⁷ Disclosures may also be made anonymously using the channels available.

The use of general repositories such as dedicated general email inboxes, phone numbers and postal addresses is not specifically mentioned in the PID Act, PID Regulations or PID Guidelines. While there are benefits to using these channels to make and receive disclosures, the associated risks were discussed in the Whistleblower Project final report. One risk is that there may be a loss of confidentiality where adequate measures are not put in place to restrict access to the information received by such repositories. There is also a risk that a reporter may not be eligible to receive protections under the PID Act if measures are not in place to ensure that a disclosure is received by a relevant authority.

The evaluation team was advised that only two staff have access to DHS' PID inbox, both of whom are responsible officers.¹¹⁸ The phone number listed in the PID procedure is DHS' general enquiries line, which is answered by DHS' central switchboard or general enquiries team, who triage calls and refer callers to the relevant business area or "authorised officer".¹¹⁹ Mail sent to the nominated postal address is received by DHS via central mail services.¹²⁰ Where correspondence is clearly marked as confidential or relates to a public interest disclosure, it is not opened and forwarded directly to a responsible officer.¹²¹ It appears from the above that DHS has appropriate arrangements in place to ensure that disclosures made via these channels are received by a relevant authority in a confidential manner.

In addition to having appropriate arrangements in place, it is important that such arrangements are communicated to staff. The PID Guidelines require an agency's public interest disclosure procedure to set out the steps in place to ensure disclosures are securely received.¹²² While DHS confirmed during the evaluation the persons who have access to the PID inbox, the evaluation team observed that it is unclear, on the face of DHS' public interest disclosure procedure, by whom disclosures made via the PID inbox, general phone number or postal address are received. It became apparent during interviews that there is a difference in understanding among staff as to who has access to, and monitors, the PID inbox.¹²³ In the absence of clear communication, prospective disclosers may be reluctant to report due to concerns about confidentiality or eligibility for protection under the PID Act. Clear communication in relevant procedures not only provides reassurance to staff but also assists in ensuring compliance with the PID Guidelines. DHS has expressed a willingness to update the public interest disclosure procedure to provide greater clarity to staff.¹²⁴

117 EXH006.

118 EXH084.

119 EXH087.

120 Ibid.

121 Ibid.

122 *Public Interest Disclosure Guidelines* (2022) (SA) Guideline 4 ("PID Guidelines").

123 EXH092; EXH094; EXH093; EXH091; EXH090.

124 EXH089.

Assessment and management of reports

Recipients of reports have an obligation to ensure that the identity of a reporter remains confidential unless one of the exceptions in the PID Act or PID Guidelines applies.¹²⁵ DHS' public interest disclosure procedure outlines DHS' commitment to protecting informants who make public interest disclosures by ensuring that the identity of the informant is kept secure (where an exception does not apply) and by maintaining the strict confidentiality of records in accordance with the *State Records Act 1997* (SA)¹²⁶ and the State Records General Disposal Schedule.¹²⁷ The procedure also provides that it is the responsibility of responsible officers to ensure that disclosures are managed with appropriate confidentiality.

In practice, DHS protects the confidentiality of informants by "locking things down" in its records management system so that information is only accessible by those authorised.¹²⁸ A cautious approach is taken when handling referrals from the OPI or ICAC and advice is sought from the OPI or ICAC if there is uncertainty around whether information can be disclosed.¹²⁹ DHS' IMU has established practices for dealing with public interest disclosures to ensure confidentiality is maintained. For instance, ordinarily when a complaint or report is received by, or referred to, the IMU, a summary of the matter is included in an agenda that is distributed to an established Triage Panel. That does not occur in the case of public interest disclosures, to prevent the unauthorised disclosure of such information.¹³⁰ Although all matters referred to the IMU are "locked down" in DHS' records management system, IMU alters its file naming conventions where a public interest disclosure has been identified, to protect the identity of the informant.¹³¹

In the context of investigations, it is apparent that confidentiality is a core consideration, regardless of whether the investigation relates to a public interest disclosure. For example, information regarding grievance investigations is usually disclosed on a "need to know" basis and complainants are consulted before an investigation has commenced about whether they wish to remain anonymous (if not already voiced).¹³² If they elect to remain anonymous, they are often advised that this may hinder DHS' ability to investigate the matter.¹³³ Investigation files are "locked down" with audit trails, and those investigating the matter are careful not to alert others to the investigation when requesting documents and other information as part of the investigation.¹³⁴

It is clear that DHS has practices in place to ensure that the confidentiality of reporters is protected unless an exception applies. It would be beneficial for DHS to outline some of these practices, as appropriate,¹³⁵ in its public interest disclosure procedure and other relevant procedures including the incident management unit procedure. This would assist in ensuring such practices are documented and uniformly followed and that DHS is complying with Guideline 4 of the PID Guidelines. The inclusion of this information may also assist in encouraging reporting by providing comfort to prospective reporters.

¹²⁵ *PID Act* (n 4) s 8; *PID Guidelines* (n 122) Guideline 3.

¹²⁶ The *State Records Act 1997* (SA) establishes the office of State Records as the principal repository for official records and contains requirements to ensure official records are preserved and managed in accordance with best practices, see s 5.

¹²⁷ The State Records General Disposal Schedule governs the permanent preservation and destruction of records.

¹²⁸ EXH093; EXH091.

¹²⁹ EXH094.

¹³⁰ EXH091.

¹³¹ *Ibid.*

¹³² EXH093.

¹³³ It was acknowledged that this may disincentivise reporters. However, open and honest communication is important, EXH093; EXH081.

¹³⁴ EXH093.

¹³⁵ Consideration should be given to the level of detail included in public facing documents regarding internal practices.

6.3 Protection from victimisation

Section 9 of the PID Act makes it an offence for a person to commit an act of victimisation. A person commits an act of victimisation if they cause detriment to another on the ground, or substantially on the ground, that the other person or a third person has made, or intends to make, a public interest disclosure.¹³⁶

It is essential that whistleblowing procedures meaningfully protect whistleblowers from all forms of retaliation.¹³⁷ Proactively protecting reporters from victimisation or reprisal, and acting when an allegation of victimisation is made, is vital for creating an environment in which employees feel encouraged and supported to report suspected wrongdoing and serious incompetence. If public sector agencies and councils are not seen to provide protections and take complaints about victimisation seriously, public officers may be less likely to come forward.

The PID Act requires agencies to set out in their public interest disclosure procedure clear obligations to take action to protect informants and risk management steps for assessing and minimising detrimental action against people because of public interest disclosures.¹³⁸ This includes assessing and minimising detriment to people who are the subject of disclosures.

DHS' public interest disclosure procedure conveys a strong message with respect to victimisation.¹³⁹ The procedure makes clear that victimisation is a criminal offence, with reference to the relevant provisions in the PID Act. Informants are encouraged to notify a DHS responsible officer or another relevant authority such as the OPI or OCPSE if they have concerns about victimisation or believe they have been victimised as a result of making a disclosure. The procedure also provides that DHS will address and minimise the risk of potential detrimental outcomes in accordance with DHS' Risk Management Policy. Other DHS policies, procedures and supporting documents¹⁴⁰ also refer to victimisation, highlighting DHS' zero tolerance to such behaviour.

The evaluation team was informed that in practice, DHS takes a proactive approach to preventing victimisation and responding to victimisation concerns. Examples of action taken include the issuing of directions to disclosers and those who are the subject of allegations (if they are aware of reports) relating to confidentiality or refraining from contacting a person.¹⁴¹ In some circumstances, a person's access to systems may be limited, they may be subject to greater supervision or directed to transfer locations or roles.¹⁴² Whilst putting parameters in place is often necessary to protect reporters from reprisals, one staff member noted that it was important not to punish reporters.¹⁴³ It was noted that some measures are easier to implement in the services area than in the corporate environment and vice versa.¹⁴⁴ Breaches of directions are acted on swiftly and DHS makes clear at the time of issuing directions that a breach may constitute misconduct.¹⁴⁵ DHS also protects against reprisals by ensuring confidentiality is maintained to the greatest extent possible.¹⁴⁶

136 PID Act (n 4) s 9(1).

137 Transparency International, *International Principles for Whistleblower Legislation* (Report, November 2013) principle 6.

138 PID Act (n 4) s 12(5)(a).

139 EXH006.

140 EXH013; EXH055; EXH050.

141 EXH091.

142 Ibid.

143 Ibid.

144 Ibid.

145 Ibid.

146 EXH093; EXH094.

The practical measures in place to prevent and respond to victimisation within DHS are not specified in DHS' public interest disclosure procedure, nor does the procedure impose an obligation on any particular person or people beyond 'DHS' as a whole to protect informants.¹⁴⁷ Consideration should be given to including further detail in the procedure on the measures to prevent and respond to victimisation and other detrimental action, including who is responsible for implementing those measures. For example, the procedure could be amended to prompt recipients of disclosures to assess the risk of victimisation or detrimental action when assessing disclosures and take appropriate measures to mitigate any risk. Such risks should continue to be considered throughout and after the whistleblowing process (i.e. at the conclusion of any investigation or disciplinary process).¹⁴⁸

DHS' public interest disclosure procedure states that a person can notify the OPI or the OCPSE if they believe they have been victimised as a result of making a disclosure to DHS. In addition to the OPI and OCPSE, concerns about victimisation can also be made to Ombudsman SA and Equal Opportunity SA. It is recommended that the procedure reflect this.

¹⁴⁷ The procedure indicates that it is the responsibility of responsible officers and all staff to be aware of their obligations under the PID Act framework, but nothing specifically about addressing victimisation.

¹⁴⁸ *TI best practice guide for internal systems* (n 60) 36; *Whistling While They Work* (n 61) 14.



Chapter 7: Communication and culture

While it is imperative that agencies have comprehensive policies and procedures in place relating to whistleblowing, such policies and procedures must be effectively communicated and supported by an organisational culture that encourages and, where appropriate, celebrates the reporting of suspected wrongdoing.

This chapter considers the strategies employed by DHS to communicate with its workforce, how DHS fosters an environment in which its staff feel encouraged and supported to report suspected wrongdoing, and opportunities for improvement.

7.1 Communication methods

Internal whistleblowing procedures and related information should be regularly communicated by an organisation's leadership in a clear, consistent and supportive manner.¹⁴⁹ A "commitment to integrity, protecting whistleblowers and addressing wrongdoing in the organisation" should be evident, and leadership behaviour and actions should emulate this.¹⁵⁰

DHS' public interest disclosure procedure is supported by a suite of general integrity related policies and procedures which set the standard of behaviour at DHS. Communication of these is imperative to ensure DHS' workforce is informed and aware of the expectations required of them and so they feel well informed about how to speak up and confident that it is safe to do so.

Like many public sector agencies, the intranet is used as a primary means of communication at DHS. All staff, students and volunteers have access to the intranet and, depending on their role, contractors and consultants may as well.¹⁵¹ There is a designated page on the intranet regarding public interest disclosures, where staff can find information on how to make a disclosure and access links to key policies and procedures.¹⁵² An intranet page containing information on reporting obligations also exists.¹⁵³ Although the existence of such intranet pages is positive, the evaluation team observed that some of the information is out-of-date, inaccurate or inconsistent with other corporate documents.¹⁵⁴ Often when staff are looking to report suspected wrongdoing, they are under significant stress.¹⁵⁵

149 *TI best practice guide for internal systems* (n 60) 23.

150 *Ibid.*

151 EXH092.

152 EXH057.

153 EXH058.

154 For example, EXH057 states that the OPI investigates corruption, misconduct and maladministration in public administration. The OPI receives and refers reports but does not investigate them.

155 *Whistling While They Work* (n 61) 28.

Thus, it is crucial that information regarding the reporting process is as clear, consistent, accurate and accessible as possible. Positively, the evaluation revealed that those within DHS are already cognisant of a reporter's potential state of mind and for this reason acknowledged the importance of keeping communication strategies short, succinct and engaging.¹⁵⁶ However, the content of such communications could be further strengthened to minimise confusion.

Recommendation

7

Review information regarding public interest disclosures and reporting obligations across the various communication methods DHS employs to ensure it is up-to-date, accurate and consistent.

Staff interviewed agreed that communication about public interest disclosures could be improved through ongoing and increased messaging.¹⁵⁷ As discussed throughout this chapter, DHS already employs a combination of communication strategies to reach its large and diverse workforce.¹⁵⁸ These strategies could be used to circulate information about public interest disclosures. Particular consideration should be given to whether communications reach all target groups, including contractors.¹⁵⁹ This would assist with making all prospective reporters aware that they may be eligible for protections under the PID Act and ensure that those who are responsible for assessing reports or complaints are well informed to identify public interest disclosures and take appropriate action.¹⁶⁰

Further, regular promotion of internal whistleblowing systems, as well as promotions through dedicated awareness campaigns is recommended by Transparency International.¹⁶¹ The evaluation team was informed that where possible, DHS seeks to align the release of a new training course or the promotion of an existing one with something happening externally, for example, fraud and corruption training is promoted during fraud and corruption awareness week.¹⁶² DHS would benefit from expanding its suite of pre-existing awareness campaigns to include information related to the PID Act and its public interest disclosure procedure (i.e. obligations, protections, trainings and communications) during whistleblower relevant awareness campaigns (i.e. World Whistleblower Day, Speak Up Week).

Recommendation

8

Review communications on public interest disclosures and consider increasing education and awareness initiatives, including through the use of emails, meetings, training and intranet articles. Consideration be given to reaching all potential groups that may be eligible for protections under the PID Act and aligning communications with relevant awareness weeks or world acknowledgment days.

¹⁵⁶ EXH092.

¹⁵⁷ EXH091; EXH092; EXH094.

¹⁵⁸ EXH092; EXH093; EXH095.

¹⁵⁹ Data from ICAC's 2025 Contract Management Survey indicates that contractors/subcontractors are less likely to be aware of whistleblower protections and the PID Act compared with public sector employees. See Independent Commission Against Corruption, *Corruption risks in public sector contract management 2025 Survey Report* (Interim Report, 27 March 2026) 46-49.

¹⁶⁰ The Whistleblower Project final report also makes recommendations relating to increased training, including refresher training, for those who may receive reports under the PID Act.

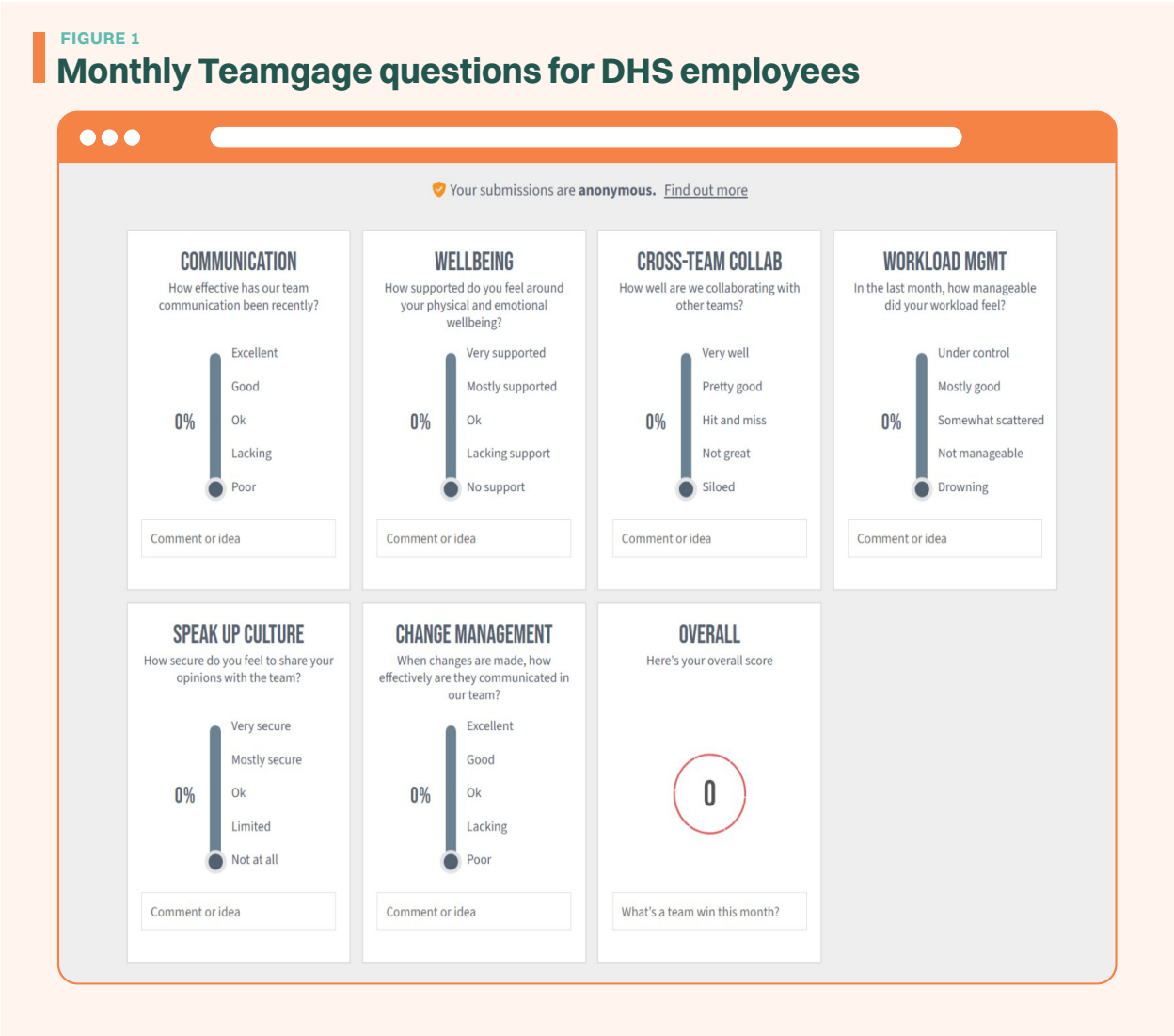
¹⁶¹ *TI best practice guide for internal systems* (n 60) 22.

¹⁶² EXH095.

7.2 Feedback avenues

At DHS, there is no shortage of opportunity to speak up. As well as having several formal pathways for making complaints or reports regarding various types of conduct, DHS provides a number of avenues for staff to raise concerns or provide feedback regularly. Having these multiple channels may promote a culture and environment where providing feedback is not a remarkable occurrence but rather part of an employee’s everyday role.

Since 2022, DHS staff have been able to provide anonymous feedback through monthly pulse surveys known as ‘Teamgage’. Teamgage measures communication, wellbeing, cross-team collaboration, workload management, speak up culture and change management across DHS (Figure 1).¹⁶³ It is available to employees only, with 2,748 active users.¹⁶⁴ The platform is not only used as a means to raise concerns but also allows staff the opportunity to provide ideas and suggestions to improve processes and systems.¹⁶⁵ Teamgage also allows managers to respond to anonymous comments.¹⁶⁶



163 EXH073.
164 As at 9 April 2026, EXH084.
165 EXH094.
166 EXH094; EXH095.

Of particular relevance to this evaluation are the “speak up culture” and “wellbeing” Teamgage questions. Teamgage asks employees to rate how secure they feel to share their opinions with the team on a scale of “very secure” to “not at all” and to rate how supported they feel around their physical and emotional wellbeing on a scale of “very supported” to “no support”.¹⁶⁷ These questions are important in ascertaining how employees view their working environment, including whether they feel physically and emotionally safe and whether they feel comfortable to raise issues and provide feedback. Both are important and relevant in the context of whistleblowing.

At present, Teamgage does not include any specific questions regarding public interest disclosures. There is an opportunity for questions to be included in Teamgage to increase awareness of the PID Act and DHS’ public interest disclosure procedure and identify areas for improvement. One interviewee suggested including a question as simple as “do you understand what a public interest disclosure is?” at the outset.¹⁶⁸ Questions could be included to measure the extent to which DHS staff understand or are aware of the PID Act, whether they feel confident to navigate the public interest disclosure procedure and whether they feel they would be supported or protected to make a public interest disclosure. Some questions could also explore the level of understanding staff have about what constitutes corruption, misconduct or maladministration in public administration.

Recommendation

9

Consider including questions in Teamgage to ascertain employee knowledge and awareness of reporting obligations and types of wrongdoing, as well as employee preparedness to make reports including under the PID Act.

Teamgage results from each business unit are distributed to Executive Directors to discuss within their directorates and are also provided to the Chief Executive.¹⁶⁹ Directors create action plans to address areas of concern, and the Organisational Development and Learning Team present results and trends to Executive Directors every quarter, providing an opportunity to consider and address comments, as well as celebrating positive feedback.¹⁷⁰ The evaluation team was provided with an example of a business unit’s monthly huddle slide deck where the unit director discussed the Teamgage results with the unit, and responded to anonymous feedback, questions and issues raised during that month.¹⁷¹ One slide includes information about other ways employees can provide feedback, including: via email, visiting the business unit’s intranet page, by speaking to leadership, completing the Teamgage survey, or using the business unit’s feedback box in the office. Another slide lists ways employees may escalate concerns, including: by contacting a Human Resources Business Partner or a Work Health and Safety Business Partner, submitting a staff grievance or complaint form via the intranet page, lodging a Gov Safety event via the website, submitting an online complaint form to Ombudsman SA, reporting corruption online via ICAC (following changes to the ICAC Act in 2021, ICAC cannot receive reports of corruption; such reports must be made to the OPI), or contacting the Public Service Association.

¹⁶⁷ EXH073.

¹⁶⁸ EXH094.

¹⁶⁹ Ibid.

¹⁷⁰ Ibid.

¹⁷¹ EXH078.

In addition to Teamgage, the evaluation team was told that DHS' Organisational Development and Learning directorate occasionally conducts surveys regarding particular changes in the workplace (e.g. restructures).¹⁷² This allows the DHS executive to gauge the views of staff in response to workplace changes and respond to any concerns raised.

It is clear from the evaluation that DHS has given significant consideration to ensuring that its communication and feedback channels are accessible to its diverse and dispersed workforce. For instance, Teamgage and DHS-owned training modules are designed to be accessible on a phone for those without access to a computer.¹⁷³ The evaluation team was also informed that DHS utilises infographics and displays key information on walls in non-corporate workplaces.¹⁷⁴ DHS' efforts in making communication channels, feedback pathways and information accessible for the diverse workforce it engages is commendable. This inclusivity assists in promoting a positive workplace culture, where all staff feel supported and included.

7.3 Education and training

Educating staff on the importance of speaking up, the pathways to do so and the wellbeing supports available is important in creating an environment in which speaking up is encouraged and expected.

DHS has a Training Policy and Schedule which set out the mandatory and recommended training available to staff. Each DHS employee has their own training plan specific to their role (this includes staff, volunteers and students) and is expected to complete all 12 mandatory training courses.¹⁷⁵ All mandatory training has been evaluated by DHS as covering key information of which staff must be informed.¹⁷⁶ Training is assigned in MyHub, DHS' Human Resources Management System, and compliance reports are generated to managers.¹⁷⁷ Anyone new or returning to DHS must complete induction training within 30 days.¹⁷⁸ Depending on the role of a contractor, they may be required to complete some training courses. For example, a contractor with access to a computer will be required to complete cyber security training, but a contracted cleaner will not. Hiring managers have responsibility for determining what training is required.¹⁷⁹

Relevant to public interest disclosures, staff are required to complete the OCPSE SA Public Sector Code of Ethics training (which was updated earlier this year and contains specific information about the PID Act) and DHS specific induction training. In response to staff feedback, DHS condensed its 3.5-hour induction training to 30 minutes, resulting in an uptake of completion.¹⁸⁰ The induction training provides information about how and where to report suspected wrongdoing (i.e. to the OPI) and makes clear DHS' commitment to wellbeing and safety, detailing how it promotes a mentally healthy workplace.¹⁸¹ As stated by those interviewed, DHS has a strong focus on psychosocial wellbeing and risk, as reflected in the induction training.¹⁸²

172 EXH095.

173 471 per cent of DHS' workforce works in disability and community divisions, thus do not have regular access to a computer, EXH071; EXH095.

174 EXH095.

175 EXH059; EXH060; EXH092.

176 EXH095.

177 Ibid.

178 Ibid.

179 Ibid.

180 Ibid.

181 EXH071.

182 EXH093.

Staff are recommended to complete a Fraud and Corruption Awareness training module.¹⁸³ This training is developed by the Department of the Premier and Cabinet and aims to provide public sector employees with a more detailed understanding of fraud, corruption, misconduct, maladministration and reporting obligations.¹⁸⁴ The training states that the content included is courtesy of the OPI, Ombudsman SA and ICAC and it was last reviewed in September 2024.¹⁸⁵ The evaluation team reviewed the training, and while it includes information and guidance on the obligations and standards of behaviour public officers must comply with, and case studies on unethical behaviour, some information could be improved for accuracy. For example, the definition of corruption has not been updated post the 2021 legislative changes and some of the case studies do not accurately reflect corruption vulnerabilities and safeguards.

While all staff would benefit from more comprehensive fraud and corruption training, the OCPSE Code of Ethics training communicates the key messages. Consideration may be given to making fraud and corruption training mandatory for any staff in roles with high levels of discretion, substantial access to sensitive information, or those involved in financial decision making, procurement, human resources or management of staff. Public officers in these roles may be more likely to become aware of wrongdoing and receive reports. Thus, they need to be able to identify when the PID Act might apply.

The Whistleblower Project final report makes recommendations to improve and increase accessibility to training on South Australia’s whistleblower laws. If those recommendations are implemented, there may be less need for DHS to make any adjustments to its existing training. However, some of those recommendations are connected to recommendations that require legislative change and legislative change takes time. Nonetheless, it remains important that agencies offer relevant and accurate internal training for their workforce.

Recommendation	10
Ensure any training provided to DHS employees relating to fraud and corruption is up-to-date and accurate, including training provided by other public sector agencies.	

Recommendation	11
Consider making fraud and corruption training mandatory for key roles more likely to become aware of wrongdoing or more likely to receive reports of suspected wrongdoing.	

183 EXH059.
184 The evaluation team was informed that the Department of the Premier and Cabinet is receptive to any feedback ICAC may have as part of this evaluation to support their current review process, EXH071.
185 EXH071.

7.4 Organisational culture

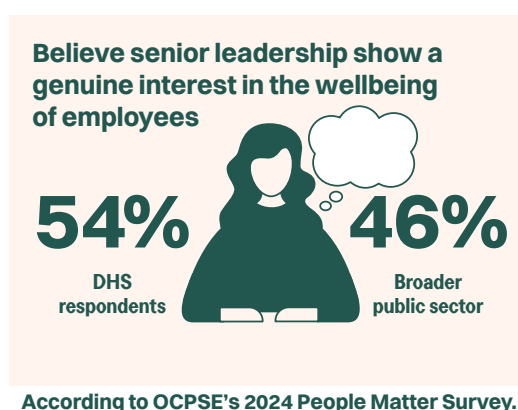
As a wide-ranging cultural review of reporting practices within DHS was beyond the scope of this evaluation, the analysis in this section of the report adopts a largely top-down perspective. To help address this gap, the evaluation considered results from Teamgage and DHS' agency specific results from OCPSE's 2024 People Matter Survey.¹⁸⁶

Tone at the top

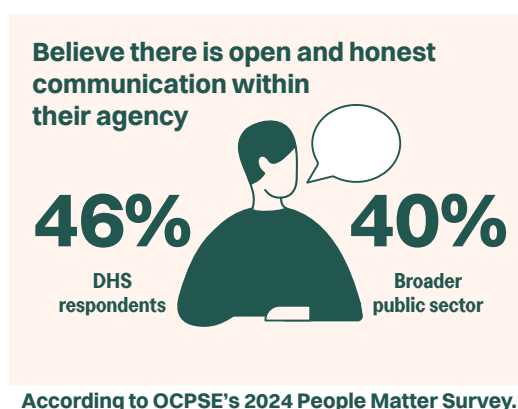
Submissions received in response to the broader Whistleblower Project observe that there is a strong correlation between positive workplace culture and willingness to speak up.

Positive workplace culture, including speak up culture, is often instilled from the top down. An organisation's leadership "should demonstrate their commitment and set a clear 'tone from the top' in support of speaking up and listening up about wrongdoing."¹⁸⁷ As discussed in Chapter 4, DHS' policies and procedures relating to reporting and standards of behaviour contain a strong pro-reporting message and a zero tolerance to inappropriate behaviour.

A number of positive comments were made about the current leadership within DHS, emphasising the importance of a leader that is visible, "humanistic" and approachable.¹⁸⁸ The evaluation team was informed that the Chief Executive often engages with staff at all levels across DHS and is seen to be accessible and genuinely interested in the work of staff.¹⁸⁹ Results from OCPSE's People Matter Survey reveal that 54 per cent of DHS respondents believe that senior leadership show a genuine interest in the wellbeing of employees, compared with 46 per cent of the broader public sector.¹⁹⁰



DHS uses a number of strategies to ensure leaders stay connected with staff. For example, the Chief Executive hosts periodic meetings with all staff via Teams, the Deputy Chief Executive hosts weekly Teams meetings with her divisional staff, the Executive Director of Disability and Specialised Services hosts an online fortnightly question and answer forum, and every quarter, there is a managers' forum.¹⁹¹ These strategies facilitate regular and open communication, build trust and increase leader accessibility. This is reflected in DHS' agency specific results from OCPSE's People Matter Survey which demonstrate that 46 per cent of DHS respondents believe that there is open and honest communication at DHS, compared with 40 per cent of the broader public sector.¹⁹²



¹⁸⁶ DHS' response rate was approximately 50 per cent.

¹⁸⁷ *TI best practice guide for internal systems* (n 60) 11.

¹⁸⁸ EXH092.

¹⁸⁹ EXH094.

¹⁹⁰ EXH086.

¹⁹¹ EXH095; EXH094; EXH102.

¹⁹² EXH086.

Those interviewed were also of the view that the Executive, including the Chief Executive, encourages reporting.¹⁹³ This is demonstrated in efforts to provide multiple accessible reporting pathways across DHS and other opportunities to provide feedback, including anonymous feedback. DHS is to be commended for its proactive efforts in seeking feedback on a regular basis from its staff and establishing channels to consider and address such feedback.

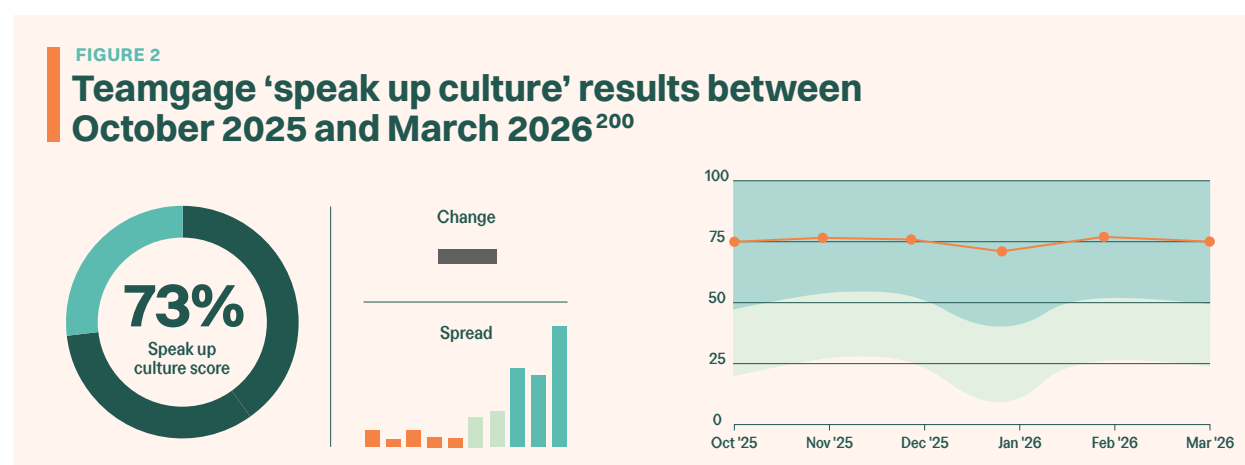
Perceptions of organisational culture

Interviews revealed that a fear of reprisal and victimisation may exist at DHS, especially amongst staff that have been at DHS for many years.¹⁹⁴

The evaluation team was informed that complaints regarding victimisation often do not fit the definition of victimisation and are instead dealt with as a grievance issue.¹⁹⁵ This issue is not unique to DHS. In a submission to the evaluation, the Equal Opportunity Commissioner noted that over 75 per cent of victimisation complaints received by the Commission do not progress beyond the initial assessment stage due to being misconceived or lacking sufficient substance to satisfy statutory criteria.¹⁹⁶ The Equal Opportunity Commissioner attributed this to ‘victimisation’ being not easily understood within the relevant legislative frameworks and therefore largely misunderstood by the public.¹⁹⁷ It was also observed in the Whistleblower Project final report that victimisation can present as a workplace grievance in some circumstances.

Some DHS-wide comments from Teamgage’s “speak up culture” section suggest that employees only feel safe to speak up within their immediate teams, but not external to that. Some comments by employees portray a negative reporting environment in DHS where employees, as a result of speaking up, have been labelled as “problematic”, or have been “sidelined”, “pushed out”, “dismissed”, or are “scorned upon”.¹⁹⁸

Conversely, there are also Teamgage comments by employees about feeling “confident”, “happy”, “safe” and “secure” sharing their opinions and speaking up.¹⁹⁹ Between October 2025 and March 2026, data from Teamgage indicates that the percentage of staff who felt secure to share their opinion was consistently around 75 per cent.



193 EXH092; EXH093.

194 EXH090; EXH093.

195 EXH093.

196 EXH096.

197 Ibid.

198 EXH074, Oct 2025- March 2026.

199 Ibid.

200 Ibid. Due to the absence of Teamgage survey communications in January 2026, there is a dip in the scoring compared to other months.

This positive view is echoed in responses to OCPSE's People Matter Survey, where:

- More than half of DHS respondents believe they can share their opinions openly without fear of retaliation
- Approximately 70 per cent of DHS respondents believe that DHS shows a commitment to ethical decisions and conduct, compared to 64 per cent of respondents from the wider South Australian public sector.

While positive experiences are evident, the Teamgage results indicate there is scope to strengthen staff confidence that they can speak up without fear of disadvantage and that they will be protected from adverse consequences. Regardless of whether victimisation is occurring or not,²⁰¹ the perception that staff may be disadvantaged for making a report can be just as harmful to an agency's culture. DHS should ensure that allegations of victimisation or other detrimental action are taken seriously and it is safe to speak up. Although DHS has established practices to prevent and respond to victimisation (as outlined in Chapter 6), it should ensure these practices are effectively implemented and continuously improved. The measures in place should be clearly communicated to ensure employees feel encouraged and supported to report suspected wrongdoing.

Recommendation

12

Consider whether DHS has sufficient practices in place to ensure disclosers are not victimised for speaking up and further communicate this messaging to ensure disclosers feel encouraged and supported to report suspected wrongdoing.

7.5 Support pathways

Like many public sector agencies, DHS' primary support avenue for employees is the Employee Assistance Program. This confidential service can be utilised free of charge by those seeking support regarding wellbeing issues, including those arising from making a disclosure or the aftermath of making one. The decision to make a disclosure can attract a myriad of emotions, with employees often feeling a lot of pressure or discomfort in doing so. Thus, it is integral that agencies have appropriate and accessible support avenues for employees.

This is especially the case for DHS due to the services they deliver; with one interviewee asserting it was DHS' duty to support staff in fulfilling their roles which often involve exposure to traumatic and complex situations.²⁰²

Other ways DHS employees can receive support is through the mental health officer program or a HR Business Partner. The evaluation team was informed that DHS is currently rolling out a mental health first aider support program for those who have elected to be a mental health officer as part of their everyday role.²⁰³

²⁰¹ Noting that victimisation is often misunderstood within the broader public sector.

²⁰² EXH093.

²⁰³ Ibid.

DHS' public interest disclosure procedure does not detail how or where a prospective discloser can access support. Although not required by Guideline 4 of the PID Guidelines, it would be beneficial for DHS to include possible support avenues or provide links where employees can access further information regarding support options.

The Whistleblower Project final report observed a lack of support throughout the process for whistleblowers in South Australia. To support and guide those who make, or handle, public interest disclosures and for prospective disclosers to have a first port-of-call, the Whistleblower Project final report recommends the establishment of an independent whistleblower support function, potentially within the OPI. It was also recommended that funding be allocated to existing community counselling services to assist prospective whistleblowers and those seeking wellbeing support. These recommendations would provide DHS and other public sector agencies and councils with external support avenues to which they can direct staff involved in the whistleblowing process.

Recommendation

13

Review and update the public interest disclosure procedure to ensure it complies with section 12 of the PID Act and Guideline 4 of the PID Guidelines. Amendments may be made to:

- i. ensure that it is accurate and clear
- ii. clarify that external disclosures need not "relate to DHS or a DHS employee" to qualify for protection under the PID Act
- iii. specify that in addition to the OPI and OCPSE, Ombudsman SA is a relevant authority under the PID Act
- iv. specify that in addition to the OPI, Ombudsman SA can receive disclosures of misconduct or maladministration in public administration
- v. outline the arrangements in place to ensure disclosures made via general repositories are received by a responsible officer in a confidential manner
- vi. outline how DHS protects the confidentiality of informants in the assessment, management and investigation of disclosures (where an exception to confidentiality does not apply), including where information relating to public interest disclosures will be securely stored
- vii. outline the measures in place to prevent and respond to victimisation and other detrimental action
- viii. specify that in addition to the OPI and OCPSE, complaints about victimisation can also be made to Ombudsman SA and Equal Opportunity SA
- ix. provide information about support avenues available for staff.



Conclusion

This evaluation has demonstrated that DHS is committed to upholding the integrity of its workforce. This is underpinned by the availability of numerous internal reporting pathways, a suite of integrity-related policies and procedures, a commitment to continuous improvement and leadership that value the views of its employees. However, there is more that can be done within DHS to increase awareness of the PID Act and to ensure those eligible for the protections afforded in the PID Act receive them.

The Whistleblower Project has highlighted the need for change to South Australia's whistleblower protection regime. However, legislative change takes time. This evaluation demonstrates that there are actions that agencies can take, without legislative change, to ensure that the current whistleblower protection framework is as effective as it can be.

Whistleblowing plays a vital role in protecting and maintaining integrity in public administration. It is therefore essential that agencies take their responsibilities seriously and that leaders set the tone from the top. Various sources of information gathered throughout this evaluation depict an agency that is cognisant of its responsibilities under the PID Act and its integrity obligations. While this is evident in some of the practices DHS has in place to protect confidentiality and prevent and respond to victimisation concerns, there is a need to ensure those practices are adhered to, improved where appropriate, mirrored in policies and procedures and regularly communicated.

The recommendations made in this report are intended to improve DHS' practices, policies and procedures in relation to the reporting of wrongdoing and the communication of such practices, policies and procedures. As DHS plays an integral role in delivering crucial services across the community, every effort should be made to foster an environment where whistleblowers are encouraged to come forward and protected when they do so.

While the observations and recommendations made in this report are specific to DHS, there are other agencies of a similar size and demographic to DHS that may be able to consider the report in the context of their own operating environment. It is hoped that this evaluation will assist DHS, as well as other agencies, to further strengthen their approach to, and management of, whistleblowing.



Appendices

Appendix 1: Exhibit List

The table below contains the exhibits cited in footnotes in this report.

Exhibit number	Exhibit name
EXH005	Public Interest Disclosure Procedure Flowchart
EXH006	Public Interest Disclosure Procedure
EXH007	Critical Client Incident Policy
EXH008	Critical Client Incident Reporting Procedure
EXH011	Customer Feedback and Complaints Policy
EXH013	Grievance Resolution Procedure
EXH015	Managing Incidents in the Workplace Procedure
EXH016	Reporting Harm of Children and Young People Procedure
EXH028	Incident Management Unit Procedure
EXH029	Incident Management Unit Triage Panel Terms of Reference
EXH032	Incident Management Unit Information Sheet for employees and managers
EXH046	Conflict of Interest Policy
EXH047	Data Breach Response Procedure

Exhibit number	Exhibit name
EXH048	Data Governance Policy
EXH050	Fraud and Corruption Control Framework
EXH051	Gifts and Benefits Guidelines
EXH052	Gifts and Benefits Policy
EXH053	Information Security Policy
EXH054	Respectful Treatment at Work Factsheet
EXH055	Respectful Treatment at Work Policy
EXH057	Public Interest Disclosures and Corruption Intranet Page
EXH058	Reporting Obligations Intranet Page
EXH059	Training Schedule
EXH060	Training Policy
EXH062	Designation of Responsible Officers
EXH071	Contribution by DHS employee via email or meeting
EXH073	Teamgage submission page questions
EXH074	Teamgage "Speak Up Culture" results October 2025-March 2026
EXH078	Screening Unit Huddle slide deck
EXH081	Online grievance form screenshot
EXH084	Contribution by DHS employee via email or interview

Exhibit number	Exhibit name
EXH085	Contribution by DHS employee via email or interview
EXH086	OCPSE People Matter Employee Survey 2024 DHS Agency Results
EXH087	Contribution by DHS employee via email or interview
EXH088	Contribution by DHS employee via email or interview
EXH089	Letter from Chief Executive of DHS dated 11 June 2026
EXH090	Contribution by DHS employee via email or interview
EXH091	Contribution by DHS employee via email or interview
EXH092	Contribution by DHS employee via email or interview
EXH093	Contribution by DHS employee via email or interview
EXH094	Contribution by DHS employee via email or interview
EXH095	Contribution by DHS employee via email or interview
EXH096	Submission from Equal Opportunity SA
EXH100	Submission from the Office for Public Integrity
EXH102	DHS' response to the draft evaluation report

Appendix 2: Department of Human Services response to draft report, August 2026

OFFICIAL

Ref: 26BDHS/1151



Ms Emma Townsend
Commissioner
Independent Commission Against Corruption
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Via email: whistleblowerproject@icac.sa.gov.au

Dear Commissioner Townsend

Thank you for your letter of 16 July 2026 with the draft *Evaluation report of the Department of Human Services* (August 2026) enclosed, which was prepared as part of the Whistleblower project.

At DHS we strive for an inclusive and safe environment, where staff are encouraged to 'speak up' to suspected wrongdoing and I was pleased to see this reflected in the draft report. Equally, I welcome the insights offered by the draft report and opportunities for improvement.

In response to the invitation for feedback, I offer one minor point of clarification, that the example on p46 should read:

"the Chief Executive hosts periodic meetings with all staff via Teams, the Deputy Chief Executive hosts weekly Teams meetings with her divisional staff, the Executive Director of Disability and Specialised Services hosts an online fortnightly question and answer forum, and every quarter, there is a managers' forum"

On behalf of DHS and the staff involved in this project, I would like to thank you and your team for your comprehensive evaluation. As part of our contribution to this work, I consent to this feedback being shared in the final evaluation report.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Ruth Ambler".

Ruth Ambler
A/CHIEF EXECUTIVE

03 / 08 / 2026

Appendix 3: Overview of South Australia's current whistleblower laws as they relate to public administration information

The *Public Interest Disclosure Act 2018* (SA) provides protections for persons who make an “appropriate disclosure” of public administration information and sets out the procedures that must be followed when dealing with such disclosures.

What is an “appropriate disclosure” of public administration information?

The disclosure is made by a “**public officer**” as defined in the [ICAC Act](#).



The information disclosed **raises**, and the public officer **reasonably suspects** it raises, a **potential issue of corruption, misconduct or maladministration** in public administration.

- Corruption is defined in the [ICAC Act](#).
- Misconduct and maladministration are defined in the [Ombudsman Act](#).



The disclosure is made to a relevant authority listed in s 5(5) which includes:

- in all cases - the **Office for Public Integrity (OPI)**
- where the disclosure relates to a public officer – **a person responsible for managing or supervising the officer or a relevant responsible officer**
- where the information relates to an agency to which the [Ombudsman Act](#) applies – the **Ombudsman**
- where the information relates to a crime or suspected crime – a member of **SAPOL**.



What must the relevant authority do with the disclosure?

(1) Assess disclosure and take action; notify informant and OPI

Who?	What?	When?
Person who receives the disclosure.	- Assess the information and take action in accordance with that assessment and the guidelines (unless there is reason not to take further action - see s 7(2)). - Take reasonable steps to notify the informant of the assessment and the action being taken (if the informant's identity is known). - Notify OPI of assessment outcome in accordance with the guidelines.	- As soon as reasonably practicable - If this has not occurred within 30 days after making the disclosure, the person may disclose the information to a journalist or MP

(s 7(1) & Guideline 1)

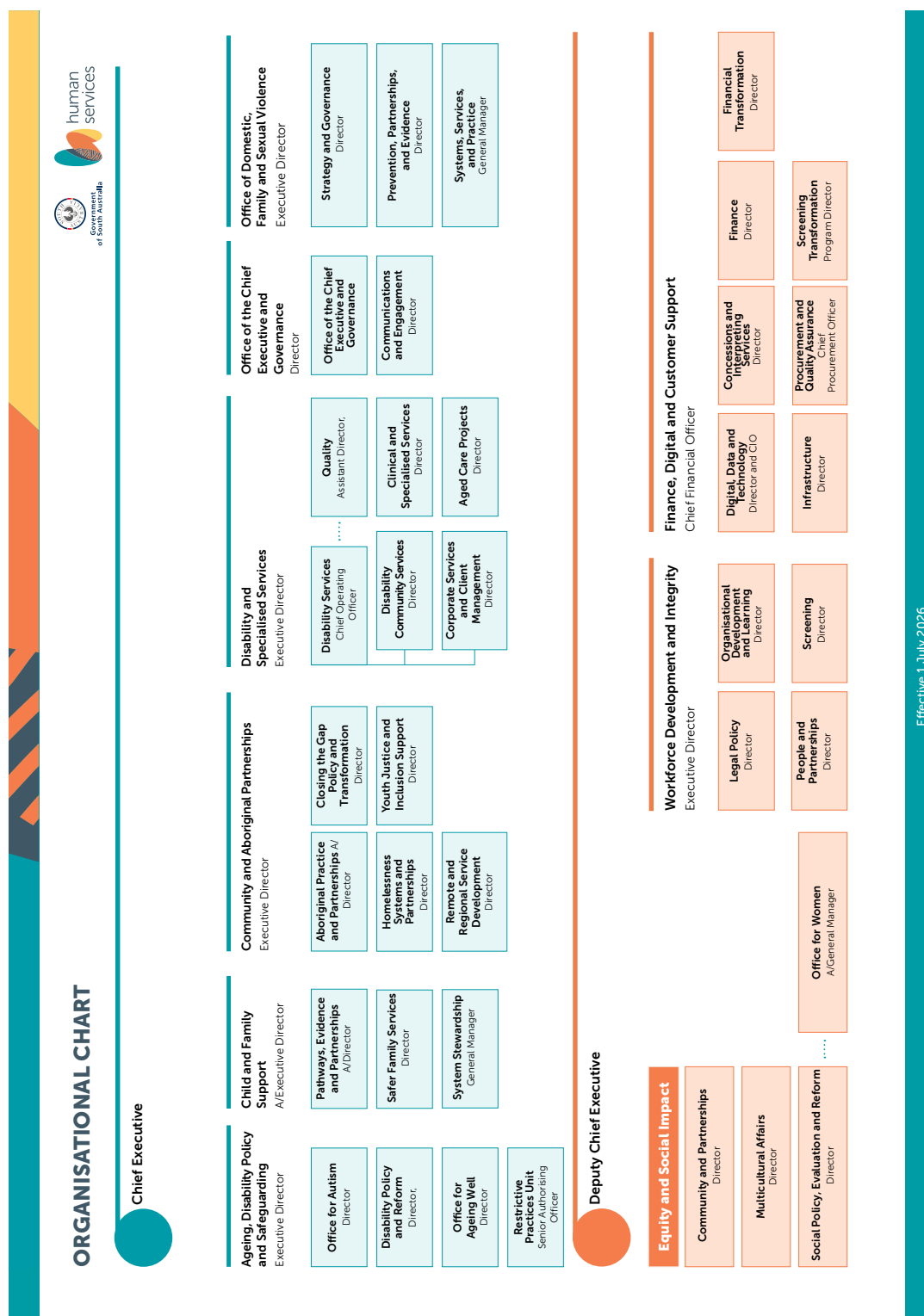


(2) Notify informant and OPI of the outcome of the action taken

Who?	What?	When?
- The person who takes the action decided in (1); or - If that action was referring the disclosure, the person to whom it was referred.	- Take reasonable steps to notify informant of the outcome of the action taken (if the informant's identity is known). - Provide OPI with information about outcome of action in accordance with the guidelines.	- As soon as reasonably practicable. - If this has not occurred within 90 days after making the disclosure, or other period specified, the person may disclose the information to a journalist or MP.

(s 7(3) & Guideline 2)

Appendix 4: Department of Human Services Organisational Chart, as at 1 July 2026



Appendix 5: Department of Human Services
Public Interest Disclosure Flowchart, as at March 2024

