



**CAMPBELLTOWN  
CITY COUNCIL**

Enq: Lyn Barton, Manager, Governance  
Ph: 8366 9234

5 November 2025

Ms Emma Townsend  
Commissioner  
Independent Commission Against Corruption SA  
GPO Box 11066  
ADELAIDE SA 5001

Via Email: [WhistleblowerProject@icac.sa.gov.au](mailto:WhistleblowerProject@icac.sa.gov.au)

Dear Ms Townsend

**Whistleblower Project Discussion Paper**

We refer to your email of 29 September 2025 inviting submissions for the *Whistleblower Project Discussion Paper - September 2025*.

Please find attached for your consideration, the submission from our Council which was endorsed at the Campbelltown City Council Meeting held on 4 November 2025.

We thank you for the opportunity to provide a submission to this important discussion paper.

Yours sincerely

Paul Di Iulio  
Chief Executive Officer

Enc: ECM 6990506 - Campbelltown City Council submission to Whistleblower Project Discussion Paper - September 2025



**SUBMISSION TO WHISTLEBLOWER PROJECT DISCUSSION PAPER – SEPTEMBER 2025**

**Issue 1: Threshold for Obtaining Protections**

Council has considered these matters and agree that former public officers and potentially volunteers could be considered for addition to the individuals who can attract whistleblower protections. A time limit should be set for protections, however Council doesn't have a view on the length of time for this.

Council agrees that protection should be expanded to those who incorrectly disclose public administration information and those who disclose conduct constituting victimisation. Workplace grievances should be expressly excluded in the definition of public administration information, as there are other avenues for the management of this information.

Council supports the expansion of the definition of 'relevant authority' to include the Commission, however cautions about it being expanded further.

The reasonable suspicion test seems sufficient, however protections should be triggered based on whether it is a 'substantially compliant disclosure' rather than penalising disclosers for technical failure to comply with legislation. Management of anonymous disclosures is problematic; Council is cautious about providing support for this approach.

**Issue 2: Early Certainty About Status**

Disclosers should have greater certainty about their protections than currently exist. It is preferred that this be managed through an existing agency. Irrespective it needs to exist for the management of suspected wrongdoing disclosures to be successful in South Australia.

**Issue 3: An Independent Statutory Authority to Support Whistleblowers**

Council supports the resourcing of an existing agency such as the Office for Public Integrity for this purpose.

**Issue 4: Confidentiality Obligations**

Council supports reform that improves the management of disclosures.

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### **Issue 5: Immunities and Remedies**

Council does not have an opinion on the questions proposed, other than supporting reform to enable 'an ability to opt in/opt out of parts of our Public Interest Disclosure Act given that some public officers, particularly those whose official role it is to identify and report wrongdoing in public administration (sometimes referred to as 'role-reporters'), may not wish to receive updates and the obligation to provide updates may be burdensome'.

### **Issue 6: Oversight**

Council does not have an opinion on the questions proposed.

### **Issue 7: Accessibility and Clarity**

Whilst Council supports simplification of the legislation and procedural requirements, it is not in a position to advise on what specific improvements should be made.

### **Issue 8: Incentives**

No Australian jurisdiction incentivises whistleblowing, and Council recommends the same for South Australia.

### **Issue 9: Organisational Climate**

Council does not have an opinion on the questions proposed.

End of submission.

5 November 2025