



PUBLIC INTEREST
DISCLOSURES ACT
INTERNAL
REPORTING
POLICY
P3.0107.3

PUBLIC INTEREST DISCLOSURES ACT INTERNAL REPORTING POLICY

DIVISION: CUSTOMER AND CORPORATE STRATEGY

BRANCH: GOVERNANCE AND RISK

CATEGORY: 1

PART 1 - INTRODUCTION

1. BACKGROUND

- 1.1 Council is committed to ensuring the highest ethical and accountable conduct and will support Council officials who report wrongdoing.

2. OBJECTIVE

- 2.1 To provide a policy and procedure under the *Public Interest Disclosures Act 1994* (PID Act) for Councillors, members of staff or any other public official in terms of the PID Act that aims to encourage and facilitate the disclosure, in the public interest, of corrupt conduct, maladministration, serious and substantial waste, government information contravention and Local Government pecuniary interest contravention within Council and to ensure any disclosure is used to achieve efficiency and effectiveness of Council's operations.

3. SCOPE

This policy applies to all Council officials, including Councillors and Council staff.

4. DEFINITION

Staff means employees, contractors and volunteers.

You means the person making a report under the PID Act.

ICAC means the NSW Independent Commission Against Corruption and

ICAC Act means the *Independent Commission Against Corruption Act 1988*.

PART 2 - POLICY STATEMENT

5. ROLES AND RESPONSIBILITIES

This policy places responsibilities on people at all levels within Council:

5.1 Staff

Staff are encouraged to report known or suspected incidences of corrupt conduct, maladministration, serious and substantial waste or government information contravention in accordance with this policy.

All staff have an important role to play in supporting those who have made legitimate disclosures. They must abstain from any activity that is or could be perceived to be victimisation or harassment of people who make disclosures. Further, they should protect/maintain the confidentiality of people they know or suspect to have made disclosures.

5.2 Nominated disclosure officers

Nominated disclosure officers are members of staff who are responsible for receiving and forwarding disclosures in accordance with this policy. Nominated disclosure officers will:

- (a) Clearly explain to people making disclosures what will happen in relation to the information received
- (b) When requested, make arrangements to ensure that disclosures can be made privately and discreetly (if necessary, away from the workplace)
- (c) Write and date any disclosures received orally (and have the person making the disclosure sign the document)
- (d) Deal with disclosures impartially
- (e) Forward disclosures to the Disclosure Coordinator for assessment
- (f) Take all necessary and reasonable steps to ensure that the identity of people who make disclosures, and the person the subject of disclosures, are kept confidential
- (g) Support people who make public interest disclosures and protect them from victimisation, harassment or other forms of reprisal.

5.3 Disclosure Coordinator

The Disclosure Coordinator is a member of staff and has a pivotal role in the internal reporting system. The Disclosure Coordinator will:

- (a) Provide an alternative internal reporting channel to the General Manager and nominated disclosure officers
- (b) Impartially assess each disclosure to determine:
 - i. Whether the disclosure appears to be a public interest disclosure within the meaning of the PID Act
 - ii. The appropriate action to be taken in relation to the disclosure, for example:

- No action or declining to take action
 - Identification of the appropriate person to take responsibility for dealing with the disclosure
 - Preliminary or informal investigation
 - Formal investigation
 - Prosecution or disciplinary action
 - Referral to an investigating authority for investigation or other appropriate action or
 - Referral to the police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct).
- (c) Consult with the General Manager or, if the protected interest disclosure is about the General Manager, consult with the Mayor
- (d) Be responsible for carrying out or coordinating any internal investigation arising out of a disclosure, subject to the direction of the General Manager or, if the protected interest disclosure is about the General Manager, subject to the direction of the Mayor
- (e) Report to the General Manager or, if the investigation is about the General Manager, to the Mayor, on the findings of any investigation and recommended remedial action
- (f) Take all necessary and reasonable steps to ensure that the identity of people who make disclosures, and people the subject of the disclosures, are kept confidential
- (g) Support those who make disclosures and actively protect them from victimisation, harassment or any other form of reprisal
- (h) Report actual or suspected corrupt conduct to the General Manager or, if the conduct is about the General Manager, to the Mayor, in a timely manner to enable that officer to comply with the ICAC Act.

5.4 General Manager

Disclosures may be made directly to the General Manager rather than by way of the internal reporting system established under this policy. The General Manager will:

- (a) Impartially assess each disclosure to determine:
- i. Whether the disclosure appears to be a public interest disclosure within the meaning of the Act
 - ii. The appropriate action to be taken in relation to the disclosure, for example:
 - No action or declining to take action
 - Identification of the appropriate person to take responsibility for dealing with the disclosure
 - Preliminary or informal investigation
 - Formal investigation
 - Prosecution or disciplinary action
 - Referral to an investigating authority for investigation or other appropriate action, or
 - Referral to the police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct).

- (b) Receive reports from the Disclosure Coordinator on the findings of any investigation and any recommendations for remedial action, and determine what action should be taken
- (c) Conduct his/her own investigation if deemed necessary
- (d) Take all necessary and reasonable steps to ensure that the identity of persons who make disclosures, and the persons the subject of disclosures, are kept confidential
- (e) Have primary responsibility for protecting staff and contracted staff who make disclosures, or provide information to any internal or external investigation of a disclosure, from victimisation, harassment or any other form of reprisal
- (f) Be responsible for implementing organisational reform identified as necessary following investigation of a disclosure
- (g) Report criminal offences to the police and actual or suspected corrupt conduct to ICAC (under section 11 of the ICAC Act).

5.5 The Mayor

The Mayor may receive internal disclosures from any member of staff or any Councillor concerning the General Manager or a Councillor. The Mayor will:

- (a) Impartially assess each disclosure made to him/her about the General Manager or a Councillor to determine:
 - i. Whether the disclosure appears to be a public interest disclosure within the meaning of the Act
 - ii. The appropriate course of action to be taken in relation to the disclosure (in consultation with the General Manager, if appropriate), for example:
 - No action or declining to take action
 - The appropriate person to take responsibility for dealing with the disclosure
 - Preliminary or informal investigation
 - Formal investigation
 - Prosecution or disciplinary action
 - Referral to an investigating authority for investigation or other appropriate action
 - Referral to the police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct), or
 - Conduct his/her own investigation if the disclosure is in relation to the General Manager and if deemed necessary.
- (b) Refer disclosures to the General Manager for appropriate action if they concern Council's administration, within the day to day responsibilities of the General Manager
- (c) Protect/maintain the confidentiality of:
 - i. The identity of persons who make disclosures (unless any of the criteria in section 22 of the Act apply)
 - ii. The identity of persons the subject of the disclosures (unless disclosure is required to enable the allegations to be investigated or otherwise appropriately dealt with).

6. WHAT SHOULD BE REPORTED

- 6.1 You should report any suspected wrongdoing you see within Council. Reports about the five categories of serious wrongdoing – corrupt conduct, maladministration, serious and substantial waste of public money, government information contravention, and local government pecuniary interest contravention – will be dealt with under the PID Act as public interest disclosures and according to this policy.

Corrupt Conduct – is the dishonest or partial exercise of official functions by a Councillor or Council officer. For example, this could include:

- The improper use of knowledge, power or position for personal gain or the advantage of others;
- Acting dishonestly or unfairly, or breaching public trust;
- A member of the public influencing a public official to use their position in a way that is dishonest, biased or breaches public trust.

Maladministration – is conduct that involves action or inaction of a serious nature that is contrary to law, unreasonable, unjust, oppressive or improperly discriminatory or based wholly or partly on improper motives.

Examples of maladministration could include:

- Making a decision and/or taking action that is unlawful;
- Making a decision not related to the merits of an application.

Serious and substantial waste – Serious and substantial waste is the uneconomical, inefficient or ineffective use of resources that could result in the loss or wastage of local government money. This includes all revenue, loans and other money collected, received or held by, for or on account of Council. Examples of this could include:

- Poor project management practices leading to projects running significantly over time and/or budget;
- Having poor or no process in place for a system involving large amounts of public funds.

Government Information Contravention – A government information contravention is a failure to properly fulfil functions under the *Government Information (Public Access) Act 2009* (GIPA Act). Examples could include:

- Destroying, concealing or altering records to prevent them from being released;
- Knowingly making decisions that are contrary to the legislation;
- Directing another person to make a decision that is contrary to the legislation.

Local Government Pecuniary Interest Contravention - A local government pecuniary interest contravention is a failure to fulfil certain functions under the *Local Government Act 1993* relating to the management of pecuniary interests. These include obligations to lodge disclosure of interests returns, lodge written declarations and disclose pecuniary interests at council and council committee meetings. A pecuniary interest is an interest that a person has in a matter because of a reasonable likelihood or expectation of appreciable financial gain or loss to the person. This could include:

- A senior council staff member recommending a family member for a Council contract and not declaring the relationship
- A general manager holding an undisclosed shareholding in a company competing for a council contract.

6.2 For more information about the five categories, see the NSW Ombudsman's Guideline on what can be reported at <http://www.ombo.nsw.gov.au/news-andpublications/guidelines/public-interest-disclosures>.

6.3 **Other Wrongdoing** – Although reports about the previous five categories of conduct can attract the specific protections of the PID Act, staff, Councillors and public officials should report all activities or incidents that they believe may be wrong. For example:

- Harassment or unlawful discrimination
- Reprisal action against a person who has reported wrongdoing
- Practices that endanger the health and safety of staff or the public.

Even if these reports are not dealt with as public interest disclosures under the PID Act, Council will consider each matter and make every attempt to protect the relevant person making the report from any form of reprisal.

7. WHEN WILL A REPORT BE PROTECTED

7.1 Council will support any member of staff, Councillor or public official who reports wrongdoing. For a report to be considered a public interest disclosure under the PID Act, it must meet the following requirements:

- The person making the disclosure must honestly believe on reasonable grounds that the information shows or tends to show wrongdoing.
- The report also has to be made to a person nominated in this policy, the General Manager (or Mayor in the case of a report against the General Manager), or one of the investigating authorities nominated in the PID Act.

7.2 Reports by staff and Councillors will not be considered to be public interest disclosures if they:

- Mostly question the merits of government policy, including the policy of the governing body of Council; or
- Are made with the sole or substantial motive of avoiding dismissal or other disciplinary action.

8. HOW TO MAKE A REPORT

8.1 Disclosures can be made verbally or in writing. You are encouraged to make a report in writing as this can help to avoid any confusion or misinterpretation. If a report is made verbally, the person receiving the report must make a comprehensive record of the disclosure and ask the person making the disclosure to sign this record. The individual making the report should keep a copy of this record.

9. ANONYMOUS REPORTING AND CONFIDENTIALITY

9.1 There will be some situations where a person may not want to identify themselves in making a report. Although these reports will be dealt with by Council, it is best to identify yourself. This allows Council to provide the necessary protection and support, as well as feedback about the outcome of any investigation into the allegations.

9.2 Council realises that many staff, Councillors and public officials may wish their report to remain confidential. Council is committed to keeping a reporter's identity, and the fact a report has been made, confidential. However there may be situations where this may not be possible or appropriate. The General Manager (or Mayor, in the case of a claim against the General Manager) will discuss with the reporter of the wrongdoing whether it is possible to keep a report confidential.

9.3 If confidentiality cannot be maintained, the General Manager (or Mayor, in the case of a claim against the General Manager) will develop a plan to support and protect a reporter from risks of reprisal. The reporter of wrongdoing will also be involved in developing this plan. You will also be told if your report will be dealt with under Council's Code of Conduct, as this may mean certain information will have to be tabled at a Council meeting.

9.4 If a person reports wrongdoing, they should only discuss the report with those dealing with it. This includes the Disclosures Coordinator, the General Manager or the Mayor. If a person discusses the report more broadly with others, this may affect the outcome of any investigation.

10. WHO CAN RECEIVE A REPORT WITHIN COUNCIL

10.1 You are encouraged to report general wrongdoing to your supervisor. However the PID Act requires that for a report to be a public interest disclosure, it must be made to a public official in accordance with Council's disclosure procedures - this means this policy and any supporting procedures.

- 10.2 Any supervisor who receives a report that they believe may be a public interest disclosure must refer the individual making the report to one of the positions listed below.
- 10.3 If you are a Council staff member and your report involves a Councillor, you should make it to the General Manager or the Mayor. If you are a Councillor and your report is about another Councillor, you should make it to the General Manager or the Mayor.
- 10.4 The following positions are the only staff within Council who can receive a public interest disclosure.

General Manager

You can report wrongdoing directly to the General Manager. The General Manager is responsible for:

- Deciding if a report is a public interest disclosure;
- Deciding what needs to be done next, including referring it to other authorities;
- Deciding what needs to be done to correct the problem that has been identified;
- Ensuring there are systems in place to support and protect people who report wrongdoing; and
- Referring actual or suspected corrupt conduct to the Independent Commission Against Corruption.

Mayor

If you are making a report about the General Manager, you should make your report to the Mayor. The Mayor is responsible for:

- Deciding if a report is a public interest disclosure;
- Deciding what needs to be done next, including referring it to other authorities;
- Deciding what needs to be done to correct the problem that has been identified; and
- Ensuring there are systems in place in Council to support and protect people who report wrongdoing.

If the report is about the General Manager, the Mayor is also responsible for referring actual or suspected corrupt conduct to ICAC.

Disclosures Coordinator – Manager Governance and Risk

The Disclosures Coordinator has a central role in dealing with reports made by staff and Councillors. The Disclosures Coordinator receives, assesses and refers reports to the people within Council or contracted by Council who can deal with them appropriately.

Disclosures Officers – General Manager, Mayor and Director Customer and Corporate Strategy

Disclosures Officers are responsible for receiving, forwarding and/or dealing with reports made in accordance with this policy.

Additional Disclosures Officers may be nominated by the General Manager from time to time.

11. WHO CAN RECEIVE A REPORT OUTSIDE COUNCIL

- 11.1 Staff and Councillors are encouraged to report wrongdoing within Council, but internal reporting is not the only option available.
- 11.2 Staff, Councillors and public officials can choose to make a report to an investigating authority. Reporters can do this first, or at any stage after the initial report to Council. If a report concerns the General Manager or the Mayor, a staff member or Councillor may consider making a report to an investigating authority.
- 11.3 It is also possible to make a report to a Member of Parliament or a journalist, however only in limited circumstances. To have the protections of the PID Act, staff and Councillors reporting wrongdoing to a Member of Parliament or a journalist must have already made substantially the same report to either the General Manager, the Mayor (in the case of a claim against the General Manager), the Disclosure Coordinator or an investigating authority and Council or the investigating authority that received the report decided not to investigate the matter; did not complete the investigation within six months of the report; investigated the matter but did not recommend any action as a result; or not told the reporter within six months whether an investigation would be completed. Most importantly, to be protected under the PID Act, if you report wrongdoing to an MP or a journalist you will need to be able to prove that you have reasonable grounds for believing that the disclosure is substantially true and that it is in fact substantially true.
- 11.4 The PID Act lists a number of investigating authorities in NSW that staff and Councillors can report wrongdoing to and the categories of wrongdoing each authority can deal with. In relation to Council, these authorities are:

Investigating Authority	What they investigate
ICAC	Corrupt Conduct
NSW Ombudsman	Maladministration
NSW Office of Local Government, (OLG)	The Chief Executive may receive disclosures relating to a wider range of wrongdoing including serious and substantial waste in local government, corrupt conduct, maladministration, breaches of pecuniary interest obligations, or a failure to exercise functions properly in accordance with the <i>Government Information (Public Access) Act 2009</i> .
NSW Information Commissioner	For disclosures about a government information contravention.

- 11.5 In making a report to an investigating authority, staff and Councillors should contact them directly for advice about how to make a disclosure. Contact details for each investigating authority are provided at the end of this policy.
- 11.6 It is also noted that it is very likely the investigating authority will discuss the case with Council. Council will make every effort to assist and cooperate with the investigating authority to ensure the matter is dealt with appropriately and there is a satisfactory outcome. Council will also provide appropriate support and assistance to staff and Councillors who report wrongdoing to an investigating authority.
- 11.7 If you report wrongdoing to a person or an organisation that is not listed above, you will not be protected under the PID Act. This may mean you will be in breach of legal obligations or our Code of Conduct – by, for example, disclosing confidential information.

12. FEEDBACK TO THE INDIVIDUAL WHO REPORTED WRONGDOING

12.1 The individual who reported wrongdoing will be told what is happening to their report. When you make a report, you will be given:

- An acknowledgment letter and copy of this policy
- The timeframe for when you will receive further updates, and
- The name and contact details of the people who can tell you what is happening.

12.2 After a decision is made about how the report will be dealt with, you will be given:

- Information about the action that will be taken in response to your report
- Likely timeframes for any investigation
- Information about the resources available within Council to handle any concerns you may have
- Information about external agencies and services you can access for support.

Although the PID Act requires that this process is required to be completed within 45 days after receipt of a report, Council will endeavour to provide this information within 10 working days from the date of the report (as recommended by the NSW Ombudsman).

12.3 During an investigation, you will be given:

- Information on the ongoing nature of the investigation
- Information about the progress of the investigation and reasons for any delay
- Advice if your identity needs to be disclosed for the purposes of investigating the matter, and an opportunity to talk about this.

12.4 At the end of any investigation, you will be given:

- Enough information to show that adequate and appropriate action was taken and/or is proposed to be taken in response to your disclosure and any problem that was identified;
- Advice about whether you will be involved as a witness in any further matters, such as disciplinary or criminal proceedings.

12.5 Behaviour of all people involved in the PID process needs to adhere to Council's Code of Conduct. A breach of the Code of Conduct may result in disciplinary action.

13. PROTECTION AGAINST REPRISALS

13.1 The PID Act provides protection for people reporting wrongdoing by imposing penalties on anyone who takes detrimental action substantially in reprisal for them making the public interest disclosure.

13.2 Council will not tolerate any reprisal action against staff who report wrongdoing. The criminal penalties that can be imposed include imprisonment or fines. Detrimental action is also misconduct that justifies disciplinary action. People who take detrimental action against someone who has made a disclosure can also be required to pay damages for any loss suffered by that person.

13.3 Detrimental action means action causing, comprising or involving any of the following:

- Injury, damage or loss
- Intimidation or harassment
- Discrimination, disadvantage or adverse treatment in relation to employment
- Dismissal from, or prejudice in, employment
- Disciplinary proceedings.

13.4 Council will act to protect staff who report wrongdoing from reprisals. When a report is received, we will ensure that a thorough risk assessment is conducted. This will identify any risks to the member of staff who reported the wrongdoing, as well as strategies to deal with those risks.

13.5 If you believe that detrimental action has been or is being taken against you or someone else who has reported wrongdoing in reprisal for making a report, you should tell your supervisor, a disclosures officer, the Disclosure Coordinator or the General Manager immediately, or in the case of an allegation of reprisal by the General Manager, to the Mayor.

13.6 All supervisors must report any suspicions they have that reprisal action against a staff member is occurring, or any reports that are made to them, to the Disclosure Coordinator or the General Manager.

13.7 If the Disclosures Coordinator becomes aware of reprisal action against a person who has made a disclosure, they will:

- Ensure that a senior and experienced member of staff, who has not been involved in dealing with the initial disclosure, will investigate the suspected reprisal
- Give the results of that investigation to the General Manager for a decision
- Give the results of that investigation to the Mayor for a decision if the allegation of reprisal action is about the General Manager
- If it has been established that reprisal action is occurring against someone who has made a disclosure, take all steps possible to stop that activity and protect the member of staff who made the disclosure
- Take appropriate disciplinary or criminal action against anyone proven to have taken or threatened any action in reprisal for making a disclosure.

13.8 If you report reprisal action, you will be kept informed of the progress of any investigation and the outcome.

13.9 The General Manager may issue specific directions to help protect against reprisals, including:

- Issuing warnings to those alleged to have taken reprisal action against the member of staff who made the disclosure
- Relocating the member of staff who made the disclosure or the subject officer within the current workplace
- Transferring the member of staff who made the disclosure or the staff member who is the subject of the allegation to another position for which they are qualified
- Granting the member of staff who made the disclosure or the subject officer leave of absence during the investigation of the disclosure.

13.10 In relation to staff who make reports, such directions will only be made if the member of staff agrees to it. The Disclosure Coordinator will make it clear to other staff that this action was taken in consultation with the staff member and with management support, and it is not a punishment.

13.11 If you have reported wrongdoing and feel that any reprisal action is not being dealt with effectively, contact the Ombudsman or the ICAC or the Chief Executive of the Division of Local Government - depending on the type of wrongdoing you reported. Contact details for all these investigating authorities are included at the end of this policy.

14. PROTECTION AGAINST LEGAL ACTION

14.1 If you make a disclosure in accordance with the PID Act, you will not be subject to any liability and no action, claim or demand can be taken against you for making the disclosure. You will not have breached any confidentiality or secrecy obligations and you will have the defence of absolute privilege in defamation.

15. SUPPORT FOR THOSE REPORTING WRONGDOING

- 15.1 Council will make sure that staff and Councillors who have reported wrongdoing in good faith and not vexatiously, regardless of whether they have made a public interest disclosure, are provided with access to any reasonable professional support they may need as a result of the reporting process such as stress management, counselling services, legal or career advice.
- 15.2 Council also has staff who are responsible for providing support to staff who report wrongdoing, particularly to those who are suffering any form of reprisal.
- 15.3 All supervisors must notify the Disclosure Coordinator if they believe a staff member is suffering any detrimental action as a result of disclosing wrongdoing.

16. SANCTIONS FOR MAKING FALSE OR MISLEADING DISCLOSURES

- 16.1 It is important that all staff and Councillors are aware that it is a criminal offence under the PID Act to wilfully make a false or misleading statement when reporting wrongdoing. It may also be a breach of Council's Code of Conduct and may result in disciplinary action. In the case of Councillors, such disciplinary action may be taken under the misconduct provisions of the *Local Government Act 1993* and may include suspension or disqualification from civic office.

17. SUPPORT FOR THE SUBJECT OF A REPORT

- 17.1 Council is committed to ensuring staff who are the subject of a report of wrongdoing are treated fairly and reasonably. The subject of a report, will be:
 - Treated fairly and impartially
 - Told their rights and obligations under Council's policies and procedures
 - Kept informed during any investigation
 - Given the opportunity to respond to any allegation made against them
 - Told the result of any investigation.

18. REVIEW

- 18.1 This policy will be reviewed by Council annually to ensure compliance with current objectives of the legislation.

19. RESOURCES AVAILABLE

- 19.1 The contact details for external investigating authorities that staff, public officials and Councillors can make a public interest disclosure to or seek advice from are listed below.

For disclosures about corrupt conduct:

Independent Commission Against
Corruption (ICAC)
Phone: 02 8281 5999
Toll free: 1800463 909
Email: icac@icac.nsw.gov.au
Web: www.icac.nsw.gov.au
Address: Level 21, 133 Castlereagh Street,
Sydney NSW 2000

**For disclosures about serious and
substantial waste:**

Auditor-General of the NSW Audit Office
Phone: 02 9275 7100
Email: mail@audit.nsw.gov.au
Web: www.audit.nsw.gov.au
Address: Level 15, 1 Margaret Street,
Sydney NSW 2000

For disclosures about maladministration:

NSW Ombudsman
Phone: 02 9286 1000
Toll free: 1800 451 524
Email: nswombo@ombo.nsw.gov.au
Web: www.ombo.nsw.gov.au
Address: Level 24, 580 George Street,
Sydney NSW 2000

**For disclosures about breaches of the
GIPA Act:**

Information Commissioner
Phone: 1800 463 626
Email: oiinfo@oic.nsw.gov.au
Web: www.oic.nsw.gov.au
Address: Level 11, 1 Castlereagh Street
Sydney NSW 2000

For disclosures about local government agencies concerning serious and substantial waste, corrupt conduct, maladministration, breaches of pecuniary interest obligations and a failure to exercise functions properly in accordance with the *GIPA Act* or *Local Government Act*.

Chief Executive, Office of Local Government
Phone: 02 4428 4100
Email: olg@olg.nsw.gov.au
Web: www.olg.nsw.gov.au
Address: 5 O'Keefe Avenue, Nowra, NSW 2541

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RELEVANT LEGISLATIVE INSTRUMENTS:

Public Interest Disclosures Act 1994
Government Information (Public Access) Act 2009
Local Government Act 1993

RELATED POLICIES, PLANS AND PROCEDURES:

Code of Conduct

RESPONSIBLE DIRECTOR:

Customer and Corporate Strategy

APPROVAL:

Council

HISTORY:

Version	Approved by	Changes made	Date	EDMS Number
1	Council	Nil	13/11/2012	
2	Council	Minor amendments	22/10/2013	
3	Council	Minor amendments	27/03/2018	18/94703