

## **10.4 DRAFT PUBLIC INTEREST DISCLOSURES POLICY - FOR PUBLIC EXHIBITION - ATTACHMENT**

Attachment Titles:

1. DRAFT Public Interest Disclosures Policy - SVC-EXE-PO-039-04

**Attachment 1 - DRAFT - Public Interests Disclosure Policy - SVC-EXE-PO-039-04**

<u>Policy Title</u>	<u>Public Interest Disclosure Policy</u>
<u>Policy Category</u>	Public
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Under section 42 of the *Public Interest Disclosures Act 2022* (PID Act), public authorities are required to have a policy for receiving, assessing and dealing with public interest disclosures. This policy is based on the NSW Ombudsman's model "*Developing your PID policy – July 2023*".

# Model Public Interest Disclosure Policy

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## Purpose

All agencies in NSW are required to have a Public Interest Disclosure (PID) Policy under section 42 of the *Public Interest Disclosures Act 2022 (PID Act)*.

At [\[agency-name Snowy Valleys Council \(Council\)\]](#), we take reports of serious wrongdoing seriously. We are committed to building a 'speak up' culture where public officials are encouraged to report any conduct that they reasonably believe involves wrongdoing.

The integrity of our agency relies upon our staff, volunteers, contractors and subcontractors speaking up when they become aware of wrongdoing.

This policy sets out:

- how [Council \[agency-name/we\]](#) will support and protect you if you come forward with a report of serious wrongdoing
- how we will deal with the report and our other responsibilities under the PID Act
- who to contact if you want to make a report
- how to make a report
- the protections which are available to you under the PID Act.

This policy also documents our commitment to building a speak up culture. Part of that speak up culture is having in place a framework that facilitates public interest reporting of wrongdoing by:

- protecting those who speak up from detrimental action
- imposing duties on agencies who receive reports of wrongdoing to take appropriate action to investigate or otherwise deal with them.

In NSW, that framework is the PID Act.

[If you are a public official \(see the section below on 'who does this policy apply to?' for a definition\)](#), this policy should be read in conjunction with [Council's Code of Conduct, Fraud and Corruption Control Policy, Grievance Procedure and Complaints Management Procedure](#).

## Accessibility of this policy

This policy is available on [Snowy Valleys Council's \[our/agency-name\]](#) publicly available website as well as [available internally via Council's Pulse module on the \[intranet/insert name of the agency's intranet\]](#).

A copy of the policy is also sent to all staff of [Council \[agency-name\]](#) on their commencement. A hard copy of the policy can be requested from [Customer Service or the Governance Team \[position or unit\]](#) and a list of disclosure officers and details of where to obtain a copy of the full policy will be made available to all employees via notice boards at [permanent worksites](#).

## Who does this policy apply to?

This policy applies to, and [is](#) for the benefit of, all public officials in NSW, [including](#):-

[You are a public official if you are:](#)

- [a person employed in or by an agency or otherwise in the service of an agency](#) Council staff and Councillors
- [Contractors, subcontractors and employees of contractors providing services or exercising functions on behalf of Council](#)
- [Volunteers providing services or exercising functions on behalf of Council](#)
- [Any other NSW public officials including other Councils.](#)

[a person having public official functions or acting in a public official capacity whose conduct or activities an integrity agency is authorised by another Act or law to investigate](#)

[If you are not a public official as listed above, complaints can be made under Council's Complaints Management Policy which can be found on Council's website.](#)

- [an individual in the service of the Crown](#)
- [a statutory officer](#)
- [a person providing services or exercising functions on behalf of an agency, including a contractor, subcontractor or volunteer](#)
- [an employee, partner or officer of an entity that provides services, under contract, subcontract or other arrangement, on behalf of an agency or exercises functions of an agency, and are involved in providing those services or exercising those functions](#)
- [a judicial officer](#)
- [a Member of Parliament \(MP\), including a Minister](#)
- [a person employed under the Members of Parliament Staff Act 2013.](#)

The [General Manager of Council](#) [title of the head of the agency], other nominated disclosure officers and managers within [Council](#) [agency name] have specific responsibilities under the PID Act. This policy also provides information on how people in these roles will fulfil their responsibilities. Other public officials who work in and for the public sector, but do not work for [Council](#) [agency name] may use this policy if they want information on who they can report wrongdoing to within [Council](#) [agency name].

[Please note: there may be circumstances where a complaint can be deemed to be a voluntary PID. This is outlined in this policy.](#)

## Compliance with the PID Act

[This policy will be reviewed by the Governance Team at Council at least every four \(4\) years to ensure it remains relevant and fit-for-purpose as well as meeting any updates to legislative requirements. Approval to any updates will only be made with endorsement from the Council after public exhibition, except for at such times where amendments are of a minor nature \(i.e. formatting, minor legislative updates to wording, etc.\) in which the Executive Leadership Team may approve such amendments.](#)

[Should you identify any errors or issues in this policy, please contact Council's Customer Service Team with attention to the Governance Team.](#)

## What is contained in this policy?

This policy will provide you with information on the following:

- ways you can make a voluntary PID to [\[agency name\] Council](#) under the PID Act

- the names and contact details for the nominated disclosure officers in [\[agency name\]Council](#)
- the roles and responsibilities of people who hold particular roles under the PID Act and who are employees of [\[agency name\]Council](#)
- what information you will receive once you have made a voluntary PID
- protections available to people who make a report of serious wrongdoing under the PID Act and what we will do to protect you
- [\[agency name\]Council](#) procedures for dealing with disclosures
- [\[agency name\]Council](#) procedures for managing the risk of detrimental action and reporting detrimental action
- [\[agency name\]Council](#) record-keeping and reporting requirements
- how [\[agency name\]Council](#) will ensure it complies with the PID Act and this policy.

If you require further information about this policy, how public interest disclosures will be handled and the PID Act you can:

- confidentially contact a nominated disclosure officer within [Council\[agency name\]](#)
- contact the PID Advice Team within the NSW Ombudsman by phone: (02) 9286 1000 or email: [pidadvice@ombo.nsw.gov.au](mailto:pidadvice@ombo.nsw.gov.au), or
- access the NSW Ombudsman's PID guidelines which are available on its website.

If you require legal advice with respect to the PID Act or your obligations under the PID Act, you may need to seek independent legal advice.

## 1. How to make a report of serious wrongdoing

### (a) Reports, complaints and grievances

[Any suspected wrongdoing or misconduct within Council, or any activities or incidents you see within Council that you believe are wrong, should be reported, not only those that may be considered serious under the PID Act.](#) When a public official reports suspected or possible wrongdoing in the public sector, their report will be a PID if it has certain features which are set out in the PID Act. [If the report does not meet the criteria described in the PID Act, Council will deal with it appropriately using other tools.](#)

Some internal complaints or internal grievances may also be PIDs, as long as they have the features of a PID. If an internal complaint or grievance is a report of serious wrongdoing, we will consider whether it is a PID. If it is a PID, we will deal with it as set out in this policy, but we will also make sure we follow our [Complaint Management Policy and Fraud and Corruption Control Policy\[name of relevant policies\]](#).

It is important that we quickly recognise that we have received a PID. This is because once a PID is received, the person who has made the report is entitled to certain protections and we have certain decisions that we have to make on how we will deal with the PID and how we will protect and support the person who has made the report. [In addition to the above policies, any review of a PID will also take into consideration Council's Grievance Procedure, Complaint Management Procedure and Procedures for the Administration of the Code of Conduct.](#)

[Reports of non-PID matters should be reported to a supervisor to be dealt with in line with relevant policies and procedures. This might include:](#)

- [harassment or unlawful discrimination](#)

- [practices that endanger the health or safety of employees or the public.](#)

[While such reports may not be considered PIDs, Council recognises that they raise important issues and will be responded to accordingly with every attempt to protect the public official making the report from detrimental action.](#)

**(b) When will a report be a PID?**

There are three types of PIDs in the PID Act. These are:

2. *Voluntary PID*: This is a PID where a report has been made by the public official because they decided, of their own accord, to come forward and disclose what they know.
3. *Mandatory PID*: This is a PID where the public official has made a report about serious wrongdoing because they have a legal obligation to make that report, or because making that report is an ordinary aspect of their role or function in an agency.
4. *Witness PID*: This is a PID where a person discloses information during an investigation of serious wrongdoing following a request or requirement of the investigator.

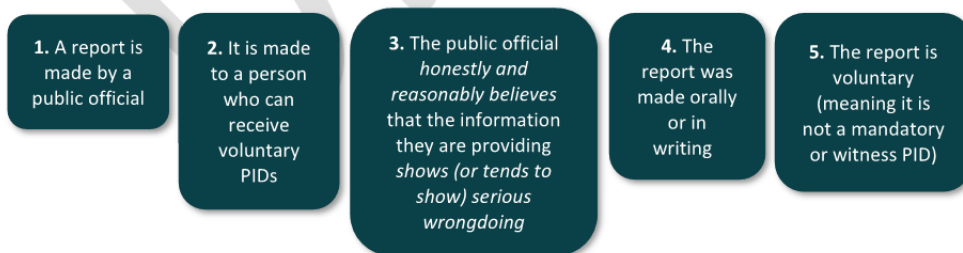
This policy mostly relates to making a voluntary PID and how we will deal with voluntary PIDs. People who make a mandatory PID or a witness PID are still entitled to protection. More information about protections is available in [Section 2](#) of this policy.

You can find more information about mandatory and witness PIDs in the Ombudsman’s guidelines ‘Dealing with mandatory PIDs’ and ‘Dealing with witness PIDs’.

Voluntary PIDs are the kind of PIDs most people have in mind when they think about public interest reporting and ‘whistleblowing’.

They involve a public official making a report because they have information that they believe shows (or tends to show) serious wrongdoing, where they are not under a legal obligation to make that report and where it is not an ordinary part of their role to report such wrongdoing.

A report is a voluntary PID if it has the following five features, which are set out in sections 24 to 27 of the PID Act:



If the report has all five features, it is a voluntary PID.

You will not be expected to prove that what you reported actually happened or is serious wrongdoing. You *do* have to honestly believe, on reasonable grounds, that the information you are reporting shows or tends to show serious wrongdoing.

Even though you do not have to prove the serious wrongdoing happened or provide evidence, a mere allegation with no supporting information is unlikely to meet this test.



If we make an error and do not identify that you have made a voluntary PID, you will still be entitled to the protections under the PID Act.

If you make a report and believe we have made an error by not identifying that you have made a voluntary PID, you should raise this with a nominated disclosure officer, [the Disclosures Coordinator](#) or your contact officer for the report. If you are still not satisfied with this outcome, you can seek an internal review or we make seek to conciliate the matter. You may also contact the NSW Ombudsman. Further information on rights to internal review and conciliation is found in [Section 7](#) of this policy.

### (c) Who can make a voluntary PID?

Any public official can make a voluntary PID — see [the section on](#) 'Who this policy applies to'. You are a public official if:

- you are employed by [\[agency-name\] Council](#)
- you are a contractor, subcontractor or volunteer who provides services, or exercises functions, on behalf of [Council\[agency-name\]](#), or
- you work for an entity (such as a non-government organisation) who is contracted by [Council\[agency-name\]](#) to provide services or exercise functions on behalf of [Council\[agency-name\]](#) — [and](#) if you are involved in undertaking that contracted work.

A public official can make a PID about serious wrongdoing relating to *any* agency, not just the agency they are working for. This means that we may receive PIDs from public officials outside our agency. It also means that you can make a PID to any agency, including an integrity agency like the Independent Commission Against Corruption (ICAC) and the NSW Ombudsman. [Annexure Appendix B](#) of this policy has a list of integrity agencies.

[As explained above \(in the section about 'Who does this policy not apply to'\), it should be noted that consultants are not considered public officials under the PID Act.](#)

### (d) What is serious wrongdoing?

Reports must be of one or more of the following categories of *serious wrongdoing* to be a voluntary PID (in addition to having the other features set out here). Serious wrongdoing is defined in the PID Act as:

- *corrupt conduct* — such as a public official accepting a bribe [or otherwise being influenced by a member of the public to use their position in a way that is dishonest, biased or breaches public trust; the improper use of knowledge, power or position for personal gain or the advantage of others; acting dishonestly or unfairly, breaching public trust](#)
- *serious maladministration* — such as an agency systemically failing to comply with proper recruitment processes when hiring staff; [making a decision and/or taking action that is unlawful; refusing to grant an approval for reasons that are not related to the merits of an application](#)
- *a government information contravention (breach of the Government Information (Public Access) Act 2009)* — such as destroying, concealing or altering records to prevent them from being released under [an Government Information Public Access application for government information; knowingly making decisions that are contrary to legislation; directing another person to make a decision that is contrary to legislation](#)
- *a local government pecuniary interest contravention* — such as a senior council staff member recommending a family member for a council contract and not declaring the

relationship; [a councillor participating in consideration of a DA for a property they or their family have an interest in](#)

- *a privacy contravention* — such as unlawfully accessing a person's personal information on an agency's database
- *a serious and substantial waste of public money* — such as an agency not following a competitive tendering process when contracting with entities to undertake government work; [having poor or the absence of processes in place for a system involving large amounts of public funds.](#)

When you make your report, you do not need to state to [Council\[us/agency name\]](#) what category of serious wrongdoing you are reporting or that you are reporting serious wrongdoing.

#### (e) Who can I make a voluntary PID to?

For a report to be a voluntary PID, it must be made to certain public officials.

#### **Making a report to a public official who works for [Snowy Valleys Council \[agency name\]](#)**

You can make a report [inside-within Council\[agency name\]](#) to:

- [\[head-of-agency\]the General Manager](#)
- [the Mayor, where the report is about the General Manager](#)
- [the Disclosures Coordinator](#)
- a [nominated](#) disclosure officer for [Snowy Valleys Council \[agency name\]](#) — a list of disclosure officer [positions](#) for [Council \[agency name\]](#) and [their contact details](#) can be found at [AnnexureAppendix A](#) of this policy
- your manager [or supervisor](#) — this is the person who directly, or indirectly, supervises you. It can also be the person who you directly, or indirectly, report to. You may have more than one manager. Your manager will make sure that the report is communicated to a disclosure officer on your behalf or may accompany you while you make the report to a disclosure officer.

[For a public official who is a person providing services or exercising functions on behalf of Council \(including a contractor, subcontractor or volunteer\) or an employee, partner or officer of an entity that provides services on behalf of an Council or exercises functions of an Council — their manager is taken to be the public official at Council who oversees those services or functions, or who manages the relevant contract or volunteering arrangement.](#)

#### **Making a report to a recipient outside of [Snowy Valleys Council \[agency name\]](#)**

You can also make your report to a public official in another agency (meaning an agency you do not work for) or an integrity agency. These include:

- the *head of another agency* — this means the head of any public service agency
- an *integrity agency* — a list of integrity agencies is located at [AnnexureAppendix B](#) of this policy
- a *disclosure officer for another agency* — ways to contact disclosure officers for other agencies is located in an agency's PID policy which can be found on their public website
- a *Minister or a member of a Minister's staff* but the report *must be made in writing*.

If you choose to make a disclosure outside of [Council-\[agency-name\]](#), it is possible that your disclosure will be referred back to [Council-\[agency-name/us\]](#) so that appropriate action can be taken.

### **Making a report to a Member of Parliament or journalist**

Disclosures to [Members of Parliament](#) (MPs) or journalists are different to other reports. You can only disclose a report of wrongdoing as a voluntary PID to an MP or journalist in the following circumstances:

- You must have first made substantially the same disclosure (described here as a 'previous disclosure') to someone who can receive disclosures.
- The previous disclosure must be substantially true.
- You did *not* make the previous disclosure anonymously.
- You did *not* give a written waiver of your right to receive information relating to your previous disclosure.
- You did *not* receive the following from [Snowy Valleys Council\[agency-name\]](#):
  - notification that [Council\[agency-name\]](#) will *not* investigate the serious wrongdoing and will also not refer the previous disclosure to another agency, or
  - the following information at the end of the investigation period:
    - notice of [Council's-\[agency-name\]](#) decision to investigate the serious wrongdoing
    - a description of the results of an investigation into the serious wrongdoing
    - details of proposed or recommended corrective action as a result of the previous disclosure or investigation.

Investigation period means:

- after six months from the previous disclosure being made, or
- after 12 months if you applied for an internal review of [the agencyCouncil's](#) decision within six months of making the disclosure.

If all the above requirements are met, your disclosure to an MP or journalist may be a voluntary PID.

### **(f) What form should a voluntary PID take?**

You can make a voluntary PID:

- *in writing* — this could be an email or letter to a person who can receive voluntary PIDs.
- *orally* — have a private discussion with a person who can receive voluntary PIDs. This can be face-to-face, via telephone or virtually.
- *anonymously* — write an email or letter or call a person who can receive PIDs to make a report without providing your name or anything that might identify you as the maker of the report. A report will only be considered anonymous if there is no reasonable or practical way of communicating with the person making the report. Even if you choose to remain anonymous, you will still be protected under the PID Act. It may be difficult, however, for [Council\[us/agency-name\]](#) to investigate the matter(s) you have disclosed if we cannot contact you for further information.

[You are encouraged to submit your report in writing as this can help to avoid any confusion or misinterpretation. Council's Internal Report Form is available to make such a report. A copy may be downloaded from the Pulse module.](#)

[If a report is made orally, the person receiving the report will make a comprehensive record of the report and ask the person making the record to sign this record. The reporter should keep a copy of this record using the \*Internal Report Form\*.](#)

#### **(g) What should I include in my report?**

You should provide as much information as possible so we can deal with the report effectively. The type of information you should include is:

- date, time and location of key events
- names of person(s) involved in the suspected wrongdoing, their role, title and how they are involved
- your relationship with the person(s) involved, such as whether you work closely with them
- your explanation of the matter you are reporting
- how you became aware of the matter you are reporting
- possible witnesses
- other information you have that supports your report.

#### **(h) What if I am not sure if my report is a PID?**

You should report all wrongdoing you become aware of regardless of whether you think it is serious wrongdoing. It is important for [Council \[us/agency name\]](#) to understand what is or may be occurring.

We are then responsible for making sure your report is handled appropriately under the PID Act, or if it is not a PID, in line with our other procedures. Even if your report is not a PID, it may fall within another one of [the agency's Council's](#) policies for dealing with reports, allegations or complaints.

#### **(i) Deeming that a report is a voluntary PID**

The [General Manager \[head of agency/delegate\]](#) can, in certain circumstances, determine that a report is a voluntary PID even if the report does not otherwise have all the features of a voluntary PID. This is known as the 'deeming power'.

By deeming that a report is a voluntary PID, it ensures that reporters are provided with protections under the PID Act.

If you make a report that has not met all the requirements of a voluntary PID, you can refer your matter to [the General Manager \[head of agency/delegate\]](#) to request that they consider deeming your report to be a voluntary PID.

A decision to deem a report to be a voluntary PID is at the discretion of the [General Manager \[head of agency/delegate\]](#). For more information about the deeming power, see the Ombudsman's guideline 'Deeming that a disclosure is a voluntary PID'.

**(i) Who can I talk to if I have questions or concerns?**

[If you have any questions or concerns about the process of reporting a PID, please seek advice from the Disclosures Coordinator or speak with one of the designated disclosure officers listed in Appendix A of this policy.](#)

## 2. Protections

**(a) How is the maker of a voluntary PID protected?**

When you make a voluntary PID you receive special protections under the PID Act.

We are committed to taking all reasonable steps to protect you from detrimental action as a result of having made a PID. We are also committed to maintaining your confidentiality as much as possible while the PID is being dealt with.

[We Council](#) will not tolerate any type of detrimental action being taken against you because you have made a report, might make a report or are believed to have made a report.

The maker of a voluntary PID is protected in the following ways:

- *Protection from detrimental action*
  - A person cannot take detrimental action against another person because they have made a voluntary PID or are considering making a PID. Detrimental action includes bullying, harassment, intimidation or dismissal.
  - Once we become aware that a voluntary PID by a person employed or otherwise associated with [Council \[agency\]](#) that concerns serious wrongdoing relating to [Council \[agency\]](#) has been made, [\[we/agency name\]](#) will undertake a risk assessment and take steps to mitigate the risk of detrimental action occurring against the person who made the voluntary PID.
  - It is a criminal offence for someone to take detrimental action against a person because they have made or may make a voluntary PID. It is punishable by a maximum penalty of 200 penalty units or imprisonment for five years or both.
  - A person may seek compensation where unlawful detrimental action has been taken against them.
  - A person can apply for a court order (injunction) where detrimental action is threatened or has occurred (for example, an order to prevent dismissal or to require reinstatement).

Note that a person who makes a PID can still be subject to reasonable management action (such as ordinary performance reviews and performance management). Provided such action is not taken because of the PID, it is not detrimental action under the PID Act.

- *Immunity from civil and criminal liability*

Some public officials are often subject to a duty of confidentiality that prevents them disclosing certain information that they obtain or become aware of at work. Sometimes, in order to make a PID, public officials will need to breach or disregard such confidentiality duties. If that happens, a public official cannot be disciplined, sued or criminally charged for breaching confidentiality.

[Where a Council official is required to make mandatory PIDs, it will be included as part of their role and responsibilities in their position description.](#)

- *Confidentiality*

Public officials and agencies must not disclose information tending to identify a person as the maker of a voluntary PID unless doing so is permitted by the PID Act.

- *Protection from liability for own past conduct*

The Attorney General can give the maker an undertaking that a disclosure of their own past conduct will not be used against them if a person discloses their own wrongdoing or misconduct while making a report. This undertaking can only be given on application by an integrity agency to the Attorney General.

### (b) Protections for people who make mandatory and witness PIDs

Apart from PIDs that are made voluntarily by public officials, there are other types of reports that are recognised as PIDs under the PID Act:

- *A mandatory PID*: This is a PID where the public official has made the report about serious wrongdoing because they have a legal obligation to make that report, or because making that report is an ordinary aspect of their role or function in an agency.
- *A witness PID*: This is a PID where a person discloses information during an investigation of serious wrongdoing following a request or requirement of the investigator.

Protections for makers of mandatory and witness PIDs are detailed in the table below.

Protection	Mandatory PID	Witness PID
<b>Detrimental action</b> — It is an offence to take detrimental action against a person based on the suspicion, belief or awareness that a person has made, may have made or may make a PID.	✓	✓
<b>Right to compensation</b> — A person can initiate proceedings and seek compensation for injury, damage or loss suffered as a result of detrimental action being taken against them.	✓	✓
<b>Ability to seek injunction</b> — An injunction can be sought to prevent the commission or possible commission of a detrimental action offence against a person. For example, an order to prevent dismissal or to require reinstatement.	✓	✓
<b>Immunity from civil and criminal liability</b> — a person will not incur civil or criminal liability if the person breaches a duty of confidentiality while making a disclosure. This means that legal action cannot be taken against a person for: <ul style="list-style-type: none"> <li>• breaching a duty of secrecy or confidentiality, or</li> <li>• breaching another restriction on disclosure.</li> </ul>	✓	✓

### 3. Reporting detrimental action

If you experience adverse treatment or detrimental action [as a result of reporting a PID](#), such as bullying or harassment, you should report this immediately. You can report any experience of adverse treatment or detrimental action directly to [Council \[agency/us\]](#), or to an integrity agency. A list of integrity agencies is located at [AnnexureAppendix B](#) of this policy.

[Reports may be made in writing \(via email or handwritten\), in person or over the phone. Council's Internal Reporting Form may be used for reporting detrimental action or a written overview should be created where the report is not received in writing.](#)

### 4. General support

[Council will allocate a key contact person to a person who makes a voluntary PID. This contact person will take steps to protect the interests of the person \(for example, if they are at risk of detrimental action\).](#)

[Council will ensure that any employee who has reported wrongdoing, regardless of whether their report is treated as a public interest disclosure, are provided with access to any professional support they may need as a result, including stress management or counselling services.](#)

[Access to support may also be available for other employees involved in the internal reporting process where appropriate. Makers of reports and other Council officials involved in the process can discuss their support options with the Disclosures Coordinator.](#)

[Council offers a free Employee Assistance Program for support and/or counselling for workplace and personal issues. The confidential independent service is provided by qualified and experienced professionals.](#)

[Questions about the PID Act and reporting should be directed to the Disclosures Coordinator and/or the NSW Ombudsman where questions are about the PID Act and reporting generally.](#)

#### 4.5. Roles and Responsibilities of [agency name]Snowy Valleys Council employees

Certain people within [\[agency name\]Council](#) have responsibilities under the PID Act.

##### [Head-of-agency]

##### (a) General Manager

The [\[head-of-agency\]General Manager](#) is responsible for:

- fostering a workplace culture where reporting is encouraged
- receiving disclosures from public officials
- ensuring there is a system in place for assessing disclosures
- ensuring the [\[agency name\]Council](#) complies with this policy and the PID Act
- ensuring that the [Council-\[agency name\]](#) has appropriate systems for:
  - overseeing internal compliance with the PID Act

- supporting public officials who make voluntary PIDs, including by minimising the risk of detrimental action
- implementing corrective action if serious wrongdoing is found to have occurred
- complying with reporting obligations regarding allegations or findings of detrimental action
- complying with yearly reporting obligations to the NSW Ombudsman.

**(b) Disclosures Coordinator (Governance Coordinator) Disclosure Officers**

The Disclosures Coordinator is responsible for:

- [serving as the primary point of contact for public officials](#)
- [receiving reports when passed on from supervisors and managers](#)
- [coordinating the assessment and response to a report](#)
- [providing advice and support to Disclosure Officers and the General Manager when dealing with PIDs](#)
- [dealing with reports made under Council's Code of Conduct in accordance with Council's adopted \*Procedures for the Administration of the Code of Conduct\*](#)
- [acknowledging reports and providing updates and feedback to the PID maker, including ensuring that any oral reports have been recorded in writing](#)
- [assessing whether it is possible and appropriate to keep the maker of the report's identity confidential](#)
- [assessing the risk of detrimental action and workplace conflict related to or likely to arise from a report, and developing strategies to manage any risk\(s\) identified](#)
- [notifying the General Manager immediately if they believe a reporter is being subjected to detrimental action as a result of reporting a PID, or in the case of suspected detrimental action by the General Manager, notifying the Mayor.](#)
- [where required, providing or coordinating support to Council officials involved in the reporting or investigation process, including protecting the interests of any officer who is the subject of the report](#)
- [ensuring Council complies with the PID Act](#)
- [complying with yearly reporting obligations to the NSW Ombudsman in accordance with the PID Act.](#)

**Disclosure Officers**

Disclosure officers are responsible for:

- receiving reports from public officials
- [receiving reports when they are passed on to them by managers and other supervisory staff members](#)
- [making any necessary arrangements to ensure report makers can make reports privately and discreetly when requested, away from the workplace if necessary](#)
- ensuring reports are dealt with appropriately, including by referring the matter to the appropriate complaint unit (if relevant)



- ensuring that any oral reports that have been received are recorded in writing
- [carrying out preliminary assessment of received reports and forwarding to the Disclosure Coordinator or General Manager for full assessment](#)
- [discussing with the reporter any concerns they may have about detrimental action or workplace conflict](#)
- [notifying the Disclosures Coordinator or General Manager immediately if they believe a reporter is being subjected to detrimental action as a result of reporting a PID, or in the case of suspected detrimental action by the General Manager, notifying the Mayor.](#)

#### (e) **Managers and Supervisors**

The responsibilities of managers [and supervisors](#) include:

- [creating a local work environment where employees are comfortable and confident about reporting wrongdoing](#)
- [identifying and](#) receiving reports from persons that report to them or that they supervise
- [passing on reports they receive to a disclosure officer](#)
- [notifying the Disclosures Coordinator or General Manager immediately if they believe a reporter is being subjected to detrimental action as a result of reporting a PID, or in the case of suspected detrimental action by the General Manager, notifying the Mayor.](#)

#### (d) **All Employees**

All **employees** must:

- report suspected [serious](#) wrongdoing or other misconduct
- [to the best of their ability, use their best endeavours to](#) assist in an investigation of serious wrongdoing if asked to do so by a person dealing with a voluntary PID on behalf of [Council \[agency name\]](#)
- treat any person dealing with or investigating reports of serious wrongdoing with respect.

[Under no circumstances should any All](#) employees ~~must not~~ take detrimental action against any person who has made, may in the future make, or is suspected of having made, a PID.

## 5.6. **How we will deal with voluntary PIDs**

### (a) **How [\[we/agency name\] Council](#) will acknowledge that we have received a report and keep the person who made it informed**

When a disclosure officer in [\[agency name\] Council](#) receives a report which is a voluntary PID, or looks like it may be a voluntary PID, the person who made the report will receive the following information:

- You will receive an acknowledgment that the report has been received. This acknowledgement will:
  - state that the report will be assessed to identify whether it is a PID
  - state that the PID Act applies to how [Council \[we/agency name\]](#) deals with the report

- provide clear information on how you can access this PID policy
- provide you with details of a contact person and available supports.
- If the report is a voluntary PID, we will inform you as soon as possible how we intend to deal with the report. This may include:
  - that we are investigating the serious wrongdoing
  - that we will refer the report to a different agency (if appropriate) to deal with the voluntary PID. If we do this, we will provide you with details of this referral
  - If we decide to not investigate the report and to not refer it to another agency for it to be investigated, we will tell you the reasons for this decision. We will also notify the NSW Ombudsman of this decision.
- If we decide to investigate the serious wrongdoing, we will provide you with updates on the investigation at least every three months. During this time, if you would like more frequent updates, you should contact the contact person who was nominated when you made the report.
- If we investigate the serious wrongdoing, we will provide you with the following information once the investigation is complete:
  - a description of the results of the investigation — that is, we will tell you whether we found that serious wrongdoing took place.
  - information about any corrective action as a result of the investigation/s(s) — this means we will tell you what action we took in relation to the person who engaged in the serious wrongdoing or if the serious wrongdoing was by our agency, what we have put in place to address that serious wrongdoing.
  - 
  - Corrective action could include taking disciplinary action against someone or changing the practices, policies and procedures that we have in place which led to the serious wrongdoing.
- There may be some details about both the findings made as a result of the investigation and the corrective action taken that cannot be revealed to you. We will always balance the right of a person who makes a report to know the outcome of that report, with other legal obligations we have.
- If you have made an anonymous report, in many cases we may not be able to provide this information to you.

[Council's Public Interest Disclosures Procedure provides additional details on how Council will process reports of wrongdoing.](#)

#### **(b) How [we/agency-name] Council will deal with voluntary PID reports of wrongdoing**

Once a report that may be a voluntary PID is received, [Council \[we/agency-name\]](#) will look at the information contained in the report to see if it has the features of a voluntary PID. This assessment is undertaken to identify whether the report is a voluntary PID or another type of disclosure, and to make sure that the right steps are followed. If it is a voluntary PID, we will ensure that we comply with the requirements in the PID Act.

[Further details of how Council will process reports is available in the Council's Public Interest Disclosure Procedure.](#)

**Outcome: Report not a voluntary PID**

Even if the report is not a voluntary PID, it will still need to be dealt with in a manner consistent with our [Complaints Management Policy, Complaints Management Procedure and Grievance Procedure](#) [name-of-relevant-internal-complaints-or-grievance-handling-process] or through an alternate process.

If the report is not a voluntary PID, we will let you know that the PID Act does not apply to the report and how we will deal with the concerns raised in the report.

If you are not happy with this assessment or otherwise disagree with it, you can raise it with the person who has communicated the outcome with you or a disclosure officer, request an internal review (see [Section 7](#)) or request that the matter be conciliated.

[Council](#)[We/agency-name] can, but [does](#) not have to, request the NSW Ombudsman to conciliate the matter.

**Outcome: To cease dealing with report as voluntary PID**

[We/agency-name]Council may stop dealing with a voluntary PID because it is not actually a voluntary PID (meaning it does not have all the features of a PID [as described in Section 1\(b\)](#)).

[Under such circumstances, the Disclosure Officer reviewing the report will contact the person who made the report to discuss the decision to cease dealing with the report as a voluntary PID.](#)

**Outcome: Report is a voluntary PID**

If the report is a voluntary PID:

- In most cases, we will conduct an investigation to make findings about whether the serious wrongdoing disclosed in the report occurred, who was involved, who was responsible, and whether the people involved, or [the agency-Council itself](#), engaged, in serious wrongdoing. There may be circumstances where we believe an investigation is not warranted — for example, if the conduct has previously been investigated.
- There may also be circumstances where we decide that the report should be referred to another agency, such as an integrity agency. For example, reports concerning possible corrupt conduct may be required to be reported to the ICAC in accordance with section 11 of the *Independent Commission Against Corruption Act 1988*.
- Before referring a matter, we will discuss the referral with the other agency, and we will provide you with details of the referral and a contact person within the other agency.
- If we decide not to investigate a report and to not refer the matter to another agency, we must let you know the reasons for this and notify the NSW Ombudsman.

**(c) How [we/agency-name]Council will protect the confidentiality of the maker of a voluntary PID**

We understand that people who make voluntary PIDs may want their identity and the fact that they have made a report to be confidential.

Under the PID Act, information tending to identify a person as the maker of a voluntary PID (known as identifying information) is not to be disclosed by a public official or an agency.

There are certain circumstances under the PID Act that allow for the disclosure of identifying information. These include:

- where the person consents in writing to the disclosure
- where it is generally known that the person is the maker of the voluntary PID because of their voluntary self-identification as the maker
- when the public official or [Council \[we/agency\]](#) reasonably considers it necessary to disclose the information to protect a person from detrimental [action](#)
- where it is necessary [for](#) the information be disclosed to a person whose interests are affected by the disclosure
- where the information has previously been lawfully published
- when the information is disclosed to a medical practitioner or psychologist for the purposes of providing medical or psychiatric care, treatment or counselling to the individual disclosing the information
- when the information is disclosed for the purposes of proceedings before a court or tribunal
- when the disclosure of the information is necessary to deal with the disclosure effectively
- if it is otherwise in the public interest to disclose the identifying information.

We will not disclose identifying information unless it is necessary and authorised under the PID Act.

We will put in place steps to keep the identifying information of the maker and the fact that a report has been made confidential. It may not be possible for us to maintain complete confidentiality while we progress the investigation, but we will do all that we practically can to not unnecessarily disclose information from which the maker of the report can be identified. We will do this by:

- [providing information to the maker of the PID about the importance of maintaining confidentiality and advising them how best to protect their identity, for example, by telling them not to discuss their report with other staff.](#)
- [limiting the number of people who are aware of the maker's identity or information that could identify them.](#)
- [if we must disclose information that may identify the maker of the PID, we will still not disclose the actual identity of the maker of the PID, unless we have their consent to do so.](#)
- [ensuring that any person who does know the identity of the maker of a PID is reminded that they have a legal obligation to keep their identity confidential.](#)
- [ensuring that only authorised persons have access to emails, files or other documentation that contain information about the identity of the maker.](#)

If confidentiality cannot be maintained or is unlikely to be maintained, [Council \[we/agency name\]](#) will:

- [advise the person whose identity may become known](#)
- [implement strategies to minimise the risk of detrimental action](#)
- [provide additional support to the person who has made the PID](#)
- [update Council's risk assessment and risk management plan for the review of the PID](#)
- [remind persons who become aware of the identifying information of the consequences for failing to maintain confidentiality and that engaging in detrimental action is a criminal offence and may also be a disciplinary matter.](#)

(d) **How [\[We/agency name\]Council](#) will assess and minimise the risk of detrimental action**

[\[We/agency name\]Council](#) will not tolerate any detrimental action being taken by any person against a person who has made a PID, investigators, witnesses or the person the report is about.

[\[We/agency name\]Council](#) will assess and take steps to mitigate detrimental action from being taken against the maker of a voluntary PID, the person whose conduct is the subject of a PID, investigators and witnesses.

[\[We/agency name\]Council](#) will take steps to assess and minimise the risk of detrimental action by:

- [conducting a risk assessment and creating a risk management plan \(including reassessing the risk throughout the entirety of the matter\). This risk assessment will be conducted by the Risk Management Officer and overseen by the Disclosures Coordinator](#)
- [identification of risks will be made in collaboration with the maker of the report and the Disclosures Coordinator](#)
- [discussing protection options with the report maker which may include remote working or approved leave for the duration of the investigation](#)
- [outlining what supports will be provided, including access to Council's \*Employee Assistance Program\*.](#)

Detrimental action against a person is an act or omission that causes, comprises, involves or encourages detriment to a person or a threat of detriment to a person (whether express or implied). Detriment to a person includes:

- injury, damage or loss
- property damage
- reputational damage
- intimidation, bullying or harassment
- unfavourable treatment in relation to another person's job
- discrimination, prejudice or adverse treatment
- disciplinary proceedings or disciplinary action, or
- any other type of disadvantage.

Detrimental action does not include:

- lawful action taken by a person or body to investigate serious wrongdoing or other misconduct
- the lawful reporting or publication of a finding of serious wrongdoing or other misconduct
- the lawful making of adverse comment, resulting from investigative action
- the prosecution of a person for a criminal offence
- reasonable management action taken by someone in relation to a person who made or may make a PID. For example, a reasonable appraisal of a PID maker's work performance.

(e) **How ~~[we/agency name]Council~~ will deal with allegations of a detrimental action offence**

If ~~[we/agency name]Council~~ become(s) aware of an allegation that a detrimental action offence has occurred or may occur, ~~[we/agency name]Council~~ will:

- take all steps possible to stop the action and protect the person(s)
- take appropriate disciplinary action against anyone that has taken detrimental action
- refer any evidence of a detrimental action offence to the Commissioner of Police and the ICAC or the Law Enforcement Conduct Commission (whichever is as applicable)
- notify the NSW Ombudsman about the allegation of a detrimental action offence being committed.

Referrals about alleged detrimental action offences will be made by the General Manager with the assistance of the Disclosures Coordinator, unless the allegations are against the General Manager, in which case the referrals will be made by the Mayor.

If you are the victim of detrimental action due to the reporting of a PID, you should speak with your supervisor, manager, the Disclosures Coordinator or the General Manager immediately. In the case of an allegation of detrimental action by the General Manager, you can alternatively report this to the Mayor.

If you allege detrimental action, you will be kept informed of the progress and outcome of any investigation or other action taken in response to your allegation. Support is available through Council's *Employee Assistance Program* or other means, such as changing the location of your worksite, remote work, etc. and can be discussed with the Disclosures Coordinator.

If you have reported a PID and are experiencing detrimental action which you believe is not being dealt with effectively, contact the Office of Local Government, the NSW Ombudsman or the ICAC (depending on the subject of your report). Contact details for these investigating authorities are included in Appendix B at the end of this document.

(f) **What ~~[agency name]Council~~ will do if an investigation finds that serious wrongdoing has occurred**

If, after an investigation, it is found that serious wrongdoing or other misconduct has occurred, ~~[we/agency name]Council~~ will take the most appropriate action to address that wrongdoing or misconduct. This is also known as corrective action.

Corrective action can include:

- a formal apology
- improving internal policies to adequately prevent and respond to similar instances of wrongdoing
- providing additional education and training to staff where required
- taking employment action against persons involved in the wrongdoing (such as termination of employment, relocation, a caution or reprimand)
- payment of compensation to people who have been affected by serious wrongdoing or other misconduct.

The findings of an investigation will be communicated with Council's Executive Leadership Team and any relevant Managers who are required to know in order to

[implement corrective action\(s\). Steps will be taken with the responsible manager's team members to address any recommendations in the findings.](#)

[The maker of the PID will be notified of the proposed or recommended corrective action\(s\) in line with Council's \*Privacy Management Plan\*.](#)

## 7. Review and dispute resolution

### (a) Internal review

People who make voluntary PIDs can seek internal review of the following decisions made by [\[agency name\]Council](#):

- that [\[agency name\] Council](#) is not required to deal with the report as a voluntary PID
- to stop dealing with the report because [\[we/agency name\] Council](#) decided it was not a voluntary PID
- to not investigate the serious wrongdoing and not refer the report to another agency
- to cease investigating the serious wrongdoing without either completing the investigation or referring the report to another agency for investigation.

[\[We/agency name\]Council](#) will ensure internal reviews are conducted in compliance with the PID Act.

If you would like to make an application for an internal review, you must apply in writing within 28 days of being informed of [Council's \[our/agency's name\]](#) decision. The application should state the reasons why you consider [\[we/agency's name\]Council's](#) decision should not have been made. You may also submit any other relevant material with your application. [This may include:](#)

- [additional documentation that support the PID report that have not been previously provided](#)
- [additional information such as witnesses that can support the claims reported within the PID.](#)

[Applications for internal review should be sent to the Director Community & Corporate, via Customer Service, who will conduct the review, unless the Director Community & Corporate was the decision maker on the report being reviewed. In such circumstances, the review will be sent to another Disclosure Officer no less senior than the Director Community & Corporate.](#)

[Reviews must be completed with 40 working days of receipt.](#)

### (b) Voluntary dispute resolution

If a dispute arises between [Council \[us/agency name\]](#) and a person who has made a report which is, or may be, a voluntary PID, we may request the NSW Ombudsman to conciliate the dispute. Conciliation is a voluntary process and will only be suitable for disputes where [\[we/agency name\]Council](#) and the maker of the report are willing to resolve the dispute.

## 8. Other agency Council obligations

### (a) Record-keeping requirements

[We/agency name]Council must keep full and accurate records with respect to all information received in connection with the PID Act. This ensures that Council [agency name] complies with its obligations under the *State Records Act 1998*.

Information will be stored in Council's electronic records management system under appropriate security levels to limit accessibility to the relevant disclosure officer and anyone else who may be assisting in the investigation of the matter.

### (b) Reporting of voluntary PIDs and [agency name Council's] annual return to the Ombudsman

Each year, Council must [we/agency name] provide an annual return to the NSW Ombudsman which includes:

- information about voluntary PIDs received by Council [agency name] during each return period (yearly with the start date being 1 July)
- action taken by Council [agency name] to deal with voluntary PIDs during the return period
- how Council [agency name] promoted a culture in the workplace where PIDs are encouraged.

The Disclosures Coordinator will be responsible for collecting the information about voluntary PIDs and other information captured in the annual return, maintaining that information within Council's electronic records management system, and preparing and submitting Council's annual return to the NSW Ombudsman.

### (c) How [we/agency name]Council will ensure compliance with the PID Act and this policy

Council has mechanisms in place for monitoring the effectiveness of its PID policy and for ensuring compliance with the PID Act. The Disclosures Coordinator will be responsible for ensuring the following compliance measures are in place and reviewed regularly:

- PID Procedure
- Training – to be provided to all Council staff using resources provided by NSW Ombudsman. This will include:
  - Awareness training to all employees and additional training for staff with specific responsibilities under the PID Act to ensure what oversight arrangements will be in place at the agency and who will be responsible for this oversight.
  - Training will be provided as part of onboarding for new employees.
  - Refresher training will be provided every three years
- Auditing – oversight and review of all PIDs will be conducted by the Disclosures Coordinator
- Non-compliance with this policy will be assessed and disciplinary action may be taken accordingly as necessary, including referral to the NSW Ombudsman



- [audits and reporting will be conducted as per legislative requirements or every four \(4\) years](#)
- [reports about compliance will be provided to the Audit Risk & Improvement Committee upon completion of any investigation of verified PIDs.](#)

## 9. Relevant Legislation

[Public Interest Disclosures Act 2022 \(PID Act\)](#)  
[Government Information \(Public Access\) Act 2009](#)  
[Local Government Act 1993](#)  
[Independent Commission Against Corruption Act 1998](#)  
[State Records Act 1998](#)

## 10. Related Policies/Documents

- [Public Interest Disclosure Procedure – SVC-EXE-PR-103](#)
- [Complaint Management Policy – SVC-COR-PO-037](#)
- [Complaint Management Procedure – SVC-COR-PR-020](#)
- [Code of Conduct – SVC-RP-STY-001](#)
- [Fraud and Corruption Control Policy – SVC-EXE-PO-040](#)
- [Grievance Procedure – SVC-HR-PR-012](#)
- [Procedures for the Administration of the Code of Conduct – SVC-RP-STY-002](#)
- [Fact Sheet: Public Interest Disclosures & Disclosure Officer Contact Information \(formerly known as the PID cheat sheet\) – SVC-EXE-F-245](#)
- [Internal Report Form - SVC-EXE-F-037](#)

## 11. Revision History

Date	Action	Name	Policy Number	Resolution Date	Resolution Number
	Superseded	Internal Reporting Policy - <i>Protected Disclosure Act 1994</i> (former Tumbarumba Shire Council policy)	TSC-EXE-PO-068		
	Superseded	Public Interest Disclosure Internal Reporting (former Tumut Shire Council policy)	GOV.15		
28.08.2018	Endorsed by ELT	Internal Reporting Policy			
27.09.2018	Adopted by Acting General Manager	<a href="#">Internal Reporting Policy</a>	SVC- <del>COREXE</del> -PO-039-01	27/09/2018	n/a
05.03.2020	Review By Governance,	<a href="#">Internal Reporting Policy</a>	SVC- <del>COREXE</del> -PO-039-02	09/06/2020	n/a

[Developing your PID policy – July 2023](#) SVC-EXE-PO-039-04  
 DRAFT Public Interests Disclosures Policy

Adopted: 28/08/2018  
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Date	Action	Name	Policy Number	Resolution Date	Resolution Number
	Approved by Chief of Staff				
25.07.2023	Approved by Director Community & Corporate (minor changes)	<a href="#">Internal Reporting Policy</a>	SVC-COREXE-PO-039-03		n/a
		Public Interests Disclosure Policy	SVC-COREXE-PO-039-04		

## **Appendix A — Names and contact details Position titles of disclosure officers for Snowy Valleys Council**

*Each of the officers in the following list can be contacted by Council staff by all internal communication methods.*

*Other persons may contact the above listed officers by calling 1300 275 982 and asking to speak to the relevant officer stating that the matter is confidential.*

### ❖ **General Manager**

### ❖ **Mayor**

### ❖ **Disclosures Coordinator**

### ❖ **Disclosures Officers (by permanent work site)**

#### RIVERINA HIGHLANDS BUILDING (TUMUT)

- ❖ Director Community & Corporate
- ❖ Director Infrastructure & Works
- ❖ Coordinator Governance
- ❖ Coordinator People & Culture
- ❖ Manager Finance
- ❖ Manager Growth & Activation
- ❖ Manager Technology
- ❖ Manager Utilities & Waste

#### TUMBARUMBA OFFICE

- ❖ Manager Community Services
- ❖ Manager Technical Services

#### TUMBARUMBA DEPOT

- ❖ Project Manager

#### INFRASTRUCTURE WORKS DEPOT (IWD) – TUMUT

- ❖ Manager Works
- ❖ Manager Utilities, Open Space & Facilities
- ❖ Manager Fleet & Depots
- ❖ Construction Manager
- ❖ Project Manager
- ❖ Coordinator Safety & Systems

#### TUMBARUMBA WORKSHOP

- ❖ Team Leader Workshop -  
Tumbarumba

#### TUMUT WORKSHOP

- ❖ Team Leader Workshop – Tumut

#### TUMBARUMBA WATER TREATMENT FACILITY

- ❖ Team Leader – Tumbarumba  
Water & Waste Water

## TUMUT WATER TREATMENT FACILITY

- ❖ Team Leader – Tumut Water & Waste Water

## ADELONG DEPOT

- ❖ Team Leader – Adelong

## BATLOW DEPOT

- ❖ Team Leader – Batlow

## KHANCOBAN DEPOT

- ❖ Team Leader – Khancoban

## TALBINGO DEPOT

- ❖ Team Leader – Talbingo

## POOLS – ADELONG, BATLOW, KHANCOBAN, TUMBARUMBA, TUMUT

- ❖ Pool Manager

## MULTI SERVICES OUTLET (MSO) – TUMBARUMBA

- ❖ Coordinator Community Services

## VISITOR INFORMATION CENTRE – TUMBARUMBA

- ❖ Tourism & Marketing Officer

## LIBRARIES – ADELONG, BATLOW, TUMBARUMBA, TUMUT

- ❖ Coordinator Library Services

## CARCOOLA CENTRE

- ❖ Coordinator Carcoola Centre

## KHANCOBAN PRESCHOOL

- ❖ Room Leader – Khancoban Preschool

## PUGGLES

- ❖ Room Leader – Puggles

## Annexure Appendix B — List of integrity agencies

Integrity agency	What they investigate	Contact information
<b>The NSW Ombudsman</b>	Most kinds of <b>serious maladministration</b> by most agencies and public officials (but not NSW Police, judicial officers or MPs)	<b>Telephone:</b> 1800 451 524 between 9am to 3pm Monday to Friday <b>Writing:</b> Level 24, 580 George Street, Sydney NSW 2000 <b>Email:</b> <a href="mailto:info@ombo.nsw.gov.au">info@ombo.nsw.gov.au</a>
<b>The Auditor-General</b>	<b>Serious and substantial waste of public money</b> by auditable agencies	<b>Telephone:</b> 02 9275 7100 <b>Writing:</b> GPO Box 12, Sydney NSW 2001 <b>Email:</b> <a href="mailto:governance@audit.nsw.gov.au">governance@audit.nsw.gov.au</a>
<b>Independent Commission Against Corruption</b>	<b>Corrupt conduct</b>	<b>Telephone:</b> 02 8281 5999 or toll free on 1800 463 909 (callers outside Sydney) between 9am and 3pm, Monday to Friday <b>Writing:</b> GPO Box 500, Sydney NSW 2001 or faxing 02 9264 5364 <b>Email:</b> <a href="mailto:icac@icac.nsw.gov.au">icac@icac.nsw.gov.au</a>
<b>The Inspector of the Independent Commission Against Corruption</b>	<b>Serious maladministration</b> by the ICAC or the ICAC officers	<b>Telephone:</b> 02 9228 3023 <b>Writing:</b> PO Box 5341, Sydney NSW 2001 <b>Email:</b> <a href="mailto:oicac_executive@oicac.nsw.gov.au">oicac_executive@oicac.nsw.gov.au</a>
<b>The Law Enforcement Conduct Commission</b>	<b>Serious maladministration</b> by the NSW Police Force or the NSW Crime Commission	<b>Telephone:</b> 02 9321 6700 or 1800 657 079 <b>Writing:</b> GPO Box 3880, Sydney NSW 2001 <b>Email:</b> <a href="mailto:contactus@lecc.nsw.gov.au">contactus@lecc.nsw.gov.au</a>
<b>The Inspector of the Law Enforcement Conduct Commission</b>	<b>Serious maladministration</b> by the LECC and LECC officers	<b>Telephone:</b> 02 9228 3023 <b>Writing:</b> GPO Box 5341, Sydney NSW 2001 <b>Email:</b> <a href="mailto:oicac_executive@oicac.nsw.gov.au">oicac_executive@oicac.nsw.gov.au</a>
<b>Office of the Local Government</b>	<b>Local government pecuniary interest contraventions</b>	<b>Email:</b> <a href="mailto:olg@olg.nsw.gov.au">olg@olg.nsw.gov.au</a>
<b>The Privacy Commissioner</b>	<b>Privacy contraventions</b>	<b>Telephone:</b> 1800 472 679 <b>Writing:</b> GPO Box 7011, Sydney NSW 2001 <b>Email:</b> <a href="mailto:ipcinfo@ipc.nsw.gov.au">ipcinfo@ipc.nsw.gov.au</a>
<b>The Information Commissioner</b>	<b>Government information contraventions</b>	<b>Telephone:</b> 1800 472 679 <b>Writing:</b> GPO Box 7011, Sydney NSW 2001 <b>Email:</b> <a href="mailto:ipcinfo@ipc.nsw.gov.au">ipcinfo@ipc.nsw.gov.au</a>

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