



## Council Policy

# Public Interest Disclosure

Version 7 - 25 September 2023

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## Policy - external Public Interest Disclosure

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### Introduction

#### Purpose

All agencies in NSW, including Lake Macquarie City Council ('Council'), are required to have a Public Interest Disclosure ('PID') Policy under section 42 of the *Public Interest Disclosures Act 2022* ('PID Act').

At 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 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 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.

This policy should be read in conjunction with other Council policies and procedures, including our Codes of Conduct, Feedback Management Policy, Business Ethics Policy and Fraud and Corruption Prevention Policy.

#### Scope

##### Who does this policy apply to?

This policy applies to, and is for the benefit of, all public officials in NSW. You are a public official if you are:

- a person employed in or by an agency or otherwise in the service of an agency
- a person having public official functions or acting in a public official capacity, whose conduct or activities are authorised by another Act or law to be investigated by an integrity agency
- 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 \(NSW\)](#).

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The Chief Executive Officer, other nominated disclosure officers and managers within Council 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, may use this policy if they want information on who they can report wrongdoing to within Council.

### Who does this policy not apply to?

This policy does not apply to:

- people who have received services from an agency and want to make a complaint about those services
- people, such as contractors, who provide services to an agency. For example, employees of a company that sold computer software to an agency.

This means that if you are not a public official, this policy does not apply to your complaint (there are some circumstances where a complaint can be deemed to be a voluntary PID, see section 1(i) of this policy for more information).

However, you can still make a complaint to us. This can be done by following the procedures set out in our Feedback Management Policy.

### What is contained in this policy?

This policy will provide you with information on the following:

- Ways you can make a voluntary PID to Council under the PID Act
- The names and contact details for the nominated disclosure officers in Council
- The roles and responsibilities of people who hold particular roles under the PID Act and who are employees of 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
- Council procedures for dealing with disclosures
- Council procedures for managing the risk of detrimental action and reporting detrimental action
- Council record-keeping and reporting requirements
- How 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
- 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.

## Policy statement

### Overview

#### Should I make a report of serious wrongdoing to Council?

Council is committed to delivering a high standard of service to our community. We actively encourage feedback and are committed to using this information to improve our services and systems. This includes where there may have been wrongdoing.

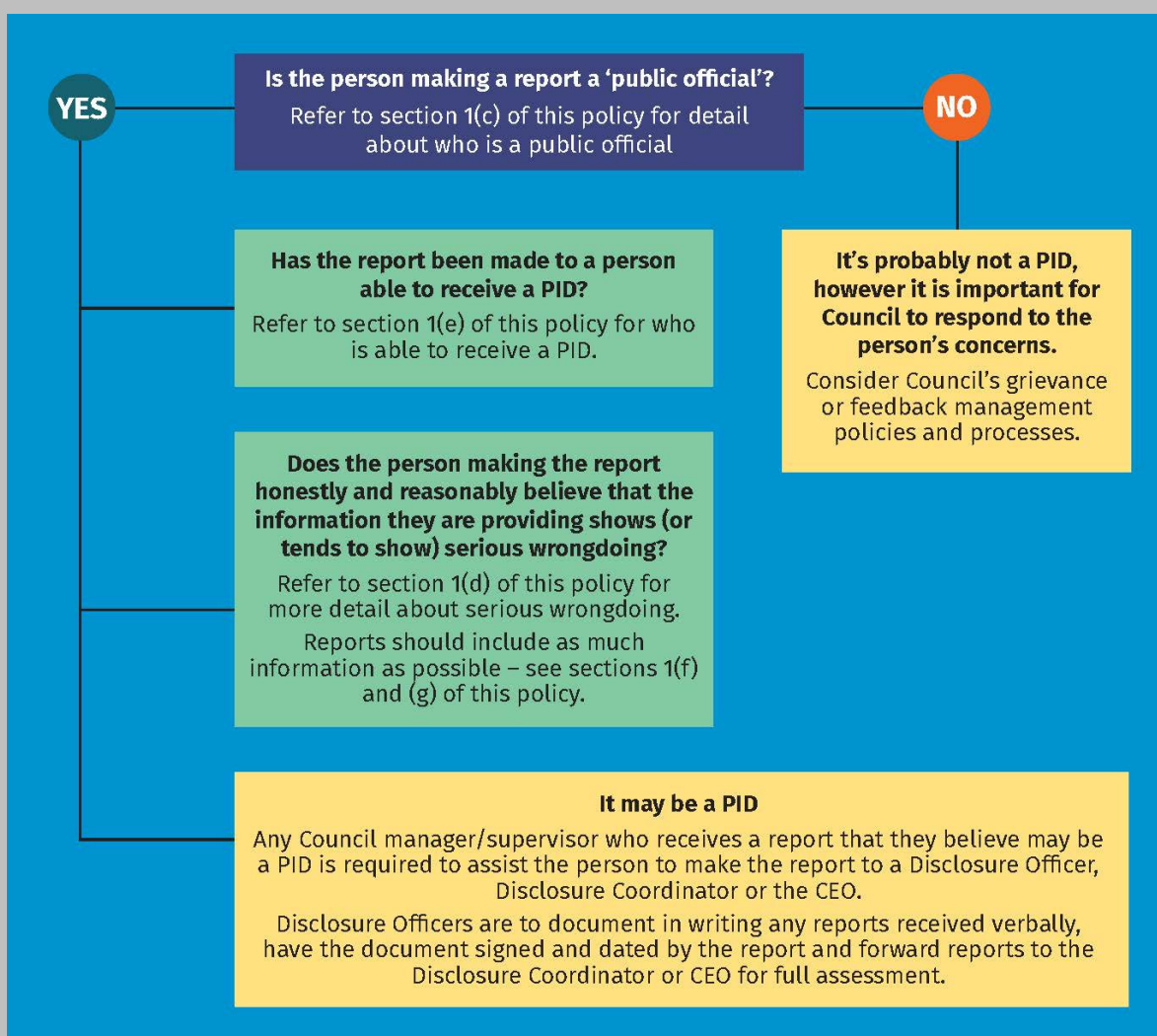
This policy sets how public officials can speak up when they see serious wrongdoing.

If you are a member of the public, we still want to understand what is occurring for you even if your report is not PID. We encourage you to raise an issue or concern under our Feedback Management Policy.

If, after reading this policy, you are not sure if you can make a PID or have questions, please contact the Disclosure Coordinator via [ethicalconduct@lakemac.nsw.gov.au](mailto:ethicalconduct@lakemac.nsw.gov.au).

#### Is a report a PID?

The following sets out a step-by-step guide for assessing whether the PID Act applies.



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### What happens after making a PID report?

We will review the report and decide the action to be taken in accordance with this policy. See sections 5 and 6 of this policy.

Council will consider appropriate supports required through the process. See sections 2, 3 and 4 of this policy.

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

### (a) Reports, complaints and grievances

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.

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 Feedback Management Policy or internal policies or procedure for dealing with staff issues or concerns.

It is important that we quickly recognise 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 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.

If you have questions about the format for making a report of wrongdoing or misconduct, please contact the Disclosure Coordinator via [ethicalconduct@lakemac.nsw.gov.au](mailto:ethicalconduct@lakemac.nsw.gov.au)

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

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

1. *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.
2. *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.
3. *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.

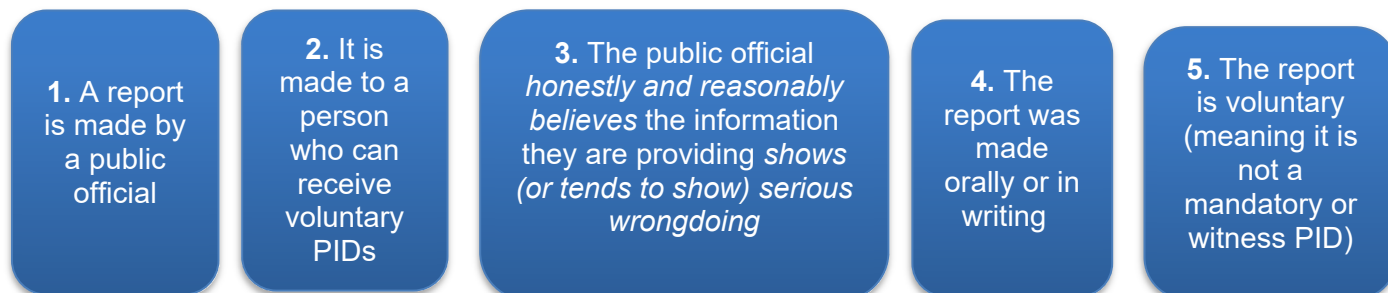
You can find more information about mandatory and witness PIDs in the Ombudsman's guidelines 'Dealing with mandatory PIDs' and 'Dealing with witness PIDs'. Council will identify a mandatory or witness PID at the time of assessment of a report and assess requirements.

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 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.

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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, 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 or your contact officer for the report. If you are still not satisfied with this outcome, you can seek an internal review or we may 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 ‘Who this policy applies to’. You are a public official if:

- you are a member of Council staff (whether permanent, temporary or fixed term, full-time or part-time)
- you are the Mayor or a Councillor
- you are a contractor, subcontractor or volunteer who provides services, or exercises functions, on behalf of Council, or
- you work for an entity (such as a non-government organisation) who is contracted by Council to provide services or exercise functions on behalf of Council — if you are involved in undertaking that contracted work.

Consultants who are engaged by Council to assist Council with their work (rather than actually doing the work on behalf of Council) are not considered public officials under the PID Act

The table at **Annexure C** contains examples of public officials who can make a PID to Council.

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

### (d) What is serious wrongdoing?

Reports must be of one or more of the following categories of *serious wrongdoing* to be a voluntary PID

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(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
- *serious maladministration* — such as an agency systemically failing to comply with proper recruitment processes when hiring staff
- *a government information contravention* — such as destroying, concealing or altering records to prevent them from being released under a Government Information Public Access application
- *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 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.

When you make your report, you do not need to state to us what category of serious wrongdoing you are reporting or that you are reporting serious wrongdoing.

### **Examples of serious wrongdoing**

#### **Corrupt conduct**

- A public official selling confidential information gained while working in an official capacity
- A public official failing to report criminal conduct in exchange for a financial advantage
- A local councillor voting in favour of a development in which the councillor has an undisclosed financial interest
- A public official accepting a financial benefit from someone in exchange for ensuring a particular outcome for that person (such as a favorable outcome on a development application)
- A public official involved in theft of any kind, including theft of cash, supplies, equipment, tools, data and records
- A public official involved in accounting fraud, for example the manipulation, falsification or alteration of financial information
- A public official failing to disclose and/or manage conflicts of interest between one's public duties and private interests
- A public official misusing corporate credit cards, assets, equipment or facilities
- A public official wrongfully using information or intellectual property
- A public official involved in unlawful procurement of property, equipment, materials or services
- A public official providing false or misleading information
- A public official failing to provide information when there is an obligation to do so
- A public official making or using false, forged or falsified documents
- A public official abusing a position of power for personal gain
- A public official misrepresenting injuries/illnesses to gain a leave or payment benefit, for example, workers compensation payments

#### **Serious maladministration**

- An agency contravenes legal procurement processes when engaging contractors
- Senior staff fail to deal with multiple reports of toxic materials in government-owned properties

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over a period of time

- An agency implements policies and procedures which are contrary to its governing legislation and result in misuse of powers
- Agency procedures are unfairly discriminatory

### Government information contravention

Examples of a failure to exercise functions under the *Government Information (Public Access) Act 2009* (NSW) ('GIPA Act') include:

- having a policy of charging a fee for open access information, which should be free of charge, either purposely or due to a lack of understanding of the rules around open access
- intentionally overlooking documents that should clearly be included in response to an access application
- destroying, concealing or altering records to prevent them from being released
- knowingly making decisions that are contrary to the GIPA Act
- directing another person to make a decision that is contrary to the GIPA Act.

Examples of a failure to exercise functions under the *State Records Act 1998* (NSW) ('SR Act') include:

- intentionally disposing of records that must be retained under the SR Act
- systemic issues with an agency's record-keeping system that means information is not being stored appropriately.

### Privacy contravention

Examples of a privacy contravention include a public official unlawfully accessing a person's personal information, for their personal use or for another non-work-related matter, on a database that is used by an agency to retain customer information.

### Serious and substantial waste of public money

- Misappropriation or misuse of public property
- The purchase of unnecessary or inappropriate goods and services
- Incurring costs which might otherwise have been avoided

### Local government pecuniary interest contravention

- A senior Council staff member recommending a family member for a Council contract and not declaring the relationship
- The Chief Executive Officer holding an undisclosed shareholding in a company competing for a Council contract
- A Councillor participating in considering a development application for a property in which they or their family have an interest

For more detail, please refer to the NSW Ombudsman's guideline 'What is 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 Council

You can make a report inside Council to:

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- the Chief Executive Officer
- a disclosure officer for Council — a list of disclosure officers for Council and their contact details can be found at Annexure A of this policy
- your manager — 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 the report is communicated to a disclosure officer on your behalf or may accompany you while you make the report to a disclosure officer.

### Making a report to a recipient outside of Council

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 Annexure B of this policy
- a *disclosure officer for another agency* — ways to contact disclosure officers for other agencies are 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, it is possible your disclosure will be referred back to us so that appropriate action can be taken.

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

Disclosures to 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 Council:
  - notification that Council 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 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 agency'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.

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- *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 us to investigate the matter(s) you have disclosed if we cannot contact you for further information.

Public officials are encouraged to make a voluntary PID in writing, as this can help to avoid any confusion or misinterpretation. A PID can be made by emailing [ethicalconduct@lakemac.nsw.gov.au](mailto:ethicalconduct@lakemac.nsw.gov.au) or completing the online form available via Council's website.

If you make a voluntary PID orally, 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 person making the disclosure should keep a copy of this record. If you are concerned about being seen making a report, you can ask to meet in a discreet location away from the workplace.

### **(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 us 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 policies for dealing with reports, allegations or complaints.

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

The Chief Executive Officer or Disclosure Coordinator 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 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 Chief Executive Officer or Disclosure Coordinator to request that they consider deeming your report to be a voluntary PID.

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A decision to deem a report to be a voluntary PID is at the discretion of the Chief Executive Officer or Disclosure Coordinator. For more information about the deeming power, see the Ombudsman's guideline 'Deeming that a disclosure is a voluntary PID'.

### (j) Who can I talk to if I have questions or concerns?

The Disclosure Coordinator can be contacted confidentially using the details outlined in Annexure A.

## 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 detriment 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 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 concerning serious wrongdoing relating to Council has been made, we 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.

- *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.

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- *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 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, such as bullying or harassment, you should report this immediately. You can report any experience of adverse treatment or detrimental action directly to us, or to an integrity agency.

You should report to us by contacting the Chief Executive Officer or Disclosure Coordinator via email or phone. Contact details are included in Annexure A of this policy.

A list of integrity agencies is located at Annexure B of this policy.

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### 4. General support

Council will make sure staff who have reported wrongdoing, regardless of whether they have made a public interest disclosure, are provided with access to support. Support available includes Council's Employee Assistance Program and HR officers in various work areas.

Support for other public officials who have made a PID will be assessed and discussed with the person through the process of dealing with a PID (see section 6 of this policy).

Council staff who are the subject of a report of wrongdoing are:

- treated fairly and impartially
- told your rights and obligations under our policies and procedures
- kept informed during any investigation
- given the opportunity to respond to any allegations made against you
- told the result of any investigation
- provided with information about support available from Council or external agencies
- provided with access to Council's Employee Assistance Program.

### 5. Roles and responsibilities of Council employees

Certain people within Council have responsibilities under the PID Act.

#### (a) Chief Executive Officer

The Chief Executive Officer 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 Council complies with this policy and the PID Act
- ensuring Council 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) Disclosure Coordinator

The Chief Executive Officer has appointed Council's Internal Ombudsman as Council's Disclosure Coordinator.

The responsibilities of the Disclosure Coordinator include:

- assisting the Chief Executive Officer to perform their role under this policy and the PID Act
- receiving disclosures about wrongdoing by public officials including referring disclosures to the Chief Executive Officer or Mayor (if about the Chief Executive Officer)

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- ensuring their actions adhere to the requirements of this policy and the PID Act including protecting and maintaining the confidentiality of the public official making the disclosure
- ensuring instances of detrimental action are reported and dealt with under Council's Code of Conduct.

### (c) Disclosure officers

Disclosure officers are responsible for:

- receiving reports from public officials
- receiving reports when they are passed on to them by managers
- making arrangements to ensure reporters can make reports privately and discreetly when requested, if necessary away from the workplace
- ensuring reports are dealt with appropriately, including by carrying out initial assessment and referring the matter to the Disclosure Coordinator or Chief Executive Officer
- ensuring any oral reports received are recorded in writing, and having the document signed and dated by the reporter.

### (d) Managers

The responsibilities of managers include:

- receiving reports from persons that report to them or that they supervise
- passing on reports they receive to a disclosure officer or Disclosure Coordinator.

### (e) All employees

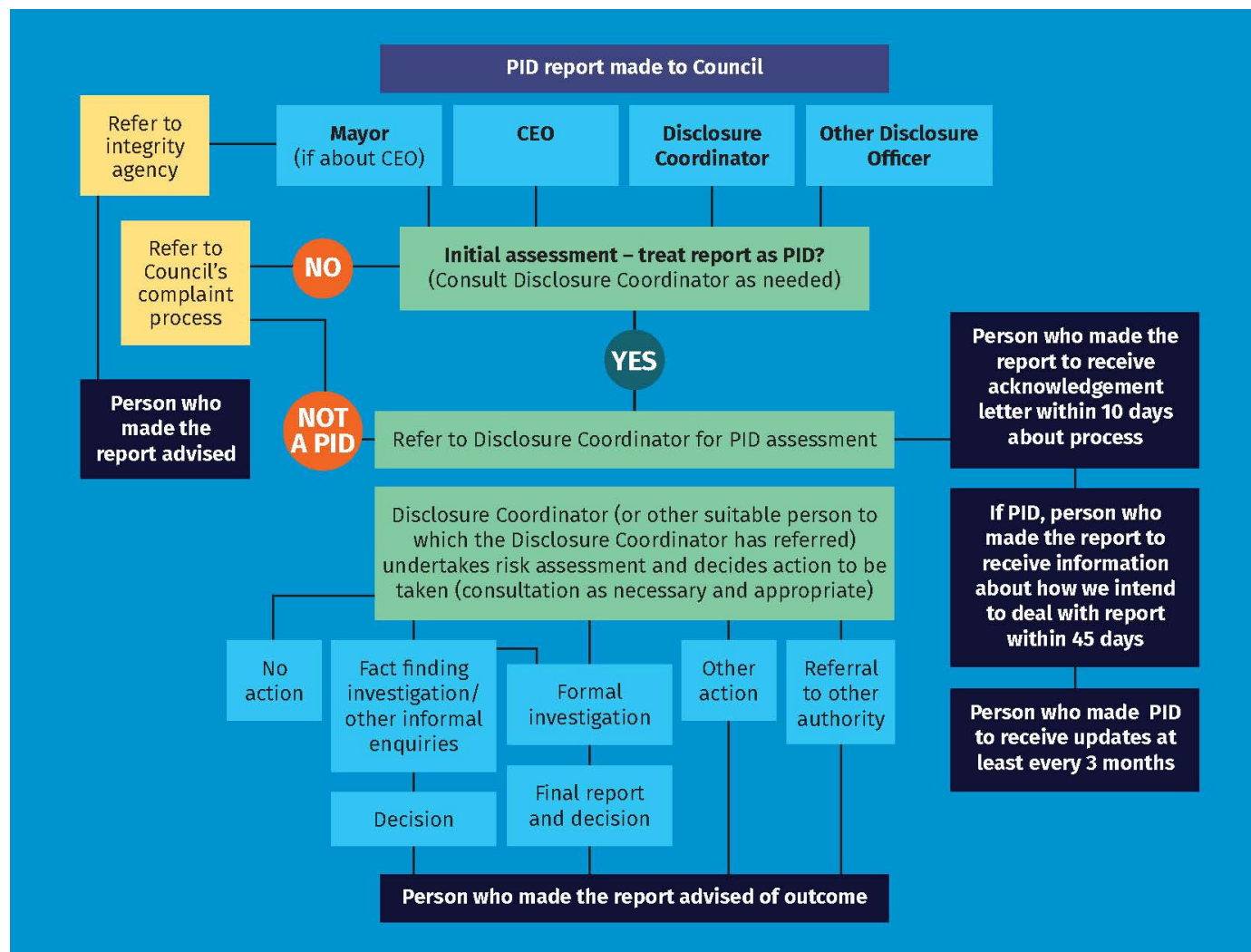
All employees must:

- report suspected serious wrongdoing or other misconduct
- 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
- treat any person dealing with or investigating reports of serious wrongdoing with respect
- not take detrimental action against any person who has made, may in the future make, or is suspected of having made, a PID.



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6. How we will deal with voluntary PIDs



(a) How Council will acknowledge we have received a report and keep the person who made it informed

When a disclosure officer in 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 letter from the Disclosure Coordinator that the report has been received (within 10 working days). This acknowledgment will:
  - state that the report will be assessed to identify whether it is a PID
  - state that the PID Act applies to how Council 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, including the timeframe for when you will receive further updates, services available such as Employee Assistance Program and availability of external agencies.
- If the report is a voluntary PID, we will inform you as soon as possible (and within 45 days of making a report) how we intend to deal with the report. This may include:
  - that we are investigating the serious wrongdoing and likely timeframes for any investigation

## Policy - external Public Interest Disclosure

- 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 — 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 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.

### (b) How Council will deal with voluntary PIDs

Once a report that may be a voluntary PID is received we 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 the right steps are followed. If it is a voluntary PID, we will ensure we comply with the requirements in the PID Act.

Council will not take action in relation to reports which:

- are based on a mere allegation or suspicion, as a disclosure must be supported by facts and/or evidence
- principally involve disagreement with or the questioning of the merits of Council's policies
- are made with the sole or substantial motive of avoiding dismissal or other disciplinary action
- are frivolous or vexatious.

### Report is 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 Feedback Management Policy, internal policies and procedures for dealing with staff issues or concerns 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 or request that the matter be conciliated. We can, but do not have to, request the NSW Ombudsman to conciliate the matter.

## Policy - external Public Interest Disclosure

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### Cease dealing with report as voluntary PID

We 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).

### Where the 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 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 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 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 the person is the maker of the voluntary PID because of their voluntary self-identification as the maker
- when the public official or Council reasonably considers it necessary to disclose the information to protect a person from detriment
- where it is necessary 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.

If you make a voluntary PID, you must keep the disclosure confidential and should only discuss the disclosure with those dealing with it, including the Disclosure Coordinator and the Chief Executive Officer.

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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 developing a plan to support and protect the maker of a voluntary PID in consultation with the person. This may include:

- limiting the number of people who are aware of the maker's identity or information that could identify them
- reminding any person who does know the identity of the maker of a PID is reminded they have a legal obligation to keep their identity confidential
- undertaking an assessment to determine if anyone is aware of the maker's identity and if those persons have a motive to cause detrimental action to be taken against the maker or impede the progress of the investigation.
- 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
- considering options to restrict the persons who 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, we will:

- advise the person whose identity may become known
- update the agency's risk assessment and risk management plan
- implement strategies to minimise the risk of detrimental action
- consider additional supports to the person who has made 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 Council will assess and minimise the risk of detrimental action**

We 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 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 will take steps to assess and minimise the risk of detrimental action by undertaking a risk assessment and developing a plan in consultation with the person. Further information on assessing the risk of detrimental action is found in the Ombudsman's guideline 'Agencies — assessing and managing the risk of detrimental action'.

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

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- 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 Council will deal with allegations of a detrimental action offence

If we become aware of an allegation that a detrimental action offence has occurred or may occur, we 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 ICAC
- notify the NSW Ombudsman about the allegation of a detrimental action offence being committed.

The Disclosure Coordinator is responsible for making referrals about alleged detrimental action offences and liaising with the affected person.

### (f) What 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 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 action under Council's disciplinary processes against persons involved in the wrongdoing (such as termination of employment, relocation, a caution or reprimand).

The Chief Executive Officer will review the findings of investigations that result in recommendations for Council action. The Disclosure Coordinator will record all corrective actions to be undertaken and liaise with the maker of a report.

## 7. Review and dispute resolution

### (a) Internal review

People who make voluntary PIDs can seek internal review of the following decisions made by Council:

- That Council is not required to deal with the report as a voluntary PID.
- To stop dealing with the report because we decided it was not a voluntary PID.
- To not investigate the serious wrongdoing and not refer the report to another agency.

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## Policy - external Public Interest Disclosure

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- To cease investigating the serious wrongdoing without either completing the investigation or referring the report to another agency for investigation.

We 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 our decision. The application should state the reasons why you consider Council's decision should not have been made. You may also submit any other relevant material with your application.

Applications for internal review should be made by emailing the Chief Executive Officer or Disclosure Coordinator.

### (b) Voluntary dispute resolution

If a dispute arises between Council 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 Council and the maker of the report are willing to resolve the dispute.

## 8. Other agency obligations

### (a) Record-keeping requirements

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

Information is stored as a sensitive complaint in Council's records management system (TRIM).

### (b) Reporting of voluntary PIDs and Council annual return to the Ombudsman

Each year we provide an annual return to the NSW Ombudsman which includes:

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

The Disclosure Coordinator is responsible for collecting information about voluntary PIDs and other information captured in the annual return and preparing the annual return. Information about all PIDs is stored in TRIM in a secure folder with restricted access.

### (c) How Council will ensure compliance with the PID Act and this policy

The Disclosure Coordinator is responsible for oversight and monitoring compliance with the PID Act, including regular reports to the Chief Executive Officer, Executive and Audit Risk and Improvement Committee.

Reports of instances of non-compliance will be reported to the Chief Executive Officer for review and action as appropriate.

## Accessibility of this policy

This policy is available on Council's publicly available website, as well as on the intranet.

Details of how the policy can be accessed is also provided to all staff of Council on their commencement.

## Policy - external Public Interest Disclosure

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A hard copy of the policy can be requested from their manager or supervisor.

### Review and Evaluation

This policy will be reviewed at least once every four years. The Disclosure Coordinator will review currency of details included in the policy every two years. The Chief Executive Officer or delegate may make minor or administrative changes to the policy, including to update any details included in Annexure A, contacts or other procedural elements, at any time.

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**Annexure A — Names and contact details of disclosure officers for Lake Macquarie City Council – as at September 2023**

Location	Address	Disclosure Officer	Contact Details
<b>Administrative Centre</b>	128 Main Road, Speers Point, NSW, 2284	Chief Executive Officer - Morven Cameron	<a href="mailto:ceo@lakemac.nsw.gov.au">ceo@lakemac.nsw.gov.au</a>
		<b>Disclosure Coordinator</b> Internal Ombudsman – Martene Archer	<a href="mailto:ethicalconduct@lakemac.nsw.gov.au">ethicalconduct@lakemac.nsw.gov.au</a>
		Internal Auditor – Marilize Van der Westhuizen	<a href="mailto:internalauditor@lakemac.nsw.gov.au">internalauditor@lakemac.nsw.gov.au</a>
		Governance Lead	(02) 4921 0584
<b>Works Depot</b> (includes other depot locations and temporary worksites)	18-32 Creek Reserve Road, Boolaroo, NSW, 2284	Manager Property and Business Development – Elizabeth Lambert	(02) 4921 0448
		Manager Environmental Regulation and Compliance - Derek Poulton	(02) 4921 0436
		Manager City Works – Matt Brogan	(02) 4921 0711
<b>Awaba Waste Management Facility</b>	367 Wilton Road, Awaba, NSW, 2283	Manager Waste Services – Paul Collins	(02) 4921 0545
		Awaba Waste Management Facility Site Coordinator – Steven Merrett	(02) 4921 0794
		Awaba Waste Management Facility Site Leading Hand – Edward Peirce	(02) 4921 0778
<b>Landcare and Sustainable Living Centre, umali barai-ku</b>	80 Toronto Road, Booragul, NSW, 2284	Landcare Coordinator - Jason Harvey	(02) 4921 0080
<b>Lake Macquarie Family Day Care</b>	81 Lakeview Street, Speers Point, NSW, 2284	Service Manager Family Day Care - Kim Hartmann	(02) 4921 0149
<b>Swim Centres</b>			
<b>Charlestown Swim Centre</b>	52 Dickinson Street,	Swim Centre Team Leader East - Chris Wilson	(02) 4921 0782

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	Charlestown, NSW 2290		
<b>Swansea Swim Centre</b>	79 Channel Street, Swansea, NSW, 2281	Swim Centre Team Leader East - Chris Wilson	(02) 4921 0733
<b>West Wallsend Swim Centre</b>	35A Edden Street, West Wallsend, NSW 2286	Swim Centre Team Leader West - Callie Spurr	(02) 4921 0738
<b>Speers Point Swim Centre</b>	20 Park Road, Speers Point, NSW 2284	Swim Centre Team Leader West - Callie Spurr	(02) 4921 0580
<b>Toronto Swim Centre</b>	Corner Awaba Road and Carleton Street, Toronto, NSW, 2283	Leisure Operations Coordinator - Paul Stone	(02) 4959 9229
<b>Morisset Swim Centre</b>	7 Kahibah Street, Morisset, NSW, 2264	Leisure Operations Coordinator - Paul Stone	(02) 4973 1070
<b>Patrolled Beaches</b>			
<b>Redhead</b>	off Beach Road, Redhead 2290	Lucas Samways – Team Leader Beach Lifeguards	0436 127 538
<b>Blacksmiths</b>	Ungala Road, Blacksmiths, NSW 2281		
<b>Caves Beach</b>	off Mawson Close, Caves Beach, NSW 2281		
<b>Catherine Hill Bay</b>	off Flowers Drive, Catherine Hill Bay, NSW, 2281		
<b>Libraries</b>			
<b>Belmont Library, ngarrabanga</b>	19 Ernest Street, Belmont, NSW, 2280	Cultural Experiences Regional Leader – East – Glenn Wardman	(02) 4921 0673
<b>Cardiff Library, kuram</b>	Corner Main and Macquarie roads Cardiff, NSW 2285	Cultural Experiences Coordinator – West – Martin Payne	(02) 4921 0793
<b>Charlestown Library, walyamayi</b>	Corner Smith and Ridley streets, Charlestown, NSW, 2290		

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<b>Morisset Library, bawarramalang</b>	39 Yambo Street, Morisset, NSW, 2264		
<b>Speers Point Library, milyaba</b>	139 Main Road, Speers Point, NSW, 2284		
<b>Sugar Valley Library Museum, kirantakamyari</b>	156 Portland Drive Cameron Park, NSW, 2285		
<b>Swansea Library, kariyawangba</b>	228 Pacific Highway, Swansea, NSW, 2281		
<b>Toronto Library, tirrabiyangba</b>	Corner Brighton Avenue and Pemell Street, Toronto, NSW, 2283		
<b>Wangi Library Creative Hub, wanji wanji</b>	295 Watkins Road, Wangi Wangi, NSW, 2267		
<b>Windale Library, bilyabayi</b>	20 Lake Street, Windale, NSW, 2306		
<b>Museums, theatres and cultural facilities</b>			
<b>Museum of Arts and Culture, yapang</b>	First Street Booragul, NSW 2284	Cultural Experiences Coordinator – Martin Payne	(02) 4921 0793
<b>Multi Arts Pavillion, mima</b>	Speers Point Park, Speers Point, NSW, 2284		
<b>Warners Bay Theatre, baramayiba</b>	Corner of Lake and John Streets, Warners Bay, NSW, 2284		
<b>Rathmines Theatre, nawayiba</b>	25 Stilling Street, Rathmines, NSW, 2283		

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Holiday facilities and parks			
<b>Belmont Lakeside Holiday Park</b>	24 Paley Cr, Belmont South, NSW 2280	Section Manager Facilities and Parks – Garry Ellem	(02) 4921 0224
<b>Blacksmiths Beachside Holiday Park</b>	30 Gerald St, Blacksmiths, NSW, 2281		
<b>Sails Holiday Park</b>	30 Gerald St, Belmont, NSW, 2280		
<b>Swansea Lakeside Holiday Park</b>	1 Dobinson Dr, Swansea, NSW, 2281		
<b>Wangi Point Holiday Park</b>	2a Watkins Rd, Wangi Wangi, NSW, 2267		
<b>Morisset Campground</b>	40 Ourimbah St, Morisset, NSW, 2264		

## Annexure 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:oiicac_executive@oiicac.nsw.gov.au">oiicac_executive@oiicac.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 (LECC)</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:oilc_executive@oilc.nsw.gov.au">oilc_executive@oilc.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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### Annexure C – Examples of how to make a PID

Who	'Public official' under the PID Act?	Who to report to
Mayor or a Councillor	✓	Chief Executive Officer or an integrity agency
Mayor <u>and</u> Chief Executive Officer	✓	An integrity agency
Chief Executive Officer	✓	The Mayor or an integrity agency.
Council staff member	✓	Council supervisor, Disclosure Officer or Disclosure Coordinator
Labour hire worker engaged by Council	✓	Council supervisor or a Disclosure Officer
Employees of a contractor operated swim centre	✓	Via online form or Disclosure Officer
Volunteer for a Council program, such as Landcare, arts, culture and tourism, or sustainable neighbourhoods	✓	Via online form or Disclosure Officer
Volunteer serving on an operating committee to manage a Council-owned community hall or sporting/other facilities	✓	Via online form or Disclosure Officer
Student on work experience or placement with Council	✓	Council supervisor or a Disclosure Officer
Contractor or subcontractor providing road maintenance services for Council managed roads	✓	Via online form or Disclosure Coordinator
Contractor or subcontractor providing waste collection and/or recycling services on behalf of Council	✓	Via online form or Disclosure Coordinator
Real estate agent providing property management, leasing and/or selling services for Council properties	✓	Via online form or Disclosure Coordinator
Contractor engaged by Council to undertake building certification services on behalf of Council	✓	Via online form or Disclosure Coordinator

## Policy - external Public Interest Disclosure

# Controlled Document Information

### Authorisation Details

<b>Folder No:</b>	F2005/02318	<b>TRIM Record No:</b>	D11166122
<b>Audience:</b>	External - All staff and those subject to the Public Interests Disclosures Act 2022		
<b>Department:</b>	Executive Group	<b>Officer:</b>	Governance and Privacy Lead - Loren Cousins
<b>Key focus area(s):</b>	Shared decision-making		
<b>Review Timeframe:</b> Max < 4 years	4 years	<b>Next Scheduled Review Date:</b>	25 September 2027
<b>Authorisation:</b>	Council		
<b>Authorisation - Council Adoption Date:</b>	25 September 2023		

### Related Document Information, Standards & References

<b>Related Legislation:</b>	Government Information (Public Access) Act 2009 Independent Commission Against Corruption Act 1988 Local Government Act 1993 Ombudsman Act 1974 Public Interest Disclosures Act 2022	Legislative basis
<b>Related Policies:</b>	Council's Codes of Conduct Business Ethics Policy – Council Policy Grievance Notification and Dispute Resolution Internal Policy and procedure Bullying and Harassment – Internal Policy and Procedure Fraud and Corruption Prevention Policy	Relevant to public interest disclosures reports
<b>Related Procedures, Guidelines, Forms, WHS Modules/PCD's, Risk Assessments, Work Method Statements:</b>	PID Internal Reporting Form External reporting form – Fraud, Corruption and Wrongdoing	(Relationship/Context)
<b>Standards, COP's &amp; Other References</b>	NSW Ombudsman model PID policy and guidelines	(Relationship/Context)

### Definitions

Term / Abbreviation	Definition
Nil	

### Consultation (update for each version created)

<b>Key Departments, Teams, Positions, Meetings:</b>	Legal, Financial Services (Procurement), individual disclosure officers
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## Policy - external Public Interest Disclosure

### Version History

Version No	Date Changed	Modified By	Details and Comments
1	28/03/2013	S Boules	Replaces Protected Disclosures Internal Reporting Procedure to comply with legislative requirements under the Public Interest Disclosures Act 1994
2	11/04/2013	Amanda Colbey	Wording incorporated to reflect Councillor Langford's additional suggestions. As per OMC 25 March 2013.
3	07/01/2016	Riarna Hamilton / Katherine McNaughton	Policy title changed to reflect current legislation / NSW Ombudsman model PID Policy. Amendments to ensure current Lake Macquarie City Council supporting policies were quoted correctly. Minor editing to words to increase readability.
4	8 February 2017	Katherine McNaughton	Name of Mayor changed to reflect current Mayor. Investigating authorities contact details updated. Grammatical errors corrected 2 New Disclosure Officer Positions.
5	30 July 2018	Katherine McNaughton / Marilize van der Westhuizen/Jeranne Kosviner	Title of General Manager changed to CEO when referring to Lake Macquarie City Council. Change to position of Disclosures Coordinator Update roles and responsibilities Insert Assessment of Reports Insert Flow Chart of Internal reporting Process Minor editing to words
6	14 April 2022	Martene Archer	Drafting updated to improve readability and reflect NSW Ombudsman model PID Policy and Procedures.
7	September 2023	Loren Cousins	Policy rewrite to reflect commencement of Public Interest Disclosures Act 2022 and new model policy and guidelines issued by NSW Ombudsman in line with 2022 Act.