	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

### 1. Purpose

To provide guidance for public officials to make a disclosure of serious wrongdoing to Warrumbungle Shire Council (Council), and to provide the framework for Council to deal with any such disclosures.

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).

### 2. Objectives

To set 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; and
- the protections which are available to you under the PID Act.


To encourage a speak up culture by having in place a framework that facilitates public interest reporting of wrongdoing by:

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

### 3. Scope

This policy applies to, and 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 an integrity agency is authorised by another Act or law to investigate;
- 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; or
- a person employed under the *Members of Parliament Staff Act 2013*.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

The General Manager, 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 Warrumbungle Shire Council.

This policy does not apply to:

- people who have received services from an agency and want to make a complaint about those services; or
- 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 Council by contacting us:

- by phone on (02) 6849 2000 or (02) 6378 5000
- in writing to the General Manager, PO Box 191, Coonabarabran, NSW, 2357
- in writing via email to [info@warrumbungle.nsw.gov.au](mailto:info@warrumbungle.nsw.gov.au)
- attending a customer service counter at Council's administration offices
  - 14-22 John Street, Coonabarabran
  - 59 Binnia Street, Coolah

For further information on how your complaint will be dealt with see Council's *Complaint Handling Policy* at [Policies - Warrumbungle Shire Council](#).

This policy is available on our publicly available website as well as on the intranet. A copy of the policy is also provided to all Council staff on their commencement. A hard copy of the policy can be requested from the Manager Corporate Services.

Annexure A to this policy may be updated from time to time without requiring endorsement of the Executive Leadership Team (ELT). Annexure A and any updates will be published on the intranet only.


	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

#### 4. Legislation and Associated Documents

<b>ASSOCIATED POLICIES</b>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Complaint Handling</li> <li>• Fraud and Corruption</li> <li>• Records Management Policy</li> <li>• Vision, Mission and Values</li> <li>• Workplace Behaviour</li> </ul>
<b>ASSOCIATED LEGISLATION</b>	<ul style="list-style-type: none"> <li>• <i>Local Government Act 1993</i> (NSW)</li> <li>• <i>Members of Parliament Staff Act 2013</i> (NSW)</li> <li>• <i>Public Interest Disclosures Act 2022</i> (NSW)</li> <li>• <i>State Records Act 1998</i> (NSW)</li> </ul>
<b>ASSOCIATED DOCUMENTS</b>	<ul style="list-style-type: none"> <li>• Fraud and Corruption Plan</li> <li>• Records Management Procedure</li> <li>• Workplace Complaints and Grievance Procedure</li> </ul>

#### 5. Definitions

Term	Definition
Agency	For the purpose of this policy, 'agency' refers to a local government authority.
Council	Warrumbungle Shire Council
Disclosure coordinator	The person responsible for coordinating the assessment and management of PIDs; Warrumbungle Shire Council's disclosure coordinator is the Manager Human Resources.
Disclosure officer	A person responsible for receiving voluntary public interest disclosures on behalf of the agency, including the following: <ul style="list-style-type: none"> <li>• The General Manager.</li> <li>• For each work site that is permanently maintained by the agency and at which more than one person is employed – the most senior ongoing employee who ordinarily works at the site.</li> </ul>
Head of an agency	For the purpose of this policy, the head of the agency is the General Manager of Warrumbungle Shire Council.
Manager	An employee of Council to whom another employee reports directly or indirectly, or who supervises the exercise of Council functions.
Public Interest Disclosure (PID)	A disclosure about serious wrongdoing in the public service that serves the public interest.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

## 6. Policy

At Warrumbungle Shire 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 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's procedures for dealing with disclosures;
- Council's procedures for managing the risk of detrimental action and reporting detrimental action;
- Council's record-keeping and reporting requirements; and
- 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.

### 6.1 How to make a report of serious wrongdoing

#### 6.1.1 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 *Workplace Behaviour Policy* and *Workplace Complaints and Grievance Procedure*.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

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.

Generally, a complaint will be handled by the relevant manager and the maker of the complaint will be kept informed of the actions taken to investigate the complaint and the outcome.

Staff should report all wrongdoing and misconduct, not only reports of serious wrongdoing as defined under the PID Act. Council will deal with these appropriately in line with the *Complaint Handling Policy* or *Workplace Complaints and Grievance Procedure* (whichever is the most relevant) even if they are not a PID. A complaint or grievance may also be a PID. All types of wrongdoing and misconduct should be reported to your direct manager, or the disclosures coordinator or a disclosure officer.

### **6.1.2 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 6.2 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:

1. A report is made by a public official.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

2. It is made to a person who can receive voluntary PIDs.
3. The public official *honestly and reasonably believes* that the information they are providing *shows (or tends to show) serious wrongdoing*.
4. The report was made orally or in writing.
5. The report is voluntary (meaning it is not a mandatory or witness PID).

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 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 6.7 of this policy.

### **6.1.3 Who can make a voluntary PID?**

Any public official can make a voluntary PID — see ‘Scope’. You are a public official if:

- you are employed by Council;
- 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.

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 B of this policy has a list of integrity agencies.

### **6.1.4 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;

- *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 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; and/or
- *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 Council what category of serious wrongdoing you are reporting or that you are reporting serious wrongdoing.

#### 6.1.5 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:


- the General Manager;
- 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; or
- 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 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.

##### ***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 is located in an agency's PID policy which can be found on their public website; or
- 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 that your disclosure will be referred back to us so that appropriate action can be taken.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

### ***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; or
- 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's 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.

#### **6.1.6 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; or
- *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.

#### **6.1.7 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;



	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

- 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; and
- other information you have that supports your report.

#### **6.1.8 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 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 Council's policies for dealing with reports, allegations or complaints.

#### **6.1.9 Deeming that a report is a voluntary PID**

The General Manager or their 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 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. For more information about the deeming power, see the Ombudsman's guideline 'Deeming that a disclosure is a voluntary PID'.

#### **6.1.10 Who can I talk to if I have questions or concerns?**

The people listed in Annexure A of this policy may be contacted if you have concerns. Alternatively, you may raise your concerns with your direct manager. Any concerns raised in relation to this policy will be kept confidential, in line with the policy.

## **6.2 Protections**


### **6.2.1 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:

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

- *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 that concerns serious wrongdoing relating to Warrumbungle Shire 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.

Note: certain employees of Council, such as those in Children’s Services, are mandatory reporters, meaning they are legally required to report any observed or suspected child abuse.

- *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.

### **6.2.2 Protections for people who make mandatory and witness PIDs**

Protections for makers of mandatory and witness PIDs include:

- *Protection from detrimental action* – 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.
- *Right to compensation* – a person can initiate proceedings and seek compensation for injury, damage or loss suffered as a result of detrimental action being taken against them.
- *Ability to seek an injunction* – 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.
- *Immunity from civil and criminal liability* – 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:
  - breaching a duty of secrecy or confidentiality; or
  - breaching another restriction on disclosure.

### 6.3 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 Council – to the disclosure coordinator or a disclosure officer (see Annexure A), or to an integrity agency. A list of integrity agencies is located at Annexure B of this policy.

### 6.4 General support

Council will make sure that staff who have reported wrongdoing, regardless of whether they have made a public interest disclosure, are provided with access to any professional support they may need as a result of the reporting process – such as stress management, counselling services, legal or career advice.

Our disclosure officers will provide support for those who report wrongdoing. They are responsible for initiating and coordinating support, particularly to those who are suffering any form of reprisal.

Council also has in place an Employee Assistance Program (EAP) to provide independent confidential counselling to employees or members of their families. This program is provided to assist employees deal with personal, family and or/work issues that may or could affect employees' quality of life. Council's Human Resources Department is able to provide you with contact details for this service. Details about the service are also available on the Council Intranet.

All supervisors must notify the disclosure coordinator if they believe a staff member is suffering any detrimental action as a result of disclosing wrongdoing.

### 6.5 Roles and responsibilities of Council employees

Certain people within Council have responsibilities under the PID Act.

#### General Manager

The 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 Council complies with this policy and the PID Act; and
- 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; and
  - complying with yearly reporting obligations to the NSW Ombudsman.

#### Disclosure coordinator

The disclosure coordinator has a pivotal position in the internal reporting system and acts as a clearing house for disclosures. The disclosure coordinator will:

- provide an alternative internal reporting channel to nominated disclosure officers and to the General Manager;
- provide advice to disclosure officer so they may impartially assess each disclosure to determine:
  - whether the disclosure appears to be a public interest disclosure within the meaning of the PID Act; and
  - the appropriate action to be taken in relation to the disclosure, for example:
    - no action/decline;
    - the appropriate person to take responsibility for dealing with the disclosure;
    - preliminary or informal investigation;
    - formal investigation;
    - prosecution or disciplinary action;
    - referral to an investigating authority for investigation or other appropriate action; or
    - referral to the police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct).
- consult with the General Manager;
- be responsible for carrying out or coordinating any internal investigation arising out of a disclosure, subject to the direction of the General Manager in carrying out their functions;
- report to the General Manager on the findings of any investigation and recommended remedial action;
- take all necessary and reasonable steps to ensure that the identity of persons who make disclosures, and persons the subject of the disclosures, are kept confidential;
- support persons who make disclosures and actively protect them from victimisation, harassment or any other form of reprisal;
- report actual or suspected corrupt conduct to the General Manager in a timely manner to enable that officer to comply with the ICAC Act; and
- provide annual reports to the NSW Ombudsman in accordance with section 78 of the PID Act.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

### Disclosure officers

Disclosure officers are responsible for:

- receiving reports from public officials;
- receiving reports when they are passed on to them by managers;
- ensuring reports are dealt with appropriately, including by referring the matter to the appropriate complaint unit (if relevant); and
- ensuring that any oral reports that have been received are recorded in writing.

### Managers

The responsibilities of managers include:

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

### 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.

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.

## 6.6 How we will deal with voluntary PIDs

### 6.6.1 How Council will acknowledge that we have received a report and keep the person who made it informed

When a disclosure officer receives a report that is a voluntary PID, or looks like it may be a voluntary PID, the person who made the report will receive the following information:

- 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 we deal with the report;
  - provide clear information on how you can access this PID policy; and
  - 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; or
  - 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 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.

#### **6.6.2 How we will deal with voluntary PIDs**

Once a report that may be a voluntary PID is received by a disclosure officer it will be referred to their direct manager, or the disclosure coordinator, or the General Manager to assess 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.

#### ***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 Complaint Handling Policy, Workplace Complaints and Grievances Procedure, 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.

#### ***Cease dealing with report as a 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). If this happens we will contact you, in line with section 6.6.1.

#### ***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 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.

#### **6.6.3 How we 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 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; and
- 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

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

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:

- limiting the number of people who are aware of the maker's identity or information that could identify them;
- not disclosing the actual identity of the maker of the PID, unless we have their consent to do so, in the event that we must disclose information that may identify the maker of the PID;
- 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;
- 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; and
- 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.

If confidentiality cannot be maintained or is unlikely to be maintained, we will:

- advise the person whose identity may become known;
- update Council's risk assessment and risk management plan;
- implement strategies to minimise the risk of detrimental action;
- provide additional supports to the person who has made the PID; and
- 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.

#### **6.6.4 How we will assess and minimise the risk of detrimental action**


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 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:

- explaining that a risk assessment will be undertaken, and a risk management plan will be created (including reassessing the risk throughout the entirety of the matter);
- providing details of the unit/role that will be responsible for undertaking a risk assessment;
- explaining the approvals for risk assessment and the risk management plan, that is, rank or role of the person who has final approval;
- explaining how the agency will communicate with the maker to identify risks;
- listing the protections that will be offered, that is, the agency will discuss protection options with the maker which may include remote working or approved leave for the duration of the investigation; and
- outlining what supports will be provided.



	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

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.

#### **6.6.5 How we 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 Commissioner of Police and the ICAC or the Law Enforcement Conduct Commission (whichever is applicable); and
- notify the NSW Ombudsman about the allegation of a detrimental action offence being committed.

Reports of detrimental action can be made to your manager, or a disclosure officer, or the disclosure coordinator, or the General Manager. Any such reports will be dealt with confidentially and in line with this policy and the Workplace Complaints and Grievance Procedure, including support for the person alleging detrimental action. You will be kept informed of the actions being taken and any outcomes of a report of detrimental action.

#### **6.6.6 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:

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

- 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); and/or
- payment of compensation to people who have been affected by serious wrongdoing or other misconduct.

Council's procedure for taking corrective action includes:

- the disclosure coordinator receives the findings of an investigation;
- recommendations in the findings will be developed into an action plan and reported to ELT;
- the manager of the person(s) subject to corrective action will be responsible for ensuring corrective action takes place;
- the maker will be notified in writing from their direct manager of the proposed corrective action(s).

## **6.7 Review and dispute resolution**

### **6.7.1 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; and/or
- 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.

Internal review applications should be sent to the disclosure coordinator. The disclosure coordinator will appoint an impartial and suitably senior member of staff to conduct the review. You should expect to be advised of the outcome of the review within 20 working days.

### **6.7.2 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.

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

## 6.8 Other agency obligations

### 6.8.1 Record-keeping requirements

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

Council records regarding information received in connection with the PID Act are held in Council's electronic records management system in a folder with restricted access.

### 6.8.2 Reporting of voluntary PIDs and Council's 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; and
- how Council promoted a culture in the workplace where PIDs are encouraged.

The disclosure coordinator is responsible for collecting information about voluntary PIDs and the other information captured in the annual return, and for preparing the annual return. The information is stored in Council's electronic records management system in a folder with restricted access.

### 6.8.3 How we will ensure compliance with the PID Act and this policy

Compliance with the PID act and this policy will include:

- regular review of the policy by the Manager Corporate Services;
- oversight of Council's practices for compliance with the PID Act by managers, supported by the Manager Corporate Services;
- in conjunction with the annual return, a report confirming compliance with the PID Act that will be referred to the Audit, Risk and Improvement Committee;
- instances of non-compliance will be dealt with in line with Council's procedures including the Workplace Behaviour Policy and Code of Conduct.

## 7. Getting Help

The staff member who can assist with this Policy:

Position: Manager Corporate Services


Department: Corporate and Community Services

## 8. Version Control

Next Review Date: September 2025

Staff Member Responsible for Review: Manager Corporate Services

Policy Name	Version	Resolution	Date
Public Interest Disclosures Act 1994 – Internal Reporting Policy	Endorsed	320/1516	16 June 2016
Public Interest Disclosures Act 1994 – Internal Reporting Policy	Endorsed	52/1718	17 August 2017
Public Interest Disclosures Policy	Endorsed	ELT	27 September 2023

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

**Annexure A – Names and contact details of disclosure officers for Warrumbungle Shire Council**

**General Manager**

Roger Bailey  
 Phone 02 6849 2090  
 Mobile 0428 600 100  
 Email [Roger.Bailey@warrumbungle.nsw.gov.au](mailto:Roger.Bailey@warrumbungle.nsw.gov.au)  
 Postal PO Box 191, Coonabarabran, NSW, 2357

**Disclosure Coordinator**

*Manager Human Resources*  
 Chris Kennedy  
 Phone 02 6849 2098  
 Mobile 0448 125 423  
 Email [Chris.Kennedy@warrumbungle.nsw.gov.au](mailto:Chris.Kennedy@warrumbungle.nsw.gov.au)  
 Postal PO Box 191, Coonabarabran, NSW, 2357

**Disclosure Officers**

<b>Worksite</b>	<b>Position and Name</b>	<b>Contact</b>
Baradine depot 114 Baradine Rd, Baradine	<i>Supervisor Urban Services Baradine</i> Phill Hensby	0427 112 813 <a href="mailto:Phillip.Hensby@warrumbungle.nsw.gov.au">Phillip.Hensby@warrumbungle.nsw.gov.au</a> 114 Baradine Rd, Baradine, NSW, 2396
Baradine pool Narren St, Baradine	<i>Supervisor Pools</i> Nigel Baker	0427 206 449 <a href="mailto:Nigel.Baker@warrumbungle.nsw.gov.au">Nigel.Baker@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357 59 Binnia St, Coolah, NSW, 2843
Binnaway depot 44-48 Park St, Binnaway	<i>Supervisor Urban Services Binnaway</i> Craig Whitty	0429 034 461 Craig.Whitty@warrumbungle.nsw.gov.au 44-48 Park St, Binnaway, NSW, 2395
Binnaway pool Renshaw St, Binnaway	<i>Supervisor Pools</i> Nigel Baker	0427 206 449 <a href="mailto:Nigel.Baker@warrumbungle.nsw.gov.au">Nigel.Baker@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357 59 Binnia St, Coolah, NSW, 2843
Children's Services 14 Robertson St, Coonabarabran	<i>Connect Five Children's Services Coordinator</i> Kelly-Ann Murnane	02 6849 2226 <a href="mailto:Kelly-Ann.Murnane@warrumbungle.nsw.gov.au">Kelly-Ann.Murnane@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357



## Public Interest Disclosure Policy

### Management

Worksite	Position and Name	Contact
Children's Services (Yuluwirri Kids) 2-6 Bandulla St, Coonabarabran	<i>Senior Supervisor Children's Services</i> Linda Miller	02 6849 2185 <a href="mailto:Linda.Miller@warrumbungle.nsw.gov.au">Linda.Miller@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Coolah administration building 59 Binnia St, Coolah	<i>Chief Financial Officer</i> Vacant	In lieu of Chief Financial Officer: Lisa Grammer 02 6378 5022 <a href="mailto:Lisa.Grammer@warrumbungle.nsw.gov.au">Lisa.Grammer@warrumbungle.nsw.gov.au</a> 59 Binnia St, Coolah, NSW, 2843
Coolah depot 1-13 Martin St, Coolah	<i>Supervisor Roads South</i> Adrian Rusten	02 6378 5102 0448 346 570 <a href="mailto:Adrian.Rusten@warrumbungle.nsw.gov.au">Adrian.Rusten@warrumbungle.nsw.gov.au</a> 1-13 Martin St, Coolah, NSW, 2843
Coolah pool 85 Binnia St, Coolah	<i>Supervisor Pools</i> Nigel Baker	0427 206 449 <a href="mailto:Nigel.Baker@warrumbungle.nsw.gov.au">Nigel.Baker@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357 59 Binnia St, Coolah, NSW, 2843
Coolah sewerage treatment plant 1-3 Botheroo St, Coolah	<i>Sewerage Treatment Plant/ Bore Operator</i> Karyna Hawkes	0427 771 623 <a href="mailto:Karyna.Hawkes@warrumbungle.nsw.gov.au">Karyna.Hawkes@warrumbungle.nsw.gov.au</a> 1-3 Botheroo St, Coolah, NSW, 2843
Coonabarabran administration building 14-22 John St, Coonabarabran	<i>Director Corporate &amp; Community Services</i> Lindsay Mason  <i>Director Environment &amp; Development</i> Leeanne Ryan  <i>Director Technical Services</i> Nicole Benson	02 6849 2080 0427 101 129 <a href="mailto:Lindsay.Mason@warrumbungle.nsw.gov.au">Lindsay.Mason@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357  02 6849 2086 0429 988 679 <a href="mailto:Leeanne.Ryan@warrumbungle.nsw.gov.au">Leeanne.Ryan@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357  02 6849 5017 0407 607 811 <a href="mailto:Nicole.Benson@warrumbungle.nsw.gov.au">Nicole.Benson@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357




## Public Interest Disclosure Policy

### Management

<b>Worksite</b>	<b>Position and Name</b>	<b>Contact</b>
Coonabarabran depot Gardener St, Coonabarabran	<i>Manager Fleet Services</i> Steve Friend	02 6849 2093 0436 307 278 <a href="mailto:Stephen.Friend@warrumbungle.nsw.gov.au">Stephen.Friend@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Coonabarabran pool John St, Coonabarabran	<i>Supervisor Pools</i> Nigel Baker	0427 206 449 <a href="mailto:Nigel.Baker@warrumbungle.nsw.gov.au">Nigel.Baker@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357 59 Binnia St, Coolah, NSW, 2843
Coonabarabran recycling centre 4202 Baradine Rd, Coonabarabran	<i>Supervisor Waste and Recycling</i> Tony Arndell	0419 281 940 <a href="mailto:Tony.Arndell@warrumbungle.nsw.gov.au">Tony.Arndell@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Coonabarabran sewerage treatment plant	<i>Supervisor Warrumbungle Water Treatment Plants</i> Andrew Milford	02 6849 2089 0428 464 152 <a href="mailto:Andrew.Milford@warrumbungle.nsw.gov.au">Andrew.Milford@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Coonabarabran water treatment plant 106 Timor Rd, Coonabarabran	<i>Supervisor Warrumbungle Water Treatment Plants</i> Andrew Milford	02 6849 2089 0428 464 152 <a href="mailto:Andrew.Milford@warrumbungle.nsw.gov.au">Andrew.Milford@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Dunedoo pool Wallaroo St, Dunedoo	<i>Supervisor Pools</i> Nigel Baker	0427 206 449 <a href="mailto:Nigel.Baker@warrumbungle.nsw.gov.au">Nigel.Baker@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357 59 Binnia St, Coolah, NSW, 2843
Dunedoo waste transfer station 129 Avonside Rd, Dunedoo	<i>Crew Leader Recycling/ Transfer Stations (Dunedoo)</i> Phil Williams	0437 478 432 <a href="mailto:Phillip.Williams@warrumbungle.nsw.gov.au">Phillip.Williams@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Mendooran depot 35-37 Dalglish St, Mendooran	<i>Team Leader Urban Services Mendooran</i> Dean Hartley	0417 325 657 <a href="mailto:Dean.Hartley@warrumbungle.nsw.gov.au">Dean.Hartley@warrumbungle.nsw.gov.au</a> 35 Dalglish St, Mendooran, NSW, 2842
Mendooran pool Pampoo St, Mendooran	<i>Supervisor Pools</i> Nigel Baker	0427 206 449 <a href="mailto:Nigel.Baker@warrumbungle.nsw.gov.au">Nigel.Baker@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357 59 Binnia St, Coolah, NSW, 2843

	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

<b>Worksite</b>	<b>Position and Name</b>	<b>Contact</b>
Plumbers' depot 31 Namoi St, Coonabarabran	<i>Supervisor Warrumbungle Water Reticulation Nick Willoughby</i>	0429 231 593 <a href="mailto:Nicholas.Willoughby@warrumbungle.nsw.gov.au">Nicholas.Willoughby@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357
Warrumbungle Community Care 27-29 John St, Coonabarabran	<i>Supervisor Warrumbungle Community Care Deanne Britton</i>	02 6849 2131 0427 709 936 <a href="mailto:Deanne.Britton@warrumbungle.nsw.gov.au">Deanne.Britton@warrumbungle.nsw.gov.au</a> PO Box 191, Coonabarabran, NSW, 2357

 <p><b>warrumbungle</b> SHIRE COUNCIL</p>	<b>Public Interest Disclosure Policy</b>
	<b>Management</b>

#### Annexure B – List of integrity agencies

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