

Western Parkland City Authority

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Code of Ethics and Conduct

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Document approval

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Contents

Acknowledgment of Country	5
Message from the Chief Executive Officer	6
1. Overview	7
1.1 Purpose	7
1.2 Scope.....	7
1.3 Review.....	7
1.4 Core Values and Principles of Conduct.....	7
2. When is the Ethical Framework to be applied?.....	8
3. Mandatory conduct and behaviour contrary to the Code.....	9
4. Legislation	9
5. Applying the Code in the Authority – specific conduct issues	10
5.1 Use of position	10
5.2 Specific criminal offences under the WPCA Act	10
5.3 Secondary employment.....	10
5.4 Post separation employment	11
5.5 Gifts and benefits	11
5.6 Drugs, alcohol and tobacco	11
5.7 Flexible workforce	12
5.8 Work health and safety.....	12
5.9 Bullying and harassment.....	12
5.10 Discrimination.....	12
5.11 Disclosure of criminal charges, convictions and bankruptcy	13
6. Managing government resources.....	13
6.1 Corruption, maladministration, substantial waste and Government information contravention	13
6.2 Record keeping.....	15
6.3 Privacy and personal information	15

6.4	Tendering for and procuring goods and services	15
6.5	Travel.....	16
6.6	Budget	16
6.7	Intellectual property and copyright.....	16
6.8	Managing grant and funding agreements.....	17
6.9	Use of facilities and equipment	17
6.10	Cyber security.....	17
7.	Engaging with stakeholders.....	18
7.1	Commercial Governance Policy and Framework.....	19
7.2	Managing complaints about the services we provide	19
7.3	Sponsorships	19
7.4	Public comment.....	19
7.5	Speaking engagements.....	20
7.6	Political participation.....	20
7.7	Engaging with lobbyists	20
8.	Risk and Audit	21
8.1	Risk management.....	21
8.2	Business Continuity Management.....	21
8.3	Business improvement: audits, inquiries and investigations.....	21
9.	Further reference.....	21

Acknowledgment of Country

Aboriginal people have had a continuous connection with the Country encompassed by the Western Parkland City (the Parkland City) from time immemorial. They have cared for Country and lived in deep alignment with this important landscape, sharing and practising culture while using it as a space for movement and trade.

We acknowledge that four groups have primary custodial care obligations for the area: Dharug/Darug, Dharawal/Tharawal, Gundungurra/Gandangara and Darkinjung . We also acknowledge others who have passed through this Country for trade and care purposes: Coastal Sydney people, Wiradjuri and Yuin.

Western Sydney is home to the highest number of Aboriginal people in any region in Australia. Diverse, strong and connected Aboriginal communities have established their families in this area over generations, even if their connection to Country exists elsewhere. This offers an important opportunity for the future of the Parkland City.

Ensuring that Aboriginal communities, their culture and obligations for Country are considered and promoted will be vital for the future of the Parkland City. A unique opportunity exists to establish a platform for two-way knowledge sharing, to elevate Country and to learn from cultural practices that will create a truly unique and vibrant place for all.

Message from the Chief Executive Officer

The Western Parkland City Authority (Authority) is a NSW Government agency within the NSW Department of Enterprise, Investment and Trade cluster under Schedule 1 of the *Government Sector Employment Act 2013 (NSW)* (GSE Act).

This Code of Ethics and Conduct (Code) for the Authority was developed in accordance with the GSE Act and the *Public Service Commissioner's Direction No 1, 2015*.

The *Ethical Framework*, outlined in [Part 2](#) of the GSE Act, is mandatory for all government sector employees and is contained in the Code. The Code forms part of each employee's contract of employment and requires employees to always act in the public interest and demonstrate standards of professional behaviour that promote and maintain public trust and confidence.

The *Ethical Framework* sets out core values for all government sector employees. These are Integrity, Trust, Service and Accountability - and at the Authority we include Excellence. I endorse these core values and principles and expect all staff to demonstrate them in their working relations with other staff, clients and customers, stakeholders and the government of the day.

The Code employs a principles-based approach to ethics, rather than a prescriptive one, since it is not possible to address every issue, we may face as public servants in one code. For this reason, it is important that we look to the core values and principles when implementing the Code and generate discussions within the Authority to promote ethical decision making. Staff who remain uncertain about how the Code might apply to a situation are urged to speak with their manager or a member of the executive.

At the Authority we put our values at the centre of what we do and adhering to the Code, as individuals and as an organisation, is critical to our success in building a high-performance organisation.

Dr. Sarah Hill
CEO

1. Overview

1.1 Purpose

The purpose of the Code is to assist all Authority staff to:

- understand expected standards of conduct and behaviour;
- comply with relevant laws and policies;
- demonstrate and promote good ethical practice;
- deal with ethical problems they may encounter; and
- maintain the integrity and reputation of the Authority and the NSW Government.

The Code also specifies actions to be taken if there are breaches or allegations of breaches of the Code.

1.2 Scope

The Code applies to all Authority staff, which includes employees, senior executives, contractors, professional services providers and volunteers engaged by the Authority. The Code also pertains to the Authority's Board members if a Board member is primarily engaged in work for the Authority they need to adhere to the Code. It applies at all times when acting in the course of, or in connection with, Authority employment or engagement. While the Code refers to officers of the Authority, the principles in the Code have been adopted by the Authority's Board as part of its policies and procedures.

1.3 Review

The Code may be amended from time to time by the Chief Executive Officer (CEO) and as directed by the Board and Public Service Commissioner.

1.4 Core Values and Principles of Conduct

All staff are to uphold the four Government sector core values of Integrity, Trust, Service and Accountability and their principles, and the Authority's additional value of Excellence, in their actions, decisions, and dealings with colleagues, clients, stakeholders and the government of the day.

Integrity

- Consider people equally without prejudice or favour
- Act professionally with honesty, consistency and impartiality
- Take responsibility for situations, showing leadership and courage
- Place the public interest over personal interest.

Trust

- Appreciate difference and welcome learning from others
- Build relationships based on mutual respect
- Uphold the law, institutions of government and democratic principles
- Communicate intentions clearly and invite teamwork and collaboration
- Provide apolitical and non-partisan advice.

Service

- Provide services fairly with a focus on customer needs
- Be flexible, innovative and reliable in service delivery
- Engage with the not-for-profit and business sectors to develop and implement service solutions
- Focus on quality while maximising service delivery.

Accountability

- Recruit and promote employees on merit
- Take responsibility for decisions and actions
- Provide transparency to enable public scrutiny
- Observe standards for safety
- Be fiscally responsible and focus on efficient, effective and prudent use of resources.

Excellence

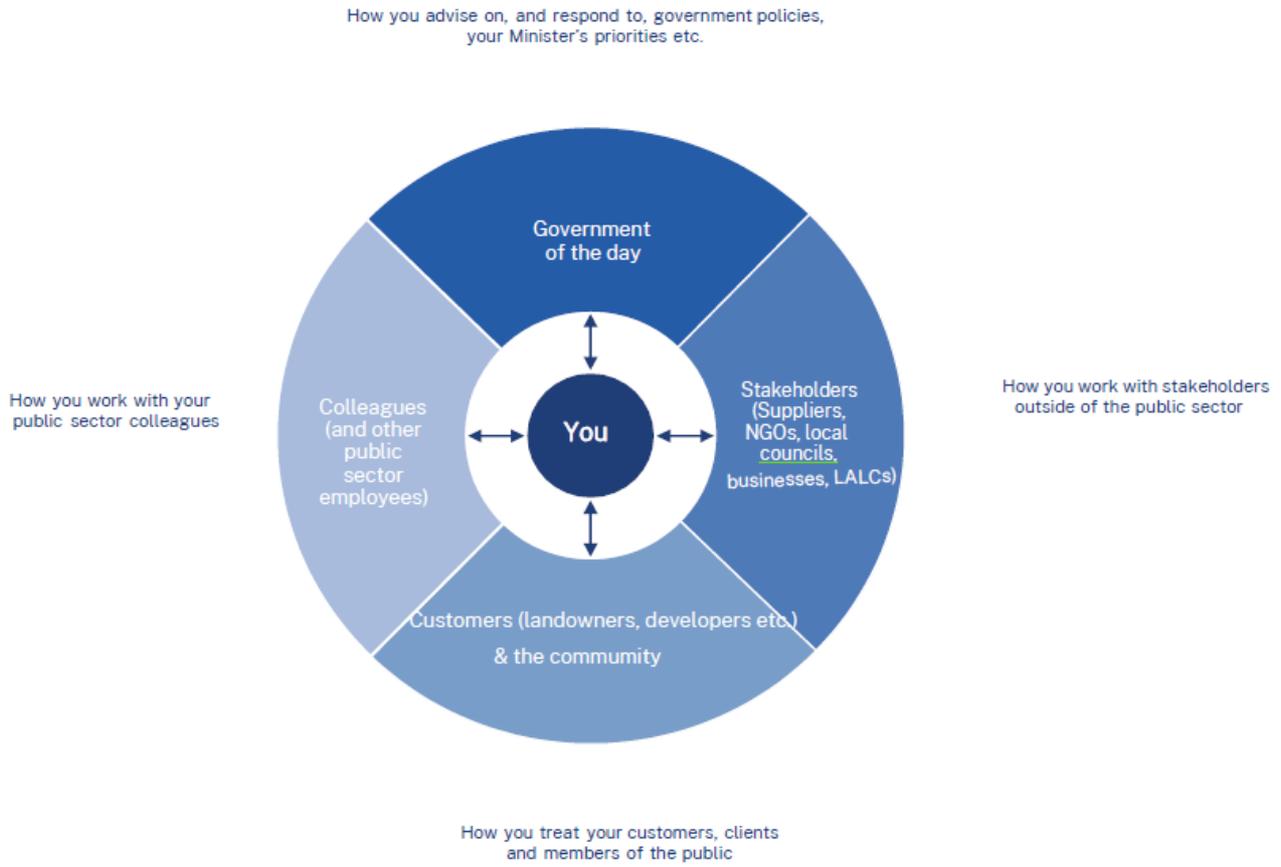
- Strive for excellence in everything we do.
- Demand high standards from ourselves and continually look for ways to improve.
- Be influential, inspirational and motivational.
- Apply rigour and innovation in our advice.
- Focus on results.
- Work as one.

There is no hierarchy among the core values and each is of equal importance.

2. When is the Ethical Framework to be applied?

The Ethical Framework must be applied at all times in working relations with colleagues, clients and customers, stakeholders and the government of the day. These working relations are depicted in Diagram 1:

Diagram 1: The Ethical Framework’s Working Relations



3. Mandatory conduct and behaviour contrary to the Code

The Code of Ethics and Conduct for NSW Government Sector Employees sets out the mandatory conduct provisions for NSW Government sector employees as well as provisions for behaviour contrary to the Code. These provisions apply to all government sector employees and heads of government sector agencies and extends to all Authority staff.

To access these provisions click [here](#).

4. Legislation

A principle of the Ethical Framework for the government sector is to uphold the law. It is important that all staff are aware of their legal obligations. The list of relevant legislation can be found in the *Authority’s Obligations Register* located on the Intranet.

For further information on compliance with our legal obligations refer to the Authority’s Compliance Management Framework.

5. Applying the Code in the Authority – specific conduct issues

Authority staff have an obligation to know, understand and comply with all Authority policies and legal obligations relating to their role and to discuss any matter requiring clarification with their manager.

The following section deals with some of the conduct issues that arise in organisations such as ours. Please refer to other applicable Authority policies for additional information.

5.1 Use of position

Corrupt conduct occurs when staff improperly use, or try to improperly use, the knowledge, power or resources of their position for personal gain. Staff must not use their official Authority position to influence or to obtain a benefit in private matters or to enable family or friends to gain benefits. For example, it is not appropriate to use your WPCA email or signature when lodging a complaint about a personal matter. It is a breach of the Code to influence a private matter by stating or inferring that your opinions are representing those of the Authority, NSW Department of Enterprise, Investment and Trade or the NSW Government.

5.2 Specific criminal offences under the WPCA Act

The WPCA Act includes specific provisions in relation to the misuse of information and influence by persons who have an ‘association with the Authority’ (**Specific Offences**).

These are **criminal offences**. All members of the Authority must familiarise themselves with these provisions.

Authority staff should follow the Authority’s *Guide to complying with the WPCA Act provisions relating to use of information and influence* or seek advice from the Authority’s Legal Team.

5.3 Secondary employment

Staff may engage in other paid employment outside their official duties provided certain conditions are met and that they have prior approval to do so. However, the duties of a staff member’s role at the Authority must always come first.

The work should not arise from or interfere with the staff member’s work at the Authority and should be done outside working hours. Staff must carefully consider whether the organisation offering them secondary employment may adversely affect the performance of their public duties and responsibilities or give rise to a conflict of interest.

Staff seeking to engage in private employment, or to significantly vary an existing approval, should submit an ***Outside Employment Application Form*** in MyCareer to their Manager for approval and to speak to People and Culture if they have any queries.

While contractors, casuals and part time employees are not required to obtain approval for employment performed outside their contracted work hours, they must however ensure that no

potential conflict of interest or adverse effect on their Authority role exists. These factors should also apply to employees considering unpaid (voluntary) employment.

Note this section does not apply to Board members.

5.4 Post separation employment

Staff should not use their position to obtain opportunities for future employment in a way that would cast doubt on their integrity, the integrity of the Authority, or the public sector generally.

Staff should not allow themselves or their work to be influenced by plans for, or offers of, employment outside the Authority. If this occurs, then there is a conflict of interest and their integrity, the integrity of the Authority, the NSW Department of Enterprise, Investment and Trade and the public sector is at risk.

Former staff should not use or take advantage of confidential information gained in the course of their official duties.

5.5 Gifts and benefits

A gift or benefit is anything that is offered to a public sector employee in the course of their work, apart from their normal employment entitlements.

Gifts and benefits, including hospitality, should not be accepted by staff or a Board member that is primarily engaged in work for the Authority if they are given with the intention of making them change how they do their work, or if other people could reasonably believe they were intended for that purpose. Soliciting personal gifts or benefits is strictly prohibited in all circumstances.

The Authority's *[Gifts and Benefits Policy and Procedure](#)* outlines our responsibilities and procedures to follow, including declaring in the Authority register of gifts and benefits through Protecht.

5.6 Drugs, alcohol and tobacco

While at work staff must not be in possession of a drug or substance that is illegal to possess or distribute. Staff are not permitted to be in the workplace or conduct business on behalf of the Authority if under the influence of alcohol or other drugs that are likely to adversely affect their ability to do their job or may pose a risk to themselves, their colleagues or members of the public.

'Workplace' includes off-site areas where work is performed and government vehicles.

'Under the influence' is defined as an obvious state of disturbance to one's physical and/or mental faculties that impairs performance, or that may pose a risk to the staff member or other staff or members of the public.

Smoking in any office of the Authority or enclosed area is not permitted ([section 6A](#) of the *Smoke-free Environment Act 2000* bans smoking within 4 metres of a pedestrian access point to a public building).

5.7 Flexible workforce

The Authority promotes a flexible culture that embraces different ways of working. Staff have the right to request flexible working arrangements that:

- support the needs of the individual, the team and the Authority;
- maintain or improve service delivery;
- uphold the Authority's work health and safety standards; and
- are in harmony with our employment conditions and legislation.

Managers should discuss requests with People and Culture and provide feedback where the proposed arrangement is not considered appropriate. Refer to the [*Authority's Flexible Working Hours Agreement*](#).

5.8 Work health and safety

The Authority is committed to protecting the health and safety of all its staff and has obligations to do so under the [*Work Health and Safety Act 2011*](#). Staff must seek to understand and follow all organisational Work Health and Safety (WHS) requirements.

While at work, all staff must take care of their health and safety and the health and safety of other people in the workplace. 'Health' includes psychological health as well as physical health.

Managers at all levels have a responsibility to promote and maintain the health and safety of all persons in the workplace. All staff must comply with any reasonable direction from management and cooperate to ensure resolution of any WHS issues. Any real or perceived hazard must be reported to a manager. Refer to the Authority's [*WHS Policy*](#) and [*WHS Manual*](#) for more information.

5.9 Bullying and harassment

The Authority promotes a healthy and safe work environment that is free from bullying and harassment. All staff have a right to be treated with courtesy and respect.

Any reports of bullying or harassment will be treated seriously and will be acted upon in accordance with the Authority's [*Prevention and Management of Bullying and Harassment Policy*](#).

All staff have responsibilities in preventing and eliminating bullying and harassment under the [*Work Health and Safety Act 2011*](#) and the [*Anti-Discrimination Act 1977*](#).

Staff who believe that they or a colleague are being bullied or harassed at work may contact their manager in the first instance, People and Culture or a senior executive.

5.10 Discrimination

New South Wales and Commonwealth legislation protects people from discrimination on the grounds of their: sex; gender identity; sexual orientation; marital, parental or carer status; pregnancy; age; disability; race; and political or religious belief.

If you believe there is discrimination at work, contact your manager in the first instance, People and

Culture or a senior executive. Refer to the [Anti-Discrimination Board](#).

5.11 Disclosure of criminal charges, convictions and bankruptcy

All Authority staff are required by law to immediately notify the CEO in writing if you have been charged with an offence with a possible penalty of imprisonment for 12 months or more, or if you have been convicted of any such criminal offence. Failure to do so may result in formal action. If you are facing charges where the penalty is less than 12 months imprisonment, the charge should only be reported if it is possibly connected to, or has a bearing on, your employment with the Authority.

You are to immediately notify the CEO in writing if you:

- become bankrupt; or
- make a composition, arrangement or assignment for the benefit of creditors.

Action taken by the Authority, if any, will depend on the nature/circumstances of the situation, its relevance to your work and any mitigating factors.

If unsure, staff are advised to contact the Authority's People and Culture or legal team to discuss the matter in confidence.

6. Managing government resources

6.1 Corruption, maladministration, substantial waste and Government information contravention

Corrupt conduct

Corrupt conduct is conduct of any person (public employee or not) that adversely affects the honest or impartial exercise of official functions by any public official or authority.

Examples of corrupt conduct may include:

- providing a contractor with work in return for a personal benefit;
- theft and misappropriation of the Authority's material or financial resources;
- offering or accepting bribes, commissions or secret payments to provide unfair advantage to contractors or particular clients;
- accepting a personal gift or benefit from a client in return for providing services;
- partiality (that is, bias);
- breach of trust (that is, misuse of your position);
- fraud and attempts at fraud;
- forgery, and making false or fraudulent claims (for example, timesheets, expenses, vehicle usage log and creating false evidence); and
- misuse or unauthorised disclosure of information held or maintained by the Authority for personal gain.

The CEO has a responsibility under [section 11](#) of the *Independent Commission Against Corruption Act 1988* to report suspected corruption. Refer to the Authority's [Fraud & Corruption Control Framework](#).

Fraud

Fraud is any practice that involves the use of deceit, confers some form of financial benefit upon the alleged offender (either directly or indirectly), and results in some form of material loss to the entity. Refer to the Authority's Fraud & Corruption Control Framework and [ICAC](#).

Maladministration

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

The following examples could be considered maladministration:

- approving allowances for staff that they are not entitled to;
- unauthorised disclosures of confidential information;
- making decisions without authority;
- serious delays in making a decision or taking action;
- applying a policy inflexibly without regard to the merits of an individual case;
- decisions or actions not justified by any evidence or that are unreasonable;
- abuses of power, intimidation or harassment; and
- inconsistent application of a law, policy or practices when there is no reasonable, justifiable or appropriate reason to do so.

Refer to the [NSW Ombudsman](#).

Serious and substantial waste

Serious and substantial waste is the uneconomical, inefficient or ineffective use of resources which results in a loss/wastage of public funds or resources. Less serious forms of waste are also to be avoided. For example, use black and white and/or double-sided printing where possible, and switch off computers at the end of the day and over weekends. Refer to the [Audit Office of NSW](#).

Government information contravention

Government information contravention means a failure to carry out the functions required by the [Government Information \(Public Access\) Act 2009](#) (GIPA Act). Under the GIPA Act, citizens have a right to access most information held by the NSW Government to foster a government that is open, accountable, fair and effective. If you receive a GIPA enquiry, please direct the enquirer to the Authority's legal team, at governance@wpca.sydney.

The Authority receives requests to release information in a number of ways:

- formal applications under the *Government Information (Public Access) Act 2009* (GIPA Act), including hearing notices for the NSW Civil and Administrative Tribunal (NCAT);
- subpoenas;
- Parliamentary Standing Order 52 requests;
- notices to Produce from NSW Independent Commission Against Corruption (ICAC) or the NSW Ombudsman and NSW Audit Office; and

- informal requests for information, which can be dealt with by the relevant business unit in consultation with the Legal Unit.

Always consider that the records you create may be released. Refer to the *Authority's Records Creation, Capture and Storage Policy*.

Refer to the Authority's *Proactive Release Procedure, Procedure for Managing Access Applications under the GIPA Act* and the [Information and Privacy Commission](#).

Reporting

Authority staff are encouraged to report any suspected corruption, maladministration, substantial waste and government information contravention. Disclosures can be made to the CEO. A disclosure may also be made to the Independent Commission Against Corruption concerning corrupt conduct, the Ombudsman concerning maladministration, the Auditor-General concerning substantial waste of public resources, or the Information Commissioner concerning government information contravention.

Refer to the *Authority's Public Interest Disclosures Policy and Procedures* for further information.

6.2 Record keeping

In accordance with the *State Records Act 1998*, all staff have a responsibility to create and maintain full and accurate records of your activities, decisions and other business transactions, to capture records into official records systems, and not to destroy records without appropriate authority. Managers have a responsibility to ensure that staff reporting to them comply with their records management obligations.

Refer to the *Authority's Records Management Framework* and related procedure documents, the State Records Authority, and [Recordkeeping in the NSW public sector](#).

6.3 Privacy and personal information

Staff need to be aware of and comply with the [Privacy and Personal Information Protection Act 1998](#). Particular care must be taken with the collection, storage, use and disclosure of personal information in order to protect the privacy of individuals.

Staff must not use or disclose personal information, for a purpose other than that for which it was collected, without obtaining consent from the person to whom the information relates.

The *Privacy and Personal Information Protection Act 1998* also contains criminal sanctions for the unauthorised use and disclosure of personal information by staff.

Refer to Authority's *Privacy Management Policy & Guidelines* and the [Information and Privacy Commission](#).

6.4 Tendering for and procuring goods and services

When purchasing goods and services for the Authority, you must follow the Authority's *Procurement Policy and Procedures, Consultant and Contractor Engagement Policy*, the *Sub-delegations* and consult

with the Procurement Team.

6.5 Travel

When travelling on official business, seeking or accepting frequent flyer points for your personal use is not permitted. Corporate mobile phones and Purchasing Cards facilities provided for official travel may only be used for work purposes. Refer to the relevant Authority's policies on *Travel* and use of *PCards* for further information.

6.6 Budget

Budgets are allocated to ensure that staff apply resources in a way that will deliver the Authority's priorities. It is important that staff:

- plan to deliver their allocated services, projects and priorities and participate in the budget process; and
- once the budget is set, comply with their budget and budget controls, including net cost of service, gross expense limit, labour expense cap and any capital authorisation expenditure limit.

Sometimes circumstances change, despite the best planning. If it becomes likely that you will not be able to spend your budget within the agreed timeframe, inform the Chief Finance Officer as soon as possible.

6.7 Intellectual property and copyright

Whole of government principles apply to the creation, management and use of intellectual property which includes copyright, trademarks, patents, plant breeders' rights and designs.

The Authority owns all intellectual property staff create in the course of their work. Staff who become aware of or suspect misuse of the Authority's intellectual property must immediately notify the Chief Operating Officer.

The Authority's intellectual property may only be licensed or used by a third party with the relevant approval. Licences for third parties to use Crown copyright will often be free. However, if you think it should be commercially licensed, discuss this with the Legal Team.

If a procurement or a collaboration with a third party will result to the creation of intellectual property, ownership of the intellectual property should be dealt with in the contract and the Legal Team must be consulted.

It is also important that staff respect and not infringe others' intellectual property rights (even if intellectual property material is publicly available on the internet, for example). This includes the cultural knowledge and material of Aboriginal and Torres Strait Islander peoples.

You should make yourself familiar with the principles contained in the *Intellectual Property Management Framework for the NSW Government Sector* for more information about intellectual property.

6.8 Managing grant and funding agreements

Staff who are responsible for programs that provide grants or other funding must ensure that:

- program guidelines are approved at an appropriate level, consistent with the decision that established the program;
- the program guidelines include a probity framework;
- the team understands the probity requirements;
- funding is being allocated in accordance with program guidelines and the probity framework;
- a grant or funding agreement is entered into with a recipient which contains terms and conditions that reflect the purpose of the grant or other funding, and the Authority's requirements;
- the deliverables are clearly articulated and that the grant or funding amounts are paid on appropriate milestones throughout the funding agreement; and
- grant and funding agreements are monitored and managed to ensure that the funds are being applied for the purpose for which they were given and the recipient is meeting its other obligations under the agreement.

Refer to the [NSW Government Grants Administration Guide](#)

6.9 Use of facilities and equipment

Staff must be efficient, economical and ethical in their use and management of public resources. Reasonable and limited personal use is permitted, provided it is done in the staff member's own time, does not affect the performance of any staff member, does not benefit the employee or other person financially, involves minimal cost to the Authority and permission is gained prior to taking any equipment off site.

The Authority's *Acceptable Use Policy* deals with the proper use of devices such as telephones, computers, email and internet. These are provided for business purposes and their use must be lawful, appropriate and ethical. Making or sending fraudulent, unlawful or abusive information, calls or messages is prohibited. This includes using facilities in any way that:

- is misleading or deceptive;
- could damage the Authority's or NSW Government's reputation;
- could result in victimisation, harassment or vilification;
- is offensive, obscene, threatening or defamatory e.g., to view pornography;
- violates Australian or State regulations or laws, including 'computer hacking'; and
- is intended to have a destructive effect on storage, processing or communications network facilities.

6.10 Cyber security

Cyber security is a rapidly evolving challenge. It is important that simple steps are taken to help

protect the Authority's systems and information. These include

- not sharing or reusing your work passwords across different accounts or for non-work-related information systems;
- using multifactor authentication where possible;
- physically securing devices if you are travelling for work. This reduces the chance of it being lost or stolen;
- never plugging in devices from unknown sources including USBs or external hard drives given as gifts or found lying around;
- not using public Wi-Fi with sensitive data. Cyber criminals can impersonate a legitimate Wi-Fi hotspot, or attack a connection that is not appropriately secured;
- thinking twice before opening email attachments and or links. Phishing emails are becoming increasingly difficult to detect;
- only using information and information systems for responsible and authorised purposes; and
- report violations of cyber security policies, cyber security incidents and suspicious activity to the IT Team.

Managers are responsible for:

- determining what information communication and technology access a staff member should have. This should be done in consultation with the system owner or the Authority's IT Team; and
- ensuring timely amendment to existing access when staff members leave or change their role, including revocation of access.

Cyber security incidents should be promptly reported using the report icon on your outlook toolbar. Refer to our [Cyber Security Policy](#) for more information.

7. Engaging with stakeholders

The Authority manages a range of programs, and it is our responsibility to engage and seek the views of the community. This occurs through the following:

- formal consultation processes;
- meeting with interested parties;
- directly with our customers; and
- sponsorship programs to inform the community.

Staff need to ensure standards are upheld and public expectations are met when engaging with the Community. It is important to remember that, sometimes, a stakeholder may seek to influence your work in an improper way (either knowingly or unknowingly). Examples include offers of low value gifts or hospitality, through to promises of substantial financial or other benefits, all which should be managed in line with our [Gifts and Benefits policy](#).

7.1 Commercial Governance Policy and Framework

Section 13 of the *Western Parkland City Authority Act 2018 (NSW) (Act)* sets out the Authority's functions.

The Authority must carry out its functions, including investment, delivery, financing and procurement, consistently with the statutory objects set out in section 3 of the Act. The objects of the Act therefore establish the parameters under which the Authority can make commercial (including investment) decisions.

7.2 Managing complaints about the services we provide

We all aim to provide high-quality, seamless services to our external stakeholders and customers. This includes those who are affected by the programs and services we deliver. From time to time, the Authority may receive complaints, each of which are addressed in accordance with the *Authority's External Complaint Handling Procedure*.

7.3 Sponsorships

A sponsorship is a commercial arrangement in which a sponsor provides money or in-kind support in return for benefits such as improved relationships, enhanced profile, or association with a program or initiative. A sponsor generally expects to receive a benefit beyond a modest acknowledgement.

The Authority does not use sponsorship as a primary tool to conduct our business, irrespective of whether we would be receiving or granting the sponsorship. It may be appropriate if the activity directly contributes to government priorities, if it directly aligns with the Authority's documented strategic objectives and does not create an inappropriate conflict.

Sponsorship proposals are evaluated in line with ICAC's sponsorship principles.

7.4 Public comment

Staff have the right to make public comment and publicly debate political and social issues as a member of the community. 'Public comment' includes public speaking engagements, comments on radio and television or in letters to newspapers, and expressing views in books, journals or notices, on internet sites (including social media) or in any other circumstances where it is expected that the comments will spread to the community at large.

Staff must, however, make it clear that their comments are made in a private capacity and do not represent the official view of the Authority, NSW Department of Enterprise, Investment and Trade, the government sector or the NSW Government. Staff must not comment publicly on matters where such comment could give rise to a real or perceived conflict of interest between your work and personal interests. Staff should only make official comments if authorised to do so and direct enquiries to the Executive Director Communications and Engagement.

7.5 Speaking engagements

Staff must obtain the approval of the CEO prior to accepting a speaking engagement relating to Authority activities with professional, educational and community groups.

Any fee received must be paid into an appropriate Authority revenue account and not retained by the staff member.

7.6 Political participation

Staff who are active in any political party or a representative for a political party, cause or movement, must be especially careful about the possibility of conflicts of interest with the duties of their position in the Authority. Government sector employees are not permitted to engage in party political activities whilst on duty. [C2018-04-PSCC2018-06 Contesting Elections](#) addresses the legislative and policy issues arising for employees contesting elections, including the difference between nomination and pre-selection as a candidate.

The staff member must ensure that they are always able to serve the government in an apolitical, non-partisan manner. A person who becomes aware of a potential conflict must immediately inform their Executive Director, or the CEO if the staff member is an Executive Director. The Executive Director should raise any concerns s/he has with a disclosure from a staff member.

At the same time, staff should not be required to perform duties that are of a political rather than public sector nature. If a staff member considers that a duty is substantially political, they should discuss it with their Executive Director, or the CEO if the staff member is an Executive Director. The Executive Director should raise any concerns s/he has with a disclosure from a staff member.

7.7 Engaging with lobbyists

The Authority recognises the need to make important decisions in an open and transparent manner, without any real or perceived undue influence from external parties.

There are obligations on parties seeking to influence decisions and outcomes, and on staff they interact with, to ensure any interactions are transparent, properly recorded and don't involve or have the perception of exerting undue influence.

All staff and heads of government sector agencies must comply with Premier's Memorandum [NSW Lobbyist Code of Conduct](#) published on the Department of Premier and Cabinet's website, as amended from time to time, and any specific Authority policies relating to lobbyists, including *[Procedures for Meetings and Precommercial Engagement with Third Parties](#)*.

It is your responsibility to make sure you understand what lobbying is and how to identify lobbying activity and to maintain transparency. Refer to the *[Authority's Procedures for Meetings and Precommercial Engagement with Third Parties](#)*.

8. Risk and Audit

8.1 Risk management

The Authority aims to create a positive and risk-aware culture within a single, integrated and robust risk management framework that supports the clear and transparent understanding and management of risks.

Risk management is the process of anticipating future events that could adversely affect the Authority and taking action to either reduce the likelihood of the risk occurring or reduce the consequences if the risk does occur. Refer to the *Authority's Risk Management Framework* and *Risk Appetite Statement*.

8.2 Business Continuity Management

Staff all have a responsibility to be aware of and understand the elements of the *Authority's Business Continuity Management Framework* and *Business Continuity Plan* including roles and responsibilities in the event of a business disruption.

Additionally, a staff member may have specific responsibilities under the framework that they need to be aware of to support the continuation of our critical business functions during a disruptive event.

8.3 Business improvement: audits, inquiries and investigations

Staff are encouraged to identify problems with, and opportunities to improve, the Authority's systems and processes through a number of mechanisms. Reviews such as internal and external audits, inquiries or investigations often result in improvement recommendations to improve internal controls, governance and reduce risk.

While the Authority does not need to accept all recommendations, it must give due consideration to insights and recommended improvements and respond appropriately. If we know about the issues and do not act on them, we face significant risks such as reputational damage if not addressed appropriately. Managers are expected to:

- provide informed and prompt responses to auditors and investigators;
- undertake the agreed actions by the due date and ensure required actions are logged, monitored and reported through to completion.

Senior executives need to make decisions about the required action and ensure any action needed is carried out in a timely manner. The Authority has numerous controls in place to protect our system of internal controls.

9. Further reference

The Public Service Commission has developed [Behaving Ethically](#) to help government sector employees and other staff better understand their ethical obligations.

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