

Western Parkland City Authority

Objective ID: A5316009

# Public Interest Disclosures Policy and Procedures

December 2021

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## Review date

The Authority will review this Policy every two years or more frequently if required. It may be reviewed earlier in response to a change in the Australian Government or NSW guidelines.

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# 1. Overview

## 1.1 Purpose and context of this policy

The public interest disclosure system in NSW supports public officials to report serious wrongdoing in the public sector.

This policy sets out the requirements for the Western Parklands City Authority (WPCA), including the protection of staff who report wrongdoing in the workplace.

Under the *Public Interest Disclosures Act 1994* (the **PID Act**), certain reports of wrongdoing may be classified as “public interest disclosures”. This policy specifically addresses those types of reports.

This policy:

- Encourages the disclosure of corrupt conduct, maladministration, serious and substantial waste of public money, government information contraventions and local government pecuniary interest contraventions,
- Informs staff of their rights and responsibilities in relation to public interest disclosures, and
- Outlines WPCA’s procedure for handling public interest disclosures.

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## 1.2 Who does this policy apply to?

This policy applies to:

- All WPCA employees (ongoing, temporary and casual and those on secondment to WPCA),
- Contractors and agency staff engaged to perform work for, or on behalf of, WPCA,
- Work experience students and volunteers, and
- Consultants engaged to provide services to or on behalf of WPCA.

The policy also applies to public officials of another public authority who report wrongdoing relating to WPCA.

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## 1.3 Organisational commitment

WPCA is committed to:

- creating a climate of trust, where staff are comfortable and confident about reporting wrongdoing
- keeping the identity of the staff member disclosing wrongdoing confidential, where this is possible and appropriate
- protecting staff from any adverse action resulting from making a report

- dealing with reports thoroughly and impartially and if some form of wrongdoing has been found, taking appropriate action to address it
- keeping staff who make reports informed of their progress and the outcome
- ensuring managers and supervisors at all levels understand the benefits of reporting wrongdoing, are familiar with this policy, and are aware of the needs and concerns of those who report wrongdoing.

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## 2. Key Principles

### 2.1 What types of wrongdoing are covered by the PID Act?

Reports about:

- corrupt conduct
- maladministration
- serious and substantial waste of public money
- government information contraventions
- local government pecuniary interest contraventions

will be dealt with under the PID Act as a public interest disclosure and according to this policy.

All other wrongdoing or suspected wrongdoing should be reported to a supervisor, to be dealt with in line with relevant WPCA or DPC policies. This might include harassment or unlawful discrimination, or practices that endanger the health or safety of staff or the public.

Even if these reports are not dealt with as public interest disclosures, WPCA recognises such reports may raise important issues. WPCA will respond to all reports and attempt to protect the staff member making the report from reprisal.

#### Corrupt Conduct

Corrupt conduct is defined in the *Independent Commission Against Corruption Act 1988* (the **ICAC Act**). While it can take many forms, corrupt conduct can occur when:

- a public official improperly uses the knowledge, power or resources of their position for personal gain
- a public official dishonestly exercises his or her official functions, or improperly exercises his or her official functions in a partial manner, breaches public trust, or misuses information or material acquired during the course of his or her official functions
- a member of the public tries to influence a public official to use his or her position in a way that affects the probity of the public official's exercise of functions
- a member of the public engages in conduct that could involve one of the matters set out in section 8(2A) of the ICAC Act where such conduct impairs, or could impair, public confidence in public administration.

#### Maladministration

Maladministration is conduct that involves action or inaction of a serious nature that is contrary to

law, unreasonable, unjust, oppressive or improperly discriminatory or based wholly or partly on improper motives.

This could include:

- making a decision and/or taking action that is unlawful
- making or refusing to make a grant of funding for reasons that are not related to the merits of the application.

### **Serious and substantial waste of public money**

Serious and substantial waste is the uneconomical, inefficient or ineffective use of resources that could result in losing or wasting public money.

This could include:

- not following a competitive tendering process for a large-scale contract
- inadequate processes for a system involving large amounts of public funds.

### **Government information contravention**

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

- destroying, concealing or altering records to prevent them from being released
- knowingly making decisions that are contrary to legislation
- directing another person to make a decision that is contrary to the legislation.

### **Local government pecuniary interest contravention**

A local government pecuniary interest contravention is a failure to comply with requirements under the *Local Government Act 1993* (NSW) relating to the management of pecuniary interests.

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## **2.2 What protections are available under the PID Act?**

### **Protections against reprisals**

The PID Act protects staff who make a public interest disclosure (referred to here as ‘reporters’) by imposing penalties on anyone who takes detrimental action against a reporter substantially in reprisal for that person making a disclosure.

WPCA does not tolerate reprisals (also known as ‘detrimental action’) against reporters. There are criminal penalties for detrimental action, including imprisonment or fines. Detrimental action may constitute misconduct that justifies disciplinary action. People who take detrimental action against reporters may also be required to pay damages for any loss suffered by the reporter.

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

- injury, damage or loss
- intimidation or harassment
- discrimination, disadvantage or adverse treatment in relation to employment
- dismissal from, or prejudice in, employment

- disciplinary proceedings.

## Responding to allegations of reprisal

If a staff member believes that detrimental action has been or is being taken against them or someone else, they should tell their supervisor, a Public Interest Disclosure Officer or the Public Interest Disclosure Coordinator (see section 5 below), or the CEO immediately.

All supervisors must report to the Public Interest Disclosure Coordinator or the CEO any suspicions they hold that detrimental action is occurring.

WPCA will ensure that any evidence of detrimental action is referred to the Commissioner of Police, the ICAC, or, if the evidence relates to the NSW Police Force, to the Law Enforcement Conduct Commission.

Staff who report detrimental action will be kept informed of the progress of any investigation and the outcome.

Staff who have reported detrimental action and feel that it is not being dealt with effectively should contact the NSW Ombudsman or the ICAC, depending on the type of wrongdoing reported. Refer to the contact details of Investigating Authorities at the end of this policy for more information.

## Protection against legal action

Reporters who make a disclosure in accordance with the PID Act will not be subject to liability and no action, claim or demand can be taken against them for making the disclosure. Staff will not have been breached any confidentiality or secrecy obligations and staff will have the defence of absolute privilege in defamation.

## Confidentiality

WPCA is committed to keeping the identity of reporters, and the fact they have reported wrongdoing, confidential. This may help prevent any action being taken against them.

However, there may be situations where this may not be possible or appropriate. WPCA will discuss with reporters whether it is possible to keep their report confidential. If confidentiality cannot be maintained, WPCA will develop a plan to support and protect reporters from risks of reprisal. Reporters will be involved in developing this plan.

If a staff member reports wrongdoing, it is important that they only discuss their report with those responsible for dealing with it. This will include the Public Interest Disclosure Coordinator and may include staff contracted by WPCA to investigate the disclosure.

Any staff involved in the investigation or handling of a report, including witnesses, are also required to maintain confidentiality and not disclose information about the process or allegations to any person except for those people responsible for handling the report. Any person who breaches these obligations may be subject to disciplinary action.

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## 2.3 When do the protections apply?

For a report to be protected, it must meet all the requirements of the PID Act. These requirements are:

- The report must be about one of the categories of wrongdoing listed above (section 2.1);

- The report is made, to the CEO, a nominated Public Interest Disclosure Officer or Public Interest Disclosure Coordinator, an investigating authority, or, in limited and specific circumstances, an MP or journalist; and
- The person making the report must honestly believe on reasonable grounds that the report shows or tends to show wrongdoing.

There is an assumption that the public official making the disclosure has an honest belief that the report shows or tends to show wrongdoing in the absence of evidence to the contrary.

Protection is not available for disclosures which:

- principally question the merits of government policy; or
- are made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

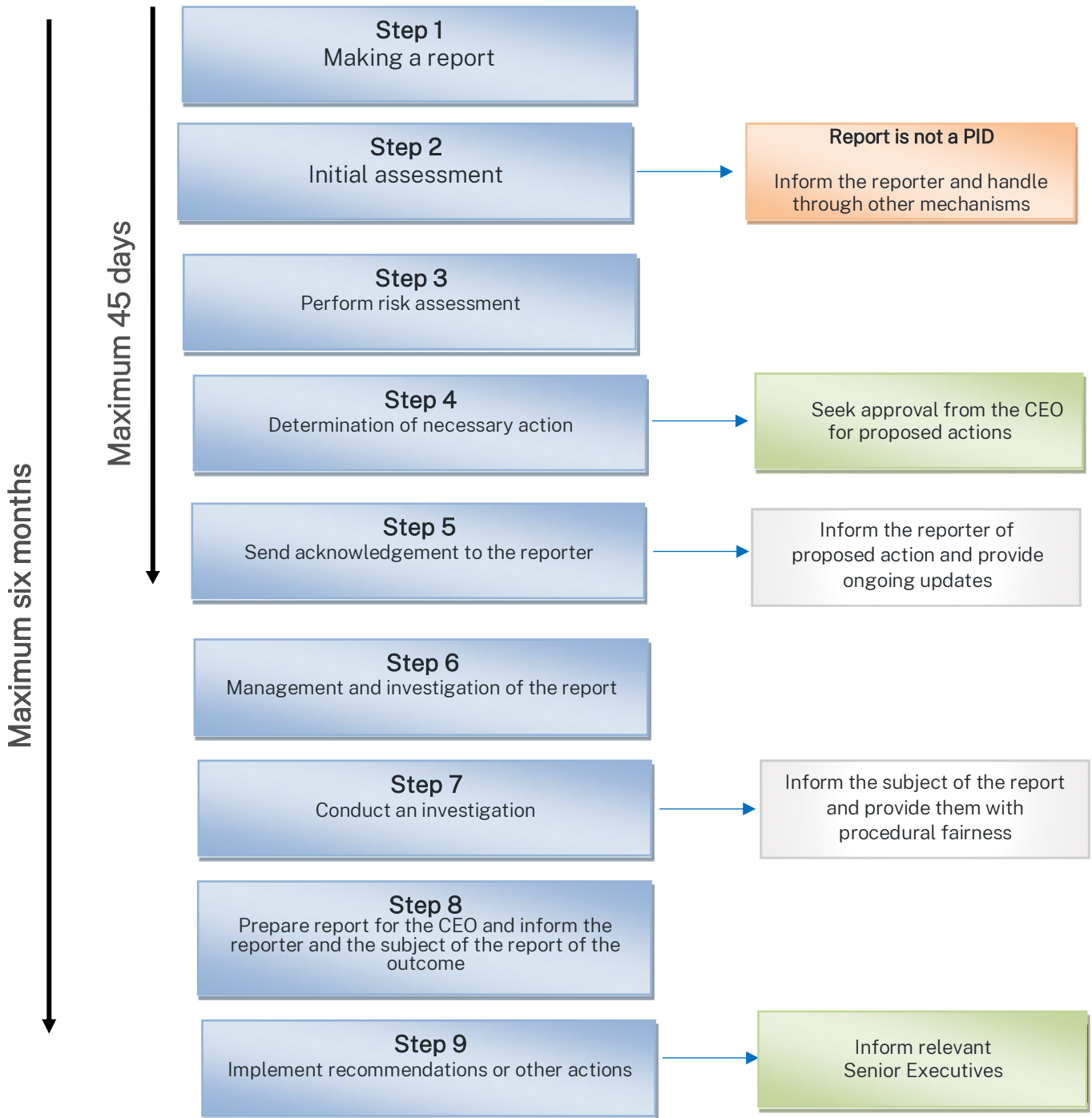
### **Sanctions for making false or misleading disclosures**

It is a criminal offence under the PID Act to wilfully make a false statement, mislead, or attempt to mislead an investigating authority, public authority or public official when making a disclosure to them.



### 3. Procedure for Public Interest Disclosures

The following figure represents WPCA’s procedure for handling public interest disclosures:



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## Step 1: Making a report

### How to make a report

- **Form of reports**

Staff can report wrongdoing in writing or verbally. Staff are encouraged to make a report in writing as this can help to avoid any confusion or misinterpretation. WPCA's [PID Reporting Form \(Attachment A\)](#) is attached to enable staff to make a report.

Staff may confidentially contact PID Officers or the PID Coordinator, Lyndsay Brooker, Executive Director Governance by email at [lyndsay.brooker@wpcasidney.com.au](mailto:lyndsay.brooker@wpcasidney.com.au).

Staff can also request a private meeting away from the workplace if they are concerned about making the report in the workplace.

If a report is made verbally, the person receiving the report will make a record of the report and ask the reporter to sign this record. The reporter should keep a copy of this record. See Record of Initial Discussion (Attachment B).

- **Can a report be anonymous?**

There may be some situations where staff do not want to identify themselves when making a disclosure. Although anonymous disclosures will still be dealt with appropriately by WPCA, it is best if reporters identify themselves. Identification allows WPCA to provide reporters with any necessary protection and support, as well as feedback about the outcome of any investigation into the disclosure.

It is also important to realise that an anonymous disclosure may not prevent the reporter from being identified by some people. If WPCA does not know who made the disclosure, it may not be possible to prevent reprisal action (section 2.2) under the PID Act.

See information about [anonymous reporting](#) on the NSW Ombudsman website.

- **Support for reporters**

WPCA will make sure that reporters, regardless of whether their report is treated as a public interest disclosure, are provided with access to any professional support they may need as a result of the reporting process – such as stress management or counselling services. WPCA staff may have access to the [Employee Assistance Program \(EAP\)](#).

Access to support may also be available for other staff involved in the internal reporting process where appropriate. Reporters and other staff involved in the process may discuss their support options with the Public Interest Disclosure Coordinator.

- **Who can receive a public interest disclosure within WPCA?**

Staff are encouraged to report general wrongdoing to their supervisor. However, the PID Act requires that, for a report to be a public interest disclosure, it must be made to certain individuals identified in this policy (namely the WPCA CEO or an authorised Public Interest Disclosure Officer, or the Public Interest Disclosure Coordinator). The contact details for staff authorised to receive a public interest disclosure can be found under WPCA Contacts (section 5.1) below.

Any supervisor or staff member authorised to receive a report that they believe may be a public interest disclosure is obliged to assist the staff member to make the report to the Public Interest

Disclosure Coordinator.

- **External reporting**

Staff are encouraged to report wrongdoing within WPCA, but internal reporting is not the only option. The PID Act also provides protection for reports made to certain external investigating authorities and, in limited circumstances, to a Member of Parliament or a journalist. Contact details and further information about making external reports can be found at the end of this policy (section 5.2).

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## **Step 2: Initial assessment**

The Public Interest Disclosure Coordinator will conduct an initial assessment of the disclosure to determine if the report meets the criteria for a public interest disclosure. See section 2.1.

Where the initial assessment clearly shows that the report is not a public interest disclosure, the reporter will be informed of this outcome.

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## **Step 3: Perform risk assessment to identify any risks to the reporter**

After confirming the report is a public interest disclosure, the Public Interest Disclosure Coordinator will conduct a risk assessment.

The Public Interest Disclosure Coordinator will use this to identify any risks to the reporter for reprisal in making the report, and to develop strategies to deal with those risks.

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## **Step 4: Determination of necessary action**

If the disclosure meets the relevant criteria, the Public Interest Disclosure Coordinator will determine how the matter is to be actioned and will seek the CEO's approval of a proposed plan to address the matter, for example, to conduct a preliminary fact finding investigation.

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## **Step 5: Send acknowledgement to the reporter**

Following the CEO's approval, the Public Interest Disclosure Coordinator will provide the reporter with:

- a written acknowledgement of receipt of the disclosure. The acknowledgement should notify the reporter that they must maintain the confidentiality of their disclosure.
- a copy of this policy, as required by section 6D(1A) of the PID Act.
- proposed action and/or a timeframe for when further updates will be received.
- the name and contact details of the people who can advise what is happening.

The PID Act requires that WPCA send a written acknowledgement within 45 days of receipt of the disclosure. However, WPCA should send a written acknowledgement as soon as possible. Please see Attachment C – "Confirmation of information provided to individual reporting wrongdoing".

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If a report is made which meets the requirements of the PID Act but the report was made under a statutory or legal obligation or incidental to the performance of the reporter's day to day functions, the reporter will not receive an acknowledgement letter or a copy of this policy.

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## Step 6: Management and investigation of report

The Public Interest Disclosure Coordinator will oversee the management and investigation of any disclosures. They will be responsible for keeping the reporter informed of any action taken or proposed to be taken in respect of the disclosure.

### Action to deal with the disclosure

The different actions that can be taken to deal with the disclosure include:

- Preliminary or informal investigation
- Formal investigation
- Prosecution or disciplinary action
- Referral to an investigating authority for investigation or other appropriate action (see section 5.2)
- Referral to the Commissioner of Police (if a criminal matter).

### Action to protect against reprisals

If appropriate in the circumstances, the CEO may consider issuing specific directions to help protect against reprisals, including:

- Issuing warnings to those alleged to have taken reprisal action against the reporter
- Relocating, within the current workplace, the reporter or the person alleged to have taken reprisal action
- Transferring the reporter or the person alleged to have taken reprisal action to another position for which they are qualified
- Granting the reporter or the person the subject of the disclosure leave of absence during the investigation of the disclosure.

Any directions in relation to the reporter will be made in consultation with them.

### Inform the reporter

All reporters will be given:

- Information about the action that will be taken in response to the disclosure
- Likely timeframes for any investigation
- Information about the resources available within WPCA to handle any concerns the reporter may have
- Information about external agencies and services for support.

**If it is decided to conduct an investigation, proceed to step 7. Otherwise, proceed to step 9.**

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## Step 7: Conduct an investigation, inform the subject of the disclosure

### Appointment of investigator

WPCA may appoint an external investigator to undertake an investigation. The reporter will be advised if an investigation is to occur and the Public Interest Disclosure Coordinator will liaise with the reporter and any other staff regarding the investigation, including organising times for witnesses to be interviewed.

### Procedural fairness and support for the subject of a disclosure

Procedural fairness will generally require that staff who are the subject of disclosures be informed of the substance of the claims against them and be given a reasonable opportunity to respond to the allegations made about them or any adverse findings made about them following the investigation.

WPCA is committed to fair and reasonable treatment of the subject of a disclosure of wrongdoing. Subjects of disclosures will be:

- Treated impartially
- Told their rights and obligations under WPCA policies and procedures
- Kept informed during any investigation
- Given the opportunity to respond to any disclosure made against them or any adverse finding made against them
- Told the result of any investigation.

### Communications with the reporter

During any investigation, the Public Interest Disclosure Coordinator will communicate with the reporter and will provide:

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

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## Step 8: Prepare report for the CEO

A confidential report on any matter that is investigated is prepared by the investigator and promptly submitted to the CEO, noting the requirement to complete the consideration of a disclosure within six months from the date of the initial report under the PID Act.

### Inform the reporter of the outcome

At the end of any investigation, the Public Interest Disclosure Coordinator will provide the reporter with:

- Enough information to show that adequate and appropriate action was taken and/or is proposed to be taken in response to the disclosure and any problem that was identified
- Any recommendations made following the investigation of the disclosure

- Advice about whether the public official may be involved as a witness in any further matters, such as disciplinary or criminal proceedings.

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## Step 9: Implement recommendations or other actions

The implementation of the recommendations as a result of the investigation or other actions will be communicated to the relevant Senior Executives, as required.

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## 4. Responsibilities

### CEO

- assess reports received by or referred to them, to determine whether or not the report should be treated as a public interest disclosure, and to decide how the report will be dealt with
- ensure WPCA has a policy and procedures for receiving, assessing and dealing with public interest disclosures
- ensure WPCA staff are aware of the policy and procedures for making public interest disclosures and of the protections provided by the PID Act
- ensure compliance with the policy and WPCA's obligations under the PID Act
- ensure the policy designates at least one officer of WPCA as being responsible for receiving public interest disclosures on behalf of the authority
- provide Annual and six monthly reports to the NSW Ombudsman in compliance with the PID Act
- report actual or suspected corrupt conduct to the ICAC, and to Police in the case of potential criminal offences.

### Public Interest Disclosure Coordinator

- maintain confidentiality when possible and appropriate
- support reporters and take all reasonable steps to protect them from reprisal
- ensure staff who are the subject of a disclosure are treated fairly and reasonably
- assess each report to determine whether it is a public interest disclosure within the meaning of the PID Act
- determine the appropriate action to be taken in relation to the disclosure
- if considered appropriate, coordinate any internal investigation arising out of a disclosure
- report on the findings of any investigation and recommend or determine any further action.

**Public Interest Disclosure Officer**

- maintain confidentiality when possible and appropriate
- support reporters and take all reasonable steps to protect them from reprisal
- ensure staff who are the subject of a disclosure are treated fairly and reasonably
- provide reports to Coordinator for them to assess each report to determine whether it is a public interest disclosure within the meaning of the PID Act.

**Executives and managers**

- ensure that all staff for whom they have responsibility are aware of their roles and responsibilities under this policy and procedures
- support reporters and take all reasonable steps to protect them from reprisal
- report to the Public Interest Disclosure Coordinator or the CEO any suspicions of reprisal action
- maintain the confidentiality of staff known or suspected to have made a public interest disclosure
- act fairly towards staff who are the subject of a disclosure which is under consideration or investigation.

**Staff**

- be familiar and comply with this policy
- report incidences of corrupt conduct, maladministration, serious and substantial waste of public money, government information contravention and local government pecuniary interest contravention in accordance with the PID Act
- support reporters, including abstaining from any activity that is or could be perceived to be a reprisal
- maintain the confidentiality of staff they know or suspect to have made a public interest disclosure.

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## 5. Contacts and external reporting

### 5.1 WPCA Contacts

All WPCA Band 1, 2 and 3 Senior Executives (CEO, Executives and Directors) are authorised **Public Interest Disclosure Officers**.

The **Public Interest Disclosure Coordinator** is the Executive Director, Governance, Lyndsay Brooker.

- Level 2, 10 Valentine Ave, Parramatta 2150

In addition, staff can also report to the CEO, Dr Sarah Hill.

- Level 2, 10 Valentine Ave, Parramatta

Staff are encouraged to make a report by completing the Public Interest Disclosure Reporting Form (Attachment A).

## 5.2 Further information about external reporting

WPCA encourages internal reporting of wrongdoing, however external reporting options are available under the PID Act. If staff follow the guidance below, their report can still be a public interest disclosure.

External reports will be handled in line with the policies and procedures of the recipient, not those of WPCA.

Staff can choose to make their report to an external investigating authority. Staff can do this first, or at any stage after their initial internal report. If their report is about the CEO, staff should make it to an investigating authority in the first instance.

Staff can also choose to make a report to a member of Parliament or a journalist, but only in limited circumstances.

### Investigating Authorities

Under the PID Act, some of the investigating authorities that staff can make public interest disclosures to, and the categories of wrongdoing each authority can deal with, are:

#### For disclosures about corrupt conduct:

##### Independent Commission Against Corruption (ICAC)

Phone: 02 8281 5999

Toll free: 1800 463 909

Tel. typewriter (TTY): 02 8281 5773

Facsimile: 02 9264 5364

Email: [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au)

Web: [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au)

Address: Level 7, 255 Elizabeth Street, Sydney NSW 2000

#### For disclosures about maladministration:

##### NSW Ombudsman

Phone: 02 9286 1000

Toll free (outside Sydney metro): 1800 451 524

Tel. typewriter (TTY): 02 9264 8050

Facsimile: 02 9283 2911

Email: [nswombo@ombo.nsw.gov.au](mailto:nswombo@ombo.nsw.gov.au)

Web: [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au)

Address: Level 24, 580 George Street, Sydney NSW 2000

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

##### Auditor-General

Phone: 02 9275 7100



Facsimile: 02 9275 7200  
Email: [mail@audit.nsw.gov.au](mailto:mail@audit.nsw.gov.au)  
Web: [www.audit.nsw.gov.au](http://www.audit.nsw.gov.au)  
Address: Tower 2 Darling Park, 201 Sussex Street, Sydney NSW 2000

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

#### **Information Commissioner**

Toll free: 1800 472 679  
Facsimile: 02 8114 3756  
Email: [ipcinfo@ipc.nsw.gov.au](mailto:ipcinfo@ipc.nsw.gov.au)  
Web: [www.ipc.nsw.gov.au](http://www.ipc.nsw.gov.au)  
Address: Level 15, McKell Building, 2-24 Rawson Place, Haymarket NSW 2000

Staff should contact the relevant authority for advice about how to make a public interest disclosure to it.

Staff should be aware that it is very likely the investigating authority will discuss the case with WPCA. WPCA will assist and cooperate with the investigating authority and will support staff who report wrongdoing to an investigating authority.

### **Members of Parliament or journalists**

To have the protections of the PID Act, staff reporting wrongdoing to a Member of Parliament or a journalist must have already made substantially the same disclosure either to:

- the CEO,
- the Public Interest Disclosure Coordinator,
- a Public Interest Disclosure Officers and / or
- an investigating authority in accordance with the PID Act.

and WPCA or the investigating authority that received the disclosure must have either:

- decided not to investigate the matter
- decided to investigate the matter but not completed the investigation within six months of the original report
- investigated the matter but not recommended any action as a result, or
- not notified the person who made the report, within six months of the report being made, whether the matter is to be investigated.

Most importantly – to be protected under the PID Act – the reporter must have reasonable grounds for believing the disclosure is substantially true and must be able to prove the disclosure is in fact substantially true (section 2.3).

A disclosure to a person or an organisation not listed above or not listed in the PID Act will not be protected under the PID Act (section 2.3).

# Attachment A

## Public Interest Disclosure Reporting Form

This document needs to be completed by individual reporting wrongdoing and submitted to a Nominated Disclosure Officer.

Details of Reporter (an anonymous report can be made)		
Name:		
Position:		
Division/Unit:		Preferred method of contact
Telephone:		<input type="checkbox"/>
Email:		<input type="checkbox"/>
Postal address:		<input type="checkbox"/>
Details of the matter being reporting		
Description of the wrongdoing being reported – What happened? Where did this happen? When did this happen? <i>(Attach additional page if required)</i>		
Name and position of people involved		
How did you become aware of this?		
List and/or attach any additional relevant information or supporting evidence		
Name and position of other people that may have additional information relating to this matter		
<i>I have made this report voluntarily and I honestly believe that the matter I am reporting shows or tends to show wrongdoing has occurred.</i>		
Signature – Reporter	Date	

## Attachment B

### Public Interest Disclosure - Record of initial discussion with individual reporting wrongdoing

**To be completed by nominated Disclosure Officer**

Date report received by nominated disclosure officer		<input type="checkbox"/> Verbal report	<input type="checkbox"/> Written report
<b>Confidentiality</b>			
Who else knows that the report is being made?			
Is the reporter concerned their identity will become known? Why?			
Is the reporter concerned that they may suffer reprisal action for making the report? From whom?			
What professional relationship does the reporter have with the subject?			
<b>Previous reporting</b>			
Has this matter been reported to another person within the WPCA or to another organisation?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, who was it reported to when was it reported and what action was/is being taken?			
Is the reporter currently / previously been the subject of		<input type="checkbox"/> Yes	<input type="checkbox"/> No
- performance issues		<input type="checkbox"/> Yes	<input type="checkbox"/> No
- disciplinary proceedings		<input type="checkbox"/> Yes	<input type="checkbox"/> No
- criminal investigation in relation to the subject matter?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, record details			
<b>Support</b>			
If the reporter wants a support person – who did they request?			
What does the reporter expect from this process?			
<b>Information provided to reporter:</b>			
<input type="checkbox"/> The contact details of the PID Coordinator and an explanation of their role and responsibilities in this process.			
<input type="checkbox"/> An acknowledgement will be sent within 2 working days along with a copy of the relevant policy			

Information provided to reporter:	
<input type="checkbox"/>	Within 40 working days the PID Coordinator will complete an assessment of the report to ensure it meets the criteria of a PID and will contact the reporter in 10 working days of the assessment to advise the determination.
<input type="checkbox"/>	Within six months the Authority has to provide the reporter with details of what action has been taken or will be taken in relation to their report.
<input type="checkbox"/>	The reporter should contact the PID Coordinator if they have any questions or concerns during the process.
<input type="checkbox"/>	The Authority will take all appropriate steps to keep the identity of the reporter confidential – provide reasons where this may not be possible.
<input type="checkbox"/>	Advised reporter of the importance of maintaining confidentiality about this report and the process.
<input type="checkbox"/>	The Authority will implement appropriate strategies to protect the reporter from detrimental action in reprisal for making the report and respond to any occurrence of this type of behavior.
<input type="checkbox"/>	If the reporter believes detrimental action is being taken against them they need to advise the PID Coordinator, CEO or support person ASAP.
<input type="checkbox"/>	Provided employee assistance program contact details.
<input type="checkbox"/>	If verbal report - copy of PID form provided to reporter.
<b>Signature – Nominated Disclosure Officer</b>	<b>Date</b>

Initial assessment:		
What is the category of wrongdoing?		
<input type="checkbox"/> Corrupt Conduct	<input type="checkbox"/> Contravention of the pecuniary interest of LGA	
<input type="checkbox"/> Maladministration	<input type="checkbox"/> Grievance	
<input type="checkbox"/> Serious & Substantial Waste	<input type="checkbox"/> Other	
<input type="checkbox"/> Contravention of the GIPA Act		
Reporter is a public official	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Matter reported is about the conduct of public official or public authority	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The reporter has an honest belief on reasonable grounds that the information they have reported shows or tends to show the alleged conduct	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The report does not principally involve questioning the merits of government policy	<input type="checkbox"/> Yes	<input type="checkbox"/> No
There is no reason to conclude that the report was made solely or substantially with the motive of avoiding dismissal or other disciplinary action	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Signature – Nominated Disclosure Officer</b>	<b>Date</b>	

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## Attachment C

### Public Interest Disclosure - Confirmation of information provided to individual reporting wrongdoing

(Disclosure Officer to hand this document to the individual reporting wrongdoing and to discuss each point. All points checked and signed off by reporter and handed back to Disclosure Officer for filing).

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Please confirm that the following information was raised with you by the nominated disclosure officer during the initial discussion about your report of wrongdoing:

- Explanation of the internal reporting and public interest disclosure process and procedures.
- The name and contact details of the PID Coordinator.
- Explanation of the role and responsibility of the PID Coordinator.
- That an acknowledgement will be sent to you within two (2) days together with a copy of relevant policies and procedures.
- That the assessment will be completed within 40 working days and the determination advised within 10 working days.
- That the Authority is required to provide you with details of what action has been taken or will be taken in relation to this report with six months.
- That the Authority will take appropriate steps to keep your identity confidential and that there may be reasons where this is not possible.
- The importance of you maintaining confidentiality regarding this report and not discussing with other people.
- That the Authority will implement appropriate strategies to protect you from reprisal action that may result from making the report and will respond to any reprisal action that may occur.
- The contact details for the employee assistance program.
- The option of requesting a support person.
- Your preferred method of contact.

Name of reporter: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# Western Parkland City Authority

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Level 2, 10 Valentine Avenue  
Parramatta NSW 2150

T: 1800 312 999  
E: [hello@wpcasidney](mailto:hello@wpcasidney)  
W: [wpcasidney](http://wpcasidney)

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