

Reporting Wrongdoing at UNE Policy

Section 1 - Purpose and scope

(1) This policy establishes a framework at the University of New England (UNE) for reporting and investigating allegations of wrongdoing, without fear of reprisal.

(2) This framework sets out:

- a. how UNE will deal with a report of wrongdoing and UNE's other responsibilities under the [Public Interest Disclosures Act 2022](#) (PID Act) and the protection of whistleblower provisions in the [Corporations Act 2001](#) (Cth) (Corporations Act) Part 9.4AAA;
- b. how UNE will support and protect a person who makes a report;
- c. who to contact if anyone at UNE wants to make a report;
- d. how to make a report; and
- e. the protections that are available to a person making a report under the [PID Act](#) and the [Corporations Act](#).

(3) This policy documents UNE's commitment to building a 'speak up' culture by having in place a framework that facilitates public interest reporting of wrongdoing by:

- a. protecting those who speak up from detrimental action; and
- b. imposing duties on UNE when it receives reports of wrongdoing to take appropriate action to investigate or otherwise deal with them.

Purpose

(4) 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).

(5) The University of New England (UNE) takes reports of serious wrongdoing seriously. UNE is 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 UNE relies upon its staff, volunteers, contractors, and subcontractors speaking up when they become aware of wrongdoing.

(6) This policy outlines what members of the UNE community should do if they suspect serious wrongdoing at UNE or other government agencies.

(7) This policy should be read in conjunction with the UNE Code of Conduct and associated information.

Principles

(8) The University of New England (UNE) is committed to:

- a. supporting a 'speak up' culture.
 - i. It encourages anyone who is concerned about possible wrongdoing to report it;
 - ii. It will provide support to staff and affiliates and public officers who do so.

- b. complying with the [PID Act](#) and the 'Protection for whistleblowers' provisions that are set out in Part 9.4AA of the [Corporations Act](#).
- c. dealing with reports confidentially and taking reasonable steps to protect the identify of any person making a public interest disclosure.
- d. dealing with all reports thoroughly and impartially and conducting investigations where appropriate.
- e. keeping individuals who make reports, informed of their progress and the outcome, and ensuring they have access to support as required.
- f. ensuring managers and supervisors at all levels in the University understand the benefits of reporting wrongdoing, are familiar with this policy, and are aware of and sensitive to the concerns and support needs of those who report wrongdoing.
- g. provide adequate resources to:
 - i. encourage reports of wrongdoing;
 - ii. protect and support those who make reports of wrongdoing;
 - iii. support those who are the subject of a report of wrongdoing;
 - iv. provide training for staff about how to make reports and the benefits of internal reports to the University and the public interest generally;
 - v. properly assess and investigate or otherwise deal with reports;
 - vi. properly manage any workplace issues that the allegations identify or that result from a report; and
 - vii. appropriately address any identified problems.

Accessibility of this policy

(9) This policy is available in the policy register of UNE's publicly available website and is brought to the attention of all staff of UNE on their commencement and through regular training.

(10) A copy of the policy is also sent to all staff of UNE on their commencement.

(11) A hard copy of the policy can be requested from the [Governance Directorate](#).

The policy

(12) Within this policy:

- a. Part A sets out the overview and scope;
- b. Part B outlines how to make a report of serious wrongdoing;
- c. Part C outlines the protections in place for various reports of wrongdoing;
- d. Part D outlines how UNE will deal with reports of serious wrongdoing;
- e. Part E outlines the review and dispute process;
- f. Part F outlines other university obligations;
- g. Part G outlines the procedures for making and receiving protected disclosures under the Corporations Act; and
- h. Part H details outlines Roles and Responsibilities of UNE staff.

Part A - Overview and scope

Scope

(13) This policy will provide a person who would like to make a report with information on the following:

- a. ways they can report serious wrongdoing including making a voluntary PID to UNE under the PID Act;

- b. the names and contact details for the nominated disclosures officers in UNE;
- c. the roles and responsibilities of people who hold roles under the PID Act and who are employees of UNE;
- d. what information they will receive once they have made a voluntary PID;
- e. protections available to people who make a report of serious wrongdoing under the PID Act and what we will do to protect them;
- f. UNE procedures for dealing with disclosures;
- g. UNE procedures for managing the risk of detrimental action and reporting detrimental action;
- h. UNE record-keeping and reporting requirements; and
- i. how UNE will ensure it complies with the PID Act and this policy.

(14) If a person who would like to make, or has made, a report requires further information about this policy, how public interest disclosures will be handled at UNE or the PID Act they can:

- a. confidentially contact a nominated disclosures officer within UNE here;
- b. contact the PID Advice Team within the NSW Ombudsman by phone: (02) 9286 1000 or email: pidadvice@ombo.nsw.gov.au; or
- c. access the NSW Ombudsman's PID guidelines which are available on its website.

(15) If a person who would like to make, or has made, a report requires legal advice with respect to the PID Act or their obligations under the PID Act, they may need to seek independent legal advice at an individual's cost unless prior approval from the Vice-Chancellor is provided.

Who does this policy apply to?

(16) This policy applies to, and is for the benefit of, all public officials in NSW.

(17) A public official is defined in section 14 of the [PID Act](#).

(18) For UNE this includes:

- a. an employee of UNE, including an employee of a controlled entity of UNE;
- b. 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;
- c. a statutory officer;
- d. a person providing services or exercising functions on behalf of UNE, including a contractor, subcontractor, or volunteer; or
- e. an employee, partner or officer of an entity that provides services, under contract, subcontract or other arrangement, on behalf of UNE or exercises the functions of UNE and are involved in providing those services or exercising those functions.

(19) The Vice-Chancellor and Chief Executive Officer (VC&CEO), Disclosures Coordinator (Chief Audit Executive), Disclosures Officers, Chair of UNE Council's Audit and Risk Committee, and managers within UNE have specific responsibilities under the [PID Act](#). This policy also provides information on how people in these roles will fulfill their responsibilities.

Who does this policy not apply to?

(20) This policy does not apply to people who are not public officials, such as:

- a. students of UNE (subject to clause 37-38);
- b. people who have received services from UNE and want to make a complaint about those services; or

- c. individuals or entities who provide services to UNE.

(21) This means that if a person is not a public official, this policy will not apply to their report of serious wrongdoing. There are some circumstances where this can be deemed to be a voluntary PID (see clause 51-55).

(22) However, a person who is not within the scope of this policy may still make a complaint to UNE. This can be done by the complaints and grievance processes.

(23) This policy is not intended to be used for personal work-related staff grievances.

Part B - How to make a report of serious wrongdoing

Reports, complaints, and grievances

(24) Staff are encouraged to report suspected or possible wrongdoing at UNE.

(25) When a public official within the UNE community reports a suspected or possible wrongdoing at UNE, their report will be a PID if it has certain features which are set out in the [PID Act](#).

(26) Some internal complaints or internal grievances may also be PIDs, if they have the features of a PID.

(27) If an internal complaint or grievance is a report of serious wrongdoing, UNE will consider whether it is a PID. If it is a PID, UNE will deal with it as set out in this policy but will also follow any other applicable and relevant policy such as the Fraud and Corruption Control Policy.

Types of Public Interest Disclosures (PID)

(28) A report of suspected or possible serious wrongdoing occurring at UNE will be a PID if it has certain features which are set out in the PID Act. There are three types of PID in the PID Act. These are:

- a. Voluntary PID – this is a PID where a report has been made by a public official (which includes a UNE employee) because they decided, of their own accord, to come forward and disclose what they know.
- b. 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 UNE.
- c. 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.

(29) This policy applies mostly to making a voluntary PID and how UNE 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 this policy under the heading 'Protections'.

Voluntary PIDs

(30) Voluntary PIDs are most often in mind when people 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.

(31) A report is a voluntary PID if it has the following five features which are set out in sections 24-27 of the [PID Act](#):

- a. A report is made by a public official;
- b. It is made to a person who can receive voluntary PIDs;

- c. The public official honestly and reasonably believes that the information they are providing shows, or tends to show, serious wrongdoing;
- d. The report was made orally or in writing; and
- e. The report is voluntary (meaning it is not a mandatory or witness PID).

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

(33) A person making a report is not expected to prove that what they reported happened or is serious wrongdoing. However, a reporter must honestly believe, on reasonable grounds, that the information they are reporting shows or tends to show serious wrongdoing.

(34) Even though a person making a report does not have to prove the serious wrongdoing happened or provide evidence, an allegation with no supporting information is unlikely to meet this test.

(35) If UNE makes an error and does not identify that a reporter has made a voluntary PID, the reporter will still be entitled to the protections under the [PID Act](#).

(36) If the person making a report believes UNE has made an error by not identifying that they have made a voluntary PID, they should raise this with a nominated Disclosures Officer or contact officer for the report. If they are still not satisfied with this outcome, they can seek an internal review, or the UNE may seek to conciliate the matter. A person making a report may also contact the [NSW Ombudsman](#). Further information on rights to internal review and conciliation is found in this document under Part E – Review and Dispute Resolution.

Who can make a voluntary PID?

(37) Any public official can make a voluntary PID. A person making a report is a public official if:

- a. they are employed by UNE, or by a controlled entity of UNE;
- b. they are a contractor, subcontractor or volunteer who provides services, or exercises functions, on behalf of UNE; or
- c. they work for an entity that is contracted by UNE to provide services or exercise functions on behalf of UNE, so long as they are involved in undertaking that contracted work.

(38) A public official can make a PID about serious wrongdoing relating to any agency, not just UNE. This means that UNE may receive PIDs from public officials outside of UNE. It also means that a UNE staff member can make a PID to any agency, including an integrity agency such as the [Independent Commission Against Corruption](#) (ICAC) and the [NSW Ombudsman](#). A list of integrity agencies can be found in Appendix B of this policy.

What is serious wrongdoing?

(39) Reports must be one or more of the following categories of serious wrongdoing to be a voluntary PID. This is in addition to having the features set out in Clause 31 of this policy. Serious wrongdoing is defined in the [PID Act](#) as:

- a. corrupt conduct – such as a University employee accepting a bribe;
- b. serious maladministration – such as UNE systematically failing to comply with proper recruitment processes when hiring staff, or failing to follow its procurement processes when selecting contractors;
- c. a government information contravention – such as destroying, concealing or altering records to prevent them from being released under a Government Information Public Access (GIPA) application;
- d. a pecuniary interest contravention – such as a senior University staff member recommending a family member for a University contract and not declaring the relationship/ conflict of interest;
- e. a privacy contravention – such as unauthorised access of a student's academic transcripts or other personal

information on UNE's database; or

- f. a serious and substantial waste of public money – such as UNE not following a competitive tendering process when contracting with entities to undertake construction or maintenance work.

(40) When a person makes a report, they do not need to state to UNE what category of serious wrongdoing they are reporting or that they are reporting serious wrongdoing.

Who can I make a voluntary PID to?

(41) For a report to be a voluntary PID it must be made to certain public officials as described below:

- a. A person making a report, can make it inside UNE to any staff member identified in Annexure A of this policy.

Making a report to a recipient outside of UNE

(42) A person wishing to make a report can also make it to a public official in another agency (meaning an agency other than UNE or another agency that they do not work for) or an integrity agency. These include:

- a. the head of another agency – this means the head of any public sector service agency;
- b. an integrity agency – a list of integrity agencies is located at Annexure B of this policy;
- c. a Disclosures Officer for another agency – ways to contact Disclosures Officers for other agencies is in an agency's PID policy which can be found on their public website; or
- d. a minister or a member of a minister's staff but the report must be made in writing.

(43) If a reporter chooses to make a disclosure outside of UNE, it is possible that their disclosure will be referred to UNE so that appropriate action can be taken.

Making a report to a member of parliament or a journalist

(44) Disclosures to members of parliament (MPs) or journalists are different to other reports. A person can only disclose a report of wrongdoing as a voluntary PID to an MP or journalist in the following circumstances:

- a. They must have first made substantially the same disclosure (described here as a 'previous disclosure') to someone who can receive disclosures.
- b. The previous disclosure must be substantially true.
- c. They did not make the previous disclosure anonymously.
- d. They did not give a written waiver of their right to receive information relating to their previous disclosure.
- a. They did not receive the following from UNE:
 - i. Notification that UNE will not investigate the serious wrongdoing and will also not refer the previous disclosure to another agency; or
 - ii. The following information at the end of the investigation period:
 - notice of UNE's decision to investigate the serious wrongdoing.
 - a description of the results of an investigation by UNE into serious wrongdoing
 - details of proposed or recommended corrective action by UNE because of the previous disclosure or investigation.

(45) Investigation period means:

- a. after six months from the previous disclosure being made; or
- b. after 12 months if a person making a report applied for an internal review of UNE's decision within six months of

making the disclosure.

(46) If all the above conditions are met, the disclosure from the person making a report to an MP or journalist may be a voluntary PID.

What form should a voluntary PID take?

(47) A person making a report can make a voluntary PID:

- a. in writing – this could be an email or letter to a person who can receive a voluntary PID;
- b. orally – have a private discussion with a person who can receive a voluntary PID. This can be face-to-face, on the telephone or virtually; or
- c. anonymously – a person may write an email or call a member of staff listed in Annexure A, who can receive voluntary PIDs to make a report without providing their name or anything that might identify them 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 a person making a report chooses to remain anonymous, they will still be protected under the PID Act. However, it may be difficult for UNE to investigate the matter(s) disclosed if UNE cannot contact the person making the report for further information.

What should I include in my report?

(48) A person making a report should provide as much information as possible so that UNE can deal with the report effectively. The type of information a person making a report should include is (a template for written reports can be used):

- a. date, time, and location of key events;
- b. names of person(s) involved in the suspected wrongdoing, their role, title and how they are involved;
- c. the person making the report's relationship with the person(s) involved, such as whether they work closely with them;
- d. the person making the report's explanation of the matter they are reporting;
- e. possible witnesses; and
- f. other information they have that supports their report.

What if I am not sure if my report is a PID?

(49) The UNE community is encouraged to report all wrongdoing they become aware of regardless of whether they think it is serious wrongdoing. It is important for UNE to understand what is or what may be occurring.

(50) UNE is responsible for making sure all reports are handled appropriately under the [PID Act](#), or if it not a PID, in accordance with relevant policies or other legislation. Even if a report is not a PID, it may fall within another one of UNE's policies for dealing with [reports, allegations, or complaints](#).

Deeming that a report is a voluntary PID

(51) The Vice-Chancellor and CEO 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'.

(52) By deeming that a report is a voluntary PID, it ensures that reporters are provided with protections under the [PID Act](#).

(53) If a person is making a report that has not met all the requirements of a voluntary PID, they can refer their matter to Vice-Chancellor and CEO to request that the Vice-Chancellor and CEO consider deeming their report to be a

voluntary PID.

(54) A decision to deem a report to be a voluntary PID is at the discretion of the Vice-Chancellor and CEO.

(55) For more information about the deeming power, see the NSW Ombudsman's guideline '[Deeming that a disclosure is a voluntary PID](#)'.

Who can I talk to if I have questions or concerns?

(56) If anyone has concerns or questions about this policy or reporting wrongdoing at UNE, they are encouraged to contact the Director Governance and University Secretary at governance@une.edu.au or via phone +61 2 6773 1241.

Part C - Protections

How is the maker of a voluntary PID protected?

(57) When someone makes a voluntary PID they receive special protections under the [PID Act](#).

(58) UNE is committed to taking all reasonable steps to protect anyone from detriment because of having made a PID. UNE is also committed to maintaining their confidentiality as much as possible while the PID is being dealt with.

(59) UNE will not tolerate any type of detrimental action being taken against an individual because they have made a report, might make a report, or are believed to have made a report.

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

a. Protection from detrimental action

- i. A person cannot take detrimental action against another person because they have made a voluntary PID or are considering making a voluntary PID. Detrimental action includes bullying, harassment, intimidation, or dismissal.
- ii. Once UNE becomes aware of a voluntary PID by a person employed or otherwise associated with UNE that concerns serious wrongdoing relating to UNE has been made, UNE will undertake a risk assessment and take steps to mitigate the risk of detrimental action occurring against the person who made the voluntary PID.
- iii. 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.
- iv. A person may seek compensation where unlawful detrimental action has been taken against them.
- v. 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 under the [PID Act](#).

b. Immunity from civil and criminal liability

- i. Some UNE employees may be subject to a duty of confidentiality that prevents them disclosing certain information that they obtain or become aware of at work. Sometimes, to make a PID, a UNE employee will need to breach or disregard such confidentiality duties. If that happens, a UNE employee cannot be disciplined, sued, or criminally charged for breaching confidentiality.

c. Protection from liability for own past conduct

- i. 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.

Protections for people who make mandatory and witness PIDs

(61) There are other types of reports that are recognised as PIDs under the PID Act, other than PIDs made voluntarily by public officials.

- a. A mandatory PID: 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 at UNE.
- b. A witness PID: is a PID where a person discloses information during an investigation or serious wrongdoing following a request or requirement of the investigator.

(62) Protections for makers of mandatory and witness PIDs are detailed in Table 1 below:

Protection	Mandatory PID	Witness PID
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.	Yes	Yes
Right to compensation – a person can initiate proceedings and seek compensation for injury, damage or loss suffered because of detrimental action being taken against them.	Yes	Yes
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.	Yes	Yes
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: 1. breaching a duty of secrecy or confidentiality, or 2. breaching another restriction on disclosure.	Yes	Yes

Reporting detrimental action

(63) If anyone experiences adverse treatment or detrimental action, such as bullying or harassment, they should report this immediately. A person can report any experience of adverse treatment or detrimental action directly to the Disclosures Coordinator, or to an integrity agency.

General support

(64) UNE's Employee Assistance Program (EAP) can be contacted to provide UNE staff with independent and confidential support.

(65) A person making a report may also contact the NSW Ombudsman if they have a question about the PID Act or reporting generally.

How UNE will protect the confidentiality of the maker of a voluntary PID

(66) UNE understands that people who make voluntary PIDs may want their identity and the fact that they have made a report to be confidential.

(67) 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 the University.

(68) There are certain circumstances under the PID Act that allow for the disclosure of identifying information. These

include:

- a. where the person consents in writing to the disclosure;
- b. where it is generally known that the person is the maker of the voluntary PID because of their voluntary self-identification as the maker;
- c. when the public official or UNE reasonably considers it necessary to disclose the information to protect a person from detriment;
- d. where it is necessary the information be disclosed to a person whose interests are affected by the disclosure.
- e. where the information has previously been lawfully published;
- f. 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;
- g. when the information is disclosed for the purposes of proceedings before a court or tribunal;
- h. when the disclosure of the information is necessary to deal with the disclosure effectively; or
- i. if it is otherwise in the public interest to disclose the identifying information.

(69) UNE will not disclose identifying information unless it is necessary and authorised under the PID Act.

(70) UNE 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 UNE to maintain complete confidentiality while UNE progress the investigation, but UNE will do all that UNE practically can to not unnecessarily disclose information from which the maker of the report can be identified. UNE will do this by:

- a. limiting the number of people who are aware of the maker's identity or information that could identify them.
- b. If UNE must disclose information that may identify the maker of the PID, UNE will still not disclose the actual identity of the maker of the PID, unless UNE have their consent to do so where possible.
- c. UNE will ensure 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.
- d. UNE will ensure that only authorised persons have access to emails, files or other documentation that contain information about the identity of the maker.

(71) It is also expected that the individual making the report will maintain confidentiality.

(72) If confidentiality cannot be maintained or is unlikely to be maintained, UNE will:

- a. advise the person whose identity may become known;
- b. implement strategies to minimise the risk of detrimental action where possible; and
- c. offer additional supports to the person who has made the PID where possible.

How UNE will assess and minimise the risk of detrimental action

(73) UNE 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.

(74) UNE 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.

(75) UNE will take steps to assess and minimise the risk of detrimental action by:

- a. explaining that a risk assessment will be undertaken, and a risk management plan will be created;
- b. providing details of the unit/role that will be responsible for undertaking a risk assessment;

- c. ensuring the person who made the report has a contact if they have concerns or questions;
- d. explaining how UNE will communicate with the maker to identify risks;
- e. listing the protections that will be offered, that is, UNE will discuss protection options with the maker which may include remote working or approved leave for the duration of the investigation; and
- f. outlining what supports will be provided.

(76) 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:

- a. injury, damage, or loss;
- b. property damage;
- c. reputational damage;
- d. intimidation, bullying or harassment;
- e. unfavourable treatment in relation to another person's job;
- f. discrimination, prejudice, or adverse treatment;
- g. disciplinary proceedings or disciplinary action; or
- h. any other type of disadvantage.

(77) Detrimental action does not include:

- a. lawful action taken by a person or body to investigate serious wrongdoing or other misconduct;
- b. the lawful reporting or publication of a finding of serious wrongdoing or other misconduct;
- c. the lawful making of adverse comment, resulting from investigative action;
- d. the prosecution of a person for a criminal offence; or
- e. 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.

How UNE will deal with allegations of a detrimental action offence

(78) If UNE becomes aware of an allegation that a detrimental action offence has occurred or may occur, UNE will:

- a. take all steps possible to stop the action and protect the person(s);
- b. take appropriate disciplinary action against anyone that has taken detrimental action;
- c. 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 where appropriate); and
- d. notify the NSW Ombudsman about the allegation of a detrimental action offence being committed.

Part D - How UNE will deal with reports of serious wrongdoing

How reports will be received and reporters kept informed

(79) When a disclosure officer in UNE receives a report which is a voluntary PID, or looks like it may be a voluntary PID, the person who made the report will receive the following information:

- a. A person who has made a report will receive an acknowledgment that the report has been received. This acknowledgement will:
 - i. state that the report will be assessed to identify whether it is a PID;
 - ii. state that the PID Act applies to how UNE deals with the report;

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

How UNE will deal with voluntary PIDs

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

When a report is not a PID

(81) Even if the report is not a voluntary PID, it will still need to be dealt with in a manner consistent with UNE's complaints handling processes or through an alternate process.

(82) If the report is not a voluntary PID, UNE will let the person making the report know that the PID Act does not apply to the report and how UNE will deal with the concerns raised in the report.

(83) If the person making the report is not happy with this assessment or otherwise disagrees with it, they can raise it with the person who has communicated the outcome with them or a disclosure officer, request an internal review or request that the matter be conciliated. UNE may, but does not have to, request the NSW Ombudsman to conciliate the matter.

(84) UNE may stop dealing with a voluntary PID because it is not actually a voluntary PID (meaning it does not have all

the features of a PID). Where this is the case the person who made the report will receive communication outlining:

- a. why the matter is no longer being dealt with as a voluntary PID;
- b. what, if any, further steps may apply; and
- c. details of a contact person and available supports.

Where the report is a voluntary PID

(85) If the report is a voluntary PID:

- a. In most cases UNE will investigate 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 UNE engaged, in serious wrongdoing. There may be circumstances where UNE believes that an investigation is not warranted — for example, if the conduct has previously been investigated.
- b. There may be circumstances where UNE decides 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](#).
- c. Before referring a matter, UNE will discuss the referral with the other agency, and UNE will provide the person who made the report with details of the referral and a contact person within the other agency.
- d. If UNE decides not to investigate a report and to not refer the matter to another agency, UNE must let the person who made the report know the reasons for this and notify the [NSW Ombudsman](#).

Receiving a report

(86) An authorised Disclosures Officer who receives a report of wrongdoing will:

- a. if the report is made verbally, record the details of the report by making a comprehensive record of the report, ask the maker of the report to sign the record, and provide the maker a copy of the signed record;
- b. refer the report immediately to UNE's Disclosures Coordinator (subject to clause 58); and
- c. provide the person who made the report with a written acknowledgement, if the person has provided a means of doing so:
 - i. the acknowledgement must provide advice about the timeframe within which the person reporting will receive further information and the name and contact details of the Disclosures Coordinator and/or disclosures manager; and
 - ii. where appropriate, the Disclosures Coordinator may provide a proforma response for this acknowledgement, or the Disclosures Coordinator may send the written acknowledgement once the report has been referred to them.

(87) Where a report of wrongdoing is about the Vice-Chancellor and Chief Executive Officer it must be forwarded to the Chair of UNE Council's Audit and Risk Committee for assessment. The Chair will have the power to engage with the Disclosures Coordinator or Chief Financial Officer to obtain funds or resources for investigation as appropriate.

(88) Where a report of wrongdoing is about the Disclosures Coordinator it must be forwarded to the Vice-Chancellor and Chief Executive Officer for assessment.

(89) The report will be assessed, and a determination made that:

- a. the report should be treated as a voluntary PID under the [PID Act](#) or a report protected by the [Corporations Act](#);
- b. the report does not meet the requirements of a voluntary PID (for example, where the reporter is not eligible to make a protected report) but may still be investigated as a wrongdoing under this policy;

- c. the report does not meet the requirements of a voluntary PID but should be referred elsewhere in UNE for investigation under other policies;
- d. the report does not meet the requirements of a voluntary PID, but should be referred to an external investigating authority or to the police; or
- e. there is not enough evidence or information to take any further action.

(90) Where immediate action is required to protect the safety of people, animals or the environment, the Disclosures Coordinator will enact any relevant emergency management procedures.

Management of reports

(91) The Disclosures Coordinator will consult with the Vice-Chancellor and Chief Executive Officer for the purpose of management of reports, including:

- a. upon assessment;
- b. prior to commencing investigation;
- c. for decisions to refer the investigation to an external investigator;
- d. upon completion of investigation; and
- e. prior to recommending a Section 11 [ICAC](#) report, or other external reporting.

Investigation of reports

(92) Where the Disclosures Coordinator determines that the report will be investigated as a voluntary PID under the [PID Act](#) or a wrongdoing under the [Corporations Act](#), they will gather preliminary facts to determine whether there may be a case to answer. The Disclosures Coordinator may also delegate the preliminary appraisal to a Disclosures Officer.

(93) The preliminary appraisal will be completed promptly to determine what action will be taken to deal with the report of wrongdoing, and the findings will be referred, in order of preference, to:

- a. the Vice-Chancellor and Chief Executive Officer (except where the matter relates to the VC&CEO); or
- b. the Chair of UNE Council's Audit and Risk Committee.

(94) Throughout all preliminary appraisals and investigations, actions will be taken as appropriate to:

- a. assess whether it is practicable and appropriate to keep the person making the report's identity confidential and discuss options as required with the reporter;
- b. assess the risk of reprisal and workplace conflict related to or likely to arise out of a report and develop strategies to manage any risk identified;
- c. where required, provide or coordinate support to people involved in the reporting or investigation process, including protecting the interests of any officer who is the subject of a report;
- d. where appropriate, refer actual or suspected cases of wrongdoing to an independent, qualified external investigator (such as a certified fraud examiner); and/ or
- e. identify systemic issues arising from reports of wrongdoing and formulate recommendations for improvement.

(95) Where required, advice may be sought from others within UNE, including the Director People and Culture, Director Legal Services or Internal Audit staff, while maintaining confidentiality as far as practicable.

(96) Unauthorised investigations by line managers or by any member of staff are prohibited.

What UNE will do if an investigation finds that serious wrongdoing has occurred

(97) If, after an investigation, it is found that serious wrongdoing or other misconduct has occurred, UNE will take the most appropriate action to address that wrongdoing or misconduct. This is also known as corrective action.

(98) The Vice-Chancellor and CEO will receive the findings of an investigation. Where the Vice-Chancellor has a conflict of interest, the Chair of the Audit and Risk Committee will receive the findings of the investigation.

(99) Any recommendations arising from an investigation will be agreed by UNE, and an owner and due date assigned. The owner will receive the action, but depending on circumstances may not receive the report.

(100) The Internal Audit Directorate will record and track the implementation of any recommendations that arise from an investigation and report progress to the Audit and Risk Committee.

Honesty in reporting and sanctions for making false or misleading statements

(101) It is a criminal offence under the [PID Act](#) and [Corporations Act](#) to willfully make a false or misleading statement when reporting wrongdoing. UNE will not support UNE Representatives who willfully make false or misleading reports. Such conduct may also be a breach of the UNE [Code of Conduct](#) and result in disciplinary action.

Rights of persons who are the subject of a report

(102) UNE is committed to ensuring staff or officers who are the subject of a report of wrongdoing are treated fairly and reasonably. This includes keeping the identity of any person the subject of a report and the allegations or investigation confidential, where this is practical and appropriate.

(103) A person who is the subject of the report will be advised of the allegations made against them at an appropriate time (aligned with the assessment process) and before any adverse findings. At this time, they will be:

- a. advised of the details of the allegation(s);
- b. advised of their rights and obligations under the relevant related policies and procedures;
- c. kept informed about the progress of any investigation;
- d. given a reasonable opportunity to respond to any allegation made against them; and
- e. told the outcome of any investigation, including any decision made about whether further action will be taken against them.

Part E - Review and dispute resolution

Internal review

(104) People who make voluntary PIDs can seek an internal review of the following decisions made by UNE:

- a. that UNE is not required to deal with the report as a voluntary PID;
- b. to stop dealing with the report because UNE decided it was not a voluntary PID;
- c. to not investigate the serious wrongdoing and not refer the report to another agency; and
- d. to cease investigating the serious wrongdoing without either completing the investigation or referring the report to another agency for investigation.

(105) UNE will ensure internal reviews are conducted in compliance with the [PID Act](#).

(106) If the person who made the report would like to make an application for an internal review, they must apply in writing within 28 days of being informed of the UNE's decision. The application should state the reasons why they consider the UNE's decision should not have been made. They may also submit any other relevant material with their

application.

- a. A request for an internal review must be sent to governance@une.edu.au who will provide it to a reviewer who has not prior involvement or conflict of interest in the report.

Voluntary dispute resolution

(107) If a dispute arises between UNE and a person who has made a report which is, or may be, a voluntary PID, UNE may request the NSW Ombudsman to conciliate the dispute. Conciliation is a voluntary process and will only be suitable for disputes where UNE and the maker of the report are willing to resolve the dispute.

Part F - Other University obligations

Record keeping requirements

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

(109) Records of PIDs will be kept confidentially in Content Manager.

(110) A register of PIDs will be maintained.

Reporting of voluntary PIDs and UNE annual return to the Ombudsman

(111) Each year UNE provides an annual return to the NSW Ombudsman which includes:

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

(112) The Internal Audit Directorate maintains a register of PIDs and relevant documents in Content Manager and will prepare the Annual Return.

How UNE will ensure compliance with the [PID Act](#) and this policy

(113) The PID Act is captured in the UNE Compliance process.

(114) The Vice-Chancellor and CEO has ultimate responsibility for ensuring compliance with the Act and will make, at least annually, enquiries and investigations into compliance.

(115) Where non-compliance is identified, the Vice-Chancellor and CEO will require the responsible officer to remediate the item and ensure compliance.

(116) Items of non-compliance will be reported to the Audit and Risk Committee.

Part G - Procedures for making and receiving protected disclosures under the [Corporations Act](#)

(117) A report will be a protected report under the [Corporations Act](#) where it relates to misconduct, an improper state of affairs or circumstances in relation to UNE or its controlled entities, a contravention of or offence under various Commonwealth financial laws, an offence under a Commonwealth law that is punishable by imprisonment for a period of 12 months or more, or represents a danger to the public or the financial system and it is made in accordance with

this policy.

(118) Reports of wrongdoing that constitute an offence against, or a contravention of, a provision of any of the following Commonwealth financial laws will be protected reports under the [Corporations Act](#):

- a. the [Corporations Act](#);
- b. the Australian Securities and Investments Commission Act 2001;
- c. the Banking Act 1959;
- d. the Financial Sector (Collection of Data) Act 2001;
- e. the Insurance Act 1973;
- f. the Life Insurance Act 1995;
- g. the National Consumer Credit Protection Act 2009;
- h. the Superannuation Industry (Supervision) Act 1993; and
- i. an instrument made under any Act referred to in this clause.

(119) People who can make a protected disclosure under the [Corporations Act](#) are:

- a. all University staff, including staff of controlled entities;
- b. individuals who supply services or goods to UNE (whether paid or unpaid);
- c. employees of a person that supplies services or goods to UNE (whether paid or unpaid);
- d. an individual that makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of UNE, or have the capacity to significantly affect UNE's financial standing (officers and associates as defined in the [Corporations Act](#));
- e. any person that was formerly a person stated at a. to d. above; and
- f. a relative, dependent or spouse of any person stated at a. to d. above.

(120) People who have been authorised by UNE to receive reports of wrongdoing that may be protected reports under the [Corporations Act](#) are the persons listed in Annexure A to this policy.

(121) It is also possible that a report of wrongdoing may be protected under the [Corporations Act](#) where the report is made to a journalist, a member of parliament, or an external legal advisor. Any person considering making a report of wrongdoing, that will be protected by the [Corporations Act](#) to a journalist, a member of parliament, or an external legal advisor should review the provisions of Part 9.4AAA of the [Corporations Act](#) to ensure that their disclosure will meet the necessary conditions for protection. The following is a summary only and should not be used to decide whether to make a report to a member of parliament or a journalist:

- a. The person making the report of wrongdoing is one of the eligible people stated in this policy;
- b. The person is disclosing a wrongdoing stated in this procedure that is protected by the [Corporations Act](#); and
- c. The person disclosing a wrongdoing to an MP or journalist must have already made substantially the same report to:
 - i. an authorised Disclosures Officer under this policy, or
 - ii. an investigating authority listed in Annexure B.
- d. Before making a disclosure to an MP or journalist all the following requirements must be met:
 - i. at least 90 days have passed since the previous disclosure was made;
 - ii. the person does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the previous disclosure related;
 - iii. the person has reasonable grounds to believe that making a further disclosure would be in the public interest; and

- iv. after at least 90 days and before the disclosure to an MP or journalist is made, the person gave UNE's contact or investigating authority to which the previous disclosure was made a written notification that:
 - includes sufficient information to identify the previous disclosure, and states that the person intends to make a public interest disclosure; and
 - the extent of the information is no greater than is necessary to inform the MP or journalist of the wrongdoing, in accordance with the [Corporations Act](#).

(122) An emergency disclosure made to an MP, or a journalist may qualify for protection if all the following are met:

- a. the person making the report of wrongdoing is one of the eligible people stated in this policy;
- b. the person is disclosing a wrongdoing stated in this policy; and
- c. the person disclosing a wrongdoing to an MP or journalist must:
 - i. have previously made a disclosure of that information (the previous disclosure) that qualifies for protection under the [Reporting Wrongdoing at UNE Policy](#) and the [Corporations Act](#);
 - ii. have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
 - iii. give the person, contact or authority to which the previous disclosure was made a written notification that:
 - includes sufficient information to identify the previous disclosure; and
 - states that the reporter intends to make an emergency disclosure.
- d. the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform MP or journalist of the substantial and imminent danger.

(123) Where a person reports wrongdoing that is not a PID and not protected by the [Corporations Act](#), UNE will, insofar as is reasonably practicable, keep the identity of the reporter confidential. The identity of a person who makes a report of wrongdoing that is protected under the [Corporations Act](#) will be kept confidential by UNE but it may be disclosed if one of the following exceptions applies:

- a. the person reporting the wrongdoing consents to having their identity disclosed;
- b. the report is referred by any of UNE's authorised Disclosures Officers to ASIC, APRA, or a member of the Australian Federal Police;
- c. UNE is seeking legal advice or legal representation in relation to the operation of the whistleblower provisions in Part 9.4AAA of the [Corporations Act](#); or
- d. the disclosure of the person's identity is made by ASIC, APRA or a member of the Australian Federal Police and is made to another Commonwealth, state or territory authority in the circumstances set out in the [Corporations Act](#).

(124) A report of wrongdoing that UNE determines is protected by the [Corporations Act](#) will be investigated in substantially the same way that a voluntary PID is investigated by UNE (as set out in this policy).

(125) UNE will protect and support a person who makes a report of wrongdoing that is a protected report under the [Corporations Act](#) in substantially the same way (as set out in this policy) that UNE will protect a person who makes a report that is a voluntary PID.

(126) All other wrongdoing or suspected wrongdoing should be reported by UNE Representatives to a supervisor, to be dealt with in accordance with the relevant policies. This might include:

- a. harassment or unlawful discrimination;
- b. personal work-related staff grievances;

- c. contractual breaches or disputes; and
- d. practices that endanger the health or safety of staff, students, or the public.

Part H - Roles and responsibilities of UNE staff

(127) Certain people within UNE have responsibilities under the PID Act.

Vice-Chancellor and CEO

(128) The Vice-Chancellor and CEO is responsible for:

- a. fostering a workplace culture where reporting is encouraged;
- b. receiving disclosures from public officials;
- c. ensuring there is a system in place for assessing disclosures;
- d. ensuring the UNE complies with this policy and the PID Act; and
- e. ensuring that the UNE has appropriate systems for:
 - i. overseeing internal compliance with the PID Act;
 - ii. supporting public officials who make voluntary PIDs, including by minimising the risk of detrimental action;
 - iii. implementing corrective action if serious wrongdoing is found to have occurred;
 - iv. complying with reporting obligations regarding allegations or findings of detrimental action; and
 - v. complying with yearly reporting obligations to the NSW Ombudsman.

Disclosures Coordinator

(129) The Disclosures Coordinator is responsible for:

- a. receiving reports of wrong doing from public officials;
- b. acknowledging reports of wrongdoing made under this policy;
- c. assessing whether a report is a PID, including deeming a report as a voluntary PID;
- d. providing updates to the maker of a voluntary PID about how their report is being dealt with, including providing updates during an investigation at intervals of not more than three (3) months;
- e. directing the activities in accordance with this policy, including the performance of investigations into serious wrongdoing;
- f. preparing risk assessment and management plans to minimise the risk of detrimental action, other than reasonable management action, being taken against a person as a result of reporting wrongdoing;
- g. managing allegations or evidence of a detrimental action offence appropriately;
- h. ensuring applications for internal review are dealt with appropriately;
- i. implementing this policy and maintaining the University's systems to comply with this policy and the [PID Act](#).

Disclosure Officers

(130) Disclosure officers are responsible for:

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

Managers

(131) The responsibilities of managers include:

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

All employees

(132) All employees must:

- a. report suspected serious wrongdoing or other misconduct;
- b. 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 UNE;
- c. not make false, dishonest, vexatious, or misleading reports or statements;
- d. treat any person dealing with or investigating reports of serious wrongdoing with respect;
- e. maintain confidentiality; and
- f. not take detrimental action against any person who has made, may in the future make, or is suspected of having made, a PID.

More information

(133) Staff can also seek advice and guidance from the Disclosures Coordinator and via the disclosures or whistleblower sections of the websites of the NSW Ombudsman, ACNC or ASIC.

Section 2 - Authority and compliance

(134) The custodian of this policy and principles the Audit and Risk Committee of Council makes this policy.

(135) UNE Representatives must observe this policy in relation to public interest and whistleblower disclosures. A failure to comply with this policy may amount to misconduct/serious misconduct and/or unsatisfactory performance.

(136) This policy is consistent with the [PID Act](#) and with guidelines of the NSW Ombudsman and with the protection of whistleblowers provisions of Part 9.4AAA of the [Corporations Act](#).

(137) This policy operates as and from the Effective Date. Previous rules and procedures are replaced from the Effective Date.

(138) This policy takes effect pursuant to Section 25 of the [University of New England By-law 2005](#). To the extent this policy conflicts with the [University of New England Act 1993 \(NSW\)](#) (the UNE Act) or UNE [University of New England By-law 2005](#), [University of New England Act 1993 \(NSW\)](#) or [University of New England By-law 2005](#) prevails to the extent of the conflict and this policy must be read down accordingly. This policy operates as a delegation by Council under Section 17 of the [University of New England Act 1993 \(NSW\)](#).

Section 3 - Quality Assurance

(139) UNE will report on statistics of public interest disclosures and whistleblowing to the NSW Ombudsman and yearly in its annual report.

(140) Records and communications regarding these matters will be kept securely in UNE's records management system.

Section 4 - Definitions specific to this policy

(141) Breach of the [GIPA Act](#). A breach of the [Government Information \(Public Access\) Act 2009 \(NSW\)](#) (GIPA Act) is a failure to properly fulfil functions under that Act. For example, this could include a. destroying, concealing, or altering records to prevent them from being released; b. knowingly making decisions that are contrary to the legislation; or c. directing another person to make a decision that is contrary to the legislation.

(142) Corrupt conduct is the dishonest or partial exercise of official functions by a public official. For example, this could include: the improper use of knowledge, power or position for personal gain or the advantage of others; acting dishonestly or unfairly or breaching public trust; or a public official being influenced by a member of public to use their position in a way that is dishonest, biased or breaches public trust. For more information about corrupt conduct see the NSW Ombudsman's Guidelines on what can be reported.

(143) 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. For example, this could include a. deciding and/or taking action that is unlawful; or awarding contracts and tenders to private parties that are related by family, friendship, or association. For more information about Maladministration see the NSW Ombudsman's Guidelines on what can be reported.

(144) Misconduct is defined in section 9 of the [Corporations Act](#) to include fraud, negligence, default, breach of trust or breach of duty.

(145) Relative, in relation to a person means the spouse, parent or remoter lineal ancestor, child or remoter issue or brother or sister of the person.

(146) Serious and Substantial Waste of Public Money is the uneconomical, inefficient, or ineffective use of resources that could result in losing or wasting public money. For example, this could include a. misappropriation or misuse of public property, or b. the purchase of unnecessary or inadequate goods and services. For more information about Serious and Substantial waste of public money see the NSW Ombudsman's Guidelines on what can be reported.

Section 5 - Delegations or Powers in the Policy

Role	Power or Delegation	Reference
Vice-Chancellor and Chief Executive Officer	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.	Clauses 51-55
Disclosures Coordinator in consultation with the Vice-Chancellor and Chief Executive Officer	Disclosures Coordinator determines if a report will be investigated as a voluntary PID under the PID Act	Clause 91
Chair of Audit and Risk Committee	Consider reports relating to the Vice-Chancellor and CEO. The Chair will have the power to engage with the Disclosures Coordinator or Chief Financial Officer to obtain funds or resources for investigation as appropriate.	Clause 87

Annexure A

- a. The following positions are authorised to receive a voluntary PID:
- Vice-Chancellor and Chief Executive Officer (VC&CEO) vc@une.edu.au +61 2 67732044;
 - Disclosures Coordinator (Chief Audit Executive or equivalent) governance@une.edu.au +61 2 6773 1241;

iii. Disclosures Officers:

- Head, Internal Audit or equivalent or any position that substantially replaces this position.
- Head Records Policy and Governance or any position that substantially replaces this position.
- Chair of the Audit and Risk Committee where a disclosure is made regarding the actions of the Vice-Chancellor and Chief Executive Officer.
- Director Legal Services
- Director People and Culture; and

b. Any supervisor or line manager who receives a report they believe may be a voluntary PID must assist the reporter to report to one of the positions listed above.

Annexure B

a. A protected disclosure can be made to the following external parties and investigating authorities depending on the circumstances:

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

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