

Public Interest Disclosure Procedures

Section 1 - Overview

(1) This Procedure sets out who you can report wrongdoing to within the University of New England (UNE), what can be reported and how reports of wrongdoing will be dealt with by UNE. The Procedures also advise who may receive a report outside of UNE.

(2) This Procedure is designed to complement normal communication channels between supervisors and staff. Staff are encouraged to raise matters of concern at any time with their supervisors, but also have the option of making a report about a public interest issue in accordance with this rule and the [Public Interest Disclosures Act 1994 \(PID Act\)](#).

(3) The internal reporting system established under this Procedure is not intended to be used for staff grievances, which should be raised utilising the appropriate provisions in the UNE Enterprise Agreements current at that time. If a staff member makes a report under this Procedure which is substantially a grievance, the staff member will be advised that the matter should be lodged with People and Culture to be dealt with in accordance with the appropriate provisions in the UNE Enterprise Agreements current at that time.

Section 2 - Scope

(4) These Procedures are developed under the authority provided by the [Public Interest Disclosure and Whistleblower Guidelines](#) and apply to all UNE Representatives.

Section 3 - Procedures

Roles and Responsibilities

The Role and Responsibilities of UNE Representatives

(5) UNE Representatives play an important role in contributing to a workplace where known or suspected wrongdoing is reported and dealt with appropriately. All UNE Representatives are obliged to:

- a. report all known or suspected wrongdoing and support those who have made reports of wrongdoing;
- b. if requested, assist those dealing with the report, including supplying information on request, cooperating with any investigation and maintaining confidentiality;
- c. treat any staff member or person dealing with a report of wrongdoing with courtesy and respect; and
- d. respect the rights of officers the subject of reports.

(6) UNE Representatives must not:

- a. victimise or harass anyone who has made a report; and/or
- b. make false or misleading reports of wrongdoing.

(7) Additionally, the behaviour of all UNE Representatives involved in the internal reporting process are obliged to

adhere to UNE's [Code of Conduct](#). A breach of the Code of Conduct could result in disciplinary action.

The Role of the University

(8) UNE has a responsibility to establish and maintain a working environment that encourages UNE Representatives to report wrongdoing and supports them when they do. This includes keeping the identity of reporters confidential where practical and appropriate, and taking steps to protect reporters from reprisal and manage workplace conflict.

(9) UNE will assess all reports of wrongdoing it receives from staff and deal with them appropriately. Once a UNE Representative reports wrongdoing, UNE takes 'ownership' of the matter. This means it is up to UNE to decide whether a report should be investigated, and if so, how it should be investigated and by whom. UNE will deal with all reports of wrongdoing fairly and reasonably, and respect the rights of any officers who may be the subject of a report.

(10) UNE must report on our obligations under the [PID Act](#) and statistical information about public interest disclosures in our annual report and to the [NSW Ombudsman](#) every six months.

(11) To ensure that UNE complies with the [PID Act](#) and deals with all reports of wrongdoing properly, all staff with roles outlined below and elsewhere in this policy will receive training on their responsibilities.

Vice-Chancellor and Chief Executive Officer

(12) The Vice-Chancellor and Chief Executive Officer has ultimate responsibility for maintaining the internal reporting system and workplace reporting culture, and ensuring that UNE complies with the [PID Act](#). The Vice-Chancellor and Chief Executive Officer can receive reports from UNE Representatives and has a responsibility to:

- a. 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;
- b. ensure there are strategies in place to support reporters, protect reporters from reprisal and manage workplace conflict that may arise in relation to a report;
- c. make decisions following any investigation or appoint an appropriate decision-maker;
- d. take appropriate remedial action where wrongdoing is substantiated or systemic problems are identified;
- e. refer actual or suspected corrupt conduct to the [Independent Commission Against Corruption \(ICAC\)](#) ; and
- f. refer any evidence of a reprisal offence under section 20 of the [PID Act](#) to the Commissioner of Police or the [ICAC](#).

Disclosures Coordinator

(13) The Disclosures Coordinator has a central role in UNE's internal reporting system. The Disclosures Coordinator can receive and assess reports, and is the primary point of contact within UNE for the reporter. The disclosures coordinator has a responsibility to:

- a. assess reports to determine whether or not a report should be treated as a public interest disclosure, and to decide how each report will be dealt with;
- b. coordinate UNE's response to a report;
- c. acknowledge reports and provide updates and feedback to the reporter;
- d. assess whether it is possible and appropriate to keep the reporter's identity confidential;
- e. 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;
- f. where required, provide or coordinate support to staff involved in the reporting or investigation process, including protecting the interests of any officer the subject of a report;
- g. ensure that UNE complies with the [PID Act](#); and

- h. provide six-monthly reports to the [NSW Ombudsman](#) in accordance with section 6CA of the [PID Act](#).

Disclosures Officers

(14) Disclosures Officers are additional points of contact within the internal reporting system. They can provide advice about the system and the internal reporting procedures, receive reports of wrongdoing and assist UNE Representatives to make reports.

(15) Disclosures Officers have a responsibility to:

- a. document in writing any reports received verbally, and have the document signed and dated by the reporter. See [Internal Report Form](#);
- b. make arrangements to ensure UNE Representatives can make reports privately and discreetly when requested, if necessary away from the workplace;
- c. discuss with the reporter any concerns they may have about reprisal or workplace conflict; and
- d. carry out a preliminary assessment and forward reports to the Disclosures Coordinator for a full assessment.

Supervisors and Line Managers

(16) Supervisors and Line Managers play an important role in managing the immediate workplace of those involved in or affected by the internal reporting process. Supervisors and Line Managers should be aware of the internal reporting procedures and are responsible for creating a local work environment where UNE Representatives are comfortable and confident about reporting wrongdoing. They have a responsibility to:

- a. encourage UNE Representatives to report known or suspected wrongdoing within the organisation and support staff when they do;
- b. identify reports made to them in the course of their work which could be public interest disclosures, and assist the UNE Representative to make the report to an officer authorised to receive public interest disclosures under this policy;
- c. implement local management strategies, in consultation with the Disclosures Coordinator, to minimise the risk of reprisal or workplace conflict in relation to a report; and
- d. notify the disclosures coordinator or Vice-Chancellor and Chief Executive Officer immediately if they believe a UNE Representative is being subjected to reprisal as a result of reporting wrongdoing.

What should be reported?

(17) UNE Representatives should report any suspected wrongdoing within UNE or any activities or incidents you see within UNE that you believe are wrong.

(18) Reports about five categories of serious misconduct — corrupt conduct, maladministration, serious and substantial waste of public money, breach of the [GIPA Act](#), and local government pecuniary interest contravention — which otherwise meet the criteria of a public interest disclosure, will be dealt with under the PID Act and according to this procedure.

(19) See clauses 22-23 for details about the four types of conduct relevant to UNE. More information about what can be reported under the [PID Act](#) can be found in the [NSW Ombudsman's Guidelines](#) B2: What should be reported?

(20) All other wrongdoing or suspected wrongdoing should be reported to a supervisor, to be dealt with in line with the relevant policies. This might include:

- a. harassment or unlawful discrimination; or
- b. practices that endanger the health or safety of staff, Students or the public.

(21) Even if these reports are not dealt with as public interest disclosures, UNE recognises such reports may raise important issues. UNE will respond to all reports and make every attempt to protect the UNE Representative making the report from reprisal.

Corrupt Conduct

(22) Corrupt conduct is the dishonest or partial exercise of official functions by a public official.

(23) For example, this could include:

- a. the improper use of knowledge, power or position for personal gain or the advantage of others;
- b. acting dishonestly or unfairly, or breaching public trust; or
- c. 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.

(24) For more information about corrupt conduct see the [NSW Ombudsman's Guidelines](#) on what can be reported.

Maladministration

(25) 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.

(26) For example, this could include:

- a. making a decision and/or taking action that is unlawful; or
- b. awarding contracts and tenders to private parties that are related by family, friendship or association.

(27) For more information about Maladministration see the [NSW Ombudsman's Guidelines](#) on what can be reported.

Serious and Substantial Waste of Public Money

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

(29) For example, this could include:

- a. misappropriation or misuse of public property; or
- b. the purchase of unnecessary or inadequate goods and services.

(30) For more information about Serious and Substantial waste of public money see the [NSW Ombudsman's Guidelines](#) on what can be reported.

Breach of the GIPA Act

(31) A breach of the [Government Information \(Public Access\) Act 2009 \(GIPA Act\)](#) is a failure to properly fulfill functions under that Act.

(32) 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.

(33) For more information about Breaches of the [GIPA Act](#) see the [NSW Ombudsman's Guidelines](#) on what can be

reported.

Assessment of Reports

(34) All reports will be promptly and thoroughly assessed to determine what action will be taken to deal with the report and whether or not the report will be treated as a public interest disclosure.

(35) The Disclosures Coordinator is responsible for assessing reports, in consultation with the Vice-Chancellor and Chief Executive Officer where appropriate. All reports will be assessed on the information available to the Disclosures Coordinator at the time. It is up to the Disclosures Coordinator to decide whether an investigation should be carried out and how that investigation should be carried out. In assessing a report the Disclosures Coordinator may decide that the report should be referred elsewhere or that no action should be taken on the report.

When will a report be treated as a public interest disclosure?

(36) UNE will treat a report as a public interest disclosure if it meets the criteria of a public interest disclosure under the [PID Act](#). These requirements are:

- a. The report must be about one of the following five categories of serious wrongdoing — corrupt conduct, maladministration, serious and substantial waste of public money, breach of the [GIPA Act](#), or local government pecuniary interest contravention;
- b. The person making the disclosure must honestly believe on reasonable grounds that the information shows or tends to show wrongdoing; and
- c. The report has to be made to either the Vice-Chancellor and Chief Executive Officer, the disclosure coordinator or a position nominated in this Policy (see clause 39), an investigating authority or in limited circumstances to an MP or journalist (see clauses 40-47).

(37) Reports by UNE Representatives are not public interest disclosures if they:

- a. mostly question the merits of government policy; and
- b. are made with the sole or substantial motive of avoiding dismissal or other disciplinary action.

Who can receive a report within UNE?

(38) UNE Representatives are encouraged to report general wrongdoing to your supervisor. However the [PID Act](#) requires that, for a report to be a public interest disclosure, it must be made to certain public officials identified in this procedure.

(39) The following positions are the only staff within UNE who are authorised to receive a public interest disclosure. Any supervisor who receives a report that they believe may be a public interest disclosure is obliged to assist the UNE Representative to make the report to one of the positions listed below. The broader responsibilities of these positions are outlined under Roles and Responsibilities within these Procedures.

- a. Vice-Chancellor and Chief Executive Officer;
- b. Disclosures Coordinator, - Director Audit and Risk;
- c. Disclosures Officers:
 - i. Associate Director Audit and Risk;
 - ii. Principal Internal Auditor, Audit and Risk; or
 - iii. any position that substantially replaces such a position in the future.

Who can receive a report outside of UNE?

(40) UNE Representatives are encouraged to report wrongdoing within UNE, but internal reporting is not your only option. You can also make a public interest disclosure to:

- a. An investigating authority; or
- b. A Member of Parliament or a journalist, but only in the limited circumstances outlined below.

Investigating Authorities

(41) The [PID Act](#) lists a number of investigating authorities in NSW that UNE Representatives can report wrongdoing to and the type of wrongdoing each authority can deal with. In certain circumstances it may be preferable to make a report of wrongdoing to an investigating authority, for example any report about the Vice-Chancellor and Chief Executive Officer.

(42) The relevant investigating authorities for UNE are:

- a. the [Independent Commission Against Corruption](#) (ICAC) — for disclosures about corrupt conduct;
- b. the [NSW Ombudsman](#) — for disclosures about maladministration;
- c. the Auditor-General — for disclosures about serious and substantial waste;
- d. the Information Commissioner — for disclosures about a breach of the [GIPA Act](#).

(43) UNE Representatives should contact the relevant investigation authority for advice about how to make a disclosure to them. Contact details for each investigating authority are provided at the end of this procedure.

(44) UNE Representatives should be aware that the investigating authority may well discuss any such reports with UNE. UNE will make every effort to assist and cooperate with the investigating authority to ensure the matter is dealt with appropriately and there is a satisfactory outcome. UNE will also provide appropriate support and assistance to UNE Representatives who report wrongdoing to an investigating authority, if UNE are made aware that this has occurred.

Members of Parliament or Journalists

(45) To have the protections of the [PID Act](#), UNE Representatives reporting wrongdoing to a Member of Parliament (MP) or a journalist must have already made substantially the same report to one of the following:

- a. the Vice-Chancellor and Chief Executive Officer;
- b. a person nominated in this procedure; or
- c. an investigating authority.

(46) Also, UNE or the investigating authority that received your initial report must have either:

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

(47) Most importantly, to be protected under the [PID Act](#), if you report wrongdoing to an MP or a journalist you will need to be able to prove that you have reasonable grounds for believing that the disclosure is substantially true and that it is in fact substantially true.

Other External Reporting

(48) If you report wrongdoing to a person or authority that is not listed above, or make a report to an MP or journalist without following the steps outlined above, you will not be protected under the [PID Act](#). This may mean you will be in breach of legal obligations or the UNE [Code of Conduct](#), for example, by disclosing confidential information.

(49) For more information about reporting wrongdoing outside UNE contact the disclosures coordinator or the [NSW Ombudsman](#)'s Public Interest Disclosures Unit. Their contact details are provided at the end of this policy.

How to Make a Report

(50) UNE Representatives can report wrongdoing in writing or verbally. UNE Representatives are encouraged to make a report in writing as this can help to avoid any confusion or misinterpretation. UNE's [Internal Reporting Form](#) is also available for UNE Representatives to use to make a report.

(51) If a report is made verbally, the person receiving the report will make a comprehensive record of the report and ask the person making the report to sign this record. The staff member should keep a copy of this record.

Can a Report be anonymous?

(52) There will be some situations where a UNE Representative may not want to identify themselves when they make a report. Although these reports will still be dealt with by UNE it is best if UNE Representatives identify themselves. This allows UNE to provide you with any necessary protection and support, as well as feedback about what action is to be taken or has been taken to deal with the issues raised in the report, or the outcome of any investigation.

(53) It is important to realise that an anonymous disclosure may not prevent you from being identified by the subjects of the report or your colleagues. If we do not know who made the report, it is very difficult for us to prevent any reprisal should others identify you.

Feedback to Staff Who Report Wrongdoing

(54) UNE Representatives who report wrongdoing will be told what is happening in response to their report.

Acknowledgement

(55) When you make a report, the Disclosures Coordinator will contact you to confirm that your report has been received and to advise:

- a. the timeframe within which you will receive further updates; and
- b. the name and contact details of the people who can tell you what is happening or handle any concerns you may have.

(56) After a decision is made about how your report will be dealt with, the Disclosures Coordinator will contact you providing:

- a. information about the action that will be taken in response to your report;
- b. the likely timeframes for any investigation or other action; and
- c. information about the internal and external resources or services available that you can access for support.

(57) The Disclosures Coordinator will provide this information to you within ten working days from the date the Disclosures Coordinator receives your report. The Disclosures Coordinator will also advise you whether your report will be treated as a public interest disclosure and provide you with a copy of the [PID Rule](#) and Procedures at that time, as required by the [PID Act](#).

(58) Please note, if you make a report 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 your day to day functions, you will not receive an acknowledgement letter or a copy of this policy.

Progress Updates

(59) While your report is being dealt with, such as by investigation or making other enquiries, you will be given:

- a. information about the progress of the investigation or other enquiries and reasons for any delay;
- b. advice of any decision by UNE not to proceed with the matter; and
- c. advice if your identity needs to be disclosed for the purposes of investigating the matter or making enquiries, and an opportunity to talk about this beforehand.

Feedback

(60) Once the matter has been finalised you will be given:

- a. enough information to show that adequate and appropriate action was taken and/or is proposed to be taken in response to your disclosure and any problem that was identified; and
- b. advice about whether you are likely to be called as a witness in any further matters, such as disciplinary or criminal proceedings.

Maintaining Confidentiality

(61) Reporters may want their identity and the fact that they have made a report to remain confidential. This can help to prevent any action being taken against them for reporting wrongdoing.

(62) Where possible and appropriate, steps will be taken to keep your identity, and the fact you have reported wrongdoing, confidential. The Disclosures Coordinator will discuss with you whether it is possible to keep your identity confidential.

(63) If confidentiality cannot be maintained, the Disclosures Coordinator will develop a plan to support and protect you from reprisal in consultation with you.

(64) If you report wrongdoing, it is important that you only discuss your report with those responsible for dealing with it for example the Disclosures Coordinator. The fewer people who know about your report, before and after you make it, the more likely it will be that we can protect you from any reprisal.

(65) Any UNE Representatives 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.

Managing the Risk of Reprisal and Workplace Conflict

(66) When a UNE Representative reports wrongdoing, UNE will undertake a thorough risk assessment to identify the risk to you of detrimental action in reprisal for reporting, as well as indirect but related risks of workplace conflict or difficulties. The risk assessment will also identify strategies to deal with those risks and determine the level of protection and support that is appropriate.

(67) Depending on the circumstances, UNE may:

- a. relocate the reporter or the staff member who is the subject of the allegation within the current workplace;
- b. transfer the reporter or the staff member who is the subject of the allegation to another position for which they

are qualified; or

- c. grant the reporter or the staff member who is the subject of the allegation leave of absence during the investigation of the disclosure.

(68) These courses of action are not punishment and will only be taken in consultation with the reporter.

Protection Against Reprisals

(69) UNE will not tolerate any reprisal against UNE Representatives who report wrongdoing or are believed to have reported wrongdoing.

(70) The [PID Act](#) provides protection for UNE Representatives who have made a public interest disclosure by imposing penalties on anyone who takes detrimental action against another person substantially in reprisal for that person making a public interest disclosure. These penalties also apply to cases where a person takes detrimental action against another because they believe or suspect the other person has made or may have made a public interest disclosure, even if they did not.

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

- a. injury, damage or loss;
- b. intimidation or harassment;
- c. discrimination, disadvantage or adverse treatment in relation to employment;
- d. dismissal from, or prejudice in, employment; or
- e. disciplinary proceedings.

(72) A person who is found to have committed a reprisal offence may face criminal penalties such as imprisonment and/or fines, and may be required to pay the victim damages for any loss suffered as a result of the detrimental action. Taking detrimental action in reprisal is also misconduct which may result in disciplinary action.

(73) It is important for UNE Representatives to understand the nature and limitations of the protection provided by the [PID Act](#). The [PID Act](#) protects UNE Representatives from detrimental action being taken against them because they have made, or are believed to have made, a public interest disclosure. It does not protect them from disciplinary or other management action where UNE has reasonable grounds to take such action.

Responding to Allegations of Reprisal

(74) If a UNE Representative believes that detrimental action has been or is being taken against you or someone else in reprisal for reporting wrongdoing, you should tell your supervisor, the Disclosures Coordinator or the Vice-Chancellor and Chief Executive Officer immediately.

(75) All supervisors must notify the Disclosures Coordinator or the Vice-Chancellor and Chief Executive Officer if they suspect that reprisal against a staff member is occurring or has occurred, or if any such allegations are made to them.

(76) If UNE becomes aware of or suspects that reprisal is being or has been taken against a person who has made a disclosure, UNE will:

- a. assess the report of reprisal to decide whether it should be treated as a public interest disclosure and whether the matter warrants investigation or if other action should be taken to resolve the issue;
- b. if the reprisal allegation warrants investigation, ensure this is conducted by a senior and experienced member of staff;
- c. if it is established that reprisal is occurring against someone who has made a report, take all steps possible to stop that activity and protect the reporter;

- d. take appropriate disciplinary action against anyone proven to have taken or threatened any action in reprisal for making a disclosure; and
- e. refer any evidence of an offence under [section 20 of the PID Act](#) to the [ICAC](#) or NSW Police Force.

(77) If you allege reprisal, you will be kept informed of the progress and outcome of any investigation or other action taken in response to the allegation.

(78) If you have reported wrongdoing and are experiencing reprisal which you believe is not being dealt with effectively, contact the [NSW Ombudsman](#) or the [ICAC](#) (depending on the type of wrongdoing you reported). Contact details for these investigating authorities are included at the end of this policy.

Protection Against Legal Action

(79) If a UNE Representative makes a public interest disclosure in accordance with the [PID Act](#), you will not be subject to any liability, and no action, claim or demand can be taken against you for having made the public interest disclosure. You will not have breached any confidentiality or secrecy obligations and you will have the defence of absolute privilege in defamation.

Support For Those Reporting Wrongdoing

(80) UNE will make sure that UNE Representatives who have reported wrongdoing, 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.

(81) 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 can discuss their support options with the disclosures coordinator.

Sanctions For Making False or Misleading Statements

(82) It is important all UNE Representatives are aware that it is a criminal offence under the [PID 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](#) resulting in disciplinary action.

The Rights of Persons the Subject of a Report

(83) UNE is committed to ensuring staff 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 confidential, where this is practical and appropriate.

(84) If you are the subject of the report, you will be advised of the allegations made against you at an appropriate time and before any adverse findings. At this time you will be:

- a. advised of the details of the allegation;
- b. advised of your 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 you; and
- e. told the outcome of any investigation, including any decision made about whether or not further action will be taken against you.

(85) Where the reported allegations against the staff member are clearly wrong, or have been investigated and

unsubstantiated, the staff member will be supported by UNE. The fact of the allegations and any investigation will be kept confidential unless otherwise agreed to by the staff member.

More Information

(86) Staff can also seek advice and guidance from the Disclosures Coordinator and via the website of the [NSW Ombudsman](#).

Resources

(87) The contact details for external investigating authorities that staff can make a public interest disclosure to or seek advice from are listed below.

(88) 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

Web: www.icac.nsw.gov.au

Address: Level 21, 133 Castlereagh Street,

Sydney NSW 2000

(89) 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

Web: www.ombo.nsw.gov.au

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

(90) For disclosures about serious and substantial waste:

Auditor-General of the NSW Audit Office

Phone: 02 9275 7100

Facsimile: 02 9275 7200

Email: mail@audit.nsw.gov.au

Web: www.audit.nsw.gov.au

Address: Level 15, 1 Margaret Street, Sydney NSW 2000

UNE Public Interest Disclosure Coordinator

Director Audit and Risk

Phone: 02 67732124

Email: director-ard@une.edu.au

(91) 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

Web: www.ipc.nsw.gov.au

Address: Level 11, 1 Castlereagh Street, Sydney NSW 2000

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Unit Head	Susannah Warrick Director Governance and University Secretary swarrick@une.edu.au
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Glossary Terms and Definitions

"UNE Representative" - Means a University employee (casual, fixed term and permanent), contractor, agent, appointee, UNE Council member, adjunct, visiting academic and any other person engaged by the University to undertake some activity for or on behalf of the University. It includes corporations and other bodies falling into one or more of these categories.

"Student" - Is an admitted student or an enrolled student, at the relevant time: 1. an admitted student is a student who has been admitted to a UNE course of study and who is entitled to enrol in a unit of study or who has completed all of the units in the UNE course of study; 2. an enrolled student is a student who is enrolled in a unit of study at UNE.

"Code of Conduct" - A document (variously referred to as a 'Code of Ethics', 'Code of Behaviour' and various other titles) broadly communicated within the entity setting out the entity's expected standards of behaviour.