



Public Interest Disclosure Policy

August 2022

Version 1.2

Essential Summary

The purpose of this Policy is to provide clear instructions for people working in the Commission on:

- How to make a Public Interest Disclosure ('PID') report on wrongdoing
- Who to submit your report to?
- When you will receive feedback on your report
- How you will be protected against Reprisals for any disclosure made

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1. Scope

This Policy applies to:

- All employees, including ongoing, temporary, term, casual, seconded employees, private contractors and consultants when performing the role of a GWIC official, are all considered to be public officials under the *Public Interest Disclosures Act 1994* (PID Act).

2. Purpose

The purpose of this procedure is to provide clear instructions for people working in the Greyhound Welfare and Integrity Commission (the 'Commission' or 'GWIC') on:

- How to make a PID report on wrongdoing.
- Who to submit your report to?
- When you will receive feedback on your report.
- How you will be protected against Reprisals for any disclosure made.

3. Definitions

CEO	Chief Executive Officer
Disclosure Officer(s)	Officer nominated by the CEO to accept PIDs within the Commission (PID Receiver) (page 8)
Disclosure Coordinator	Coordinator nominated by the CEO to accept PIDs within the Commission (page 8)
Fraud	Wrongful or criminal deception intended to result in financial or personal gain
GWIC	Greyhound Welfare and Integrity Commission
GWIC employees / employee	Persons working with or on behalf of the Commission, including ongoing, temporary or term- basis employees and senior executives
ICAC	Independent Commission Against Corruption
Maladministration	Conduct of a serious nature that is contrary to law, unreasonable unjust or improperly discriminatory, or wholly or partly based on improper motives
Principal Officer	The Chief Executive Officer (CEO) of the Commission
Public Interest Disclosures Act 1994 (PID Act)	Sets in place a system to encourage public officials to report serious wrongdoing.
NSW Ombudsman	NSW Ombudsman is responsible for promoting public awareness and understanding of the PID Act and monitoring its operation
Reprisals	Detrimental treatment or behaviour directed at a person substantially in reprisal for the person making a PID
GIPA	Government Information (Public Access) Act 2009 (GIPAA) created new rights to information that are designed to meet community expectations of more open and transparent government
Corrupt Conduct	'Corrupt conduct' is defined in the ICAC Act. It is deliberate or intentional wrongdoing, not negligence or a mistake
Serious and Substantial Waste	Refers to the serious and substantial waste of public money or resources, which provides little or no actual benefit to the agency or wider community

4. What is a Public Interest Disclosure?

A public interest disclosure (PID) is a report of wrongdoing involving conduct of a serious nature made by a public official which has been assessed and accepted as meeting the requirements of the PID Act.

Those requirements include that the person making the report must honestly believe on reasonable grounds that serious wrongdoing has occurred. Reasonable grounds are expected to be based upon credible direct evidence, such as the reporter personally witnessing an action, hearing a person admitting they have done something wrong or providing documentation indicating serious wrongdoing has occurred. A report relying upon gossip, suspicion, hearsay or personal opinion to substantiate the concerns being raised will not be accepted as a PID.

The report must also concern one or more of the categories of wrongdoing specified in the PID Act. The categories which would most likely be relevant to the Commission are corrupt conduct, maladministration, serious and substantial waste and breaches of the GIPA Act.

Finally, the report must be made in accordance with this policy and the associated processes. A central requirement is that to be accepted as a PID an internal report must be made to an officer or entity authorised by the Commission to receive a PID, while an external report must be made to an authorised external investigative agency.

5. What is a Not a Public Interest Disclosure?

Reports not made in accordance with this policy are not PIDs and do not provide the person making the report with the protections that would otherwise be available under the PID Act. Those protections include against possible defamation action.

Public interest disclosures must be made to authorised people and bodies specified in this policy. You must also be able to explain why you believe that wrongdoing has occurred and have a reasonable basis for that belief.

A report will not be accepted as a PID if it was considered frivolous or vexatious, primarily questioned the merits of government policy or was made solely or substantially to avoid dismissal or other disciplinary action.

Matters which are more appropriately dealt with under alternate mechanisms will be managed in accordance with those arrangements and not as a PID. That includes workplace grievances and allegations concerning bullying and work health & safety matters.

Any concerns that relate to the way someone's behaviour is affecting you as an individual employee or general complaints of dissatisfaction should be made using a grievance or other employees complaint process. This includes, for example, actions or decisions by managers or other employees that you believe involve inequitable treatment in the workplace, harassment or bullying that affect you personally (other than where this is part of a course of conduct, particularly of a general practice affecting a number of employees).

6. What should be reported

You should report suspected wrongdoing, or any activities or incidents you see or know about within the Commission that you believe to be wrongdoing (including fraud).

Reports about serious misconduct which meet the criteria of a PID will be dealt with under the PID Act and according to this internal reporting policy.

Even if your report is not accepted as a PID, if it was made in good faith and indicates that wrongdoing may

have occurred it can still be investigated.

In those circumstances the Commission would still provide whatever protection it could, including keeping your identity as the reporter as confidential as possible.

7. How to make an internal report

You are encouraged to report general wrongdoing to your supervisor, however, for a report to be accepted as a PID it must be made to a person or entity authorised to receive such a disclosure.

Any supervisor who receives a report they believe should be treated as a PID should assist the employee to make the report to an authorised PID Receiver. Occupants of the following roles are the only people within Commission authorised to receive a PID:

- Chief Commissioner
- Commissioner
- Chief Executive Officer
- Director, Compliance, Policy & Legal
- Director, Race Day Operations & Integrity
- Manager, Business Operations

In addition, you are able to make an internal report by telephone, online, post or through the 'FairCall' service provided by KPMG Forensic to receive internal reports, including anonymous reports, while maintaining the protections otherwise available under the [PID Act](#).

Although you can report wrongdoing verbally, you are encouraged to make a report in writing as this can help to avoid any confusion or misinterpretation. An Internal Reporting Form is available to assist you in making a [report](#).

When making a verbal report, the person you are talking to will document the discussion and ask you to review and sign that record as accurately reflecting the report you have made – you should keep a copy of that record.

PID's relating to alleged conduct of the Chief Commissioner of Commissioners should not be made internally, but rather made to a relevant *investigating authority* (see section 8 below)

8. How to make an external report

Employees are encouraged to report wrongdoing to an authorised person within the Commission or through the KPMG *FairCall* service, however, you can also make a public interest disclosure to:

- an investigating authority; and/or
- a Member of Parliament or a journalist, but only in limited circumstances.

Investigating Authorities

The PID Act lists a number of investigating authorities in NSW that employees can report wrongdoing to and the type of wrongdoing each authority can deal with. You may be more comfortable in making an external report where the matter involves the decisions or behaviour of a senior person or an on-going issue which is very contentious or problematic and you have concerns about how you may be affected by bringing this to notice.

The listed investigating authorities that are most relevant to the Commission's activities are:

- The Independent Commission Against Corruption (ICAC) — for disclosures about corrupt conduct
- The NSW Ombudsman — for disclosures about maladministration
- The NSW Auditor-General — for disclosures about serious and substantial waste
- The NSW Information Commissioner — for disclosures about a breach of the GIPPA Act.

Where your PID relates to alleged corrupt conduct by the Chief Commissioner or Commissioners, the relevant investigative authority to receive your PID is the ICAC.

Where your PID relates to allegations of maladministration or conduct not amounting to corruption by the Chief Commissioner or Commissioners, the relevant investigative authority for receipt of your disclosure is the NSW Ombudsman.

If you are considering making an external report, you should contact the relevant investigation authority for advice about how to make a disclosure to them.

You should be aware that the investigating authority may discuss any such reports with us and possibly refer them to the Commission to investigate and manage. We 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. We will also provide appropriate support and assistance to employees who report wrongdoing to an investigating authority if we are aware that has occurred.

Members of Parliament or journalists

To have the protections of the PID Act, employees reporting wrongdoing to a Member of Parliament (MP) or a journalist must have already made substantially the same report to an authorised person within the Commission, or an investigating authority and they:

- decided not to investigate the matter;
- decided to investigate the matter, but didn't complete the investigation within six months of the original report;
- investigated the matter but didn't recommend any action as a result; or
- didn't tell you, within six months of the report being made, whether the matter would be investigated.

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 you have reasonable grounds for believing the disclosure is substantially true, and also to prove that it is in fact substantially true.

9. Can a report be anonymous?

There will be some situations where you may not want to identify yourself when you make a report. Although these reports will still be dealt with there are challenges where further information may be required, in providing protection and support and not being able to advise you of progress and the outcome.

To overcome some of these challenges the KPMG *FairCall* service has been introduced. This allows reports to be made to a third-party contractor, KPMG Forensic Pty Ltd, with the level of anonymity determined by the person making the report. That can be - complete anonymity (no contact details provided or retained), contact details provided to the contractor but not to be disclosed to the Commission, or contact details provided and permission given to disclose to the Commission.

FairCall

Operated by KPMG Forensic Pty Ltd

Hotline: 1800 500 965

Online: <https://www.kpmgfaircall.kpmg.com.au/GWIC>

Post: The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213

Notwithstanding these arrangements, 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 if others suspect or have concluded that you have made a report.

10. What happens if I make a report and no wrongdoing was found

Making a report and having it accepted as a PID attracts the statutory protections available under the PID Act. You remain protected by the PID Act regardless of whether any wrongdoing was subsequently found to have occurred or not.

11. Roles and Responsibilities

Employees

Employees play an important role in contributing to a workplace where known or suspected wrongdoing is reported and dealt with appropriately. All employees are encouraged to:

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

Employees must not:

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

Additionally, all employees involved in the internal reporting process and any investigation actions are obliged to adhere to our code of conduct. A breach of the code could result in disciplinary action.

Employer

The Commission has a responsibility to establish and maintain a working environment that encourages employees to report wrongdoing and supports them when they do. This includes keeping the identity of reporters confidential where practical and appropriate, taking steps to protect reporters from reprisal and managing potential workplace conflict.

All reports of wrongdoing received from employees will be assessed and dealt with appropriately.

Once an employee reports wrongdoing, the Commission 'takes ownership' of the matter. This means it is up to us to assess and decide whether a report should be investigated, and if so, how it should be investigated and by whom. We will deal with all reports of wrongdoing fairly and reasonably and respect the rights of any officers the subject of a report.

The Commission must report on its obligations under the PID Act and statistical information about PIDs in our annual report, and to the NSW Ombudsman every six months.

Roles of key positions

Chief Executive Officer (CEO)

The CEO has ultimate responsibility for maintaining the internal reporting system and workplace reporting culture and ensuring compliance with the PID Act. The CEO can receive reports from employees, and has a responsibility to:

- assess reports received to determine whether or not the report should be treated as a PID, and to decide how the report will be dealt with;
- ensure there are strategies in place to support reporters, protect them from reprisal and manage workplace conflict that may arise from the making of a report;
- make decisions following any investigation or appoint an appropriate decision-maker;
- take appropriate remedial action where wrongdoing is substantiated, or systemic problems are identified;
- refer actual or suspected corrupt conduct to the Independent Commission Against Corruption (ICAC); and
- refer evidence of a reprisal offence under section 20 of the PID Act to the Commissioner of Police or the ICAC.

PID Disclosures Coordinator

The Director, Compliance, Policy & Legal and has a central role in our internal reporting system. The PID Disclosures Coordinator manages the process on behalf of the CEO and has a responsibility to:

- assess reports and determine whether or not a report should be treated as a PID, and then decide how each report will be dealt with;
- acknowledge reports and provide appropriate updates and feedback to the reporter, including the outcome when the matter has been finalised;
- assess whether it is possible and appropriate to keep the reporter's identity confidential;
- conduct a risk assessment looking at the risk of reprisal and workplace conflict related to or likely to arise out of a report, and develop local management strategies to manage any risks identified;
- provide and coordinate support to employees involved in the reporting and investigation process, including protecting the interests of any officer the subject of a report;
- coordinate the response to a report and confirm what actions should or should not be taken;
- ensure the Commission complies with the PID Act; and
- provide six-monthly reports to the NSW Ombudsman in accordance with section 6CA of the PID Act.

The following positions are PID Receivers for the Commission:

- Chief Commissioner
- Commissioner
- Chief Executive Officer
- Director, Compliance, Policy & Legal
- Director, Race Day Operations & Integrity
- Manager, Business Operations

These positions provide a readily accessible point of contact to provide advice about the internal reporting system, receive reports of wrongdoing and assist employees to make reports.

PID Receivers have a responsibility to:

- document in writing any reports received verbally, and have the document signed and dated by the reporter;
- make arrangements to ensure employees can make reports privately and discreetly when requested, if necessary, away from the workplace;
- discuss with the reporter any concerns they may have about reprisal or workplace conflict;
- carry out a preliminary assessment and provide initial feedback and advice to the reporter - that includes managing expectations about possible outcomes; and
- forward reports and the completed PID Receiver Initial Assessment and Checklist forms (attached to this policy) to the PID Disclosures Coordinator for full assessment.

Supervisors and line managers

While reports to supervisors and line managers will not attract the protections of the Act, they still 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 framework and are responsible for creating a local work environment where employees are comfortable and confident about reporting wrongdoing.

They have a responsibility to:

- encourage employees to report known or suspected wrongdoing within the organisation and support employees when they do;
- assist employees to make a report to a PID Receiver if they raise concerns which could be a PID;
- advise employees of the KPMG *FairCall* service if they are concerned about maintaining their anonymity;
- implement local management strategies, in consultation with the PID Disclosures Coordinator, to minimise the risk of reprisal or workplace conflict in relation to a report; and/or
- notify the PID Disclosures Coordinator immediately if they believe an employee is being subjected to reprisal as a result of reporting wrongdoing.

12. Assessment of Reports

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.

The PID Disclosures Coordinator is responsible for assessing all reports based upon the information available at the time.

It is up to the PID Disclosures Coordinator to decide whether an investigation should be carried out and how that investigation should be conducted. That assessment may conclude that the report should be referred elsewhere, or that no action should be taken.

13. Feedback to employees who report wrongdoing to a PID Receiver

Acknowledgement

When you make a report, you will be advised in writing within 10 working days that it has been received. That advice will include confirmation of whether your report has been accepted as a PID and the contact details of the person managing the report.

If it has not been accepted as a PID you will be told why not and any further action which may still be taken.

If it is accepted as a PID a copy of this Internal Reporting Policy will be provided, together with an explanation of the action intended to be taken and likely timeframes. Details of available support services will also be advised.

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 are not required to be given an acknowledgement letter or a copy of the Internal Reporting Policy.

Progress updates

While your report is being investigated or other enquiries are being made, we will keep you informed of progress. If it becomes necessary to disclose your identity, or it becomes apparent in the course of an investigation who made the report, you will be consulted on possible strategies to protect you from possible reprisals or adverse actions.

In some circumstances it may be agreed to disclose your identity as the reporter to enable suitable protection and support to be implemented and monitored by your manager. If your identity remains undisclosed it may be difficult to provide the same level of support and protection as your manager may not be able to be advised of your situation.

Feedback

Once the matter has been finalised you will be given:

- 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
- advice about whether you are likely to be called as a witness in any further matters, such as disciplinary or criminal proceedings.

Feedback to employees who report wrongdoing through the KPMG *FairCall* service

When you make a report to the KPMG *FairCall* service via the Hotline number, online platform or post, you will be given an individual case number and PIN so that you may call in for updates, provide further information later and access details of the outcome if you have chosen to remain anonymous. If you have agreed for your identity and contact details to be disclosed, you will be kept informed in the same manner as if you had made the report direct to the Commission.

14. Maintaining Confidentiality

The Commission understands that you may prefer for your identity and the fact you have made a report to remain confidential. This can help to prevent reprisal action being taken against you for reporting wrongdoing.

Where possible and appropriate we will take steps to keep your identity, and the fact you have reported wrongdoing, confidential. To be able to deal with your report, it may not be possible or practical to maintain confidentiality. There may also be circumstances where others in the organisation become aware of the identity of a reporter because of the subject matter of the report or because the reporter has already raised the issue in the workplace.

If confidentiality cannot be maintained, we will develop a plan to support and protect you from reprisal in consultation with you.

If you report wrongdoing, it is important that you only discuss your report with those responsible for dealing with it. 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.

When a report is received by one of the persons listed earlier in this policy, you will be asked to give consent to the disclosure of information that will or might reveal your identity to:

- certain persons within GWIC who will have a role in dealing with the reporting of or in ensuring you are protected (such as the CEO, PID Coordinator, an investigator), and/or
- the ICAC if the subject matter of your report concerns suspected corrupt conduct.

Employees 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 anybody other than those people responsible for managing the internal reporting and investigation processes

15. Managing the risk of reprisal and workplace conflict

If you report wrongdoing a risk assessment will be undertaken by the PID Coordinator 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 be used to identify strategies to deal with those risks and determine the level of protection and support that is appropriate.

Depending on the circumstances, those actions may be to:

- relocate the reporter or the employee who is the subject of the allegation within the current workplace;
- transfer the reporter or the employee who is the subject of the allegation to another position for which they are qualified; and/or
- grant the reporter or the employee who is the subject of the allegation leave of absence during the investigation of the disclosure.

These actions are not punishment and will be undertaken in consultation with the affected people.

16. Protection against reprisals

The Commission will not tolerate any reprisal against employees who report wrongdoing or are believed to have reported wrongdoing.

The PID Act provides protection for employees 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 in cases where a person takes detrimental action against somebody because they mistakenly believe or suspect the other person has made a PID when they didn't.

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

- injury, damage or loss;
- intimidation or harassment;
- discrimination, disadvantage or adverse treatment in relation to employment;
- dismissal from, or prejudice in, employment; and/or
- disciplinary proceedings.

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.

It is important to understand the nature and limitations of the protection provided by the PID Act. The PID Act protects employees from detrimental action being taken against them because they have made, or are believed to have made, a PID. Making a report does not provide immunity or protect people from disciplinary or other management sanctions where their behaviour or actions otherwise provide reasonable grounds to do so. That may apply where the reporter has been complicit or involved in the action in question, or other unrelated matters which warrant investigation.

Responding to allegations of reprisal

If you believe that detrimental action has been or is being taken against you or someone else in reprisal for reporting wrongdoing, you should tell the PID Disclosures Coordinator or the CEO immediately. Alternatively, you may also report allegations of reprisal through the KPMG *FairCall* service.

All supervisors must notify the PID Disclosures Coordinator if they suspect that reprisal against an employee known or suspected to have made a report is occurring or has occurred, or if any such allegations are made to them.

If we become aware of or suspect that reprisal is being or has been taken against a person who has made a disclosure, we will:

- assess the report of reprisal to decide whether it should be treated as a PID and whether the matter warrants investigation, or if other action should be taken to resolve the issue;
- if the reprisal allegation warrants investigation, ensure this is conducted by a senior and experienced person;
- if it is established that reprisal was or is still occurring against someone who has made a report, take all steps possible to stop that activity and protect the reporter;
- take appropriate disciplinary action against anyone proven to have taken or threatened any action in reprisal for making a disclosure; and/or
- refer any evidence of an offence under section 20 of the PID Act to the ICAC or NSW Police Force.

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.

If you have reported wrongdoing and are experiencing reprisal which you believe is not being dealt with effectively you can contact the 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

If you make a PID 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 PID. You will not have breached any confidentiality or secrecy obligations and you will have the defence of absolute privilege in defamation.

17. Support for those reporting wrongdoing

The Commission will make sure that employees who have reported wrongdoing in good faith, regardless of whether their report is treated as a PID or not, 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.

Access to support may also be available for other employees involved in the internal reporting process where appropriate. Reporters and other employees involved in the process can discuss their support options with the PID Disclosures Coordinator.

18. Sanctions for making false or misleading statements

It is important all employees are aware it is a criminal offence under the PID Act to wilfully make a false or misleading statement when reporting wrongdoing. The Commission will not support employees who wilfully make false or misleading reports. Such conduct may also be a breach of the Code of Ethics and Conduct and result in disciplinary action.

19. The rights of the persons subject of a report

The Commission is committed to ensuring employees 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.

If you are the subject of a report that is or is going to be formally investigated, you will be:

- advised of the details of the allegation(s) that concern you given a reasonable opportunity to respond to those allegations;
- advised of your rights and obligations under the relevant policies and procedures;
- kept informed about the progress of any investigation;
- told the outcome of any investigation, including any decision made about whether or not further action will be taken against you; and
- Allowed a support person if required to attend an interview as part of the investigation.

Where the reported allegations are clearly wrong, or have been investigated and unsubstantiated, the allegations will, as far as possible, remain confidential unless you agree otherwise.

20. External Contacts

The NSW Ombudsman is responsible for promoting public awareness and understanding of the PID Act and monitoring its operation. They also provide advice and guidance to public sector workers who are thinking about reporting serious wrongdoing; and public authorities responsible for managing and responding to public interest disclosures.

For more information contact the PID Unit on 02 9286 1000 or email pid@ombo.nsw.gov.au.

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

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

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

For disclosures about breaches of the GIPA Act:

Information Commissioner

Toll free: 1800 463 626

Facsimile: 02 8114 3756

Email: oicinfo@oic.nsw.gov.au

Web: www.oic.nsw.gov.au

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

21. References

The following references were used in developing the content of this document, or provide additional information, procedures and resources that support the operation of this policy.

You are expected to be aware of the Codes, Acts and Regulations that legally govern the way you undertake your work. This procedure does not stand alone and operates in conjunction with the following:

1. Greyhound Welfare and Integrity Commission Code of Ethics and Conduct
2. The [Public Interest Disclosures Act 1994](#) (PID Act)
3. NSW Ombudsman *Model Internal Reporting Policy*.

(End)

22. Document information

Title:	Public Interest Disclosure Policy
Business Centre:	
Author:	Steve Griffin
Approver:	Steve Griffin
Date of Effect:	9 August 2022
Next Review Date:	9 August 2023
File Reference:	1.2
Key Words:	Public Interest, Reporting

23. Document history

Version	Date	Reason for Amendment
1.0	31 January 2019	Creation of Policy
1.1	9 July 2020	KPMG <i>FairCall</i> Information Updated
1.2	9 August 2022	Change to reporting of PID relating to Commissioners

PID Receiver – Checklist for receiving an internal report

Internal Report

Report received by:

Date report received

Verbal Written Anonymous

If the report was made **verbally**, the report has been documented in writing and signed:

Yes No

The reporter has been thanked for coming forward with their concerns: Yes No

Confidentiality / Risk of reprisal

Who else knows that the report has been made?

Is the reporter concerned their identity will become known in the workplace? Why?

Is the reporter concerned that they may suffer reprisal action for making the report if their identity becomes known? From whom?

What professional relationship does the reporter have with any subject(s) of the report?

Previous reporting

The reporter has raised this matter to another person within your organisation: Yes No

If **yes**, who was it reported to, when was it reported, what action was/is being taken?

Support

The reporter has been advised of our employee assistance program: Yes No

The reporter requires additional support: Yes No

If the reporter requires support, what type of support?

Reporter's expectations

What does the reporter expect from this process?

What does the reporter expect will happen to any subject(s) of allegations?

Additional information the recipient of a report may be aware of

The reporter is currently/has previously been the subject of performance issues: Yes No

The reporter is currently/has previously been the subject of disciplinary proceedings relating to this matter:

Yes No

The reporter is currently/has previously been the subject of criminal investigation related to this matter:

Yes No

The reporter is currently/has previously been the subject of workplace changes:

Yes No

If yes to any of the above, provide any known details.

Signature of recipient

Date