

Policy No. PP021

Internal Reporting Policy

1 INFORMATION ABOUT THIS POLICY

POLICY INFORMATION

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Policy Responsibility General Manager	
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DOCUMENT HISTORY

DOCUMENT NO.	DATE AMENDED	SUMMARY OF CHANGES
	21/02/2020	Reviewed in line with review schedule. Item 15 altered to include risk assessments to be documented and in accordance with a risk management framework adopted by Council.
	DD/MM/YYYY	
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FURTHER DOCUMENT INFORMATION AND RELATIONSHIPS

Related Legislation	<p>Public Interest Disclosures Act 1994</p> <p>Local Government Act 1993</p> <p>Independent Commission Against Corruption Act 1988</p> <p>Ombudsman Act 1974</p> <p>NSW Government Information (Public Access) Act 2009 (GIPA Act)</p> <p>Privacy & Personal Information Protection Act NSW 1998 (PPIPA)</p> <p>Public Interest Disclosures Act 1994</p> <p>Goldenfields Water County Council Enterprise Award 2017 (as amended)</p>
Related Policies	<p>PP031 Code of Conduct Policy (Code of Conduct)</p> <p>PP010 Gifts and Benefits Policy</p> <p>PP020 Complaints Handling Policy</p>
Related Procedures, Protocols, Statements and Documents	

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3 PURPOSE

The purpose of this Policy is to establish an internal reporting system for staff and Board Members to report wrongdoing without fear of reprisal. The Policy sets out who wrongdoing can be reported to, and how reports of wrongdoing will be dealt with by Goldenfields Water.

This Policy 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 Policy and the Public Interest Disclosures Act 1994 (PID Act).

The internal reporting system established under this Policy is not intended to be used for staff grievances, which should be raised through the standard grievance procedures under the Goldenfields Water County Council Enterprise Award 2017 (The Award).

4 SCOPE

This Policy applies to all staff, Board Members and delegates of Goldenfields Water. The Policy also applies to public officials of another council or public authority who report wrongdoing relating to Goldenfields Water.

5 ROLES AND RESPONSIBILITIES

5.1 The role of staff and Board Members

Staff and Board Members play an important role in contributing to a workplace where known or suspected wrongdoing is reported and dealt with appropriately. All staff and Board Members are obliged 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 staff member or person dealing with a report of wrongdoing with courtesy and respect; and
- respect the rights of any person who is the subject of a report.

Staff and Board Members must not:

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

The behaviour of all staff and Board Members involved in the internal reporting process must adhere to the Code of Conduct. A breach of the Code may result in disciplinary action.

5.2 The role of Goldenfields Water

Goldenfields Water has a responsibility to establish and maintain a working environment that encourages staff and Board Members 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.

Goldenfields Water will assess all reports of wrongdoing it receives from staff and Board Members and deal with them appropriately. Once wrongdoing has been reported, Goldenfields Water takes 'ownership' of the matter. This means it is the responsibility of Goldenfields Water to decide whether a report should be investigated, and if so, how it should be investigated and by whom. Goldenfields Water will deal with all reports of wrongdoing fairly and reasonably, and respect the rights of any person the subject of a report.

Goldenfields Water 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.

To ensure Goldenfields Water complies with the PID Act and deals with all reports of wrongdoing properly, all staff and Board Members with roles outlined below and elsewhere in this Policy will receive training on their responsibilities.

5.3 The role of key positions

General Manager

The General Manager has ultimate responsibility for maintaining the internal reporting system and workplace reporting culture, and ensuring Goldenfields Water complies with the PID Act. The General Manager can receive reports from staff and Board Members and has a responsibility to:

- 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;
- deal with reports made under the Code of Conduct in accordance with the Code of Conduct;
- 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;
- 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 any evidence of a reprisal offence under section 20 of the PID Act to the Commissioner of Police or the ICAC.

Disclosures Coordinator

The Disclosures Coordinator has a central role in Goldenfields Water's internal reporting system. The Disclosures Coordinator can receive and assess reports, and is the primary point of contact for the reporter. The Disclosures Coordinator has a responsibility to:

- 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 (either under

- delegation or in consultation with the General Manager);
- deal with reports made under the Code of Conduct in accordance with the Code of Conduct;
 - coordinate Goldenfields Water's response to a report;
 - acknowledge reports and provide updates and feedback to the reporter;
 - assess whether it is possible and appropriate to keep the reporter's identity confidential;
 - 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;
 - 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;
 - ensure Goldenfields Water complies with the PID Act; and
 - provide six-monthly reports to the NSW Ombudsman in accordance with section 6CA of the PID Act.

Disclosures Officers

Disclosures Officers are additional points of contact within the internal reporting system. They can provide advice about the system and this Policy, receive reports of wrongdoing and assist staff and Board Members to make reports.

Disclosures Officers 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 reporters 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; and
- carry out preliminary assessment and forward reports to the Disclosures Coordinator or general manager for full assessment.

Chairperson

The Chairperson can receive reports from staff and Board Members about the General Manager. Where the Chairperson receives such reports, the Chairperson has a responsibility to:

- assess the reports to determine whether or not they should be treated as a public interest disclosure, and to decide how they will be dealt with;
- deal with reports made under the Code of Conduct in accordance with the Code of Conduct;
- refer reports to an investigating authority, where appropriate;
- liaise with the Disclosures Coordinator to 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;

- refer actual or suspected corrupt conduct to the ICAC; and
- refer any evidence of a reprisal offence under section 20 of the PID Act to the Commissioner of Police or the ICAC.

Coordinators and supervisors

Coordinators and supervisors play an important role in managing the immediate workplace of those involved in or affected by the internal reporting process. Coordinators and supervisors should be aware of this Policy and are responsible for creating a local work environment where staff are comfortable and confident about reporting wrongdoing. They have a responsibility to:

- encourage staff to report known or suspected wrongdoing within the organisation and support staff when they do;
- identify reports made to them in the course of their work which could be public interest disclosures, and assist the staff member to make the report to an officer authorised to receive public interest disclosures under this Policy;
- 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
- notify the Disclosures Coordinator or General Manager immediately if they believe a staff member is being subjected to reprisal as a result of reporting wrongdoing, or in the case of suspected reprisal by the General Manager, notify the Chairperson.

6 WHAT SHOULD BE REPORTED

Suspected wrongdoing within Goldenfields Water or any activities or incidents seen that are believed to be wrong, should be reported.

Reports about the 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 in accordance with this Policy. Details about these types of conduct are set out below. More information about what can be reported under the PID Act can be found in the [NSW Ombudsman's Guideline B2: What should be reported?](#)

All other wrongdoing or suspected wrongdoing should be reported to a supervisor, to be dealt with in accordance with the relevant Policies and legislation. This may include:

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

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

Corrupt Conduct

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 council official being influenced by a member of the public to use their position in a way that is dishonest, biased or breaches public trust.

Maladministration

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

For example, this could include:

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

Serious and substantial waste of public money

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

For example, this could include:

- not following a competitive tendering process for a large scale contract; or
- having bad or no processes in place for a system involving large amounts of public funds.

Breach of the GIPA Act

A breach of the GIPA Act is a failure to properly fulfil functions under that Act.

For example, this could include:

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

Local government pecuniary interest contravention

A local government pecuniary interest contravention is a failure to comply with requirements under the Local Government Act 1993 relating to the management of pecuniary interests. These include obligations to lodge disclosure of interest returns, disclose pecuniary interests at Council meetings and leave the meeting while the matter is being discussed. A pecuniary interest is an interest that a person has in a matter because of a reasonable likelihood or expectation of appreciable financial gain or loss to the person.

For example, this could include a senior staff member recommending a family member for a council

contract and not declaring the relationship.

7 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 Disclosures Coordinator is responsible for assessing reports, in consultation with the General Manager 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 conducted 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.

8 WHEN WILL A REPORT BE TREATED AS A PUBLIC INTEREST DISCLOSURE?

Goldenfields Water will treat a report as a public interest disclosure if it meets the criteria of such under the PID Act. These requirements are:

- 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;
- the person making the disclosure must honestly believe on reasonable grounds that the information shows or tends to show wrongdoing; and
- the report has to be made to either the General Manager or, for reports about the General Manager the Chairperson, a position nominated in this Policy (see section 8), an investigating authority or in limited circumstances to an Member of Parliament or journalist (see section 9).

Reports by staff are not public interest disclosures if they:

- mostly question the merits of government policy (see section 17); and
- are made with the sole or substantial motive of avoiding dismissal or other disciplinary action (see section 18).

9 WHO CAN RECEIVE A REPORT WITHIN GOLDENFIELDS WATER?

Staff are encouraged to report general wrongdoing to their supervisor. However the PID Act requires that, for a report to be a public interest disclosure, it must be made to certain public officials identified in this Policy.

The following positions are the only people within Goldenfields Water 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 staff member to make the report to one of the positions listed below.

Disclosures Coordinator

Corporate Services Manager

Disclosures Officers

Production and Services Manager

Operations Manager

Human Resources Coordinator

Administration Coordinator

Northern Distribution Coordinator

Mechanical Coordinator

Executive Assistant

If a report involves a Board Member, it should be made to the General Manager. If a report relates to the General Manager, it should be made to the Chairperson.

10 WHO CAN RECEIVE A REPORT OUTSIDE OF GOLDENFIELDS WATER?

Staff and Board Members are encouraged to report wrongdoing within Goldenfields Water, but internal reporting is not the only option. A public interest disclosure can also be made to:

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

Investigating authorities

The PID Act lists a number of investigating authorities in NSW that staff and Board Members 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, a report about either the General Manager or the Chairperson.

The relevant investigating authorities for Goldenfields Water are:

- ICAC — for reports about corrupt conduct;
- the Ombudsman — for reports about maladministration;
- the Information Commissioner — for disclosures about a breach of the GIPA Act; and
- the Office of Local Government— for disclosures about local councils.

The relevant investigating authority should be contacted for advice about how to make a disclosure to them.

The investigating authority may discuss any such reports with Goldenfields Water. Every effort will be made to assist and cooperate with the investigating authority to ensure the matter is dealt with appropriately and there is a satisfactory outcome. Appropriate support and assistance will be provided to staff or Board Members who report wrongdoing to an investigating authority.

Members of Parliament or journalists

To have the protections of the PID Act, staff reporting wrongdoing to a Member of Parliament or a journalist must have already made the same report to one of the following:

- the General Manager;
- a person nominated in this Policy, including the Chairperson for reports about the General Manager; or
- an investigating authority.

Additionally, Goldenfields Water or the investigating authority that received the initial report must have either:

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

Most importantly – to be protected under the PID Act – if wrongdoing is reported to a Member of Parliament or a journalist, it will need to be proved that there are reasonable grounds for believing that the disclosure is substantially true, and that it is in fact substantially true.

Other external reporting

If wrongdoing is reported to a person or authority that is not listed above, or a report is made to a Member of Parliament or journalist without following the steps outlined above, the individual will not be protected under the PID Act. This may mean they will be in breach of legal obligations or the Code of Conduct for disclosing confidential information.

For more information about reporting wrongdoing outside of Goldenfields Water, contact the Disclosures Coordinator or the NSW Ombudsman's Public Interest Disclosures Unit.

11 HOW TO MAKE A REPORT

A report of wrongdoing can be made verbally or in writing. Reporters are encouraged to make a report in writing as this can help to avoid any confusion or misinterpretation. Goldenfields Water's Internal Reporting Form located on the intranet is also available for staff or Board Members to use to make a report.

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 reporter should keep a copy of this record.

12 CAN A REPORT BE ANONYMOUS?

There will be some situations where a reporter may not want to be identified when making a report. Although these reports will still be dealt with, it is in the best interest of the reporter to

identify themselves. This allows Goldenfields Water to provide the reporter 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.

It is important to understand that an anonymous disclosure may not prevent a reporter from being identified by the subjects of the report or their colleagues. If Goldenfields Water does not know who made the report, it is very difficult for to prevent any reprisal should others identify them.

13 FEEDBACK TO STAFF WHO REPORT WRONGDOING

Staff and Board Members who report wrongdoing will be kept informed of the status in response to their report.

Acknowledgement

When a report is made, Goldenfields Water will contact the reporter to confirm that the report has been received and to advise:

- the timeframe within which further updates will be received; and
- the name and contact details of the people who can provide further information to the reporter.

After a decision is made about how the report will be dealt with, an acknowledgment letter will be sent, providing:

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

This information will be provided within ten (10) working days and no later than 45 days from the date the report is made. Goldenfields Water will also advise whether the report is to be treated as a public interest disclosure and provide a copy of this Policy at that time, as required by the PID Act.

If a report meets the requirements of the PID Act but the report was made under a statutory or legal obligation or incidental to the performance of the reporters day to day functions, they will not receive an acknowledgement letter or a copy of this Policy.

Progress updates

While the report is being dealt with, such as by investigation or making other enquiries, the reporter will be given:

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

Feedback

Once the matter has been finalised the reporter will be given:

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

14 MAINTAINING CONFIDENTIALITY

Goldenfields Water understands reporters may want their identity and the fact they have made a report to remain confidential. This can help to prevent any action being taken against them for reporting wrongdoing.

Where possible and appropriate Goldenfields Water will take steps to keep the identity of the reporter, and the fact they have reported wrongdoing, confidential.

If confidentiality cannot be maintained, Goldenfields Water will develop a plan to support and protect the reporter from reprisal in consultation with them.

It is important that reporters only discuss their report with those responsible for dealing with it. This will include the Disclosures Coordinator and the General Manager, or in the case of a report about the General Manager, the Disclosures Coordinator and the Chairperson.

Any staff or Board Member involved in the investigation or handling of a report, including witnesses, are 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.

15 MANAGING THE RISK OF REPRISAL AND WORKPLACE CONFLICT

When a staff member or Board Member reports wrongdoing, Goldenfields Water will undertake a thorough risk assessment to identify the risk of detrimental action in reprisal for reporting, as well as related risks of workplace conflict or difficulties. Such risk assessments shall be fully documented and completed in accordance with a risk management framework adopted by Council. The risk assessment will also identify strategies to deal with those risks and determine the level of protection and support that is appropriate.

Depending on the circumstances, Goldenfields Water may:

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

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

16 PROTECTION AGAINST REPRISALS

Goldenfields Water will not tolerate any reprisal against staff or Board Members who report wrongdoing or are believed to have reported wrongdoing.

The PID Act provides protection for staff and Board Members 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.

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; 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 a breach of the Code of Conduct which may result in disciplinary action. In the case of Board Members, such disciplinary action may be taken under the misconduct provisions of the *Local Government Act 1993*.

It is important for staff and Board Members to understand the nature and limitations of the protection provided by the PID Act. The PID Act protects reporters 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 reporters from disciplinary or other management action where Goldenfields Water has reasonable grounds to take such action.

Responding to allegations of reprisal

If it is believed that detrimental action has been or is being taken against an individual in reprisal for reporting wrongdoing, the relevant supervisor, the Disclosures Coordinator or the General Manager must be notified immediately. In the case of an allegation of reprisal by the General Manager, the Chairperson should be notified.

All supervisors must notify the Disclosures Coordinator or the General Manager if they suspect that reprisal against a staff member is occurring or has occurred, or if any such allegations are made to them. In the case of an allegation of reprisal by the General Manager, the Chairperson can alternatively be notified.

If Goldenfields Water becomes aware of or suspects that reprisal is being or has been taken against a person who has made a disclosure, Goldenfields Water will:

- assess the allegation of reprisal to decide whether the report 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;

- if the reprisal allegation warrants investigation, ensure this is conducted by a senior and experienced member of staff; and
- 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.

Responding to allegations of reprisal

If a public interest disclosure is made in accordance with the PID Act, the reporter will not be subject to any liability, and no action, claim or demand can be taken against the individual for having made the public interest disclosure. The individual will not have breached any confidentiality or secrecy obligations and will have the defence of absolute privilege in defamation.

17 SUPPORT FOR THOSE WHO REPORT WRONGDOING

Goldenfields Water will make sure that staff 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.

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.

Goldenfields Water has an established Employee Assistance Program (EAP). The EAP service provides staff with confidential counselling, coaching and support for workplace and personal issues.

Staff can make an appointment with an EAP counsellor by phoning 1300 361 008.

18 SANCTIONS FOR MAKING FALSE OR MISLEADING STATEMENTS

It is important all staff and Board Members are aware that it is a criminal offence under the PID Act to willfully make a false or misleading statement when reporting wrongdoing. Goldenfields Water will not support staff or Board Members who willfully make false or misleading reports. Such conduct may also be a breach of the Code of Conduct resulting in disciplinary action. In the case of Board Members, disciplinary action may be taken under the misconduct provisions of the Local Government Act 1993.

19 THE RIGHTS OF PERSONS WHO ARE THE SUBJECT OF A REPORT

Goldenfields Water is committed to ensuring staff or Board Members who are the subject of a report of wrongdoing are treated fairly and reasonably. This includes keeping the identity of any person who is the subject of a report confidential, where this is practical and appropriate.

The subject of a report will be advised of the allegations made against them at an appropriate

time and before any adverse findings. At this time they will be:

- advised of the details of the allegation;
- advised of their rights and obligations under the relevant related policies and procedures;
- kept informed about the progress of any investigation;
- given a reasonable opportunity to respond to any allegation made against them; and
- told the outcome of any investigation, including any decision made about whether or not further action will be taken against them.

Where the reported allegations against the subject officer are clearly wrong, or have been investigated and unsubstantiated, the subject officer will be supported by Goldenfields Water. The fact of the allegations and any investigation will remain confidential unless otherwise agreed to by the subject officer.

20 MORE INFORMATION

More information about public interest disclosures can be sought from the Disclosures Coordinator and the NSW Ombudsman's website at www.ombo.nsw.gov.au.

21 IMPORTANT CONTACTS

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

Disclosures about corrupt conduct:

Independent Commission Against Corruption
Phone: 02 8281 5999
Toll Free: 1800 463 909
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: 1800 451 524
Email: nswombo@ombo.nsw.gov.au
Web: www.ombo.nsw.gov.au
Address: Level 24, 580 George Street
Sydney NSW 2000

For disclosures about breaches of the GIPA Act **For disclosures about local councils**

Information Commissioner
Toll Free: 1800 472 679
Email: ipcinfo@ipc.nsw.gov.au
Web: www.ipc.nsw.gov.au
Address: Level 11, 1 Castlereagh Street
Sydney NSW 2000

Office of Local Government
Phone: 02 4428 4100
Email: dlg@dlg.nsw.gov.au
Web: www.dlg.nsw.gov.au
Address: 5 O'Keefe Avenue
Nowra NSW 2451

22 FLOW CHART OF INTERNAL REPORTING PROCESS

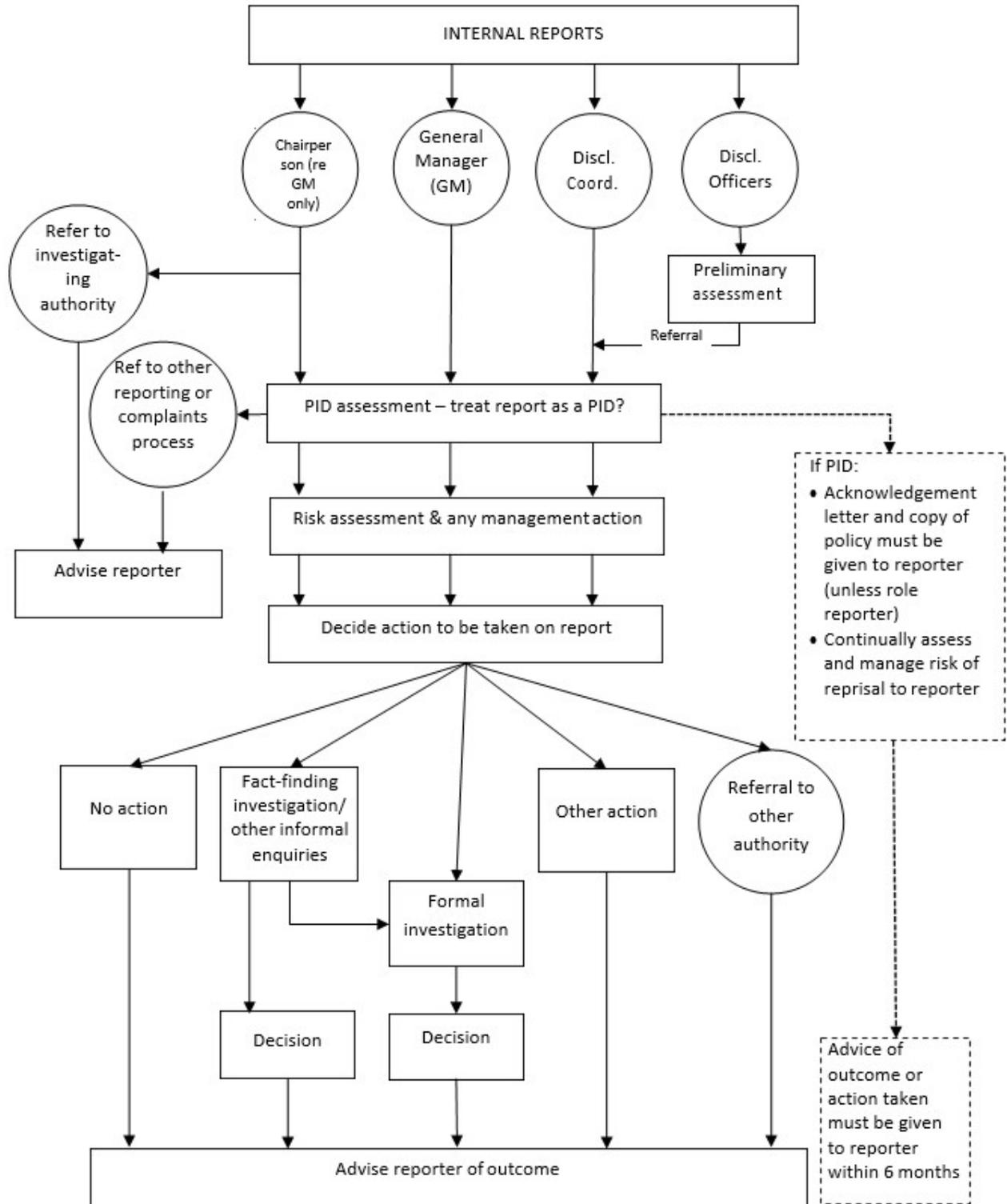


Figure 1: Flowchart of internal reporting process