



Public Interest Disclosure Policy

Implementation officer	Executive Manager Finance, Legal & Risk
Relevant to	All Public Officials within the definition of section 14 of the PID Act including all Employees of WaterNSW and persons providing services or exercising functions on behalf of WaterNSW including contractors, subcontractors, and volunteers – see section 2, below.
Relevant documents	WaterNSW Code of Conduct WaterNSW Supplier Code of Conduct WaterNSW Corrective and Disciplinary Action Procedure WaterNSW Managing Workplace Complaints Procedure WaterNSW Fraud and Corruption Prevention Policy WaterNSW Fraud and Corruption Prevention Control Plan WaterNSW Investigating Alleged Wrongdoing and Criminal Conduct Employee Assistance Program Information
Relevant legal and other requirements	<i>Crimes Act 1900 (NSW)</i> <i>Government Information (Public Access) Act 2009 (NSW)</i> <i>Independent Commission Against Corruption Act 1988 (NSW)</i> <i>Ombudsman Act 1974 (NSW)</i> <i>Privacy and Personal Information Protection Act 1998 (NSW)</i> <i>Public Interest Disclosures Act 2022 (NSW)</i> <i>ICAC Publication: A Guide to Conducting Internal Investigations – Fact Finder, April 2022</i> <i>NSW Ombudsman’s Developing your Public Interest Disclosure policy</i>

Monitoring, Evaluation and Review, Revision history

Outcome: How does this Policy deliver against the purpose and scope?

Monitoring	This Policy will be measured by review and feedback on the efficacy of the document to appropriately manage Public Interest Disclosures. Monitoring to occur through periodic reporting to the Board Committee on Audit and Risk and annual reporting to the NSW Ombudsman.								
Evaluation and Review	This document is risk rated as a Medium level based on the WaterNSW Risk Management Rating table. It will be reviewed no later than every two years unless a change in legislation or regulatory requirement commands the need to review. <table border="1" data-bbox="483 1771 1198 1924"> <thead> <tr> <th>Risk Rating</th> <th>Recommended Review Period</th> </tr> </thead> <tbody> <tr> <td>High</td> <td>Annually</td> </tr> <tr> <td>Medium</td> <td>2 years</td> </tr> <tr> <td>Minor</td> <td>3 years</td> </tr> </tbody> </table>	Risk Rating	Recommended Review Period	High	Annually	Medium	2 years	Minor	3 years
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Revision history	February 2024 – In response to the commencement of the <i>Public Interest Disclosures Act 2022</i> (NSW), this document replaces and supersedes the WaterNSW Reporting and Responding to Alleged Wrongdoing and Criminal Conduct Procedure.
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Approval

JOE PIZZINGA

Executive Manager Finance, Legal & Risk

Monitoring, Evaluation and Review, Revision history	2
Approval.....	3
1. Purpose/Scope	5
2. Coverage	5
3. What is a Public Interest Disclosure?	6
3.1 Types of Public Interest Disclosure	6
4. Making a voluntary Public Interest Disclosure.....	6
4.1 Who can make a voluntary Public Interest Disclosure?	7
4.2 What can a voluntary Public Interest Disclosure be about?	7
4.3 Who can receive a voluntary Public Interest Disclosure?	8
4.3.1 Within WaterNSW	8
4.3.2 Internal disclosure – WaterNSW's independent service provider Your Call	9
4.3.3 External disclosure	10
4.3.4 One step removed principle – Disclosures concerning the Chief Executive Officer or Disclosures Panel.....	11
4.4 Can a voluntary Public Interest Disclosure be anonymous?	11
4.5 Form and content of a voluntary Public Interest Disclosure	11
4.6 What support is available for Reporters?	12
5. How WaterNSW will deal with voluntary Public Interest Disclosures.....	12
5.1 Disclosures Panel	12
5.2 Disclosures assessed by the Disclosures Panel.....	12
5.3 Where the Disclosure is a voluntary Public Interest Disclosure	13
5.4 Investigation of a voluntary Public Interest Disclosure	13
5.5 Where the Disclosure is not a voluntary Public Interest Disclosure	13
5.6 Acknowledging Disclosures and keeping the Reporter Informed	14
6. Protections	15
6.1 How is a Reporter protected?	15
6.2 Detrimental action - meaning	16
6.3 How WaterNSW will assess and minimise the risk of Detrimental Action	16
6.4 Reporting Detrimental Action.....	17
6.5 How WaterNSW will deal with allegations of a Detrimental Action offence	17
6.6 How WaterNSW will protect the confidentiality of Reporters who have made a voluntary Public Interest Disclosure	17
6.7 Sanctions for making false or misleading statements.....	18
7. The rights of persons the subject of alleged Serious Wrongdoing	18
8. Internal review and dispute resolution	19
8.1 Internal review	19
8.2 Voluntary dispute resolution.....	19
9. Reporting to the NSW Ombudsman	19
10. Record-keeping requirements.....	20
11. Potential actions arising from a substantiated finding of Serious Wrongdoing	20
12. Communication of information on Disclosures of Serious Wrongdoing	20
13. Allegations involving Criminal Conduct	21
14. Authorities and responsibilities	21
15. Terms and definitions	24
Annexure A – Full list of WaterNSW Disclosure Officers	26
Annexure B – External investigating authorities	28

1. Purpose/Scope

WaterNSW is committed to acting with integrity in everything we do. The Board and Management of WaterNSW have a zero-tolerance approach to Serious Wrongdoing and are committed to detecting, investigating and fostering a culture that supports the reporting of such conduct. All Public Officials are encouraged to 'speak up' to report any conduct that they reasonably believe involves Serious Wrongdoing.

The purpose of this Procedure is to outline the process for reporting and responding to alleged Serious Wrongdoing including Public Interest Disclosures under the *Public Interest Disclosures Act 2022 (NSW) (PID Act)*.

WaterNSW is also committed, as far as possible, to eliminating Criminal Conduct by supporting a culture where such behaviour is appropriately reported, referred out, and sanctioned. This Policy also explains the steps to report alleged Criminal Conduct by Public Officials. See section 13.

Capitalised terms used in this Policy are defined in section 15.

2. Coverage

2.1 Who/what this policy applies to

This Policy applies to, and for the benefit of, all Public Officials in NSW.

For the purposes of WaterNSW, a person is a Public Official if they are:

- employed by or otherwise in the service of WaterNSW;
- a person having Public Official functions or acting in a Public Official capacity for WaterNSW and whose conduct or activities an integrity agency is authorised by another Act or law to investigate;
- an individual in the service of the Crown;
- a statutory officer;
- a person providing services or exercising functions on behalf of WaterNSW, including a contractor, agency staff, subcontractor or volunteer
- an employee, partner or officer of an entity that provides services, under contract, subcontract or other arrangement, on behalf of WaterNSW or exercises functions of WaterNSW, and are involved in providing those services or exercising those functions.

Other Public Officials who do not work for WaterNSW, but who work in and for the public sector may use this Policy if they seek information about who they can report serious wrongdoing to within WaterNSW.

2.2 Who/what this policy does not apply to

This Policy is not intended to apply to Workplace Complaints, which should be raised through the *WaterNSW Managing Workplace Complaints Policy*. If an Employee makes a Disclosure under this Policy which does not qualify as a Public Interest Disclosure, the matter will be referred to the Safety People and Culture Team to be dealt with in accordance with the *Managing Workplace Complaints Policy*.

This Policy also does not apply to those who:

- have received services from WaterNSW and want to provide feedback or make a complaint about those services; or
- provide services to WaterNSW, such as contractors, and would like to provide feedback or make a general complaint.

WaterNSW welcomes the above types of feedback. This can be done by contacting WaterNSW's Customer Service Centre as follows:

- Phone: 1300 662 077 between 8.00am and 5.00pm, Monday to Friday. A message service is available 24 hours, 7 days per week.
- Email: customer.helpdesk@waternsw.com.au.

See WaterNSW's *Feedback, Compliments and Complaints Policy* for more details.

3. What is a Public Interest Disclosure?

Public Officials should report any suspected Serious Wrongdoing within WaterNSW, or any activities or incidents they see within WaterNSW that they believe are wrong. In circumstances where such Disclosures have certain features that are set out in the PID Act, they will qualify as a Public Interest Disclosure.

3.1 Types of Public Interest Disclosure

There are three types of Public Interest Disclosure as set out in the table below.

Voluntary Public Interest Disclosure	A Disclosure made by a Public Official to a person who can receive voluntary Public Interest Disclosures which relates to information that the Public Official honestly and reasonably believes shows (or tends to show) Serious Wrongdoing, where they are not under a legal obligation to make that Disclosure and where it is not an ordinary part of their role to report such wrongdoing.
Mandatory Public Interest Disclosure	A Disclosure by a Public Official about Serious Wrongdoing because they have a legal obligation to make that Disclosure, or because making that Disclosure is an ordinary part of their role or function in WaterNSW.
Witness Public Interest Disclosure	Where a person discloses information during an investigation of Serious Wrongdoing following a request or requirement of the investigator.

This Policy mostly relates to voluntary Public Interest Disclosures.

However, the protections afforded to those who make a mandatory Public Interest Disclosure or witness Public Interest Disclosure are discussed below within Section 6 of this Policy.

4. Making a voluntary Public Interest Disclosure

The relevant avenues for making a Disclosure are discussed in detail below at section 4.3. If a Reporter makes a Disclosure to a person or authority that is not identified in this Policy as someone who can receive a Public Interest Disclosure, the Reporter may not be protected by the PID Act. This may mean the Reporter will be in breach

of legal obligations or WaterNSW's *Code of Conduct* by, for example, disclosing confidential information.

4.1 Who can make a voluntary Public Interest Disclosure?

Any Public Official can make a voluntary Public Interest Disclosure. See the above discussion in section 2.1 as to who is a Public Official.

A Public Official can make a voluntary Public Interest Disclosure relating to any agency, not just the agency they are working for. This means WaterNSW may receive voluntary Public Interest Disclosures from Public Officials outside of WaterNSW. It also means that Public Officials associated with WaterNSW can make a voluntary Public Interest Disclosure to any agency, including an integrity agency like the Independent Commission Against Corruption (ICAC) and the NSW Ombudsman.

4.2 What can a voluntary Public Interest Disclosure be about?

To be a voluntary Public Interest Disclosure, the Reporter must have information that they honestly and reasonably believe shows (or tends to show) Serious Wrongdoing.

Serious Wrongdoing is one or more of the following:

Type of serious wrongdoing	Meaning	Example
Corrupt conduct	<p>Any conduct that adversely affects, or could adversely affect, the honest or impartial exercise of official functions by a Public Official, a group, or body of Public Officials.</p> <p>Any dishonest or partial act or omission by a Public Official that constitutes or involves the exercise of their official functions.</p> <p>Conduct by a current or former Public Official that involves a breach of public trust.</p> <p>Conduct by a current or former Public Official that involves the misuse of information or material acquired by a Public Official in the course of their official duties.</p> <p>Any conduct that impairs, or could impair, public confidence in public administration.</p>	<p>A Public Official with delegations to approve procurements accepting a bribe from an infrastructure assets maintenance company.</p>

Serious maladministration	Conduct, other than conduct of a trivial nature, of an agency or a Public Official relating to a matter of administration that is: <ul style="list-style-type: none"> • unlawful, or • unreasonable, unjust, oppressive or improperly discriminatory, or • based wholly or partly on improper motives. 	Systemic failure to deal with multiple reports of toxic materials in WaterNSW-owned properties over a period of time.
A government information contravention	A failure, other than a trivial failure, by an agency or Public Official to exercise functions in accordance with: <ul style="list-style-type: none"> • the <i>Government Information (Information Commissioner) Act 2009</i> (NSW), or • the <i>Government Information (Public Access) Act 2009</i> (NSW), or • the <i>State Records Act 1998</i> (NSW). 	Destroying, concealing or altering minutes of a WaterNSW board meeting to prevent them from being released under a Government Information Public Access application.
A privacy contravention	A failure, other than a trivial failure, by an agency or Public Official to exercise functions in accordance with: <ul style="list-style-type: none"> • the <i>Privacy and Personal Information Protection Act 1998</i> (NSW), or • the <i>Health Records and Information Privacy Act 2002</i> (NSW). 	A Public Official unlawfully accessing an employee's personal information on WaterNSW's database for non-work related purposes.
A serious and substantial waste of public money	An uneconomical, inefficient or ineffective use of resources, authorised or unauthorised, which results in losing or wasting public money or resources.	Not following a competitive tendering process when contracting with entities to undertake maintenance work on WaterNSW assets.

Disclosures are not Public Interest Disclosures if they:

- relate only to a disagreement with a government policy, including a government decision concerning amounts, purposes or priorities of public expenditure; or
- concern only a grievance about a matter relating to the employment or former employment of an individual, and either:
 - do not have significant implications beyond matters personally affecting or tending to personally affect the individual, or
 - relate to a disagreement with the taking or proposed taking of reasonable management action.

See instead WaterNSW *Managing Workplace Complaints Policy*

4.3 Who can receive a voluntary Public Interest Disclosure?

4.3.1 Within WaterNSW

The PID Act requires that, for a Disclosure to be a voluntary Public Interest Disclosure, it must be made to certain Public Officials identified in this Policy.

WaterNSW encourages voluntary Public Interest Disclosures to be made to the following WaterNSW Employees:

Name and position	Contact details
Andrew George Chief Executive Officer	Email: andrew.george@waternsw.com.au
Daniella Maffeo-Zuvela Legal Workplace & Governance Manager Disclosures Coordinator	Email: daniella.zuvela@waternsw.com.au
Clarita Imperial Manager Risk, Compliance & Audit Disclosures Officer	Email: clarita.imperial@waternsw.com.au
Amanda Gombru Legal Counsel Compliance & Information Access Disclosure Officer	Email: amanda.gombru@waternsw.com.au
Jodi Butfield Legal Services & Information Access Adviser Disclosure Officer	Email: jodi.butfield@waternsw.com.au

A full list of Disclosure Officers authorised to receive voluntary Public Interest Disclosures for WaterNSW can be found at **Annexure A**.

Public officials may also make a voluntary Public Interest Disclosure to their manager. For Employees of WaterNSW, this is the person who directly or indirectly supervises you, or to whom you directly or indirectly report. For Public Officials who provide services or exercise functions on behalf of WaterNSW, their manager is the Employee within WaterNSW who oversees the delivery of those services or functions or who manages the relevant arrangement.

A manager who receives a voluntary Public Interest Disclosure must communicate that Disclosure to the Disclosure Coordinator (or another Disclosure Officer) as soon as practicable.

4.3.2 Internal disclosure – WaterNSW’s independent service provider Your Call

If a Reporter does not feel comfortable to make a voluntary Public Interest Disclosure internally, they can do so instead through WaterNSW’s independent Disclosure service provider, Your Call. Your Call operates under a Services Agreement with WaterNSW and acts as the intermediary. This option allows the Reporter to:

- remain completely anonymous, or
- identify themselves to Your Call only, or
- identify themselves to both Your Call and WaterNSW.

Your Call reporting options include:

- Website: <https://www.yourcall.com.au/report> (Available 24/7)
Reporters will be required to enter the unique identified code, **WATERNSW**.
Relevant documentation and/or material can also be uploaded.

- Telephone Hotline: **1800 751 298** (Available 9am and 12am, Monday to Friday, excluding national public holidays)

If a Reporter has a hearing or speech impairment, Your Call can be contacted online or through the National Relay Service. Simply choose a contact method at <https://nrscaptions.nrscall.gov.au/nrs/captionrelay> and request Your Call's Hotline 1800 751 298.

After making a Disclosure, the Reporter will be provided with a unique Disclosure Identification Number (DIN) and access to a secure Message Board . The Message Board allows ongoing anonymous communication with Your Call and/or WaterNSW. Your Call remain the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive updates, share further information/evidence and request support or report Detrimental Action.

In the event a Disclosure received by Your Call relates to a Disclosure Officer, Your Call will exclude that Disclosure Officer from all communications when providing the Disclosure to WaterNSW. Your Call remains an independent intermediary at all times and will only communicate with those authorised within WaterNSW.

4.3.3 External disclosure

While Reporters are encouraged to make a voluntary Public Interest Disclosure directly to WaterNSW using the channels set out in this Policy, a Disclosure can also be made to certain external investigating authorities identified in the PID Act. These authorities include:

- the head of any other public service agency;
- an integrity agency such as the ICAC;
- the NSW Ombudsman;
- the Auditor-General of NSW;
- the Information Commissioner;
- the Privacy Commissioner;
- a disclosure officer of another agency – contact details will be set out in the relevant agency's PID policy; and
- if the Disclosure is in writing, a Minister or a member of the Minister's staff.

If a Reporter decides to make a Disclosure to an external investigating authority, they should contact the relevant authority for advice about how to make a Disclosure to them. Contact details for each investigating authority are provided at **Annexure B** of this Policy.

Reporters should be aware that an external investigating authority may discuss any Disclosures with WaterNSW, subject to the requirements of the PID Act, and it is possible the Disclosure may be referred to WaterNSW for appropriate action. 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 anyone who makes a Disclosure to an investigating authority, if we are made aware that this has occurred.

If information is received from an external authority that involves alleged Serious Wrongdoing and potentially qualifies as a voluntary Public Interest Disclosure, the person who receives the notification must contact the Disclosures Coordinator prior to taking any action. The Disclosures Coordinator will respond to the notification in accordance with this Policy.

4.3.4 One step removed principle – Disclosures concerning the Chief Executive Officer or Disclosures Panel

Where a Disclosure involves alleged Serious Wrongdoing:

- by the Chief Executive Officer, the relevant Disclosure should be made to the Chair of the Board Committee on Audit & Risk; or
- by a member of the Disclosures Panel, the relevant Disclosure should be made to the Chief Executive Officer.

4.4 Can a voluntary Public Interest Disclosure be anonymous?

There will be some situations where a Reporter may not want to identify themselves when they make a Disclosure. In this situation, the nature and content of the Disclosure must be such that the recipient is satisfied that it has been made by a Public Official who holds an honest belief on reasonable grounds that the Disclosure shows or tends to show Serious Wrongdoing.

Although anonymous Disclosures will be dealt with by WaterNSW to the extent possible, Reporters are encouraged to identify themselves if they are comfortable to do so. This allows WaterNSW to provide Reporters with any necessary protection and support, as well as feedback about what action will be or has been taken to deal with the issues raised in the Disclosure, or the outcome of any investigation.

An anonymous Disclosure may not prevent Reporters from being identified by the subjects of the Disclosure or their colleagues. If WaterNSW does not know who made the Disclosure, it is very difficult for WaterNSW to prevent any Detrimental Action should others identify the Reporter.

4.5 Form and content of a voluntary Public Interest Disclosure

Voluntary Public Interest Disclosures can be made:

- In writing – this could be an email or letter to a person who can receive voluntary Public Interest Disclosures;
- Orally – by having a private discussion with a person who can receive voluntary Public Interest Disclosures (either face to face, virtually or by telephone).

You should provide as much information as possible so the report can be dealt with effectively. Examples of the types of information that should be included are:

- Date, time and location of key events;
- Name(s) of person(s) involved in the suspected wrongdoing, their position and how they are involved;

- Your relationship with the person(s) involved (such as whether you work closely with them);
- Your explanation of the matter you are reporting;
- How you became aware of the matter you are reporting;
- Possible witnesses;
- Any other information, or documents, supporting your report.

4.6 What support is available for Reporters?

Reporters who are WaterNSW Employees

WaterNSW will ensure that Employees who have made a Disclosure, regardless of whether their Disclosure 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. 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 Disclosures Coordinator.

WaterNSW has an Employee Assistance Program (AccessEAP) which is a free and confidential service paid for by WaterNSW to enhance the emotional, mental and general psychological wellbeing of our Employees. AccessEAP can be contacted 24/7 on **1800 818 728**. Counselling sessions can be arranged over the phone or via online mediums.

Other Reporters

For all other Reporters who make a Disclosure to WaterNSW, we will consider what support may be suitable in the circumstances.

5. How WaterNSW will deal with voluntary Public Interest Disclosures

5.1 Disclosures Panel

The Disclosures Panel has been established to determine how to respond to Disclosures of alleged Serious Wrongdoing. Members of the Disclosures Panel include the Executive Manager Finance, Legal & Risk, Executive Manager People Safety & Culture, and the Disclosures Coordinator.

5.2 Disclosures assessed by the Disclosures Panel

The Disclosures Coordinator will refer all voluntary Public Interest Disclosures to the Disclosures Panel, who will:

- confirm if the Disclosure is a voluntary Public Interest Disclosure under the PID Act and provide a recommendation as to how to proceed in the circumstances, having regard to the PID Act;
- determine whether the Disclosure involves reasonable grounds of actual or suspected Corrupt Conduct that would require the Chief Executive Officer to report the matter to the ICAC;
- determine whether the Disclosure may involve Criminal Conduct and should be reported to the NSW Police;

- determine whether the Disclosure involves other conduct that would require referral to other external agencies such as the NSW Ombudsman;
- consider whether to notify members of the Safety People & Culture portfolio and/or relevant senior management of relevant matters, where appropriate; and
- ensure any required notifications to external agencies are made.

The Disclosures Panel will then identify a course of action or actions to be taken.

5.3 Where the Disclosure is a voluntary Public Interest Disclosure

If a Disclosure is a voluntary Public Interest Disclosure, the Disclosures Panel may take any of the actions set out in the table below:

Investigate	The Panel may recommend to the Chief Executive Officer that an investigation be commissioned into the alleged Serious Wrongdoing and whether; <ul style="list-style-type: none"> • an investigation should be conducted by internal or external resources; and • any technical, financial or legal advice may be required.
Refer	The Panel may decide the Disclosure should be referred to another agency, such as an integrity agency. Before referring, WaterNSW will discuss the referral with the other agency, and provide the Reporter with details of the referral and a contact person within the other agency.
No further action	The Panel may decide not to investigate the Disclosure and not to refer the matter to another agency, for example, due to inadequate information. If WaterNSW does this, we must let the Reporter know the reasons for this and notify the NSW Ombudsman.

In certain circumstances, the Chief Executive Officer can determine that a Disclosure is a voluntary Public Interest Disclosure even if it does not have all the features under the PID Act. By deeming a disclosure to be a voluntary Public Interest Disclosure, the Reporter will be protected under the PID Act. A decision to deem a disclosure to be a voluntary Public Interest Disclosure is at the Chief Executive Officer's discretion.

5.4 Investigation of a voluntary Public Interest Disclosure

In circumstances where an investigation of the voluntary Public Interest Disclosure is commissioned, the process set out in the *WaterNSW Investigating Alleged Wrongdoing and Criminal Conduct Procedure* will be followed.

The Disclosures Coordinator will monitor the progress of all investigations of alleged Serious Wrongdoing and report to the Disclosures Panel on the status of each investigation. Progress updates will also be provided to the Reporter as set out in section 5.6.

5.5 Where the Disclosure is not a voluntary Public Interest Disclosure

If a Disclosure is not a voluntary Public Interest Disclosure, the Disclosure panel will determine how to respond to the Disclosure, for example, the matter may be

referred to the Safety People and Culture portfolio to be dealt with in accordance with the *Managing Workplace Complaints Policy*.

The Disclosure Coordinator will advise the Reporter that the PID Act does not apply.

WaterNSW may also stop dealing with a Disclosure if it is later determined that it is not actually a voluntary Public Interest Disclosure (meaning it does not have all the features of a Public Interest Disclosure). The Reporter will be provided with reasons for the decision to discontinue dealing with the matter as a Disclosure.

5.6 Acknowledging Disclosures and keeping the Reporter Informed

Acknowledgment - as soon as reasonably practicable and within ten working days after a Disclosure has been made to WaterNSW, the Disclosures Coordinator will provide the Reporter with written acknowledgment of the receipt of the Disclosure. The acknowledgment will:

- advise the Reporter that the report will be assessed to identify whether it is a voluntary PID;
- state that the PID Act applies to how WaterNSW deals with the Disclosure;
- provide a copy of this Policy; and
- provide details of a contact person (usually the Disclosures Coordinator) and the support services available (see section 4.6 for more detail about available supports).

If the Disclosure is a voluntary Public Interest Disclosure, the Disclosures Coordinator will inform the Reporter as soon as practicable how WaterNSW intends to deal with the Disclosure. This may include:

- that WaterNSW is investigating the Serious Wrongdoing;
- that WaterNSW will refer the Disclosure to a different agency (if appropriate) to deal with the voluntary Public Interest Disclosure, and details of that referral;
- if WaterNSW decides to not investigate the Disclosure and to not refer it to another agency for it to be investigated, the reasons for this decision (WaterNSW will also notify the NSW Ombudsman of this decision);

If WaterNSW decides to investigate the allegations of Serious Wrongdoing, the Disclosures Coordinator will provide the Reporter with:

- updates on the investigation at least every three months,
- the following information once the investigation is complete:
 - a description of the results of the investigation — that is, whether we found that Serious Wrongdoing took place.
 - information about any corrective action as a result of the investigation/s — that is, what action we took in relation to the person who engaged in the Serious Wrongdoing or if the Serious Wrongdoing was by our agency, what we have put in place to address that Serious Wrongdoing.

There may be some details relating to the Disclosure that cannot be revealed to the Reporter, such as particulars of the investigation findings and corrective action

taken. WaterNSW will always balance the right of a Reporter to know the outcome of that Disclosure, with other legal obligations we have.

If a Reporter has made an anonymous Disclosure, in many cases WaterNSW may not be able to provide this information to the Reporter.

6. Protections

6.1 How is a Reporter protected?

When a Reporter makes a Public Interest Disclosure, the Reporter receives special protections under the PID Act.

WaterNSW is committed to taking all reasonable steps to protect Reporters from detriment as a result of having made a Public Interest Disclosure. Except where otherwise noted, the protections discussed below are applicable to voluntary, witness and mandatory Public Interest Disclosures:

- **Protection from Detrimental Action**

- A person cannot take Detrimental Action against a Reporter because they have made a Public Interest Disclosure or are considering making a Public Interest Disclosure. Detrimental Action is defined and discussed further in sections 6.2-6.4 below.
- It is a criminal offence for someone to take Detrimental Action against a Reporter because they have made or may make a Disclosure. It is punishable by a maximum penalty of 200 penalty units or imprisonment for five years or both.
- A Reporter may seek compensation where unlawful Detrimental Action has been taken against them.
- A Reporter can apply for a court order (injunction) where Detrimental Action is threatened or has occurred (for example, an order to prevent dismissal or to require reinstatement)

- **Immunity from civil and criminal liability**

Some Public Officials are subject to a duty of confidentiality that prevents them disclosing certain information that they obtain or become aware of at work. Sometimes, in order to make a Public Interest Disclosure, Public Officials will need to breach or disregard such confidentiality duties. If that happens, a Public Official cannot be disciplined, sued or criminally charged for breaching confidentiality.

- **Protection from liability for own past conduct**

The Attorney General can give an undertaking that a Public Interest Disclosure of a persons' own past conduct will not be used against them if they disclose their own wrongdoing or misconduct while making a Public Interest Disclosure. This undertaking can only be given on application by an integrity agency to the Attorney General.

- **Confidentiality (voluntary public interest disclosures only)**

If a Reporter has made a voluntary Public Interest Disclosure, Public Officials and agencies must not disclose information tending to identify the person as the Reporter unless doing so is permitted by the PID Act. This is discussed further at section 6.5 below.

6.2 Detrimental action - meaning

WaterNSW will not tolerate any Detrimental Action being taken by any person against a Reporter, investigators, witnesses or the person the Public Interest Disclosure is about.

Detrimental Action against a person is an act or omission that causes, comprises, involves or encourages detriment to a person or a threat of detriment to a person (whether express or implied). Detriment to a person includes:

- injury, damage or loss
- property damage
- reputational damage
- intimidation, bullying or harassment
- unfavourable treatment in relation to their job
- discrimination, prejudice or adverse treatment (whether related to employment or not)
- disciplinary proceedings or disciplinary action, or
- any other type of disadvantage.

Detrimental Action does not include:

- lawful action taken by a person or body to investigate Serious Wrongdoing or other misconduct
- the lawful reporting or publication of a finding of Serious Wrongdoing or other misconduct
- the lawful making of adverse comment, resulting from investigative action
- the prosecution of a person for a criminal offence
- reasonable management action taken in relation to a person who made or may make a Disclosure. For example, a reasonable appraisal of a Reporter's work performance.

6.3 How WaterNSW will assess and minimise the risk of Detrimental Action

WaterNSW will assess and take steps to mitigate Detrimental Action from being taken against the maker of a Disclosure, the person whose conduct is the subject of a Disclosure, investigators and witnesses.

Upon receipt of a Disclosure, the Disclosure Coordinator will undertake a risk assessment to identify the risks of Detrimental Action against any person which may arise from the Disclosure, and develop a risk management plan.

In conducting the assessment and developing the risk management plan, WaterNSW will have regard to the NSW Ombudsman's guidelines – *Assessing and managing the risk of detrimental action*.

6.4 Reporting Detrimental Action

If a Reporter experiences Detrimental Action, such as bullying or harassment, they should report this immediately to the Disclosure Coordinator. Reporters can also report any experience of Detrimental Action to an integrity agency. A list of integrity agencies is located at **Annexure B** of this policy.

6.5 How WaterNSW will deal with allegations of a Detrimental Action offence

If WaterNSW becomes aware of a suggestion that Detrimental Action has occurred or may occur, WaterNSW will:

- take steps to stop the action and protect the person(s);
- take appropriate disciplinary action against anyone that has taken Detrimental Action;
- refer any evidence of a Detrimental Action offence to the Commissioner of Police and the ICAC or Law Enforcement Conduct Commission (whichever is applicable);
- notify the NSW Ombudsman about the allegation of a Detrimental Action offence being committed.

6.6 How WaterNSW will protect the confidentiality of Reporters who have made a voluntary Public Interest Disclosure

WaterNSW understands that Reporters may want their identity and the fact they have made a voluntary Public Interest Disclosure to be confidential.

Under the PID Act, information tending to identify a person as the Reporter (known as identifying information) is not to be disclosed by a Public Official or an agency.

There are certain circumstances under the PID Act that allow WaterNSW to disclose the identifying information. These include where:

- the Reporter consents in writing to the disclosure;
- it is generally known that the Reporter is the maker of the Disclosure because of their voluntary self-identification as the Reporter;
- the Public Official or WaterNSW reasonably considers it necessary (after consulting with the Reporter) to disclose the information to protect a Reporter from detriment;
- it is necessary the information be disclosed to a person whose interests are affected by the Disclosure;
- the information has previously been lawfully published;
- the information is disclosed to a medical practitioner or psychologist for the purposes of providing medical or psychiatric care, treatment or counselling to the Reporter;
- the information is disclosed for the purposes of court or tribunal proceedings;

- the disclosure of the information is necessary to deal with the Disclosure effectively; or
- it is otherwise in the public interest to disclose the identifying information.

WaterNSW will put in place steps to maintain the confidentiality of the Reporter's identifying information and the fact that a voluntary Public Interest Disclosure has been made. It may not be possible for us to maintain complete confidentiality while we progress the investigation, but we will take practical steps to minimise disclosure.

WaterNSW will do this by:

- if the voluntary Public Interest Disclosure is written and needs to be forwarded for the purposes of an investigation, redacting identifiable information from the Disclosure;
- ensuring only the Disclosures Panel, and any other person who is required to know in order to manage the voluntary Public Interest Disclosure (e.g. an investigator) has knowledge of the Reporter's identity; and
- advising any person who becomes involved in the management of the voluntary Public Interest Disclosure that the process is strictly confidential and, unless advised otherwise, the Reporter's identity must not be disclosed.

In appropriate circumstances, where confidentiality cannot be maintained, WaterNSW will:

- advise the Reporter that their identity may be disclosed or otherwise identified;
- issue warnings that the Reporter's identity must not be disclosed and Detrimental Action must not be taken against the Reporter; and
- provide all persons involved in the management of the voluntary Public Interest Disclosure with a copy of this Policy.

6.7 Sanctions for making false or misleading statements

It is important that Reporters are aware that it is a criminal offence under the PID Act to wilfully make a false or misleading statement when making a Disclosure. The protections afforded under the PID Act and this Policy are not applicable to Reporters who wilfully make false or misleading Disclosures. Such conduct may also be a breach of the *WaterNSW Code of Conduct* resulting in disciplinary action or termination of employment.

7. The rights of persons the subject of alleged Serious Wrongdoing

WaterNSW is committed to ensuring persons the subject of a Disclosure are treated fairly and reasonably, and in accordance with the principles of Procedural Fairness. This includes keeping the identity of any person the subject of a Disclosure confidential, where this is practical and appropriate.

Generally, if a person is the subject of the Disclosure, they will be advised of the allegations made against them at an appropriate time and before any adverse findings. At the relevant time, they will be:

- advised of the details of the allegation(s);
- 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 further action will be taken against them.

Where the allegations are clearly wrong, or have been investigated and unsubstantiated, the persons the subject of the Disclosure will be supported by WaterNSW. The fact of the allegations and any investigation will be kept confidential unless otherwise agreed to by them.

8. Internal review and dispute resolution

8.1 Internal review

Reporters of voluntary Public Interest Disclosures can seek internal review of the following decisions made by WaterNSW:

- that WaterNSW is not required to deal with the Disclosure as a voluntary Public Interest Disclosure;
- to stop dealing with the Disclosure because WaterNSW decided it was not a voluntary Public Interest Disclosure;
- to not investigate the Serious Wrongdoing and not refer the voluntary Public Interest Disclosure to another agency; and
- to cease investigating the Serious Wrongdoing without either completing the investigation or referring the Disclosure to another agency for investigation.

If a Reporter would like to make an application for an internal review, they must inform the Disclosure Coordinator in writing within 28 days of being informed of WaterNSW's decision. The application should state the reasons why the Reporter considers WaterNSW's decision should not have been made. The Reporter may also submit any other relevant material with their application.

WaterNSW will ensure internal reviews are conducted in compliance with the PID Act.

8.2 Voluntary dispute resolution

If a dispute arises between WaterNSW and a Reporter, WaterNSW can request the NSW Ombudsman to conciliate the dispute. Conciliation is a voluntary process and will only be suitable for disputes where both parties are willing to participate in the conciliation process.

9. Reporting to the NSW Ombudsman

Within 30 days after the end of each 12 month period ending on 30 June, the Disclosures Coordinator will deliver a report to the NSW Ombudsman. The report will

contain the matters required under section 78 of the PID Act and clauses 5 and 6 of the PID Regulation, including:

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

10. Record-keeping requirements

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

11. Potential actions arising from a substantiated finding of Serious Wrongdoing

If, after an investigation, it is found that Serious Wrongdoing or other misconduct has occurred, WaterNSW will take the most appropriate action to address that Serious Wrongdoing or other misconduct. This is also known as corrective action.

Corrective action may include:

- a formal apology;
- taking an action authorised by an Act or law (eg. reporting corrupt conduct to ICAC or criminal behaviour to NSW Police);
- improving internal policies to adequately prevent and respond to similar instances of Serious Wrongdoing;
- providing additional education and training to staff where required;
- taking employment action against persons involved in the Serious Wrongdoing (such as termination of employment, relocation, a caution or reprimand) in accordance with the *WaterNSW Corrective and Disciplinary Action Procedure*;
- payment of compensation to people who have been affected by Serious Wrongdoing or other misconduct.

12. Communication of information on Disclosures of Serious Wrongdoing

Disclosures of Serious Wrongdoing are serious and information regarding the Disclosure and any investigations is maintained as strictly confidential. As a result, information on Disclosures will be communicated on a 'need to know' basis.

In most cases, information on investigations in progress cannot be communicated to parties outside of the investigation. Relevant information (which is de-identified, if necessary) will be communicated at the conclusion of an investigation to management in order to improve organisational governance by helping management identify and respond to control weaknesses.

Information on Disclosures of Serious Wrongdoing will be communicated as follows:

- The Board Committee on Audit and Risk will receive periodic reports on the number and types of Disclosures made and, subject to confidentiality

requirements, the outcomes of investigations and any disciplinary or remedial action taken.

- The Disclosures Coordinator will meet as required with the Manager Risk Compliance & Audit to assess the impact of Disclosure outcomes against the fraud risks identified in WaterNSW's Fraud Risk Register.

13. Allegations involving Criminal Conduct

Public Officials may have information concerning behaviour of Public Officials that could amount to Criminal Conduct. In these circumstances, the Public Official should report this information to the Disclosure Coordinator or a Disclosure Officer identified in this Policy, or to Your Call (see section 4.3).

Any report of Criminal Conduct must be referred to the Disclosures Panel who will determine whether the information should be reported to the NSW Police and/or another investigating authority. To the extent it is appropriate to do so, reports of Criminal Conduct may be dealt with by WaterNSW in the same way as voluntary Public Interest Disclosures. However, this will be determined by WaterNSW on a case by case basis.

14. Authorities and responsibilities

Role	Responsibility
Chief Executive Officer (or Chair of the Board Committee on Audit & Risk, where the Chief Executive Officer is implicated in the disclosure)	Has the authority and responsibility to: <ul style="list-style-type: none"> • maintain the internal reporting system and workplace reporting culture ensuring WaterNSW complies with the PID Act; • assess Disclosures received by or referred to them, to determine whether they should be treated as a Public Interest Disclosure, and decide how the Disclosure will be dealt with; • commission an investigation, where required, in circumstances where the Disclosures Panel has recommended there are reasonable grounds to suspect the alleged Serious Wrongdoing has occurred; • consult with the Chair of the Board Committee on Audit & Risk when deciding whether to investigate alleged Serious Wrongdoing; • ensure strategies are in place to support Reporters, protect Reporters from Detrimental Action and manage workplace conflict that may arise in relation to a Disclosure; • make decisions following any investigation or appoint an appropriate decision-maker; • take appropriate corrective action where Serious Wrongdoing is substantiated, or systemic problems are identified; • comply with all reporting obligations under the ICAC Act. The Chief Executive Officer reviews and signs

	<p>correspondence to ICAC under section 11 of the ICAC Act;</p> <ul style="list-style-type: none"> • respond or arrange for a delegate to respond to the ICAC on Disclosures referred to WaterNSW for investigation or for any request for information from the ICAC; • refer any evidence of a Detrimental Action offence under section 34 of the PID Act to the Commissioner of Police and the ICAC; and • determine whether a Disclosure should be deemed to be a voluntary Public Interest Disclosure pursuant to section 29 of the PID Act.
Executive Manager Finance, Legal & Risk	<p>Has the authority and responsibility to:</p> <ul style="list-style-type: none"> • approve this Policy; • act as a member of the Disclosures Panel; • establish the mechanisms and resources for the end to end process for managing Disclosures; • exercise delegations to engage external investigations where required; • exercise delegations to request legal advice when required.
Executive Manager Safety People & Culture	<p>Has the authority and responsibility to:</p> <ul style="list-style-type: none"> • act as a member of the Disclosures Panel; • assist with the investigation of Disclosures as and when requested by the Disclosures Coordinator; • report to the Disclosures Panel on proposed disciplinary actions; and • ensure welfare support is provided to persons involved in an investigation.
Executive Managers and Senior Leadership Group Managers	<p>Have authority and responsibility to:</p> <ul style="list-style-type: none"> • promote knowledge of this Policy; • encourage Employees to make a Disclosure of known or suspected Serious Wrongdoing and support Employees when they do; • receive and communicate Disclosures to the Disclosure Coordinator or Disclosure Officer as soon as reasonably practicable • implement local management strategies, in consultation with the Disclosures Coordinator, to minimise the risk of Detrimental Action or workplace conflict in relation to a Disclosure; • notify the Disclosures Coordinator or Chief Executive Officer immediately if they believe a Reporter is being subjected to Detrimental Action.
General Counsel & Company Secretary	<p>Has the authority and responsibility to:</p> <ul style="list-style-type: none"> • provide legal advice to the Disclosures Panel as required; • upon receiving specific instructions to do so, undertake or commission investigations for the purpose of providing legal advice.

Disclosures Coordinator	<p>Has the authority and responsibility to:</p> <ul style="list-style-type: none"> • receive Disclosures of Serious Wrongdoing; • act as a member of the Disclosures Panel; • assess and refer Disclosures and information to the Disclosures Panel; • assist the Chief Executive Officer in identifying Corrupt Conduct or potentially Corrupt Conduct that is reportable to ICAC; • coordinate WaterNSW's response to a Disclosure; • acknowledge Disclosures 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 Detrimental Action and workplace conflict related to or likely to arise out of a Disclosure, and develop risk management strategies in consultation with relevant Executive Managers and Senior Leadership Group Managers; • provide annual reports to the NSW Ombudsman in accordance with section 78 of the PID Act; • ensure applications for internal review are dealt with appropriately.
Disclosure officers (see section 4.3.1)	<p>Have the authority and responsibility to:</p> <ul style="list-style-type: none"> • receive disclosures of Serious Wrongdoing; • act as additional points of contact within the internal reporting system; • document in writing any Disclosures received verbally, and have the document signed and dated by the Reporter; • make arrangements to ensure Public Officials can make Disclosures privately and discretely when requested, if necessary, away from the workplace; • discuss with the Reporter any concerns they may have about Detrimental Action or workplace conflict; • carry out a preliminary assessment and forward reports to the Disclosures Coordinator for full assessment.
Disclosures Panel members	<p>Have the authority and responsibility to:</p> <ul style="list-style-type: none"> • attend Disclosures Panel meetings at which investigations are discussed; • declare perceived or actual conflicts of interest involving a person identified in a Disclosure and withdraw from deliberations and decisions in relation to that Disclosure; and • notify the Chief Executive Officer of any Disclosure suspected on reasonable grounds to concern actual or suspected Corrupt Conduct.
Public Officials (including Employees)	<p>Have the authority and responsibility to:</p> <ul style="list-style-type: none"> • report Serious Wrongdoing; • use best endeavours to assist in an investigation of serious wrongdoing if asked to do so;

- protect and maintain the confidentiality of any Public Official they know or suspects has made a Disclosure;
- not victimise or harass anyone who has made a Disclosure; and
- maintain awareness of, and comply with, this Policy.

15. Terms and definitions

Definitions

Agency	is as defined in s16 of the PID Act and (amongst other things) includes Public Service agencies, State owned corporations, and local government authorities.
Criminal Conduct	is alleged conduct which would constitute a criminal offence.
Detrimental Action	See section 6.2.
Disclosure	means a report, or the reporting, of circumstances relating to suspected Serious Wrongdoing by a Public Official (and includes a Public Interest Disclosure).
Disclosures Coordinator	receives and assesses Disclosures and provides information to the Disclosures Panel.
Disclosures Officer	provides advice about the system and the internal reporting process, receives reports of Wrongdoing and assists Employees to make reports.
Disclosures Panel	a panel of Employees normally comprising the Executive Manager Finance, Legal & Risk, Executive Manager Safety People & Culture, and the Disclosures Coordinator.
Employee	means: <ul style="list-style-type: none"> • any person employed by WaterNSW whether on a permanent or temporary basis, whether in a full-time, part-time or casual capacity; and • all contractors, consultants and professional service providers engaged by WaterNSW (and includes their personnel and employees) that are representing, or acting for or on behalf of, WaterNSW in the performance of official duties (please refer to paragraph 3.3 of the WaterNSW Conflicts of Interest Procedure for further information about official duties, however these roles include secondees and other people who are contracted to fill WaterNSW positions or perform roles or functions that are similar, or equivalent, to positions or roles typically performed by Employees) ("Contracted Employees").
ICAC	the Independent Commission Against Corruption as constituted under the ICAC Act.
ICAC Act	the <i>Independent Commission Against Corruption Act 1988</i> (NSW).
NSW Ombudsman	the NSW Ombudsman as constituted under the <i>Ombudsman Act 1974</i> (NSW).
PID Act	the <i>Public Interest Disclosures Act 2022</i> (NSW).
PID Regulation	the <i>Public Interest Disclosure Regulation 2022</i> (NSW).

Procedural Fairness	also known as 'natural justice', it includes: the right for the person who is the subject of the concern to be informed of all the allegations in relation to their behaviour; provided with an opportunity to respond; all relevant material considered; the decision is impartial, fair and just. Investigations must be conducted fairly and without bias and with no undue delay in investigations and proceedings.
Public Interest Disclosure	a Disclosure that satisfies the applicable requirements of Part 2 of the PID Act.
Public Official	see section 2.1.
Reporter	a person who makes a Disclosure.
Serious Wrongdoing	see section 4.2.
Workplace Complaint	an expression of dissatisfaction raised by an Employee regarding a genuine work-related concern. Also known as a grievance, it can relate to a range of concerns including interpersonal conflict; behaviour of others; a work-related decision; workload issues or perceived unfairness. A 'Workplace Complaint' is to be dealt with by following the process set out in the <i>WaterNSW Managing Workplace Complaints Procedure</i> .

Annexure A – Full list of WaterNSW Disclosure Officers

WaterNSW Location	Position	Position holder as at Jan 2024
Parramatta (HQ)	See section 4.3.1	
Albury	Executive Manager Operations	Ronan Magaharan
Armidale	General Manager Regional Operations North	Michelle Yeaman
Balranald	Regional Project Manager South	Benjamin Renfrey
Bega	Acting Water Monitoring Manager	Adam Wiggins
Blowering Dam	Asset Custodian Blowering	Barry Brunson
Buronga	Manager Water Planning & Delivery South	Jonathan Belej
Burrawang	Area Manager Catchment	Mary Knowles
Burrendong Dam	Maintenance Team Leader	Rodney Wilson
Burrinjuck Dam	Area Manager South East	Stuart Johnson
Carcoar Dam	Area Manager South East	Steve Hamson
Cascades	Catchment Officer	Andrew Simson
Coffs Harbour	Manager First Nations Programs & Engagement	Russell Hill
Copeton Dam	Area Manager Upper North	Tim Tanner
Deniliquin	Team Leader Water Planning & Delivery South	Col Hood
Dubbo	Manager Procurement Corporate Property & Services	Andrea Patrick
Forbes	Lead Project Manager	Luke Walsh
Glenbawn Dam	Portfolio Asset Planner	Hank Hochfaerber
Glennies Creek Dam	Asset Custodian Glennies Creek	Howard Sills
Goondiwindi	Water Planning & Delivery Specialist	Ken Gee
Goulburn	Compliance Officer	Amelia Stein
Grafton	Water Regulation Manager North	Tracey Lawson
Gunnedah	Water Monitoring Officer	David Donnelly/ Ross Beasley
Hume Dam	Maintenance Team Leader Hume	Simon Nolan
Hunter Hub	Manager Assets	Neda Abed Khojasteh
Keepit Dam	Construction Manager	Russell Sainsbury
Kenny Hill	Construction Manager	Chris Field
Lake Cargelligo	Maintenance Supervisor Lake Cargelligo	Glenn Riley
Leeton	Area Manager South West	Eddy Taylor
Lock 10 Wentworth	Maintenance Supervisor Wentworth	Daniel Bourke
Lock 15 Euston	Maintenance Supervisor Euston	Phil Cocks
Menangle	Water Monitoring Team Leader	Simon Dunn
Moree	Water Monitoring Team Leader	Peter Kelleff
Menindee Lakes	Maintenance Team Leader Menindee	Barry Philp
Murwillumbah	Metering Program Delivery Manager	Ryan Lindsay
Narrabri	Water Monitoring Team Leader	Matt Walters
Nepean Dam	Catchment Officer	Keith Maylin
Nowra	Meter & Data Operations Manager	Jack Finch
Orange	Manager Strategic Communications	Teneille Rennick

Pindari Dam	Maintenance Team Leader	Daryl Brooks
Split Rock Dam	Instrumentation & Controls Technician	Mark Hewitt
Tamworth	General Manager Water Planning & Delivery	Ashley Webb
Toonumbar Dam	Asset Custodian Toonumbar	Damien Smith
Tumut	Water Monitoring Team Leader	Ryan Brown
Wagga Wagga	Acting Water Monitoring Team Leader	Michael Debono
Wallerawang	Maintenance Team Leader Wallerawang	Perrin Walsh
Warragamba Dam	General Manager Regional Operations Sydney	Brian Mayhew
Warren	Water Planning & Delivery Support Coordinator	Jennifer Stocks
Windamere Dam	Asset Custodian Windamere	Paul Nelson
Wollongong	Construction Manager	Gianni Gazzola
Wyangala Dam	Maintenance Team Leader Wyangala	Rodney Veney

Annexure B – External investigating authorities

Integrity agency	What they investigate	Contact information
The NSW Ombudsman	Most kinds of serious maladministration by most agencies and Public Officials (but not NSW Police, judicial officers or MPs)	<p>Telephone: 1800 451 524 between 9am to 4pm Monday to Friday</p> <p>Writing: Level 24, 580 George Street, Sydney NSW 2000</p> <p>Email: info@ombo.nsw.gov.au</p>
The Auditor-General	Serious and substantial waste of public money by auditable agencies	<p>Telephone: 02 9275 7100</p> <p>Writing: GPO Box 12, Sydney NSW 2001</p> <p>Email: governance@audit.nsw.gov.au</p>
Independent Commission Against Corruption	Corrupt conduct	<p>Telephone: 02 8281 5999 or toll free on 1800 463 909 (callers outside Sydney) between 9am and 3pm, Monday to Friday</p> <p>Writing: GPO Box 500, Sydney NSW 2001 https://www.icac.nsw.gov.au/reporting/report-corruption/icac-corruption-complaints-form</p> <p>Email: icac@icac.nsw.gov.au</p>
The Inspector of the Independent Commission Against Corruption	Serious maladministration by the ICAC or the ICAC officers	<p>Telephone: 02 9228 3023</p> <p>Writing: PO Box 5341, Sydney NSW 2001</p> <p>Email: oiicac_executive@oiicac.nsw.gov.au</p>
The Law Enforcement Conduct Commission	Serious maladministration by the NSW Police Force or the NSW Crime Commission	<p>Telephone: 02 9321 6700 or 1800 657 079</p> <p>Writing: GPO Box 3880, Sydney NSW 2001</p> <p>Email: contactus@lecc.nsw.gov.au</p>
The Inspector of the Law Enforcement Conduct Commission	Serious maladministration by the LECC and LECC officers	<p>Telephone: 02 9228 3023</p> <p>Writing: GPO Box 5341, Sydney NSW 2001</p> <p>Email: oilc_executive@oilc.nsw.gov.au</p>
Office of the Local Government	Local government pecuniary interest contraventions	<p>Email: olg@olg.nsw.gov.au</p>
The Privacy Commissioner	Privacy contraventions	<p>Telephone: 1800 472 679</p> <p>Writing: GPO Box 7011, Sydney NSW 2001</p> <p>Email: ipcinfo@ipc.nsw.gov.au</p>
The Information Commissioner	Government information contraventions	<p>Telephone: 1800 472 679</p> <p>Writing: GPO Box 7011, Sydney NSW 2001</p> <p>Email: ipcinfo@ipc.nsw.gov.au</p>