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INDEPENDENT COMMISSION  
AGAINST CORRUPTION

NEW SOUTH WALES

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**MAKING A  
PUBLIC INTEREST  
DISCLOSURE TO  
THE NSW ICAC**

POLICY FOR EXTERNAL REPORTS

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**OCTOBER 2023**

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## Making a public interest disclosure to the NSW ICAC - policy for external reports

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## 1. Purpose

Section 42 of the [Public Interest Disclosures Act 2022](#) (“the PID Act”) requires the NSW Independent Commission Against Corruption (“the Commission”) to have a public interest disclosure (PID) policy.

This is the Commission’s policy dealing with PIDs made by public officials who are not officers of the Commission.

The integrity of the NSW Government relies upon NSW Government staff, contractors and subcontractors speaking up when they become aware of serious wrongdoing.

The Commission appreciates the courage that can be involved in a person “blowing the whistle” on serious wrongdoing in the public sector and acknowledges the importance of whistle-blowers to its work in exposing and preventing corrupt conduct.

This policy sets out how the Commission will fulfil its responsibilities under the PID Act by:

- identifying when a matter will be a PID
- setting out how a report of serious wrongdoing can be made to the Commission
- explaining how the Commission will deal with a report of serious wrongdoing
- setting out what information a PID maker will receive once they have made the report
- setting out the protections that are available to PID makers under the PID Act
- identifying what support is available
- identifying relevant recordkeeping and reporting requirements.

This policy also documents the Commission’s commitment to building a speak up culture. Part of that speak up culture is having in place a framework that facilitates reporting of serious wrongdoing. In NSW, that framework is the PID Act.

For further information about this policy, how public interest disclosures will be handled and the PID Act:

- confidentially contact the Commission’s Manager Assessments at [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au)
- contact the NSW Ombudsman’s PID Advice Team by telephone: (02) 9286 1000 or email: [pidadvice@ombo.nsw.gov.au](mailto:pidadvice@ombo.nsw.gov.au), or
- access the NSW Ombudsman’s PID guidelines which are available on its [website](#) at.

People requiring legal advice with respect to the PID Act or their obligations under the Act, should seek such advice independently.

## 2. When will a matter be a PID?

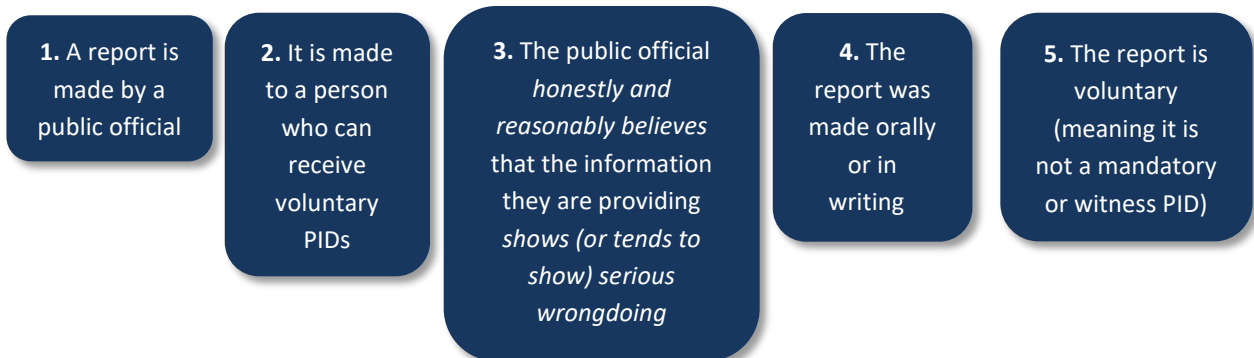
There are three types of PIDs in the PID Act. These are:

1. *Voluntary PIDs* (s 24 PID Act): This is a PID where a report has been made by a **public official**, of their own accord, about a matter the public official honestly and on reasonable grounds believes shows or tends to show “serious wrongdoing”.
2. *Mandatory PIDs* (s 23 PID Act): This is a PID where a **public official** has made a report about “serious wrongdoing” because they have a legal obligation to make that report, or because making that report is an ordinary aspect of their role or function in an agency.
3. *Witness PIDs* (s 22 PID Act): This is a PID where a **person** discloses information during an investigation of serious wrongdoing following a request or requirement of the investigator.

This policy mostly relates to making a voluntary PID and how the Commission will deal with voluntary PIDs. People who make a mandatory PID or a witness PID are still entitled to protection. More information about protections is available later in this policy.

More information about mandatory and witness PIDs in the NSW Ombudsman’s guidelines [Dealing with mandatory PIDs](#) and [Dealing with witness PIDs](#).

A report is a voluntary PID if it has the following five features, which are set out in sections 24 to 27 of the PID Act:



A PID maker is not expected to prove that what they reported actually happened or is “serious wrongdoing”. They *do* have to honestly believe, on reasonable grounds, that the information they are reporting shows or tends to show “serious wrongdoing”.

Even though it is not necessary to prove the “serious wrongdoing” happened, or to provide evidence, a mere allegation with no supporting information is unlikely to meet this test.

A disclosure will not be a voluntary PID if it relates only to a disagreement with a government policy, including:

- a government decision concerning amounts, purposes or priorities of public expenditure, or
- a policy of the governing body of a local government authority.

A disclosure also will not be a voluntary PID if the information disclosed concerns only a grievance about a matter relating to the employment or former employment of an individual (unless the grievance arises from a decision by an agency in dealing with a previous voluntary PID or alleged detrimental action relating to a previous PID), and either:

- does not have significant implications beyond matters personally affecting or tending to personally affect the individual, or
- relates to a disagreement with the taking or proposed taking of reasonable management action.

If the Commission makes an error and does not identify that a maker has made a voluntary PID, the maker is still entitled to the protections under the PID Act.

If a report is made and the maker believes the Commission has made an error by not identifying that they have made a voluntary PID, they should raise this with their nominated disclosure officer or contact officer for the report. In certain circumstances, set out below, they may be able to apply to the Commission for an internal review. Further information on rights to internal review and voluntary dispute resolution is set out in section 12 of this policy.

### 3. Who is a public official?

Section 14 of the PID Act defines a public official as one or more of the following:

- a person employed in or by an “agency” or otherwise in the service of an “agency”
- a person having public official functions or acting in a public official capacity whose conduct or activities an “integrity agency” is authorised by another Act or law to investigate
- an individual in the service of the Crown
- a statutory officer
- a person providing services or exercising functions **on behalf** of an agency, including a contractor, subcontractor or volunteer
- if an entity, under a contract, subcontract or other arrangement, is to provide services **on behalf** of an agency or exercise functions of an agency in whole or in part – an employee, partner or officer of the entity who is to be involved in providing the services in whole or in part, or who is to exercise the function
- a judicial officer
- a member of Parliament, including a Minister
- a person employed under the *Members of Parliament Staff Act 2013*
- any other person declared to be a public official under the regulations.

The meaning of “agency” is set out in s 16 of the PID Act. It includes a Public Service agency, the NSW Police Force, the NSW Teaching Service, the NSW Health Service, the NSW Transport Service, an “integrity agency”, a State owned corporation (or subsidiary), a local government authority, a Local Aboriginal Land Council, the Department of Parliamentary Services, the Department of the Legislative Assembly and the Department of the Legislative Council. However, a Minister’s office is not an agency.

The meaning of “integrity agency” is set out in s 19 of the PID Act. It means one of the following:

- the NSW Ombudsman
- the NSW Auditor-General
- the Commission
- the Inspector of the ICAC
- the Law Enforcement Conduct Commission
- the Inspector of the Law Enforcement Conduct Commission
- the Secretary of the NSW Department of Planning, Industry and Environment when exercising certain functions specified in s 19 of the PID Act
- the Privacy Commissioner
- the Information Commissioner
- a person or body declared by the regulations to be an integrity agency for the purposes of the PID Act.

Even if they are not a “public official”, people can still make a complaint about corruption involving NSW public authorities and public officials by reporting the matter to the Commission using one of the methods set out in section 5 of this policy.

### 4. What is “serious wrongdoing”?

Reports must be of one or more of the following categories of “serious wrongdoing” to be a voluntary PID (in addition to having the other features set out here). Serious wrongdoing is defined in s 13 of the PID Act as:

- **corrupt conduct** (as defined in the ICAC Act)
- **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 unlawful, or

unreasonable, unjust, oppressive or improperly discriminatory, or based wholly or partly on improper motives)

- **a government information contravention** (a failure, other than a trivial failure, by an agency or public official to exercise functions in accordance with the *Government Information (Information Commissioner) Act 2009*, or the *Government Information (Public Access) Act 2009*, or the *State Records Act 1998*)
- **a local government pecuniary interest contravention** (a contravention of an obligation imposed in connection with a pecuniary interest by the *Local Government Act 1993* or a code of conduct adopted by a council under that Act)
- **a privacy contravention** (a failure, other than a trivial failure, by an agency or public official to exercise functions in accordance with the *Privacy and Personal Information Protection Act 1998* or the *Health Records and Information Privacy Act 2002*)
- **a serious and substantial waste of public money.**

When making a report, people do not need to state what category of serious wrongdoing they are reporting or that they are reporting serious wrongdoing.

## 5. How to make a voluntary PID

A voluntary PID can be made to the Commission in writing by:

- email [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au), or
- using the [online complaint form](#), or
- posting the report to GPO Box 500, Sydney NSW 2001.

Reports can also be made by calling the Commission on (02) 8281 5999.

If a disclosure is made orally (that is, by telephone) then, in accordance with s 53 of the PID Act, the person to whom the disclosure is made must make a written record of the disclosure.

A report can be made anonymously. A report will only be considered anonymous if there is no reasonable or practical way of communicating with the person making the report. Even if a PID maker chooses to remain anonymous, they will still be protected under the PID Act. It may be difficult, however, for the Commission to investigate the matter(s) they have disclosed if the Commission cannot contact them for further information.

The report will be received and assessed by a Commission Assessment Officer. The Commission's Assessment Officers are Commission disclosure officers for the purposes of the PID Act. Under s 18 of the PID Act, the Chief Executive Officer is also a disclosure officer for the Commission.

The Commission's disclosure officers can be contacted at [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au).

### *Making a report to a member of Parliament (MP) or journalist*

Disclosures to MPs or journalists are different from other reports. Under s 28 of the PID Act, PID makers can only disclose a report of wrongdoing as a voluntary PID to an MP or journalist in the following circumstances:

- the disclosure is substantially true, and
- the maker has made substantially the same disclosure (described here as a "previous disclosure") to someone who can receive disclosures, and
- they did not make the previous disclosure anonymously, and
- they did not give a written waiver of their right to receive information relating to their previous disclosure, and
- **either**, within six months from making the previous disclosure, they did not receive from the Commission notice of its decision to investigate the serious wrongdoing, a description of the results of the investigation and details of corrective action taken,

proposed or recommended, **or**, they have been notified by the Commission of its decision neither to investigate or refer the disclosure or that it has decided to cease investigating without completing the investigation or referring the disclosure.

If all the above requirements are met, the disclosure to an MP or journalist may be a voluntary PID.

### **What to include in the report**

PID makers should provide as much information as possible so the Commission can deal with the report effectively. The type of information they should include is:

- date, time and location of key events
- details of the names and positions of persons they believe have engaged in serious wrongdoing
- their relationship with the person(s) involved, such as whether they work closely with them
- a summary of the information and a short explanation of how they believe that this information supports an allegation of serious wrongdoing
- how they became aware of the matter they are reporting
- possible witnesses or anybody else who can provide supporting information
- the details of any other agency they have raised the matter with and the agency's response.

It is an offence to wilfully make a false statement or mislead or attempt to mislead when making a disclosure (s 84 PID Act).

### **Deeming that a report is a voluntary PID**

The Commission's Chief Executive Officer (or delegate) can, in certain circumstances, determine that a report is a voluntary PID even if the report does not otherwise have all the features of a voluntary PID (s 29 of the PID Act).

Such a determination may be made on the initiative of the Chief Executive Officer (or delegate) or at the request of the maker of the disclosure but must not be made unless the Chief Executive Officer (or delegate) believes the disclosure shows or tends to show serious wrongdoing.

By deeming that a report is a voluntary PID, it ensures that PID makers are provided with protections under the PID Act.

If a report does not meet all the requirements of a voluntary PID, the PID maker can refer their matter to the Commission's Chief Executive Officer to request that they consider deeming the report to be a voluntary PID. The Chief Executive Officer can be contacted by email at [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au).

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

### **Addressing questions or concerns**

Further information to address any questions or concerns may be obtained from the Commission's [Blowing the Whistle](#) fact sheet.

## 6. How will the Commission deal with the report?

As provided for in s 55 of the PID Act, the Commission must decide how to deal with a voluntary PID. This may include deciding to deal with it in one or more of the following ways:

- by investigating the relevant serious wrongdoing if it involves corrupt conduct as defined in the ICAC Act
- by deciding to investigate the relevant serious wrongdoing if it shows or tends to show serious maladministration by the NSW Ombudsman or an officer of the NSW Ombudsman (s 58(2) of the PID Act)
- by deciding not to investigate
- by referring the disclosure to another integrity agency
- by referring the disclosure to a person or body that is authorised by another Act or law to investigate the relevant serious wrongdoing
- (if the disclosure relates to more than one agency) by referring it to another agency to which the disclosure relates.

When the Commission receives a report which is a voluntary PID, or looks like it may be a voluntary PID, the person who made the report will receive the following information in accordance with s 59 of the PID Act:

- An acknowledgment that the report has been received. This acknowledgement will:
  - state that the report will be assessed to identify whether it is a PID
  - state that the PID Act applies to how the Commission deals with a PID
  - provide directions to the page on the Commission's website where this policy can be found
  - provide details of the Commission contact person for the matter (this will usually be the Commission's Assessment Officer being the disclosure officer responsible for dealing with the disclosure).
- If the report is a voluntary PID, the Commission will, in accordance with s 59 of the PID Act, as soon as reasonably practicable after the matter becomes applicable:
  - advise the PID maker that Division 2 of Part 5 of the PID Act applies
  - advise how the Commission is dealing with or proposes to deal with the disclosure
  - if the Commission has decided to neither investigate the relevant serious wrongdoing nor to refer it, advise of the reasons for that decision
  - if the Commission decides to cease investigating the relevant serious wrongdoing without either completing the investigation or referring the disclosure, advise of the reasons for that decision
  - if the Commission refers the disclosure to another agency, provide details of the referral
  - if the Commission decides to investigate the relevant serious wrongdoing, update the maker on the progress of the investigation at intervals of not more than three months
  - if the Commission completes an investigation of the relevant serious wrongdoing, advise the maker of the results of the investigation and details of any corrective action taken, proposed or recommended
  - if the Commission ceases to deal with the disclosure as a voluntary PID, inform the maker of its reasons for doing so.

In most cases, PID makers will receive the above advice from the Commission Assessment Officer dealing with their matter. If the matter is made the subject of a Commission investigation, another Commission Officer may be appointed as the contact officer. If the contact officer is changed, they will be notified of this by the Commission.



The above advice will be provided in writing and sent to the email or other address nominated by the PID maker.

There may be some details about both the findings made as a result of the investigation and the corrective action taken that cannot be revealed to the PID maker. The Commission will always balance the right of a person who makes a report to know the outcome of that report, with other legal obligations it has.

In many cases of anonymous reports, the Commission may not be able to provide this information to the PID maker.

As required by s 55(3) of the PID Act, if the Commission decides to neither investigate the relevant serious wrongdoing, nor refer the disclosure, or decides to cease investigating the relevant serious wrongdoing without either completing the investigation or referring the disclosure, the Commission will, as soon as reasonably practicable, provide written reasons explaining the decision to the NSW Ombudsman.

#### *Report not a voluntary PID*

If the report is not a voluntary PID, the Commission will advise the PID maker that the PID Act does not apply to the report and how it will deal with the concerns raised in the report.

If a PID maker is not happy with this assessment, or otherwise disagree with it, they can raise it with the person who has communicated the outcome with them or a disclosure officer, request an internal review or request that the matter be conciliated. The Commission can, but does not have to, request the NSW Ombudsman to conciliate the matter (see section 12 of this Policy for more details).

## **7. Protections**

### **How is the maker of a voluntary PID protected?**

Special protections apply under the PID Act for those who make voluntary PIDs.

The Commission is committed to taking all reasonable steps to protect PID makers from detriment as a result of having made a PID. The Commission is also committed to maintaining their confidentiality as much as possible while the PID is being managed.

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

- *Protection from detrimental action*
  - Under s 33 of the PID Act, it is a criminal offence for someone to take “detrimental action” against a person because they have made or may make a voluntary PID. It is punishable by a maximum penalty of 200 penalty units or imprisonment for five years or both.
  - A person may seek damages where unlawful detrimental action has been taken against them (s 35 PID Act).
  - The Supreme Court may grant an injunction where detrimental action is threatened or has occurred (for example, an order to prevent dismissal or to require reinstatement) (s 37 PID Act).
- *Confidentiality*

Section 64 of the PID Act provides that information tending to identify a person making a voluntary PID is not to be disclosed unless:

  - a) the person consents in writing to the disclosure of their identity, or

- b) it is generally known that the person has made the voluntary PID as a result of the person's voluntary self-identification as the maker, or
- c) after consulting the person, it is reasonably necessary to disclose identifying information to protect a person from detriment, or
- d) it is necessary for the identifying information be disclosed to a person whose interests are affected by the disclosure, or
- e) the identifying information has previously been published, or
- f) the identifying information is disclosed to a medical practitioner or psychologist for the purposes of the practitioner or psychologist providing medical or psychiatric care, treatment or counselling to the person disclosing the information, or
- g) the identifying information is disclosed for the purposes of proceedings before a court or tribunal, or
- h) the disclosure of the identifying information is necessary to deal with the disclosure effectively, or
- i) it is otherwise in the public interest to disclose the identifying information.

The Commission has systems in place to keep identifying information confidential. It will do all that it practically can to not unnecessarily disclose information from which the maker of the report can be identified.

Under s 111 of the ICAC Act it is, subject to limited exceptions set out in that section, a criminal offence for a Commission officer to directly or indirectly, except for the purposes of the ICAC Act or otherwise in connection with the exercise of the person's functions under the ICAC Act, to make a record of any information or divulge or communicate to any person any information acquired by the person by reason of, or in the course of, the exercise of the person's functions under the ICAC Act.

If confidentiality cannot be maintained, or is unlikely to be maintained, the Commission will:

- advise the person that their identity may become known
  - provide additional support to the person who has made the PID
  - remind persons who become aware of the identifying information of the consequences for failing to maintain confidentiality and that engaging in detrimental action is a criminal offence and may also be a disciplinary matter.
- *Immunity from civil and criminal liability*  
Section 40 of the PID Act provides certain protections to makers of a PID from civil liability, including liability for breaching a duty of secrecy or confidentiality or another restriction on disclosure applicable to the person (whether or not imposed by an Act) and from criminal liability, including liability for breaching a law or code of conduct imposing a duty of confidentiality or other restriction in relation to the disclosure of information and from disciplinary action.
  - *Protection from liability for own past conduct*  
Under s 41 of the PID Act, the NSW Attorney General can give the maker of a PID an undertaking that a disclosure of their own past conduct will not be used against them if a person discloses their own wrongdoing or misconduct while making a report. This undertaking can only be given on application by an "integrity agency" to the Attorney General.

## **Protections for people who make mandatory and witness PIDs**

Protections for makers of mandatory and witness PIDs are detailed in the table below.

Protection	Mandatory PID	Witness PID
<b>Detrimental action — It is an offence to take detrimental action against a person based on the suspicion, belief or awareness that a person has made, may have made or may make a PID.</b>	✓	✓
<b>Right to compensation — A person can initiate proceedings and seek compensation for injury, damage or loss suffered as a result of detrimental action being taken against them.</b>	✓	✓
<b>Ability to seek injunction — An injunction can be sought to prevent the commission or possible commission of a detrimental action offence against a person. For example, an order to prevent dismissal or to require reinstatement.</b>	✓	✓
<b>Immunity from civil and criminal liability — a person will not incur civil or criminal liability if the person breaches a duty of confidentiality while making a disclosure. This means that legal action cannot be taken against a person for:</b> <ul style="list-style-type: none"> <li>• breaching a duty of secrecy or confidentiality, or</li> <li>• breaching another restriction on disclosure.</li> </ul>	✓	✓

## 8. Detrimental action

It is an offence under s 33 of the PID Act to take detrimental action against a person in relation to a PID.

Section 32 of the PID Act provides that detrimental action in relation to a person includes:

- injury, damage or loss caused to the person,
- damage caused to the person's property,
- damage caused to the person's reputation,
- intimidation, bullying or harassment,
- unfavourable treatment in relation to the person's career, profession, employment or trade,
- discrimination, prejudice or adverse treatment, whether in relation to employment or otherwise,
- disciplinary proceedings or disciplinary action.

Detrimental action does not involve:

- 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, or the lawful making of adverse comment, resulting from the above investigative action,
- the prosecution of a person for a criminal offence.

A person who makes a PID can still be subject to reasonable management action (such as ordinary performance reviews and performance management), provided such action is not taken because of the PID.

## 9. Reporting detrimental action

If a person considers that they are the subject of detrimental action as a result of making a voluntary PID, or otherwise require protection as a result of making the voluntary PID, they should contact their Commission contact officer as soon as possible or notify the Commission by sending an email to [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au).

## 10. Dealing with reports of detrimental action

The Commission will not tolerate any detrimental action being taken by any person against a person who has made a PID, investigators, witnesses or the person the report is about.

The Commission will, where it considers there may be a risk of detrimental action being taken against a person as a result of a PID being made, take such steps as are necessary to assess and minimise that risk. In such circumstances a risk management plan will be created by the Commission's Assessment Section for approval by the Manager Assessments. The Commission contact officer will advise the person where a risk management plan has been created and discuss protection options with the person and outline what further support will be provided.

If the Commission forms the opinion that there is evidence of detrimental action, the Commission will:

- take all steps possible to stop the action and protect the person(s)
- in accordance with s 34 of the PID Act, refer any evidence of a detrimental action offence to the Commissioner of Police
- refer the alleged offence to the NSW Director of Public Prosecutions (DPP) by providing a brief of evidence to the DPP or, if the alleged offence relates to the DPP, refer it to the Attorney General
- notify the NSW Ombudsman about the allegation of a detrimental action offence being committed.

Referrals to the Commissioner of Police or the DPP or Attorney General will be made by the Solicitor to the Commission.

The Solicitor to the Commission (or delegate) will notify the person involved if such action is taken and provide updates on progress.

## 11. General support

People requiring support or advice in relation to their disclosure or any detrimental action can contact their Commission contact officer, or the Commission, by email at [icac@icac.nsw](mailto:icac@icac.nsw) or by telephone on (02) 8281 5999.

For further information about the PID Act and reporting more generally, contact the NSW Ombudsman.

## 12. Review and dispute resolution

### Internal review

Section 60 of the PID Act provides that the maker of a disclosure may apply to the Commission for a review of the following decisions made by the Commission:

- That the Commission is not required to deal with the report as a voluntary PID.

- To stop dealing with the report because it was not a voluntary PID.
- To not investigate the serious wrongdoing and not refer the report to another agency.
- To cease investigating the serious wrongdoing without either completing the investigation or referring the report to another agency for investigation.

An application for internal review must be made in writing and within 28 days of being informed of the Commission's decision. The application should state the reasons why the maker of the disclosure applicant considers the Commission's decision should not have been made. Applicants may also submit any other relevant material with their application.

An application for review should be addressed to the Commission's Chief Executive Officer and forwarded to the Commission at [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au).

The Commission's Chief Executive Officer (the reviewer) will conduct any internal review and will advise the applicant of the outcome.

The reviewer may decide:

- to confirm the Commission's decision, or
- the disclosure is to be dealt with, or continue to be dealt with, as a voluntary PID by the Commission.

If the reviewer decides the disclosure is to be dealt with, or continue to be dealt with, as a voluntary PID by the Commission, the Commission must give effect to that decision.

Section 74 of the PID Act provides that if a dispute arises under the Act or a PID policy in connection with a disclosure that is or may be a voluntary PID, an agency that is dealing with the disclosure **may** request the NSW Ombudsman deal with the dispute. A dispute may include whether the disclosure is in fact a voluntary PID or conduct or proposed conduct that constitutes or may constitute a detrimental action offence relating to the disclosure.

## 13. Other Commission obligations

### Recordkeeping requirements

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

All information in relation to any disclosure is securely stored by the Commission in accordance with its Information Security Policy and its Records Management Program Policy and Procedures.

### Reporting of voluntary PIDs and the Commission's annual return to the NSW Ombudsman

Section 78 of the PID Act sets out the information the Commission must provide to the NSW Ombudsman in relation to each period ending 30 June. The information to be provided is:

- information about voluntary PIDs received by the Commission during the period
- action taken by the Commission to deal with voluntary PIDs during the period
- measures taken by the Commission to promote a culture in which PIDs are encouraged.

This information will be collated and prepared by the Commission's Manager Assessments and the Manager People, Governance and Security.

### **Ensuring compliance with the PID Act and this policy**

The Commission's Chief Executive Officer is responsible for overseeing this policy and for reviewing it every three years or sooner if there are changes to the PID Act or the Commission's other policies that impact on this policy.

The Chief Executive Officer may conduct audits to ensure compliance with this policy. Reports concerning compliance will be provided to the Commission's Audit and Risk Committee.

### **14. Accessibility of this policy**

As required by s 47 of the PID Act, this policy is available on the Commission's public website.

### **15. Document control and review**

This policy is to be reviewed in accordance with the *Commission's Policy and Compliance Monitoring Register*, or as directed by the Chief Executive Officer or Chief Commissioner.

<b>Document Name:</b>	Making a public interest disclosure to the NSW Independent Commission Against Corruption - policy for external reports
<b>Approval/Adoption Date</b>	26 September 2023
<b>Approved By</b>	CEO
<b>Document Number (CM Ref)</b>	D10925347



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