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Corporate gift giving: the shrewd practice of manipulation

by Dr Robert Waldersee, ICAC Executive Director,
Corruption Prevention

Those seeking a positive decision give gifts to government officials for one reason – they work. As far back as Roman times, Cicero stated “there is no duty more indispensable than that of returning a kindness”. Two thousand years on, the mechanisms by which gifts exert their power are better understood and manipulated by those seeking to influence the behaviour of others.

The most important mechanism is the “norm of reciprocity”. This norm underpins the cooperative behaviour that makes society possible. It is therefore universal across societies and a powerful force on individual behaviour. And it can be manipulated.

In many private sector cases, as in many ICAC investigations into public sector corruption, the value of the gift is negligible by almost any standard yet a substantial benefit flows to the giver. The norm of reciprocity does not work through a rational process of equal value exchanges but is rather about creating a sense of moral obligation in the recipient.

Free food samples in a supermarket are designed to create a force within the recipient to reciprocate by buying the product. When Disabled American Veterans started to include token sticky self-address labels as a gift in fundraising letters, the organisation nearly doubled the number of individuals willing to donate. The effect of pharmaceutical gifts and benefits on the prescription-writing behaviour of doctors is so well understood that governments have acted to curb the practice.

A second mechanism by which small gifts extract large returns is by using the gift as a way of establishing a relationship. Eighteenth century philosopher David Hume noted that benevolence springs from sympathy that depends on the closeness of a relationship. In other words, the more the receiver believes they are in a relationship, the more benevolent they will be.

Harbour cruises, meals at expensive restaurants, weekend holidays, days at a golf course and weekends at the Australian Grand Prix are among gifts encountered during investigations by the ICAC that involve an extended social interaction. The greater the recipient believes this to be a true relationship, the more benevolent they will be to the giver.

Finally, gifts can be used to great effect by flattering the recipient. The mythical Trojan horse was described by Roman poet Virgil as a votive

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Commissioner's editorial

In 2007, a joint venture was launched by Australia's three major anti-corruption agencies. Known as the Australian Public Sector Anti-Corruption Conference (APSACC), the initiative has become an important catalyst for anti-corruption practitioners in Australia and internationally to meet and discuss issues, trends and the latest investigation and prevention techniques to combat public sector corruption. APSACC, which takes place biennially, will be held from 15 to 17 November 2011 in Fremantle, Western Australia.

APSACC is hosted by the ICAC, the Corruption and Crime Commission (Western Australia) and the Crime and Misconduct Commission (Queensland). The agencies work together to deliver the right mix of workshops and sessions, and to ensure that the topics are relevant, dynamic and contemporary. It is an event I recommend to all senior public officials and corruption prevention practitioners (see pages 4–5 for further details).

Outreach

Closer to home, from 31 May to 2 June 2011, the ICAC will deliver a program of corruption prevention activities in Queanbeyan, on the NSW Southern Tablelands. This is part of our Rural and Regional Outreach Program, which began in 2001 as a way to bring advice and resources on site to non-metropolitan areas of NSW.

The ICAC conducts two rural and regional visits annually. Each visit includes training workshops and briefing sessions for public sector managers and supervisors, and a specific session for community leaders. For further information on the program, as well as other workshops offered free of charge by the ICAC, I encourage you to call the Education and Training Coordinator on 02 8281 5999 or email education@icac.nsw.gov.au.

Scholarships

I am pleased to announce that 10 scholarships (valued at \$5,500 each) will be offered once again by the ICAC for the Corruption and Anti-Corruption Executive Program. As one of the few graduate courses in Australia to combine corruption theory and practice, it prepares attendees (such as chief executive officers and general managers of local councils) to take a leading role in preventing corruption in their workplace.

The course will be held from 14 to 21 September 2011 at the Australian National University. Applications for the scholarships will close at 5.00 pm (AEST) on 8 July 2011 (see page 7 for further details).

Corruption findings

Since our last issue of *Corruption Matters* in November 2010, the ICAC has released the results of four public inquiries into corruption allegations in the NSW public sector.

Most recently, the ICAC made 17 corrupt conduct findings against a former General Manager of Burwood Council and recommended that the advice of the Director of Public Prosecutions (DPP) should be obtained with regard to his prosecution for multiple offences, including four of giving false or misleading documents to the Council with the intent to defraud the Council, four common law offences of misconduct in public office and two offences of causing detrimental action to be taken against a person who made protected disclosures.



The Hon David Ipp AO QC, ICAC Commissioner

As a result of this inquiry, the ICAC made 31 corruption prevention recommendations, including that the NSW Division of Local Government be authorised through legislative amendment to require NSW councils to adopt policy and practice considered to be of state-wide significance by the Division's Chief Executive. The ICAC also recommended that the NSW Minister for Local Government seek legislative amendment to the *Local Government Act 1993* to establish internal audit for local authorities as a statutory function.

In March 2011, we released the results of an investigation into Sydney Water, where nine people were found corrupt and 18 corruption prevention recommendations were made to help the agency prevent similar conduct from recurring. One of these recommendations included the need for Sydney Water to ensure that staff in identified risk areas of operational and/or fraud risk are subject to intrusive supervision.

In December last year, the ICAC reported on the results of two public inquiries. It found that a former State Member of Parliament and her staff member engaged in corrupt conduct by falsely claiming sitting day relief benefits, and that a former City of Canada Bay Council City Services Manager acted corruptly by accepting a boat and trailer worth more than \$30,000. In both cases, the ICAC recommended that the advice of the DPP should be obtained with regard to several offences.

All reports from these and other public inquiries are available from the ICAC website at www.icac.nsw.gov.au

A handwritten signature in dark ink, appearing to read 'D Ipp', written over a light-colored background.

The Hon David Ipp AO QC
Commissioner

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offering by the Greeks following the failed siege of Troy. Besotted by the horse, the symbol of the city, the Trojans accepted the gift and the destructive force within.

The same practice of offerings and flattery appear in modern gift giving. Unable to use reciprocity to influence the behaviour of doctors, some US pharmaceutical companies came upon the idea of token gifts wrapped in flattery. First, the companies identified those doctors already prescribing high volumes of their product. Next, the doctors were approached and asked to speak to gatherings of other doctors, for which a token \$1,500 fee was paid.

The emphasis was on conveying to the speakers that they were “thought leaders” and smarter than other doctors. As a result, the speakers

subsequent annual prescriptions of the product increased by an additional \$100,000 to \$200,000 per year; all in all, a very good return on the company’s investment.

Whether fanning a desire to reciprocate, creating a fake relationship or flattering a public official, gifts are rarely the oft-cited impartial, harmless gesture of goodwill. They are designed to manipulate a public official, and outcomes of investigations undertaken by the ICAC prove time and time again that they do so in a very efficient and effective way. Like corporate giants such as IBM and Microsoft, the ICAC recommends a near as practicable zero tolerance of gifts.

Legal safeguards stepped up for whistleblowers

On 1 July 2011, amendments to the Public Interest Disclosures Act 1994 will take effect, resulting in increased protections for public sector employees and certain contractors who blow the whistle on corruption. These amendments arose from recommendations made by the Parliamentary Committee on the Independent Commission Against Corruption (ICAC) in its November 2009 parliamentary report.

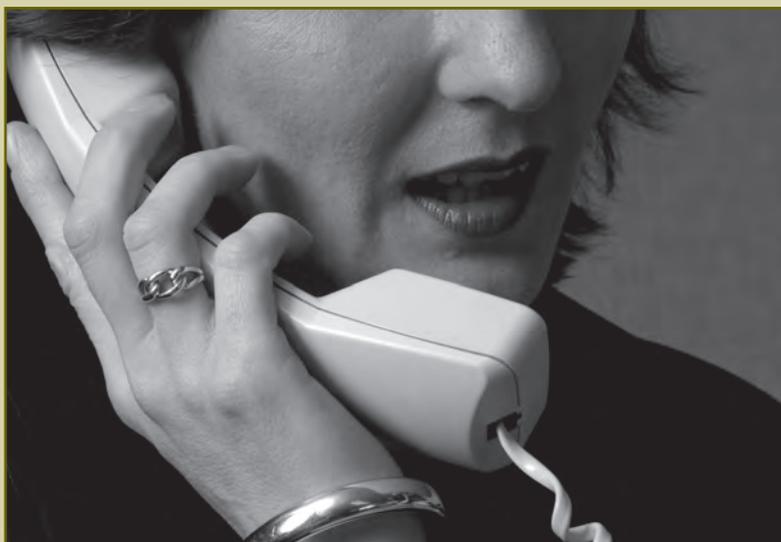
The Commission recognises the key role whistleblowers play in exposing public sector corruption and the courage required to come forward, particularly if corrupt activities are occurring in the whistleblower’s own workplace.

In March 2011, the Commission concluded a six-month project that examined how it manages its whistleblower matters. To determine its findings, the project team reviewed current literature, such as academic studies and parliamentary reports, and consulted with Commission staff

as well as staff from a number of regulatory and watchdog agencies.

One of the recommendations made as a result of the initiative has been to establish an internal committee made up of senior staff drawn from all of the Commission’s operational divisions. The committee members will be able to offer guidance and assistance in instances where a whistleblower has broader concerns or needs beyond the scope of the complaint or investigation.

The committee will be operational from 1 July 2011. Further information will be provided in the next issue of *Corruption Matters*.



Detailed information on how to report suspected corrupt conduct involving or affecting the NSW public sector is available from the Commission’s website at www.icac.nsw.gov.au. Enquiries and reports can be made to the ICAC in the following ways:

- by phone on 02 8281 5999 or freecall 1800 463 909 (callers outside Sydney)
- in writing to GPO Box 500 Sydney NSW 2001 or faxing 02 9264 5364
- online via the ICAC website
- by email on icac@icac.nsw.gov.au
- in person by attending its premises at 133 Castlereagh Street, Sydney.

Premier biennial anti-corruption event kicks off in November

Registrations are invited for the third Australian Public Sector Anti-Corruption Conference (APSACC). Inaugurated in 2007, APSACC has quickly garnered a reputation as Australia's leading international anti-corruption event.

More than 500 senior public officials, corruption prevention practitioners and other delegates from around Australia and overseas are expected to participate in the conference, which will be held from 15 to 17 November 2011 in Fremantle, Western Australia.

The theme of APSACC 2011 is "A Global Compass – Navigating Public Sector Corruption". As in previous years, the 2011 conference will be hosted by Australia's major anti corruption agencies – the NSW ICAC, the Western Australian Corruption and Crime Commission, and the Queensland Crime and Misconduct Conduct Commission. A range of workshops and featured sessions will be presented that target up-to-the-minute issues affecting public sector anti-corruption management.

On Tuesday, 15 November, participants will have the opportunity to attend a variety of half- and full-day workshops. The objective of the conference's workshop stream is to accommodate the range of interests that are represented at APSACC.

Workshop topics currently on offer include understanding the roles and functions of codes of conduct, managing the risks and responsibilities of whistleblowing, establishing misconduct and complaints handling systems,

and embedding ethics into an organisation. Specialist staff from the ICAC will also present a workshop on how to conduct an internal disciplinary investigation (see p. 5) and a workshop on probity in procurement, which is aimed at helping managers understand and deal with procurement corruption and risks.

On Wednesday, 16 November, APSACC 2011 will officially be launched by the Hon Christian Porter, Western Australian Treasurer and Attorney General. The Hon Wayne Martin, Chief Justice of Western Australia, will deliver the keynote address.

The opening will be followed by a total of 12 featured sessions presented under the four categories of improper influence, "both sides of the fence" (which looks at corruption issues from the viewpoint of both the investigative agencies and those investigated), local government and the police. Session topics currently on offer include taser weapons and misconduct, lobbying, secret commissions and university misconduct.

On Thursday, 17 November, the Hon Martin Moynihan AO QC, Chairperson of the Queensland Crime and Misconduct Commission, will introduce a plenary session that includes keynote speakers Professor Geoff Gallop, Director of the University of Sydney's Graduate School of Government, and Professor Andrew Goldsmith, Executive Director of the Centre for Transnational Crime Prevention and Professor of Law at the University of Wollongong.

A further six featured sessions will be presented on this day under the themes of public versus private, corruption typologies, international perspectives, the police and whistleblowing.

Kerry O'Brien, formerly of the ABC's *7.30 Report* and current host of *Four Corners*, will act as moderator for the closing plenary debate that will take place on the afternoon of 17 November. The debate will be followed by a closing address from the Hon David Ipp AO QC, ICAC Commissioner.



Held in Brisbane, APSACC 2009 coincided with the 20th anniversary of the release of the Fitzgerald Report into corruption in Queensland. The conference was attended by more than 500 delegates and speakers.

APSACC workshop: how to deliver an effective disciplinary investigation

The strength of the program delivered at APSACC lies in the ongoing participation and support of distinguished speakers and industry experts. For APSACC's 2011 workshop series, ICAC staff will deliver a session on the critical issues involved in planning and implementing an internal fact-finding investigation.

Presented by ICAC Chief Investigator Stephen Osborne and Senior Lawyer Jay Lawrence, the aim of the full-day workshop is to ensure that staff who are required to oversee, review or conduct internal disciplinary investigations within their organisation (such as managers and human resources personnel) are equipped with appropriate planning, investigation and evidence-handling techniques. These investigations, for example, may be a result of alleged misconduct in public office (such as code of conduct breaches).

Mr Osborne, whose role is to manage a multidisciplinary team that conducts investigations into corrupt conduct in the NSW public sector, explains that there are several important steps that people may fail to take when conducting an internal disciplinary investigation. One of these is not getting enough relevant information from the source of the complaint.

"Plan the investigation in order to maximise the amount of evidence and information that can be collected early on," says Mr Osborne. "This reduces the opportunity for evidence to be fabricated or destroyed and for people to contaminate their recollections through discussions with other people."

He adds that staff in charge of these investigations should maintain adequate records of the nature and outcome of all enquiries undertaken (including the receipt and transfer of all evidence) and record all critical decisions made during the process.

In addition to ensuring that adequate and appropriate investigation strategies and processes are being utilised, the workshop will address fundamental legal principles with regard to these investigations and the reporting of their outcomes.



Stephen Osborne (L) and Jay Lawrence (R) will deliver the *Fact finder: how to conduct an internal fact-finding investigation* workshop, which will take place on 15 November.

"Remember to be fair," says Mr Lawrence, whose role at ICAC is to provide specialist support in relation to legal issues, especially in the exercise of the Commission's legal powers. "Give the affected person particulars of the allegation and opportunities to provide their version, and treat the affected person with respect and dignity."

The workshop, which was successfully presented at APSACC 2007 and 2009, will provide participants with an opportunity to resolve issues that they may be grappling with and get clarity on some of the more technical aspects of these types of investigations. In addition to the presentations delivered by the experts, attendees in the past found that the sharing of experiences of staff from other agencies was also insightful and worthwhile.

APSACC 2011: A Global Compass – Navigating Public Sector Corruption

15–17 November, The Esplanade Hotel, Fremantle, Western Australia

Who hosts APSACC?

APSACC is a joint initiative of Australia's three major anti-corruption agencies: the Independent Commission Against Corruption (NSW), the Corruption and Crime Commission (Western Australia) and the Crime and Misconduct Commission (Queensland).

Who should attend APSACC and why?

Attendees at APSACC 2007 and APSACC 2009 included public sector executives and managers, corruption prevention practitioners, policy advisers, local government and planning specialists, senior police officers, forensic accountants and consultants, academic and university executive members, internal auditors and investigators, and human resources specialists.

Attendees can expect to gain insight into the latest anti-corruption trends and strategies and to network with representatives from other public sector agencies both within Australia and abroad.

More information or to register:
www.apsacc.com.au

Changes to public interest disclosures

Recent changes to the former *Protected Disclosures Act 1994*, now called the *Public Interest Disclosures Act 1994*, aim to encourage and ease the path for people who disclose serious problems in the NSW public sector.

The changed name of the Act reflects the wider objective of improving the way that the public sector tackles problems of corrupt conduct, maladministration, serious and substantial waste and breaches of the *Government Information (Public Access) Act 2009*.

To many of us, the image of the whistleblower in modern Australia is a lonely warrior for justice, combining public martyrdom and crusading zeal in equal quantities. The real picture is less tabloid and a lot more interesting.

Recent research shows us that around 97% of public interest whistleblowers report internally to their agency in the first place and about 80% of all people who make internal disclosures said management and co-workers treated them well, or the same, as a result of reporting wrongdoing.¹

According to the *Whistling While They Work* project,² the average whistleblower is an employee of longstanding who shares the same attitudes as his or her colleagues and is neither disgruntled nor embittered. They take their complaint to their supervisor, not to the media.

What sets these public employees apart from their colleagues is that they report the wrongdoing that they witness. The research found that many of their fellow workers also directly observe wrongdoing but do not report it. These recent changes to the Act aim to address this shortfall.

From 1 July 2011, changes to the Act will strengthen the statutory protections for those people who make disclosures, facilitate the making of disclosures and provide clearer pathways for those wanting to make disclosures.

Also from 1 July, the NSW Ombudsman will have a new oversight role in relation to protected disclosures. Our new role includes the provision of training, advice and guidance to public officials and public authorities, and monitoring and auditing the exercise of functions under, and compliance with, the Act by public authorities.

By 1 October 2011, public sector agencies will need to have an internal reporting policy in place to help people understand what to expect when they make a protected disclosure and support and assist those people who make a disclosure. My office will be publishing model policies to guide state and local government agencies in the development of their policies before 1 July 2011.

Our website has up-to-date information about these changes at: www.omb.nsw.gov.au/aboutus/PublicInterestDisclosures.html.

Bruce Barbour
NSW Ombudsman

1 Extract from draft first report, *Whistleblowing in the Australian Public Sector*, AJ Brown (ed) 2007.

2 For further information, see www.griffith.edu.au/law/whistleblowing.

PID Act: revisions in a nutshell

A number of amendments have been made to the *Public Interest Disclosures Act 1994* (formerly the *Protected Disclosures Act 1994*). Some of these came into force on 3 March 2011, with the remainder to take effect on 1 July 2011 and 1 January 2012. The more significant amendments are set out below.

- The Ombudsman is given a special role to oversee the Act. This role includes promoting public awareness of the Act, issuing guidelines and publications, and monitoring and providing reports to Parliament with regard to public authority compliance (with the exception of the Commission and other investigating authorities under the Act).
- Each public authority will be required to prepare an annual report on its obligations under the Act. This report can be included as part of the Commission's annual report.
- A Public Interest Disclosures Steering Committee is established comprising the heads of each investigating authority, which will be chaired by the Ombudsman. The ICAC Commissioner or his delegate is a member of this Committee. Its functions are to provide advice to the Minister on the operation of the Act.
- A protected disclosure can now be made in relation to a "government information contravention" as well as corrupt conduct, maladministration and serious and substantial waste of public money. A government information contravention is conduct of a kind that constitutes a failure to exercise functions in accordance with any provisions of the *Government Information (Public Access) Act 2009*.
- Previously, to be protected it was necessary that the disclosure showed or tended to show that a public authority or another public official had engaged, was engaged or proposed to engage in particular conduct. It is now sufficient that the person making the disclosure honestly believes, on reasonable grounds, that the information shows or tends to show that a public authority or another public official has engaged, is engaged or proposes to engage in particular conduct.
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Applications invited for anti-corruption scholarships

The Corruption and Anti-Corruption Executive Program is a joint initiative of the ICAC and the Australian National University (ANU). It is one of the few courses in Australia that teaches theories of corruption with practical prevention strategies. Applications are now invited for 10 scholarships offered by the ICAC in 2011, with four specifically reserved for applicants from rural and regional NSW.

Endeavour Energy (formally Integral Energy Australia) manager Greg Rose was a scholarship recipient in 2010 and attended the week-long course at the ANU in Canberra last year. His application was motivated by the positive experience of another Endeavour Energy staff member who had participated in the program the previous year. "The rewards and experience," says Mr Rose, "had proven very beneficial to the organisation as a whole," and this prompted him to apply.

As Manager Strategic Procurement Business and Process, Mr Rose is responsible for the development, implementation and management of policies and procedures for the procurement process across the company's business. "The scholarship opened up opportunities to learn more about fraud and corruption, better ways to detect and prevent, as well as highlighting some of leading and lagging indicators," Mr Rose said.

In addition to learning about theoretical approaches to corruption, a key component of the course is more pragmatic, where participants work on



The Corruption and Anti-Corruption Executive Program is delivered by ICAC specialists and staff from the ANU's Crawford School of Economics and Government.

The course will be delivered at the ANU in Canberra, 14–21 September 2011. Scholarship applications must include:

- completed application form
- curriculum vitae
- outline of your proposed workplace project that addresses corruption risks in your organisation
- letter from the CEO or general manager supporting (1) the application and (2) the proposed workplace project.

Applications close 5.00 pm (AEST) on 8 July 2011. For further information call 02 8281 5772 or visit www.icac.nsw.gov.au.

a project that addresses corruption risks in their own workplace. Once the course has ended, specialist ICAC officers continue to offer support and feedback on the progress of these projects.

For Mr Rose, his overall goal was to refresh the organisation's Statement of Business Ethics, which incorporated an overall view of fraud and corruption within the procurement process. As a newcomer to the public sector and with the responsibilities of compliance and risk management added to his position, he found participation in the course to be particularly beneficial.

"Within the course, we actually reviewed several business cases of where fraud had taken place," he adds. "This insight is then easily comparable back to my own organisation to see if the same conditions exist. Understanding the leading and lagging indicators or what conditions exist when fraud and corruption happen has helped in many facets of the procurement review."

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- The amendments make it clear that persons engaged under contract to provide services to or on behalf of the public authority are public officials for the purposes of the Act.
- A number of provisions deal with the taking of action against a person that is substantially in reprisal for the person making a protected disclosure. The penalty for taking detrimental action has been increased from 50 penalty units or imprisonment for 12 months or both to 100 penalty units or imprisonment for two years or both.
- The amendments provide that the taking of detrimental action constitutes misconduct for disciplinary action purposes. A person

taking detrimental action will now be liable in damages for any loss that the other person suffers as a result of that detrimental action. Any evidence of an offence of taking detrimental action against a person must now be referred to the Director of Public Prosecutions (DPP) or, if the alleged offence relates to conduct of the DPP, the Attorney General.

- The provision that removed protection for disclosures considered to be made frivolously or vexatiously has been repealed.

In other news

Identifying possible corruption loopholes

The role of the ICAC is not only to investigate allegations of corruption in the NSW public sector but to administer a range of activities, such as education, training and advice, to minimise corrupt conduct from taking place altogether.

In 2010, the ICAC and the NSW Department of Planning established a joint task force to examine whether there were corruption risks attached to Part 3A of the *Environmental Planning and Assessment Act 1979*, and to develop measures to address any of the identified risks. Part 3A, which commenced in 2005, consolidates the different assessment and approval regimes for major projects in NSW determined by the Minister for Planning.

While there were no established examples of the corrupt use or manipulation of discretion under Part 3A, the Commission found that there was considerable discretion built into it. In December 2010, the ICAC announced 20 recommendations to more effectively manage and mitigate potential corruption risks in the process underlying Part 3A of the Act.

The report, *The exercise of discretion under Part 3A of the Environmental Planning and Assessment Act 1979 and the State Environmental Planning Policy (Major Development) 2005*, follows in the footsteps of another landmark corruption prevention initiative undertaken by the ICAC in 2009 and 2010. Released late last year, the report, *Investigation into corruption risks involved in lobbying*, details the findings of an ICAC investigation into the corruption risks associated with the lobbying of public officials and authorities in NSW. Both reports are available from the ICAC website at www.icac.nsw.gov.au.

Quality reporting: who to and how?

The ICAC can only act on matters that (1) involve or affect a NSW public official or NSW public sector authority, (2) concern dishonest or biased official conduct, and (3) concern conduct so serious that criminal charges, disciplinary action or dismissal would be likely if the complaint was substantiated.

Occasionally, the ICAC receives matters from complainants that fall outside its jurisdiction and refers the complainant on to the most

suitable complaint-handling agency in NSW. Similarly, complaints that fall within its jurisdiction are sometimes made to other agencies, including the NSW Police Force. In order to ensure that these corruption allegations are not lost, the ICAC is currently working with the NSW Police Force to develop an effective system of identifying and referring the complaints between the two agencies.

Before making a complaint, you should consider which agency in NSW is equipped to handle the matter. Matters that fall within the ICAC's jurisdiction and a list of other relevant complaint-handling agencies in NSW is available from the ICAC website.

The quality of the reporting of the corrupt conduct allegations to the ICAC is also important. The list below ensures that sufficient information is submitted in order for the ICAC to decide on what action to take.

- (optional) your name and contact details (see pages 3 and 6 for further details on increased protection for whistleblowers from July 2011)
- names of NSW agencies and public sector officials involved
- details of any private individuals or organisations involved
- how you became aware of the matter
- a summary of the matter and why you believe it involves corrupt conduct
- other people aware of the matter
- other organisations you have contacted and their response
- what material exists in support and its location
- (optional) consent to disclose identity

Complaints can be made to the ICAC in several ways, including by phone on 02 8281 5999 or 1800 463 909.

Corruption Matters is produced twice a year to raise awareness in the NSW public sector and the wider community about corruption-related issues. If you have any comments about the publication or would like to be put on the mailing list, please contact the Corruption Prevention, Education and Research Division of the Independent Commission Against Corruption.

Independent Commission Against Corruption

Level 21, 133 Castlereagh Street, Sydney, NSW, Australia 2000 – Postal Address: GPO Box 500, Sydney, NSW, Australia 2001

T: 02 8281 5999 or 1800 463 909 (toll free for callers outside metropolitan Sydney)

TTY: 02 8281 5773 (for hearing-impaired callers only) E: icac@icac.nsw.gov.au W: www.icac.nsw.gov.au