



ENGAGING WITH LOBBYISTS AND BUSINESS CONTACTS

POLICY

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1. Policy Statement

The Engaging with Lobbyists and Business Contacts Policy (Policy) outlines the standards and behaviour expected of staff, Commissioners and Youth Panel in the Greater Sydney Commission (Commission) when interacting with lobbyists and business contacts. The Commission must promote confidence in the integrity of public administration and always act in the public interest, not in individuals' private interest. This means our decisions must be made in an open and transparent manner, without any undue influence, or the perception of undue influence, by external parties.

The purpose of this document is to:

- affirm the Commission's support of the objectives of the *Lobbying of Government Officials Act 2011* (the Act) and *Lobbying of Government Officials (Lobbyists Code of Conduct) Regulation 2014*;
- assist staff in meeting the requirements of the Premier's Memorandum *M2014-13, NSW Lobbyists Code of Conduct* (the Premier's Memorandum);
- provide guidance for staff, Commissioners and Youth Panel on their obligations and requirements when engaging with lobbyists and business contacts in a manner consistent with the Commission's Code of Ethics and Conduct; and
- provide a framework for managing staff and Commissioner interactions with lobbyists and business contacts in an open and transparent manner, without any undue influence, or the perception of undue influence, by external parties.

This Policy should be read in conjunction with the Commission's Engaging with Lobbyists and Business Contacts Procedure (in development), which outlines the process for engaging with lobbyists and business contacts.

This Policy will be reviewed every two years or if there are relevant legislative changes to ensure currency with statutory and NSW Government requirements.

2. Who does this Policy apply to?

The Engaging with Lobbyists and Business Contacts Policy applies to Commission members (Commissioners), Youth Panel and all employees including:

- permanent staff;
- temporary staff;
- casual staff;
- other Government sector employees who are on secondment or assigned to the Commission;
- contractors;
- consultants;
- volunteers; and
- employees of organisations who provide services under contract to the Commission.

For the purposes of this Policy, "staff" refers to all people to whom this Policy applies.

In this Policy, a reference to a senior executive manager means:

- Chief Executive Officer;
- Executive Director; and
- Director.

In addition to complying with the Policy, staff must also comply with the Premier's Memorandum *M2014-13 NSW Lobbyists Code of Conduct*, the Commission's Code of Ethics and Conduct and Gifts, Benefits and Hospitality Policy, as well as the Public Service Commission's Code of Ethics and Conduct for NSW Government Sector Employees.

3. Definitions

Business Contacts	means any individual or group, who is not a third-party lobbyist or other lobbyist, that communicates with a Government Official about a specific application or proposal, funding decision, policy or regulatory issue.
Commission matter	means any issue, consultation, proposal, plan, strategy, advice, information, recommendation, report, assistance or other matter being considered, developed or made by the Commission.
Government Official	Includes: <ul style="list-style-type: none"> • a Minister or Parliamentary Secretary; • a staff member of a Minister or Parliamentary Secretary (including a staff member in an electorate office); • the head of a Public Service agency; • a person employed in the Public Service of New South Wales, the Transport Service of New South Wales, or any other service of the Crown; • a local government official; • an individual who is engaged under a contract to provide services to or on behalf of the Public Service of New South Wales, the Transport Service of New South Wales or any other service of the Crown; or • a member (however expressed) of, or of the governing body of, a statutory body (includes Greater Sydney Commission).
Lobbying	means communicating with a Government Official for the purposes of representing the interests of others (including their own organisation) in relation to: <ul style="list-style-type: none"> • legislation or proposed legislation; • a Government decision or proposed Government decision; • a Government policy or proposed Government policy; • a planning application; • the exercise by the Government Official of their official functions; or • any Commission matters.
Lobbyists Code of Conduct	means the document that sets out the ethical standards, disclosures and requirements for individuals and organisations to lobby in New South Wales. The Code is included in Schedule 1 of the <i>Lobbying of Government Officials (Lobbyists Code of Conduct) Regulation 2014</i> .
Lobbyists Register	means the Register of Third-party Lobbyists, an online register that contains the names and organisations of third-party lobbyists and the clients they represent. It is kept and maintained by the NSW Electoral Commission.
Lobbyists Watch List	means a list of third-party lobbyists or other lobbyists placed on a 'Watch List' by the NSW Electoral Commission as a result of non-compliance with the Act or Lobbyist Code of Conduct. The Lobbyists

	Watch List is located on the Register of Third-party Lobbyists and is maintained by the NSW Electoral Commission.
Other Lobbyists	means individuals or bodies that lobby Government Officials other than a third-party lobbyist; this includes individuals engaged to undertake lobbying for a third-party lobbyist.
Senior executive manager	means: <ul style="list-style-type: none"> • In relation to Greater Sydney Commissioners – the Chief Commissioner; • In relation to the Chief Executive Officer's direct reports – the Chief Executive Officer; and • In relation to all other staff – Executive Directors and other senior executives reporting directly to the Chief Executive Officer.
Third-party lobbyist	means an individual or body carrying on the business of lobbying Government Officials (generally for money or other valuable consideration) on behalf of another individual or body. This excludes technical specialists and consultants in their work capacity.
Third-party Lobbyist Contact Register	means the Commission's register of contacts with third-party lobbyists

4. Key responsibilities

Chief Operating Officer

The Commission's Chief Operating Officer is responsible for:

- ensuring the Commission has systems in place to comply with its obligations with respect to third-party lobbyists;
- authorising the publication of amendments to the Third-party Lobbyist Contact Register; and
- reporting non-compliance with the Act and Lobbyists Code of Conduct to the NSW Electoral Commission as appropriate.

Senior executive managers and managers

A senior executive manager or manager responsible for supervising or managing an individual or group of staff, is responsible for:

- overseeing the effective management of the Policy and Procedure;
- complying with all mandatory decision-making, reporting and publishing requirements contained in the Procedure for Engaging with Lobbyists and Business Contacts;
- discussing compliance as part of the ongoing management of their teams; and
- monitoring and evaluating the operation of the Policy and the Procedure in their area of responsibility.

Staff

In all dealings with lobbyists and business contacts, staff must:

- Behave in a lawful, professional and reasonable manner and always act in the best interests of the Commission;
- Make impartial decisions that demonstrate the values of the Commission and the Public Service Commission's Code of Ethics and Conduct for NSW Government Sector Employees and promote confidence in the integrity of public administration;
- Report instances of non-compliance to their manager or a senior executive manager.
- Comply with this Policy and the Commission's Procedures for Engaging with Lobbyists and Business Contacts, including:
 - Follow protocols that cover the scheduling of, and attendance at, meetings, as well as verbal and written communications; and
 - Keep an accurate record with any contact with a lobbyist, whether or not lobbying has occurred in relation to that contact.

The Commission's Procedure for Engaging with Lobbyists and Business Contacts contains detailed guidance and protocols for interacting with third-party lobbyists, other lobbyists and business contacts including processes for the establishment of meetings, who may attend, recordkeeping and maintaining the Third-party Lobbyist Contact Register.

NSW Electoral Commission

The NSW Electoral Commission maintains the Register of Third-party Lobbyists and the Lobbyists Watch List and enforces the Lobbyists Code of Conduct.

To improve compliance, the NSW Electoral Commission may enter into arrangements with lobbyists to ensure that they follow the Lobbyists Code. If a lobbyist breaches the Lobbyists Code, the NSW Electoral Commission may place the lobbyist on the Lobbyists Watch List and impose further restrictions on contact with Government Officials.

5. Lobbying

5.1. Forms of lobbying

Lobbying is communicating with a Government Official for the purpose of representing the interests of others in relation to:

- legislation or proposed legislation;
- a Government decision or proposed Government decision;
- a Government policy or proposed Government policy;
- a planning application; or
- the exercise by a Government Official of their official functions.

Lobbying **does not** include any communications by a Member of Parliament or a Government Official who is acting in the ordinary course of their duties.

5.2. Methods of lobbying

Lobbying extends to any communication – in person, in writing, by telephone, email or by other electronic means:

- even if it occurs in an incidental way to other business activity or it is not performed by a third-party lobbyist;
- by a person who works for an organisation (including their own) for the purpose of representing the interests of the organisation or its members; or
- for the purposes of representing community interests.

An individual or body may still be lobbying even if the Commission is not ultimately responsible for assessing or deciding a proposal.

5.3. Third-party Lobbyists

Third-party lobbyists must be registered on the Government's Register of Third-party Lobbyists (the Lobbyist Register) and must comply with the Lobbyist Code of Conduct. This includes individuals involved in operating on behalf of an organisation listed as conducting third-party lobbying.

Lobbyists must disclose if they are third-party lobbyists, the names of any individuals they have engaged to undertake the lobbying, and the name of the person whose interests the lobbyist is representing. The information must be disclosed before any meeting for the purpose of the lobbying is held, or other communication made.

The following are not third-party lobbyists: members of a professional institute or association and persons where lobbying is incidental to the provision of professional services to a client in the course of their work, such as technical specialists and consultants.

5.4. Other Lobbyists

Individuals, organisations or bodies such as industry or community organisations that lobby Government Officials, other than a third-party lobbyist; this includes individuals engaged to undertake lobbying for a third-party lobbyist.

5.5. Business Contacts

A Business Contact is an individual person, organisation or Government agency that communicates with the Commission about a specific application or proposal, funding decision, policy or regulatory issue, who is not a third-party lobbyist or other lobbyist.

5.6. Prohibited lobbying

There are restrictions on the contact that staff can have with lobbyists. Government Officials must not permit lobbying by:

- a third-party lobbyist who is not registered on the Lobbyist Register;
- an individual engaged to undertake lobbying for a third-party lobbyist who is not themselves registered;
- any lobbyist who has failed to make the disclosures required under the Act and the Lobbyists Code;
- a third-party lobbyist engaging in lobbying on behalf of a client not listed on the Lobbyist Register.
- a lobbyist whose name has been placed on the Lobbyist Watch List, unless:
 - at least two Commission staff (including at least one Senior Executive) are present during any communication with the lobbyist; and
 - at least one employee takes notes of the communications with the lobbyist and provides those notes to the CEO.

6. Procedure

The Commission's Procedure for Engaging with Lobbyists and Business Contacts contains guidance and protocols for interacting with third-party lobbyists, other lobbyists and business contacts, including processes for the establishment of meetings, who may attend (including probity officers), record keeping and maintaining the Third-party Lobbyist Contact Register.

Staff are responsible for understanding the requirements of, and complying with, the Procedure.

Staff may also obtain further information from their manager or supervisor.

7. Breaches of the Engaging with Lobbyists and Business Contacts Policy

Behaviour that is contrary to this policy must be reported to a staff member's supervisor or manager, or to a senior executive manager (unless reporting as a public interest disclosure – see Public Interest Disclosures Policy).

Breaches of the Policy and the Procedure will be dealt with in a manner that is proportionate to the seriousness of the matter. The *Government Sector Employment Act 2013* (GSE Act) and the *Government Sector Employment Rules 2014* establish procedures for dealing with allegations of misconduct, and actions that may be taken. A breach of this Policy by an employee may constitute misconduct under the GSE Act and may result in any of the following actions:

- suspension and/or termination of employment;
- imposition of a fine;
- reducing remuneration;
- reducing classification or grade;
- assignment to a different role; or
- caution or reprimand.

The Commission provides reports of suspected fraud and/or corrupt conduct to the Independent Commission Against Corruption (ICAC), and in some cases, to the NSW Police. Where a breach of the Policy is considered to involve potentially corrupt conduct, the Commission will notify ICAC which has significant statutory powers to investigate serious corrupt conduct in all NSW Government departments and agencies.

8. Contacts

NSW Electoral Commission

Visit the Lobbyists Register website at: www.lobbyists.elections.nsw.gov.au

By email at: lobbyists@elections.nsw.gov.au

By phone on: (02) 9290 5999

To include a third-party lobbyist contact on the online register:

By email at: executive.services@gsc.nsw.gov.au

9. Further information and resources

9.1. Internal Policies

- Greater Sydney Commission Code of Ethics and Conduct Policy
- Greater Sydney Commission Gifts, Benefits and Hospitality Policy
- Greater Sydney Commission Public Interest Disclosures Policy and Procedures

9.2. Legislation

- *Government Sector Finance Act 2019*
- *Government Sector Employment Act 2013*
- *Government Sector Employment Rules 2014*
- *Lobbying of Government Officials Act 2011*
- *Lobbying of Government Officials (Lobbyists Code of Conduct) Regulation 2014*
- *Premier's Memorandum 2014-13 NSW Lobbyists Code of Conduct*
- *Independent Commission Against Corruption Act 1988*

9.3. Other resources

Register of Third-party Lobbyists

Lobbyists and Business Contacts meeting requests webpage (including the Commission's Third-party Lobbyists Register)

Online Lobbyists Training

9.4. Support and/or advice

Employee Assistance Program – (AccessEAP)

1800 818 728

info@accesseap.com.au

Safework NSW – Information, advice or assistance

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ENGAGING WITH LOBBYISTS AND BUSINESS CONTACTS

PROCEDURE

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Document management

Approver	Danielle Smalley – Chief Operating Officer (pending) Greg Woodhams – Executive Director (pending)
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1. Procedure Statement

The Engaging with Lobbyists and Business Contacts Procedure (Procedure) outlines the principles, processes and requirements for interacting with Third-party Lobbyists, other Lobbyists and Business Contacts in the Greater Sydney Commission (the Commission). It provides guidance and procedures for Commission staff to follow in relation to the establishment of meetings, who may attend the meetings, recordkeeping and maintaining the Third-party Lobbyist Contact Register.

2. Who does this Procedure apply to?

The Engaging with Lobbyists and Business Contacts Procedure applies to Commission members (Commissioners), Youth Panel members and all employees including:

- permanent staff, temporary staff, and casual staff;
- other Government sector employees who are on secondment or assigned to the Commission;
- contractors, consultants, and volunteers; and
- employees of organisations who provide services under contract to the Commission.

For the purposes of this Procedure, “staff” refers to all people to whom this Procedure applies.

In this Policy, a reference to a senior executive manager means:

- Chief Executive Officer;
- Executive Director; and
- Director.

3. Definitions

Business Contacts	means any individual or group, who is not a third-party lobbyist or other Lobbyist, that communicates with a Government Official about a specific application or proposal, funding decision, policy or regulatory issue.
Commission matter	means any issue, consultation, proposal, plan, strategy, advice, information, recommendation, report, assistance or other matter being considered, developed or made by the Commission.
Government Official	Includes: <ul style="list-style-type: none"> • a Minister or Parliamentary Secretary; • a staff member of a Minister or Parliamentary Secretary (including a staff member in an electorate office); • the head of a Public Service agency; • a person employed in, or an individual who is engaged under a contract to provide, services to or on behalf of the Public Service of NSW, the Transport Service of NSW, or any other service of the Crown; • a local government official; or • a member (however expressed) of, or of the governing body of, a statutory body (includes Greater Sydney Commission).

Lobbying	<p>means communicating with a Government Official for the purposes of representing the interests of others (including their own organisation) in relation to:</p> <ul style="list-style-type: none"> • legislation or proposed legislation; • a Government decision or proposed Government decision; • a Government policy or proposed Government policy; • a planning application; • the exercise by the Government Official of their official functions; or • any Commission matters.
Lobbyists Code of Conduct	<p>means the document that sets out the ethical standards, disclosures and requirements for individuals and organisations to lobby in New South Wales. The Code is included in Schedule 1 of the <i>Lobbying of Government Officials (Lobbyists Code of Conduct) Regulation 2014</i>.</p>
Lobbyists Register	<p>means the Register of third-party lobbyists, an online register that contains the names and organisations of third-party lobbyists and the clients they represent. It is kept and maintained by the NSW Electoral Commission.</p>
Lobbyists Watch List	<p>means a list of third-party lobbyists or other lobbyists placed on a 'Watch List' by the NSW Electoral Commission as a result of non-compliance with the Act or Lobbyist Code of Conduct. The Lobbyists Watch List is located on the Register of Third-party Lobbyists and is maintained by the NSW Electoral Commission.</p>
Other Lobbyists	<p>means individuals or bodies that lobby Government Officials other than a third-party lobbyist; this includes individuals engaged to undertake lobbying for a third-party lobbyist.</p>
Third-party lobbyist	<p>means an individual or body carrying on the business of lobbying Government Officials (generally for money or other valuable consideration) on behalf of another individual or body. This excludes technical specialists and consultants in their work capacity.</p>
Third-party Lobbyist Contact Register	<p>means the Commission's register of contacts with third-party lobbyists.</p>

4. Key responsibilities

Chief Operating Officer

The Commission's Chief Operating Officer is responsible for:

- ensuring the Commission has systems in place to comply with its obligations with respect to third-party lobbyists;
- authorising the publication of amendments to the Third-party Lobbyist Contact Register; and
- reporting non-compliance with the Act and Lobbyists Code of Conduct to the NSW Electoral Commission as appropriate.

Senior executive managers and managers

A senior executive manager or manager responsible for supervising or managing an individual or group of staff, is responsible for:

- overseeing the effective management of the Policy and this Procedure;
- complying with all mandatory decision-making, reporting and publishing requirements contained in the Procedure for Engaging with Lobbyists and Business Contacts;
- discussing compliance as part of the ongoing management of their teams; and
- monitoring and evaluating the operation of the Policy and this Procedure in their area of responsibility.

Staff

In all dealings with lobbyists and business contacts, staff must:

- behave in a lawful, professional and reasonable manner and always act in the best interests of the Commission and NSW Government;
- make impartial decisions that demonstrate the values of the Commission and the Public Service Commission's Code of Ethics and Conduct for NSW Government Sector Employees and promote confidence in the integrity of public administration;
- report instances of non-compliance to their manager or a senior executive manager; and
- comply with this Procedure and the Policy for Engaging with Lobbyists and Business Contacts, including:
 - follow protocols that cover the scheduling of, and attendance at, meetings, as well as verbal and written communications; and
 - keep an accurate record with any contact with a lobbyist, whether or not lobbying has occurred in relation to that contact.

NSW Electoral Commission

The [NSW Electoral Commission](#) maintains the [Register of Third-party Lobbyists](#) and the Lobbyists Watch List and enforces the [Lobbyists Code of Conduct](#).

To improve compliance, the NSW Electoral Commission may enter into arrangements with lobbyists to ensure that they follow the Lobbyists Code. If a lobbyist breaches the Lobbyists Code, the NSW Electoral Commission may place the lobbyist on the [Lobbyists Watch List](#) and impose further restrictions on contact with Government Officials.

5. Lobbying

5.1. Forms of lobbying

Lobbying is communicating with a Government Official for the purpose of representing the interests of others in relation to:

- legislation or proposed legislation;
- a Government decision or proposed Government decision;
- a Government policy or proposed Government policy;
- a planning application; or
- the exercise by a Government Official of their official functions.

Lobbying **does not** include any communications by a Member of Parliament or a Government Official who is acting in the ordinary course of their duties.

5.2. Methods of lobbying

Lobbying extends to any communication – in person, in writing, by telephone, email or by other electronic means:

- even if it occurs in an incidental way to other business activity or it is not performed by a third-party lobbyist;
- by a person who works for an organisation (including their own) for the purpose of representing the interests of the organisation or its members; or
- for the purposes of representing community interests.

An individual or body may still be lobbying even if the Commission is not ultimately responsible for assessing or deciding a proposal.

5.3. Third-party Lobbyists

Third-Party lobbyists must be registered on the Government's [Register of Third-party Lobbyists](#) (the Lobbyist Register) and must comply with the [Lobbyist Code of Conduct](#). This includes individuals involved in operating on behalf of an organisation listed as conducting third-party lobbying.

Lobbyists must disclose if they are third-party lobbyists, the names of any individuals they have engaged to undertake the lobbying, and the name of the person whose interests the lobbyist is representing. The information must be disclosed before any meeting for the purpose of the lobbying is held, or other communication made.

The following are not third-party lobbyists: members of a professional institute or association and persons where lobbying is incidental to the provision of professional services to a client in the course of their work, such as technical specialists and consultants.

5.4. Other Lobbyists

Individuals, organisations or bodies such as industry or community organisations that lobby Government Officials, other than a third-party lobbyist; this includes individuals engaged to undertake lobbying for a third-party lobbyist.

Individuals and organisations that are not third-party lobbyists but their representational activities are still captured under the Act if they lobby Government officials. They are known as other lobbyists because some of their activities are captured under the definition of lobbying. Examples of other lobbyists include:

- representatives of corporations who are promoting the interests of their organisation;

- representatives of industry or trade associations;
- representatives of religious or charitable organisations;
- representatives of business, community, or environmental groups;
- planning consultants; or
- professional service providers, such as economists, lawyers or accountants.

5.5. Business Contacts

A Business Contact is an individual person, organisation or Government agency that communicates with the Commission about a specific application or proposal, funding decision, policy or regulatory issue, who is not a third-party lobbyist or other lobbyist.

6. Requirements for lobbyists

Schedule 1 of the Lobbying of Government Officials (Lobbyists Code of Conduct) Regulation 2014 (the Regulation) sets out standards and requirements for lobbyists.

6.1. All lobbyists

All lobbyists must:

- disclose the matter that they wish to discuss in advance when seeking a meeting with a Government official;
- disclose any financial or other interest they may have in the matter to be discussed before the meeting commences;
- not engage in any misleading, dishonest, corrupt or other unlawful conduct in relation to their lobbying;
- use all reasonable endeavours to satisfy themselves of the truth and accuracy of all material information they provide; and
- not have held office as a Minister or Parliamentary Secretary in the past 18 months, unless they are lobbying in their capacity as a Member of Parliament or a Government official.

6.2. Additional requirements for Third-party Lobbyists

Third-party Lobbyists, and any individuals they engage to lobby on their behalf, **must also**:

- not meet or otherwise communicate with a Government official unless they are registered on the Lobbyists Register;
- prior to any meeting or communication with a Government official, disclose:
 - their status as third-party lobbyists;
 - the names of any individuals they have engaged to undertake lobbying on their behalf; and
 - the name/s of their clients;
- not lobby on a matter that relates to a NSW Government board or committee of which they, or the individuals they engage to lobby on their behalf, are a member;
- not make exaggerated or misleading claims to their clients about the nature or extent of their access to political parties or Government;
- keep separate from their lobbying activities any personal involvement with a political party; and
- not receive success fees for lobbying a Government official.

7. Prohibited lobbying

There are restrictions on the contact that staff can have with lobbyists. Government Officials must not permit lobbying by:

- a third-party lobbyist who is not registered on the Lobbyist Register;
- an individual engaged to undertake lobbying for a third-party lobbyist who is not themselves registered;
- any lobbyist who has failed to make the disclosures required under the Act and the Lobbyists Code;
- a third-party lobbyist engaging in lobbying on behalf of a client not listed on the Lobbyist Register.
- a lobbyist whose name has been placed on the Lobbyist Watch List, unless:
 - at least two Commission staff (including at least one Senior Executive) are present during any communication with the lobbyist; and
 - at least one staff member takes notes of the communications with the lobbyist and provides those notes to the CEO.

8. Procedures for contact with lobbyists and business contacts

Step 1: Meeting request

Third-Party Lobbyists, other Lobbyists and Business Contacts wishing to meet with Commission staff must lodge a Meeting Request Form. Staff must seek approval for the meeting from a senior executive manager. Other forms of contact such as in writing or through telephone (or verbal) must be taken by a senior executive manager.



Step 2: Record keeping

Following all contact with Lobbyists and Business Contacts, appropriate records must be kept and recorded on CM9.



Step 3: Public registration of Third-Party Lobbyists Contacts

Following approval of meeting notes, a record of the Third Party Lobbyist contact will be added to the Commission's online Register.

8.1. Meeting requests

a) Third-party Lobbyists

A Third-party Lobbyist wishing to meet with a staff member must lodge a Third-party or Other Lobbyist **Meeting Request Form**, which is available on the Commission's website. The form must be lodged at least one week in advance of the proposed meeting date.

Staff must confirm the attendees are third-party lobbyists prior to seeking approval. Approval for the meeting must be sought from a senior executive manager, who must decline a meeting unless the requirements in Section 6 of this Procedure are met. A senior executive manager and at least one other staff member must be present at the meeting.

Meetings must be held at Government Offices. A Probity Officer must be engaged for the meeting.

b) Other Lobbyists

Other lobbyists wishing to meet with the Commission must lodge a **Third-party or Other Lobbyist Meeting Request Form**, which is available on the [Commission's website](#). The form must be lodged at least one week in advance of the proposed meeting date.

Community groups are not required to fill in a meeting request form, but must disclose at least one week prior to the meeting:

- the reason for the meeting and issue/s to be discussed; and
- any financial and other interest they have in the issue/s to be discussed.

Staff must confirm the attendees are third-party lobbyists prior to seeking approval. A senior executive manager must approve the meeting but is not required to attend and must not approve a meeting unless the requirements in Section 6 of this Procedure are met.

Meetings should be held at a Government Office or the organisation's premises. Meetings may be held on site or at Council premises with approval of a senior executive manager. A Probity Officer must be engaged for the meeting.

If someone who works for a third-party lobbyist organisation is attending a meeting as an Other Lobbyist (being in a professional services capacity and not themselves recorded on the Lobbyist Register), but attempts to lobby a Government official on behalf of a client, they should be advised of their responsibility to be registered and the meeting should be terminated.

c) Business contacts

A business contact wishing to meet with the Commission may lodge a **Business Contact Request Form**, which is available on the [Commission's website](#). Members of the public and government agencies are not required to fill in a meeting request form if they are acting as business contacts.

Staff must confirm the attendees are third-party lobbyists prior to their attendance. Anyone may accept and attend a business contact meeting.

Meetings may be held at a Government Office, Council premises or the organisation's premises.

8.2. Written contact

a) Third-party Lobbyists

Written contact with third-party lobbyists should only be undertaken by senior executive managers. If another staff member is emailed by a third-party lobbyist, they should refer it to a senior executive manager immediately. A record of the contact should be made by the staff member who received the email and included in the relevant file in CM9 (see Section 9).

Informal electronic contact, including SMS, social media or instant messages between staff and Third-Party lobbyists are permitted, but only for routine and/or logistical matters.

b) Other Lobbyists

All written contacts with other lobbyists must be sent to Government Services for management as correspondence. Significant written correspondence with other lobbyists must be approved by a senior executive manager.

Informal electronic contact, including SMS, social media or instant messages between staff and other lobbyists are permitted, but only for routine and/or logistical matters.

c) Business Contacts

Any staff member may have written contact with business contacts for routine matters. Significant matters should be referred to Government Services for management as formal correspondence.

Informal electronic contact, including SMS, social media or instant messages between staff and Government Officials are permitted, but only for routine and/or logistical matters.

8.3. Telephone and other verbal contact

a) Third-party Lobbyists

Telephone contact with third-party lobbyists should only be taken by senior executive managers. If another staff member is contacted by a third-party lobbyist, they should refer it to a senior executive manager immediately and decline further contact.

b) Other Lobbyists

Where possible, a manager or senior executive manager should be involved in the conversation, but any staff member may have verbal contact with other lobbyists. The other lobbyist must disclose prior to substantive discussion:

- the reason for the contact and issue/s to be discussed; and
- any financial and other interest they have in the issue/s to be discussed.

d)c) _____ Business Contacts

Any staff member may verbally communicate with business contacts.

9. Record keeping

Following all contacts with lobbyists and business contacts, appropriate records must be kept and recorded on CM9.

9.1. Record-Keeping Procedures

Third-party Lobbyists

Staff must use the following record-keeping procedures when dealing with third-party lobbyists.

For a meeting, a completed and approved **Third-party Lobbyist Meeting Record form** must be filed in CM9.

A file note of a telephone call or other verbal contact must be made, containing:

- items of discussion;
- any substantive issues raised;
- any key decisions, advice, actions, outcomes, guidance or information given to the Third-party Lobbyist, and who in the Commission made/gave them; and
- who is responsible for actions arising.

Records of all incoming and outgoing emails must be kept in CM9.

Electronic records of all contacts should be placed in the "Registered third-party lobbyists Contact" folder for that year (with a subfolder for each contact).

The record title should include:

- date of the contact in YYYYMMDD format (i.e. 23 August 2017 is 20170823);
- "Third-party Lobbyist/s";
- Third-party Lobbyist name/s;
- Third-party Lobbying Organisation;
- who the Third-party Lobbyist represented; and
- the matter raised.

Example:

20190312 – Third-party Lobbyist – John Smith – John Smith and Co. – on behalf of Jane Citizen Products – Industrial lands in the Central City District Plan

Completed meeting records should be sufficiently clear and detailed to allow anyone reading them to understand who was there, what took place, and the decisions advice, actions, outcomes or guidance given.

If a discussion concerns more than one area of legislation, policy, plans, assessment or exercise of the Commission's official duties, the record must include each item discussed.

Third-party lobbyists must be informed up front that the records of the discussion will be published on the Commission's website, using the Commission's Third-party Lobbyist Contact Register.

Records of Third-party Lobbyist contact must:

- include any meeting, telephone call, email or other communication with a Third-Party lobbyist;
- be approved by a senior executive manager once completed within five business days;
- be provided to Government Services once approved to draft updates to the Third-party Lobbyist Contact Register;
- be sent to the CEO, Chief Operating Officer, Executive Director City Planning Projects or Director Government Services, within five business days of the approval to publish; and
- once the updates are approved, be published on the Commission's website within five business days.

See Section 10 of this Procedure for approval rights for the Third-party Lobbyist Meeting Notes and Contact Register.

Other Lobbyists and Business Contacts

A record of communications with other lobbyists and business contacts must be prepared and filed in CM9.

A record of any communication with other lobbyists and business contacts may be made by:

- using the **Other Lobbyist and Business Contact Meeting Notes form**;
- a file note;
- email to the staff member's manager;
- copies of incoming and outgoing correspondence (for emails) or
- minuting the meeting.

The record must contain:

- items of discussion;
- any substantive issues raised;
- when and where it took place;
- any key decisions, advice, actions, outcomes, guidance or information given to the third-party lobbyist, and who in the Commission made/gave them; and
- who is responsible for actions arising.

The record title should include:

- date of the contact in YYYYMMDD format (i.e. 23 August 2017 is 20170823);
- names of the individuals;
- name of the organisation/group; and
- the matter raised.

10. Public registration of Third-party Lobbyists Contacts

Government Services will draft a record of Third-party Lobbyist contacts after the Meeting Notes have been approved.

Following approval by the Chief Executive Officer, Chief Operating Officer, Executive Director City Planning Projects, or Director Government Services, a record of the third-party lobbyist contact will be added to the Commission's online Third-party Lobbyists Contact Register within 10 business days.

The Register is to include:

- date of the primary contact (for multiple contacts on the same matter, this will be the meeting date or date of first contact for written/telephone contacts).
- the name of the third-party lobbyist and their third-party lobbyist organisation/entity;
- who the third-party lobbyist represented;
- Subject matter;
- outcome; and
- contact type.

Staff responsibilities – contact records		
Position	Role	Responsibilities
All staff	Creator	<ul style="list-style-type: none"> • attending and recording meetings in consultation with other Commission attendees; • saving record of meeting and advising Approver; and • viewing published records.
Senior executive managers	Approver	<ul style="list-style-type: none"> • as above; • finalising records for completion before sending them to Publisher; • advising Publisher that record is ready to be published; and • Viewing unpublished records.
Government Services	Contact register updates	<ul style="list-style-type: none"> • draft the updated Third-party Lobbyist Contact Register using the approved meeting notes.
Chief Executive Officer, Chief Operating Officer, Executive Director City Planning Projects, or Director Government Services	Publisher	<ul style="list-style-type: none"> • as above; • authorising Third-party Lobbyist Contact Register updates to appear on the Commission's website.

11. Contacts

NSW Electoral Commission

Visit the Lobbyists Register website at: www.lobbyists.elections.nsw.gov.au

By email at: lobbyists@elections.nsw.gov.au

By phone on: (02) 9290 5999

To include a Third-party Lobbyist contact on the online register:

By email at: executive.services@gsc.nsw.gov.au

12. Further information and resources

12.1. Internal Policies

- Greater Sydney Commission Code of Ethics and Conduct Policy
- Greater Sydney Commission Gifts, Benefits and Hospitality Policy
- Greater Sydney Commission Public Interest Disclosures Policy and Procedures

12.2. Legislation


- [Government Sector Finance Act 2019](#)
- [Government Sector Employment Act 2013](#)
- [Government Sector Employment Rules 2014](#)
- [Lobbying of Government Officials Act 2011](#)
- [Lobbying of Government Officials \(Lobbyists Code of Conduct\) Regulation 2014](#)
- [Premier's Memorandum 2014-13 NSW Lobbyists Code of Conduct](#)
- [Independent Commission Against Corruption Act 1988](#)

12.3. Other resources

[Register of Third-party Lobbyists](#)

[Lobbyists and Business Contacts meeting requests webpage \(including the Commission's Third-party Lobbyists Register\)](#)

[Online Lobbyists Training](#)

 1800 617 681 (tel:1800617681)

 info@gsc.nsw.gov.au (mailto:info@gsc.nsw.gov.au)

Select Language

 (<https://www.facebook.com/GreaterSydneyCommission>)

 (<https://twitter.com/gscsydney>)

 (<https://www.youtube.com/channel/UCEknSYZmPxQKWYf7BEW5bGA>)

 (<https://www.linkedin.com/company/greater-sydney-commission>)

 (<https://www.instagram.com/greatersydneycommission>)

Lobbyists and Business Contacts meeting requests

Since our establishment in January 2016, a critical element of our ongoing work at the Greater Sydney Commission has been collaboration and engagement with the wider community to plan for a more productive, liveable and sustainable Greater Sydney. We will continue our conversations and engagement with stakeholders as we move into the next phase of implementing our plans.

If you are a third-party lobbyist or business contact (including peak industry group or a representative of a community group) and would like to request a meeting with a representative of the Commission, please complete the relevant form below, or call us on 1800 617 681 for more information.

If you are a community member, please call us on 1800 617 681 to request a meeting.

Request a meeting

The Greater Sydney Commission is guided by its policy on *Engaging with Lobbyists & Business Contacts*.

If you would like to request a meeting with the Commission, then please complete the Third-Party and Other Lobbyist Meeting Request Form (DOC, 112 KB) (https://gsc-public-1.s3.amazonaws.com/s3fs-public/lobbyist_meeting_request_form_13.05.18.doc) or the Business Contact Meeting Request Form (DOC, 97 KB) (https://gsc-public-1.s3.amazonaws.com/s3fs-public/business_contact_meeting_request_form_130518.doc), print out, sign the acknowledgement, then scan the relevant document and return it via email to meeting.requests@gsc.nsw.gov.au (<mailto:meeting.requests@gsc.nsw.gov.au>) at least 7 working days in advance of the meeting date. A meeting date and time will be arranged by the Commission.

Meetings with the Commission should generally be to provide information to the Commission on issues relevant to strategic planning in the Greater Sydney Region. Please note that the Commission does not have a role with regard to site specific developments requiring decisions or planning proposals. If your query is in relation to such matters then you should contact the relevant local council or Department of Planning, Industry and Environment.

If a meeting occurs then it will generally be attended by a representative of the Commission and a probity officer. If a meeting with a registered lobbyist occurs then it will be attended by at least two Commission representatives and a probity officer.

Third-Party Lobbyist and Other Lobbyist Contact



The policy *Engaging with Lobbyists & Business Contacts* (https://gsc-public-1.s3-ap-southeast-2.amazonaws.com/s3fs-public/gsc_engaging_with_lobbyists_and_business_contacts_policy_-_april_2019.pdf) applies to persons who are required to be registered on the NSW Electoral Commission's register of Third-Party Lobbyists. The Lobbying of Government Officials Act 2011 (<https://www.legislation.nsw.gov.au/#/view/act/2011/5>) and Premier's Memorandum M2014-13 NSW Lobbyists Code of Conduct (<https://arp.nsw.gov.au/m2014-13-nsw-lobbyists-code-conduct>), governs the interactions between NSW Government officials and lobbyists.

In accordance with the policy Engaging with Lobbyists & Business Contacts, the Commission will make a record of contact with Third-Party Lobbyists, information from which is published on the Registered Lobbyists Contact Register August 2019 (PDF, 69KB) (https://gsc-public-1.s3.amazonaws.com/s3fs-public/registered_lobbyist_contact_register_15082019.pdf) on the Commission's website.

All contact with lobbyists that are not Third-Party Lobbyists is recorded by the Commission.

Business Contacts



A Business Contact includes any person or organisation that communicates with the Commission about any development matter, but who is not a Third-Party Lobbyist or Other Lobbyist. For the purposes of any communication with the Commission, development matters include any subject relating to strategic planning, the Greater Sydney Region Plan and the District Plans.


The Commission's policy also applies to persons who are not registered lobbyists, but wish to discuss development matters with the Commission.

All contact with Business Contacts is recorded on a Meeting Record Form.

If you have any queries regarding meeting requests, please contact the Commission at meeting.requests@gsc.nsw.gov.au (<mailto:meeting.requests@gsc.nsw.gov.au>).

Downloads


Third-Party and Other Lobbyist Meeting Request Form (DOC, 112 KB) (https://gsc-public-1.s3.amazonaws.com/s3fs-public/lobbyist_meeting_request_form_13.05.18.doc)
Business Contact Meeting Request Form (DOC, 97 KB) (https://gsc-public-1.s3.amazonaws.com/s3fs-public/business_contact_meeting_request_form_130518.doc)
Registered Lobbyists Contact Register August 2019 (PDF, 69 KB) (https://gsc-public-1.s3.amazonaws.com/s3fs-public/registered_lobbyist_contact_register_15082019.pdf)

 1800 617 681 (tel:1800617681)

 info@gsc.nsw.gov.au (mailto:info@gsc.nsw.gov.au)

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 (<https://twitter.com/gscsydney>)

 (<https://www.youtube.com/channel/UCEknSYZmPxQKWYf7BEW5bGA>)

 (<https://www.linkedin.com/company/greater-sydney-commission>)

 (<https://www.instagram.com/greatersydneycommission>)

Third-Party and Other Lobbyist Meeting Request Form

The Greater Sydney Commission requires all meeting requests from lobbyists¹ to be made by completing and submitting this form. All records of contact with Third-Party Lobbyists will be published on the Commission's Third-Party Lobbyist Contact Register, which is located on the [Commission's website](#). Please assist us by providing as much information as possible.

The Greater Sydney Commission is committed to protecting the privacy of your personal information, in accordance with the *Privacy and Personal Information Protection Act 1998* (NSW). Personal information provided on this form is collected for the purpose for which you have provided it. Records of contact with Third-Party Lobbyists (which may include personal information) will be published on the Commission's website. The Commission will not use your personal information for any other purpose, nor will it be otherwise disclosed, unless with your consent or in other circumstances where such use or disclosure is permitted under the *Privacy and Personal Information Protection Act 1998*. You may choose not to provide your personal information to the Greater Sydney Commission. However, this may mean that it is not possible for us to arrange a meeting with you. For information about how your personal information is collected, used and disclosed by the Greater Sydney Commission, please see the privacy management plan available at

https://gsc-public-1.s3.amazonaws.com/s3fs-public/privacy_management_plan.pdf.

You can ask to access or amend your personal information held by the Greater Sydney Commission by contacting:

Greater Sydney Commission

GPO Box 257

Parramatta NSW 2124

info@gsc.nsw.gov.au

Phone: 02 8289 6200.

Section 1: Purpose

Purpose of the meeting
(summary)

Matters to be discussed

Section 2: Meeting Details

1. Meetings with the Commission are generally held at the:
Greater Sydney Commission offices
Level 5, 10 Valentine Avenue
Parramatta
 Meetings at other locations are subject to the Commission's approval.
2. Meetings will be held at least 7 days after the submission of this Request Form.
3. Meetings will be held with senior officers of the Commission and a Probity Officer engaged by the Commission.
4. The meeting request may be declined if the Commission considers the purpose of the meeting or matters to be discussed primarily concerns a specific development application or planning proposal.

¹ A 'lobbyist' is defined in the *Lobbying of Government Officials Act 2011* to mean:

- (a) a third-party lobbyist, or
- (b) any other individual or body that lobbies Government officials (including an individual engaged to undertake lobbying for a third-party lobbyist).

A 'third-party lobbyist' is defined to mean an individual or body carrying on the business (generally for money or other valuable consideration) of lobbying Government officials on behalf of another individual or body.

Section 3: Third-Party and Other Lobbyist/s details (as described in the Third-Party Lobbyist Contact Register)	
Third-Party Lobbyist/s and individuals engaged to undertake lobbying for Third-Party Lobbyists	
Other Lobbyist	
Name of Client/s represented for the purpose of this meeting	
Section 4: Attendees	
Third-Party Lobbyist Attendee/s	
Name	
Title	
Other Lobbyist Attendee/s	
Name	
Title	
Client Attendee/s (if none, please state n/a)	
Name	
Title	
Other Attendee/s (if none, please state n/a)	
Name	
Title	
Reason for attendance	
Section 5: Disclosure of Interests	
Do the lobbyist/s attending the proposed meeting have a financial or other interest in the matter/s to be discussed? (If YES tick the box and describe the interest below.)	<input type="checkbox"/>
Nature of interest: _____	
Section 6: Lobbying on NSW Government Board or Committee Business	
Is the lobbyist/s listed above a member of a NSW Government Board or Committee? (If YES tick the box and list the Board/Committee.)	<input type="checkbox"/>
Name of Board/Committee: _____	
Section 7: Contact Details	
Name	
Title	
Email	
Telephone	

Section 8: Confirmation

Under the Lobbying of Government Officials Act 2011 and the NSW Lobbyists Code of Conduct 2014, the following ethical standards and requirements apply.

All lobbyists must:

1. disclose in advance the nature of the matter to be discussed, when seeking a meeting with a NSW Government official;
2. disclose any financial or other interest they may have in the matter to be discussed before the meeting commences;
3. not engage in any misleading, dishonest, corrupt, or other unlawful conduct in relation to their lobbying; and
4. use all reasonable endeavours to satisfy themselves of the truth and accuracy of all material information that they provide.

In addition, third-party lobbyists, must:

1. not meet or otherwise communicate with NSW Government officials unless registered on the NSW Register of Third-Party Lobbyists and that any individuals that they engage to undertake the lobbying for them are registered on the NSW Register of Third-Party Lobbyists;
2. disclose, prior to any meeting or communication with NSW Government officials:
 - o their status as third-party lobbyists;
 - o the names of any individuals they have engaged to undertake lobbying on their behalf; and
 - o the name/s of their client/s;
3. not lobby on a matter that relates to the functions of a NSW Government board or committee of which they, or the individuals they engage to lobby on their behalf, are a member;
4. not make exaggerated or misleading claims to their clients about the nature or extent of their access to political parties or Government or persons associated with them;
5. keep separate from their lobbying activities any personal activity or involvement on behalf of a political party; and
6. not receive or agree to receive (or agree that other persons are to receive) success fees for lobbying NSW Government officials.

☐ I confirm that this meeting request complies with all of these requirements. (If YES tick the box.)

X_____

Signature of Third-Party or other Lobbyist requesting meeting

Please scan the completed form and email to meeting.requests@gsc.nsw.gov.au

Business Contact Meeting Request Form

The Greater Sydney Commission requires all meeting requests from business contacts to be made by completing and submitting this form. Please assist us by providing as much information as possible. This will assist in ensuring that the most appropriate people are made available for this meeting.

All meeting requests from lobbyists must be made completing the Third-Party Lobbyist Meeting Request Form.

Section 1: Purpose	
Purpose of the meeting (summary)	
Matters to be discussed	
Section 2: Meeting Details	
<ol style="list-style-type: none"> Meetings with the Commission are generally held at the: Greater Sydney Commission offices Level 5, 10 Valentine Avenue Parramatta Meetings will be held at least 7 days after the submission of this Request Form. Meetings will be held with senior officers of the Commission and a Probity Officer engaged by the Commission. The meeting request may be declined if the Commission considers the purpose of the meeting or matters to be discussed primarily concerns a specific development application or planning proposal. 	
Section 3: Business Contact details	
Business Contact Organisation	
Client/s represented (for the purposes of this meeting)	
Section 4: Attendees	
Business Contact Attendee/s	
Name	
Title	
Client Attendee/s (if none, please state n/a)	
Name	
Title	
Other Attendee/s (if none, please state n/a)	
Name	
Title	
Reason for attendance	

Section 5: Contact Details	
Name	
Title	
Email	
Telephone	

Section 6: Confirmation	
<input type="checkbox"/> I confirm that this meeting does not involve a specific development application or planning proposal. (If YES tick the box.)	
X _____	
Signature of meeting requestor	

Please scan the completed form and email to meeting.requests@gsc.nsw.gov.au

Greater Sydney Commission

Record of Meeting

Contact information	
Date of Contact	
Type of Communication (Meeting or phone call)	
Time of meeting (start and finish time)	
Meeting location and address of location (required for meetings)	
Business Contact details	
Type of contact (Developer / Council / planning consultant / Group / Objector / Proponent)	
Attendees	

Meeting notes

Greater Sydney Commission

Approval		
Name of staff completing form	Name:	
	Title:	
	Signature:	
	Date:	
Name of staff approving form	Name:	
	Title:	
	Signature:	
	Date:	

As at: 19 September 2019

Greater Sydney Commission

Registered Lobbyist Contact Register

Contact Date	Registered Lobbyist	Who the Lobbyist Represented	Subject Matter	Outcome	Method
4/05/2016	Christopher Brown and Luke Turner	Western Sydney Leadership Dialogue	Western Sydney Light Rail	No further action.	Meeting
25/07/2016	Kerry Chikarovski	DNC Property	Camberwell Rd Vineyard	No further action.	Meeting
25/07/2016	Kerry Chikarovski	Logos Property	Yennora former Alcoa site	No further action.	Meeting
29/07/2016	Kerry Chikarovski	TITFA Consultancy and JBA Planning	Victoria Rd Marrickville	No further action.	Meeting
7/09/2016	Barton Deakin	TASAND and Hanson Construction	Glebe Island	No further action.	Meeting
7/09/2016	Christopher Brown and Luke Turner	Western Sydney Leadership Dialogue, UWS	Badgerys Creek Airport & Blacktown CBD	No further action.	Meeting
20/09/2016	Kerry Chikarovski	Logos Property	Yennora former Alcoa site	No further action.	Meeting
13/12/2016	Kerry Chikarovski	Logos Property and JBA Planning	Yennora former Alcoa site	GSC provided advice on process.	Meeting
13/12/2016	Kerry Chikarovski	DNC Property	Camberwell Rd Vineyard	GSC provided advice on process.	Meeting
11/05/2017	Robert Anthony Furolo	CRK Properties, LeaMac Properties, Benlee Property Trust, Pitt St Real Estate, Goodman, JBA Planners	Kingsgrove South Precinct	GSC provided advice on process.	Meeting
23/06/2017	Robert Anthony Furolo	ALAND	Edmondson Park, Liverpool, Campbelltown	GSC provided advice on process.	Meeting
26/07/2017	Christopher Brown	Taylor Street Advisory	Greater Parramatta and the Olympic Peninsula	No further action.	Telephone

As at: 19 September 2019

Greater Sydney Commission

Registered Lobbyist Contact Register

Contact Date	Registered Lobbyist	Who the Lobbyist Represented	Subject Matter	Outcome	Method
14/08/2017	Matthew Hingerty	Rookwood General Cemeteries Reserve Trust	Fern Gully	GSC provided advice on process for formal meetings.	Telephone
19/12/2017	The Hon Nick Greiner AC, Nicholas Nogarotto, Mitchell Corn and Russell King - CT International and Corporate Advisory	Clients (generally)	Draft Greater Sydney Region Plan and draft District Plans	No further action.	Meeting
16/01/2018	Robert Anthony Furolo	Kingsgrove landowners within the Industrial precinct	Kingsgrove Industrial precinct	GSC provided advice on process for rezonings and GSC policy on industrial areas.	Email
22/01/2018	Robert Anthony Furolo	Kingsgrove landowners within the Industrial precinct	Kingsgrove Industrial precinct	No further action.	Email
25/01/2018	Robert Anthony Furolo	Kingsgrove landowners within the Industrial precinct	Kingsgrove Industrial precinct	GSC provided advice on process.	Telephone
4/02/2018	Harry Hughes - Axis Strategic Advisory	Scenic NSW	Varroville	Parties agreed to convene at a later date. Meeting with proponents occurred without registered lobbyist in attendance.	Email
17/05/2018	Isabella Walker - Wells Haslem Mayhew	Blacktown City Council	Blacktown CBD	Parties agreed to convene at a later date.	Email
5/06/2018	Stephen Albin - Urbanised	Visionary Investment Group	Macquarie Park Proposal	GSC provided advice on process.	Meeting

As at: 19 September 2019

Greater Sydney Commission

Registered Lobbyist Contact Register

Contact Date	Registered Lobbyist	Who the Lobbyist Represented	Subject Matter	Outcome	Method
24/07/2018	Christopher Brown	Western Sydney Leadership Dialogue	Greater Sydney Commission Governance	No further action.	Email/ Telephone
27/07/2018	Christopher Brown	Western Sydney Leadership Dialogue	Greater Parramatta and the Olympic Peninsula	No further action.	Telephone
8/08/2018	The Hon Nick Greiner AC - CT International and Corporate Advisory		Carter Street Precinct	Referral for discussion with another party.	Email
18/09/2018	Christopher Brown - Taylor Street Consultancy	Canterbury Bankstown Council	Canterbury Bankstown Council engagement	GSC provided advice on process for meetings.	Email
12/09/2018; 19/09/2018	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	Liverpool Collaboration Area and speaking event	No further action.	Telephone
27/09/2018	Christopher Brown and Faith Halliday - Taylor Street Consultancy	Canterbury Bankstown Council	Canterbury Bankstown Council engagement	No further action.	Meeting
4/10/2018	Michael Teoh - CT International and Corporate Advisory	Lemac Group and Coronation Property	Liverpool Collaboration Area	GSC provided advice on process.	Telephone
14/01/2019	Christopher Brown and Faith Halliday - Taylor Street Consultancy	Western Sydney Leadership Dialogue	East London Study Tour	Meeting request declined.	Email

As at: 19 September 2019



Registered Lobbyist Contact Register

Contact Date	Registered Lobbyist	Who the Lobbyist Represented	Subject Matter	Outcome	Method
19/02/2019	Christopher Brown - Taylor Street Consultancy	Western Sydney Leadership Dialogue	Central City District	Parties agreed to convene at a later date.	Email
20/03/2019	Christopher Brown - Taylor Street Consultancy	Western Sydney Leadership Dialogue	Central City District	No further action.	Meeting
5/06/2019	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	East London Study Tour	GSC provided advice on progress of the matter/project.	Telephone
23/07/2019	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	Future Opportunities for Western Sydney	No further action.	Meeting
26/07/2019	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	Central City District	Speaking event request declined.	Telephone
27/07/2019	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	Central City District	Speaking event request received.	Telephone
12/08/2019	Christopher Brown - Taylor Street Consultancy	Western Sydney Leadership Dialogue	Central City District	No further action.	Meeting
12/08/2019	Kerry Chikarovski - Chikarovski and Associates	Dexus	St Leonards Health Hub	No further action.	Meeting
2/08/2019	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	Central City District	Speaking event request declined. No further action.	Telephone
22/08/2019	Christopher Brown - Taylor Street Advisory	Western Sydney Leadership Dialogue	Sydney Meets London - Study Tour	No further action.	Telephone

Engagement Strategy

25 July 2017



Greater Sydney
Commission



Introduction

Greater Sydney – world class and successful – is a growing city.

Sydney's population is likely to reach 8 million people by 2056, so we need to start planning now. We need more homes, jobs, public transport and roads in the right places. We want new schools, great public places and open spaces to make our city a better place now and for future generations.

The Greater Sydney Commission has been established to lead coordinated planning across government ensuring we deliver a more productive, liveable and sustainable city for everyone.

An important part of that planning is having robust conversations with Greater Sydneysiders about their ideas for the future of the city.

This Engagement Strategy outlines how the Commission has engaged to date, how we will engage moving forward, who we will engage with and how we will listen.

2

What we have done so far

The Greater Sydney Commission was established in January 2016. At that time, we gave a commitment to have many, varying conversations with Greater Sydneysiders about their aspirations for the future of the city. The response from individuals, community groups, peak bodies and industry has been strong.

From January through to November 2016 the Commission spoke to over 7,500 people about their ideas for how the city could be transformed to meet

the challenges of the future. This feedback was used to shape the six Draft District Plans and Towards our Greater Sydney document.

From 21 November 2016 to 31 March 2017 the six Draft District and Towards our Greater Sydney Plans were placed on public exhibition. The response was again strong – the Commission engaged with more 7,750 people and received 2,345 formal submissions providing a wide range of viewpoints.

What we plan to do

The Greater Sydney Commission will continue to embrace engagement to ensure we can collectively deliver great outcomes now and for future generations. We have been working closely with other government agencies such as Transport for NSW and Infrastructure NSW to ensure our conversations about the future of Sydney focus on the big picture, aligning planning and infrastructure delivery.

Our focus through to finalisation of the Greater Sydney Region Plan and District Plans will be on:

- ensuring we provide information to stakeholders and the community about how we used their feedback to shape the District Plans;
- providing opportunities for conversations about issues affecting Greater Sydney in the lead up to the release of the Draft Region Plan;
- engagement around the Draft Region Plan during the exhibition period.

How we will engage

The Greater Sydney Commission has adopted the following engagement principles to guide how it engages and develops relationships with individuals.

PRINCIPLE	HOW WE WILL ACT
Respectful	The Greater Sydney Commission engages with all stakeholders in a respectful manner. We openly discuss the challenges and listen before acting. We respect differing views. We make decisions that consider the range of views we've heard and the evidence.
Collaborative	The Greater Sydney Commission works collaboratively to create a greater Sydney. We work together with individuals, local community groups, peak representative bodies, all levels of government, industry groups and the private sector to inform our decisions. We will not be limited to the passive supply of information but will encourage and record views and informed opinion.
Accessible	The Greater Sydney Commission is accessible and visible in the community. We communicate by using direct, clear language that is free of jargon to reach as many people as possible. We provide multiple opportunities for people to get involved, provide feedback and share their ideas. We tailor our engagement to people's needs by providing a range of engagement opportunities including channels that are widely used, opportunities for face-to-face engagement and going to people in their communities. We help the community understand complex information.
Transparent	The Greater Sydney Commission acts in an open, honest and accountable manner. We provide clear direction on the scope of our decisions and decision making. We are honest about what can and cannot be influenced through engagement and we explain how feedback has informed our decisions.
Inclusive	The Greater Sydney Commission engages broadly, early and often with all stakeholders. We ensure that a diverse range of community members have opportunities to be actively engaged in the process, including young people, people from Culturally and Linguistically Diverse backgrounds, Aboriginal and Torres Strait Islander peoples and people with a disability.
Evaluated	The Greater Sydney Commission evaluates the effectiveness of its engagement to ensure we can continually improve and innovate. We establish pre-set key performance indicators and assess our engagement practice against these indicators.

4

Who we will engage with

The Commission is committed to engaging with as wide a range of Greater Sydneysiders and stakeholders as possible. For each activity undertaken by the Commission we will identify those individuals, stakeholders and groups with a potential interest in having their voice heard and design engagement activities to reach them. We are also committed to ensuring that people who may not normally participate in engagement processes are provided with opportunities to have their voices heard.

To date the Greater Sydney Commission has and will continue to engage with groups such as (but not limited to):

Community

- Residents
- Community, sporting, cultural and other special interest groups
- Young people
- Aboriginal and Torres Strait Islander people
- Culturally and linguistically diverse people
- People with a disability

Groups

- Peak bodies
- Advocacy groups
- Non-government organisations
- Special interest groups

Business and industry

- Local businesses
- Business chambers
- Industry associations
- Professional associations
- Property owners
- Industries including development, building planning, retail, technology/start-ups, industrial/commercial

Educational institutions

- Schools
- Universities
- TAFEs
- Research centres

Government

- Federal government
- State government
- Local government
- Regional organisations of councils
- Local government peak bodies

What we will do

The Commission has already engaged extensively around the six Draft District Plans and Towards our Greater Sydney document. In the lead-up to the release of the Draft Greater Sydney Region Plan and during the exhibition period, the Commission will continue to provide a range of engagement opportunities. The Commission will also provide feedback to stakeholders and the community about how their input helped shaped the District Plans.

During the next engagement phase the Commission will provide opportunities for all Greater Sydney-siders to help shape the Greater Sydney Region Plan. However, there will be an emphasis on drawing out the voices of groups that do not typically participate in consultation activities. This will be done by:

- Employing randomly sampling techniques in some engagement activities to ensure the Commission captures a wide range of voices
- Designing activities to include young people
- Ensuring Culturally and Linguistically Diverse communities are engaged and able to contribute.

The range of activities outlined below will enable the myriad of voices in Greater Sydney an equal opportunity to be heard and contribute to the future of our city.



Engagement activities

ACTIVITY	INVOLVEMENT	FOCUS
Local government technical working groups Working groups with Council officers to help shape the draft Greater Sydney Region Plan.	<ul style="list-style-type: none"> Local Councils across Sydney 	Greater Sydney Region Plan
Community Challenge events Collaboration between community groups, industry and government to co-create solutions that will make Greater Sydney more liveable, sustainable and productive. Challenges to be explored include shared spaces, active transport and making the 30-minute City a reality.	<ul style="list-style-type: none"> Community groups Industry and business groups Special interest groups Academics / research institutions Government agencies 	Greater Sydney Region Plan
Peak body roundtables Roundtable discussions to provide feedback to the GSC about key issues with a focus on environment, heritage, arts/culture and social issues.	<ul style="list-style-type: none"> Environment peak bodies and groups Heritage peak bodies and groups Social peak bodies and groups Arts and culture peak bodies and groups 	Greater Sydney Region Plan District Plans
Industry roundtables Roundtable discussions to provide feedback to the Commission about industry issues with a focus on retail, industrial/commercial and residential.	<ul style="list-style-type: none"> Industry peak bodies Retail industry Residential development industry Industrial/commercial industry 	Greater Sydney Region Plan District Plans
City dialogues Workshops in the three cities to provide an opportunity for community and stakeholder deliberation on the Draft Greater Sydney Region Plan. Participants will be randomly sampled to represent the make-up of communities in each of the three cities.	<ul style="list-style-type: none"> Communities in the Western, Central and Eastern Cities 	Greater Sydney Region Plan
Youth Dialogue In collaboration with the Advocate for Children and Young People we will hold a workshop for young people to capture their aspirations for the future of Greater Sydney. This activity will draw together youth from across Greater Sydney to tell the Commission and other agencies about the city they want to inherit and their ideas for addressing the challenges.	<ul style="list-style-type: none"> Young people with diverse backgrounds from across Greater Sydney 	Greater Sydney Region Plan

ACTIVITY	INVOLVEMENT	FOCUS
Youth Survey In conjunction with the Advocate for Children and Young People the Commission will collect survey feedback from up to 2000 young people from across Sydney.	<ul style="list-style-type: none"> Young people with diverse backgrounds from across Greater Sydney 	Greater Sydney Region Plan
Community engagement surveys The Commission will use a quantitative community survey to gather feedback from across Greater Sydney about the draft Greater Sydney Region Plan with representative sampling to reflect community demographics.	<ul style="list-style-type: none"> Individuals across Greater Sydney 	Greater Sydney Region Plan
Focus groups for culturally and linguistically diverse communities The Commission will conduct focus groups for CALD communities to ensure feedback is captured from these groups.	<ul style="list-style-type: none"> Culturally and linguistically diverse communities 	Greater Sydney Region Plan
Building a Greater Sydney An online application that allows younger children to build their vision online and show the Commission their vision for the future of the city.	<ul style="list-style-type: none"> Primary school aged children 	Greater Sydney Region Plan
Greater Sydney Region Plan briefings A series of briefings on the Draft Greater Sydney Region Plan following its release.	<ul style="list-style-type: none"> Elected representatives Community members Government officers Industry 	Greater Sydney Region Plan
District-based Dialogues District-based workshops that: <ul style="list-style-type: none"> allow community members to provide feedback on the Greater Sydney Region Plan report back on how community feedback was considered by the Commission in shaping the District Plans. 	<ul style="list-style-type: none"> Community members in each of the six Districts 	Greater Sydney Region Plan District Plans
Live-on-line discussion forums A series of discussion forums on social media platforms where community members can ask Commissioners and senior staff questions about the Draft Greater Sydney Region Plan and District Plans.	<ul style="list-style-type: none"> Greater Sydney-siders 	Greater Sydney Region Plan
Online submission form Online submission form making it easy for stakeholders and community members to provide feedback on the Greater Sydney Region Plan	<ul style="list-style-type: none"> Stakeholders Community members 	Greater Sydney Region Plan

Communication tools

The Commission will use a wide range of tools to ensure people are aware of opportunities to comment on and have access to information about the Greater Sydney Region Plan and District Plans. These include:

- Website
- Social media – Facebook, Twitter, LinkedIn including Live on Line question and answer sessions
- Advertising in metropolitan, local and ethnic newspapers
- Newspaper, TV and radio stories
- Meetings and briefings
- Speaking engagements and presentations.





GIFTS, BENEFITS AND HOSPITALITY

POLICY

APRIL 2019

Document management

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1. Policy Statement

The Greater Sydney Commission (the Commission) is committed to promoting appropriate standards of behaviour that protect its integrity and reputation. Accepting a gift or benefit which could be perceived by other persons to be an inducement is inconsistent with the standards of behaviour outlined in the Commission's Code of Ethics and Conduct Policy.

This policy provides the principles and standards for Commission staff to apply when considering whether it is appropriate to accept or provide a gift, benefit and/or hospitality in the course of their work.

There can be serious consequences for the Commission where the management of gifts, benefits and hospitality are mishandled. There is a risk of loss of public trust, damage to the Commission's reputation, financial loss and possible legal action. Staff risk consequences relating to behaviour that breaches this policy which may affect their employment, and where criminal conduct is involved, may even face prosecution.

2. Who does this policy apply to?

The Gifts, Benefits and Hospitality policy (Policy) applies to Commission members (Commissioners), Youth Panel and all employees including:

- permanent staff;
- temporary staff;
- casual staff;
- other Government sector employees who are on secondment or assigned to the Commission;
- contractors;
- consultants;
- volunteers; and
- employees of organisations who provide services under contract to the Commission.

For the purposes of this Policy, "staff" refers to all people to whom this Policy applies.

In this Policy, a reference to a senior executive manager means:

- Chief Executive Officer;
- Executive Director; and
- Director.

3. Key responsibilities

Senior executive managers and managers

A senior executive manager or manager responsible for supervising or managing an individual or group of staff, is responsible for:

- overseeing the effective management of this Policy, including ensuring all staff in their areas are aware of their obligations;
- complying with all reporting requirements in this Policy;
- discussing compliance with this Policy as part of the ongoing management of your teams;
- identifying and managing any potential or perceived corruptions risks; and

- monitor and evaluate the operation of this Policy in their area of responsibility.

Chief Operating Officer

On a case by case basis, the Chief Operating Officer will determine the appropriate action, management, custody, retention and disposal of:

- gifts or prizes won in competitions while on official duty;
- non-returnable gifts; and
- ceremonial gifts awarded to the Commission.

The Chief Operating Officer will inform the Chief Executive Officer of these decisions.

All staff

All staff have a responsibility to:

- always act lawfully, ethically and honestly, and in accordance with the Commission's Code of Ethics and Conduct and the NSW Public Sector values under the *Government Sector Employment Act 2013*;
- refrain from accepting gifts, benefits or hospitality that are prohibited under this Policy;
- register gifts, benefits and hospitality as required under this Policy;
- avoid situations in which individual staff might have, or might reasonably be thought to have, a private interest which conflicts with their official duties;
- avoid situations that give rise to preferential treatment of self or others;
- declare any conflicts or perceived conflict of interest;
- adhere to the financial, procurement and Pcard policies; and
- protect the reputation of the Commission and the NSW Government.

4. Definitions

Bribe	means money or inducements (gifts or benefits) offered to or promised to staff to influence that person to act in a particular way in performing their role that is contrary to the known values of honesty and integrity.
Gift or benefit	<p>means any item, gift card, service, prize, ticket, meal, hospitality or travel, provided by a customer, stakeholder, client, applicant, supplier, potential supplier or external organisation, which has an intrinsic value and/or a value to the recipient, a member of their family, relation, friend or associate.</p> <p>A gift or benefit may be enduring or tangible such as a work of art or consumables such as a box of chocolates, wine or gift voucher. They may also be intangible such as invitations to seating at sporting, cultural or social events or access to discounts.</p>
Hospitality	means the provision of benefits that are directly associated with and consumed at or during the course of a particular event and for which no, or no adequate, consideration is given. Hospitality does not extend to any travel to and from, or overnight accommodation at the place at which an event is to be held. It may include a ticket

	or right of entry to the relevant event, as well as food, beverage, entertainment and other consumables provided at the event.
High risk hospitality	<p>examples of high-risk hospitality include:</p> <ul style="list-style-type: none"> • restaurant meals; • travel and/or accommodation; • invitations to corporate boxes or marquees; • substantial hospitality; • invitations to lunches, dinners or other events to 'seal the deal' or to 'celebrate' finalisation of a procurement process or the signing of a contract; • invitations to functions held at private homes; • invitations which extend to family members, relations, friends and associates.
Low risk hospitality	<p>examples of low risk hospitality include:</p> <ul style="list-style-type: none"> • functions where the recipient attends in an official capacity as a Commission representative; • hospitality provided as part of a conference package, where the Commission has paid a fee for the staff member to attend; • catered briefings, roundtables or launches where invitees from a range of external organisations are present; and • occasional working lunches, where the hospitality is incidental and of low-value.

5. General Principles and standards

The guiding principles of this Policy are informed by the NSW Government's and Commission's values.

As a general rule, where there is doubt about whether to accept hospitality, staff should always err on the side of caution and refuse.

All offers of gifts, benefits or hospitality must be recorded on the Commission's Gifts and Benefits Register, regardless of whether the offer is accepted or declined.

5.1. Prohibited gifts and benefits

Staff should never solicit a gift, benefit or hospitality.

Under no circumstances should staff accept a gift or benefit:

- as an inducement to act in a certain way;
- where there could be a perception that it has been offered as an inducement to act in a certain way;
- that comprise cash, cheques, money orders or gift vouchers;
- where it is to be provided to a family member, relation, friend or associate;
- where they currently, or may in the future, exercise discretion in the making of a decision affecting the giver;
- if they are unsure whether they should;

- if it could be perceived as undermining the core values of trust, integrity, service and accountability of the government sector;
- if it is or could create a conflict of interest (that is, where there is an actual, potential or reasonably perceived conflict between an individual staff member's private interest and the impartial performance of their official duties);
- from people or organisations about whom they are likely to make decisions involving, but not limited to, recommending a policy or strategy, reviewing a plan, tender processes, procurement of goods or services, enforcement, licensing and/or regulation; or
- from people or organisations expecting preferential treatment or favours in return.

To further guide staff on whether to accept a gift, they should assess the risk by asking the following questions:

Giver	Who is providing the gift or benefit and what is their relationship to me, the Commission and the NSW Government?
Influence	Is the giver seeking to influence my decisions or actions?
Favour	Is the giver seeking a favour in return for the gift or benefit?
Trust	Would accepting the gift or benefit diminish public trust?

5.2. Threshold dollar value test

Gifts (other than hospitality)

If acceptance of a gift or benefit is not prohibited and is considered low risk, staff must also consider the value of the offer. If it is valued at \$50 or less, the gift or benefit may be accepted and retained by the staff member, however it still needs to be declared on the Commission's Gifts and Benefits Register. The gift should be offered in a business situation and not given as a personal gift (such as pens, calendars, coffee mugs, T-shirts or folders with a company logo).

If the value of the offer is \$50 or more, the gift or benefit should, wherever possible, be politely refused. The offer should also be declared on the Commission's Gifts and Benefits Register even though it has been refused.

The exception is that, if the offer is an act of goodwill towards the people of New South Wales and offence might possibly be given by its rejection the gift may be accepted on behalf of the State. However, the gift or benefit must not become the personal property of staff. It will belong to the Commission.

Where multiple gifts or benefits are received from the same source, within a six month period, staff must assess whether the items have a cumulative value of \$50 or greater. If they do, then any subsequent gifts or benefits received from the same giver should be treated as having a value of \$50 or more.

Hospitality

An offer of hospitality that is valued under \$150 and is not otherwise prohibited, after an assessment that deems it low risk, may be accepted.

An offer of hospitality valued at \$150 or more, that is not prohibited or high risk, in agreement with the staff member's manager/supervisor, may be accepted provided:

- the hospitality is proportionate – where the same meal is given to everyone, the meal is proportionate for the event and preferential treatment is not being given (ie a reasonable person would not think that the hospitality was intended to influence the recipient to act in the interests of the giver, either now or in the future); and
- the hospitality fits into the Commission's portfolio interests or business operations or for government networking purposes.

All offers of hospitality, whether they are accepted or declined, must be declared on the Commission's Gifts and Benefits Register. This does not include invitations that are mass circulated and not directed or addressed to a particular staff member.

Sporting, entertainment and cultural events

In many cases, the value of such invitations and tickets will be significant, possibly beyond the acceptance threshold of a gift. It is important to distinguish between situations where staff attendance at an event is unrelated to their work responsibilities. If there is no relation to carrying out their official duties, staff should not accept offers of these types. For transparency, it is preferable for the acceptance and allocation of invitations and tickets to be managed and recorded centrally.

Invitations and tickets from unrelated third parties – that is, from parties not directly involved in the event – should always be treated as gifts and benefits.

Some event invitations may include hospitality, and should be refused as Substantial hospitality, unless the Chief Executive Officer approves.

In the case of the Chief Executive Officer, the Secretary of the Department of Premier and Cabinet would need to approve attendance.

Travel and accommodation

Occasionally, Commission staff may be offered travel or accommodation upgrades during official travel within Australia or overseas.

Staff should never seek or solicit an upgrade from a travel or accommodation provider in relation to official travel.

Where a travel or accommodation provider seeks to upgrade a staff member for operational reasons, at no charge to the staff member or the Commission, staff may accept the upgrade, but should record receipt of the upgrade in the Commission's Gifts and Benefits Register.

6. Disposal of gifts

The Department of Planning and Environment's Disposal of Surplus or Unserviceable Goods (Assets) Policy provides guidance on how to appropriately dispose of goods.

6.1. Accountability and record keeping

Staff members must record all offers of gifts, benefits or hospitality in the Commission's Gifts and Benefits Register.

The method and authorisation of the method of disposal will also be recorded in the Register.

Records must be maintained in accordance with the *State Records Act 1988*.

6.2. Storage and audit of gifts

All non-perishable gifts valued over \$50 will be stored in a secure cupboard and the contents recorded. An inventory of the gifts will be kept.

At the end of each financial year, an internal audit of gifts will be conducted against the inventory. The disposal of gifts must occur at least once per year and be recorded.

6.3. Surrender of gifts over \$50 or more

All gifts valued over \$50 must be surrendered to the Chief Operating Officer who will make a decision regarding disposal or retention by the Commission.

Gifts may be disposed of via any of the methods outlined in the Disposal of Surplus or Unserviceable Goods (Assets) Policy or as outlined below.

6.4. Disposal of perishable gifts

In the case of perishable gifts such as chocolates, food hampers etc, an appropriate method to dispose of the gift could be to share the gift among staff or alternatively donate the gift to the Commission's nominated charity if practical.

Where it is decided to share the gift among staff, records must be kept showing this as the authorised method of disposal.

Refer to the Commission's Disposal of Surplus or Unserviceable Goods (Assets) Policy for further information on methods of disposal.

6.5. Disposal of non-perishable gifts

Non-perishable goods valued over \$50 must be surrendered to the Chief Operating Officer who will make a decision regarding the retention or disposal of the goods. Where appropriate, an internal auction amongst staff could occur with the proceeds going to the Commission's nominated charity.

Alternatively, a raffle could be held with staff, with proceeds going to the Commission's nominated charity. Any raffles held must adhere to the requirements set out in the NSW Fair Trading's guidelines on *Guessing competitions and raffles*.

Refer to the Commission's Disposal of Surplus or Unserviceable Goods (Assets) Policy for further information on methods of disposal.

7. Gift and benefit giving

Staff providing a gift or benefit should ensure:

- the Commission's delegations are complied with in approving granting of the gift or benefit;
- it is provided for a business purpose; it should assist the conduct of official business or other legitimate organisational goals, or promote and support Government policy objectives and priorities;
- any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations; and
- the gift or benefit is purchased through a transparent and equitable process, particularly if they are ongoing and the selected vendor(s) can end up with a competitive industry advantage.

8. Hospitality

Any expenditure by the Commission on official hospitality and/or entertainment must be in accordance with the following principles:

- the Commission's delegations are complied with in approving the official hospitality and/or entertainment;
- it is provided for an official business purpose; it must assist the conduct of official business or other legitimate organisational goals, or promote and support Government policy objectives and priorities;
- expenses must be properly documented and saved into the Commission's financial information system;
- the expense must generate direct benefits; the hospitality and/or entertainment must result in, or be reasonably expected to contribute to, achieving the Commission's objectives and should not be used merely for social occasions;
- the expense must be reasonable for the circumstances, and publicly defensible; for example, it is appropriate to provide modest refreshments like sandwiches during an all-day training session, but more lavish arrangements would not be appropriate;
- expenditure should not provide a personal benefit to staff members or their family or friends (e.g. Christmas functions, birthday celebrations, staff farewells or work social events). In exceptional circumstances and only with the approval of the Chief Executive Officer, families of staff may be asked to attend official functions as their presence is clearly necessary for the success of the function or where the party to be entertained is to be accompanied by a family member;
- in general, hospitality and/or entertainment should not be extended to consultants or other providers of goods and services unless authorised by the relevant senior executive manager; and
- when hospitality is provided, staff involved must demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

8.1. Approval of hospitality and/or entertainment expenditure

Authority to approve expenditure on official hospitality and/or entertainment must be consistent with the Commission's financial delegations, as well as its procurement delegations.

Approval for any official hospitality and/or entertainment expenditure should be obtained prior to the cost being incurred.

9. Breaches of the Gifts, Benefits and Hospitality Policy

Behaviour that is contrary to this Policy should be reported to a supervisor or manager (unless reporting as a public interest disclosure – see Public Interest Disclosure Policy).

Each report will be evaluated to determine whether a formal process is required and action may be taken in relation to any contraventions. The matters to consider when deciding what action to take include:

- the seriousness of the breach;
- the likelihood of the breach occurring again;
- whether the staff member has committed the breach more than once;
- the risk the breach poses to staff, stakeholders, and any other persons; and
- whether the breach would be serious enough to warrant action for misconduct.

A breach of this Policy may constitute misconduct under the *Government Sector Employment Act 2013* and may result in any of the following actions:

- suspension and/or termination of employment;
- imposition of a fine;
- reducing remuneration;
- reducing classification or grade;
- assignment to a different role; or
- caution or reprimand.

The Commission provides reports of suspected fraud and/or corrupt conduct to the Independent Commission Against Corruption (ICAC), and in some cases, to the NSW Police. Where a breach of the Policy is considered to involve potentially corrupt conduct, the Commission will notify ICAC. ICAC has significant statutory powers to investigate serious corrupt conduct in all NSW Government departments and agencies.

10. Further information and resources

10.1. Internal Policies

- Greater Sydney Commission Code of Ethics and Conduct Policy
- Greater Sydney Commission Fraud and Corruption Control Policy
- Greater Sydney Commission Accounts Payable Policy
- Greater Sydney Commission Public Interest Disclosures Policy
- (Draft) Greater Sydney Commission Procurement Policy
- Department of Planning and Environment Risk Management Policy

10.2. Legislation

NSW

- *Government Sector Employment Act 2013*
- *Government Sector Employment Rules 2014*
- *Independent Commission Against Corruption Act 1988*
- *Public Finance and Audit Act 1983*
- *Government Sector Finance Act 2018*
- *State Records Act 1988*

10.3. Other resources

Public Service Commission Managing Gifts and Benefits

Public Service Commission Code of Ethics and Conduct for NSW Government Employers

DFSI, NSW Government Travel and Transport Policy, November 2016

NSW Fair Trading – Guessing competitions and raffles

10.4. Support and/or advice

Employee Assistance Program – (AccessEAP)

1800 818 728

info@accesseap.com.au

Safework NSW – Information, advice or assistance

13 10 50