

**Corporate
Serious Wrongdoing Reporting Policy**

Date approved:	March 2024	Date Policy will take effect:	March 2024	Date of Next Review:	March 2026
Approved by:	UOW Pulse Board of Directors				
Custodian title:	Head of People & Culture				
Author:	Chief Executive Officer				
Responsible Unit:	People & Culture				
Supporting documents, procedures & forms of this policy:	UOW Pulse Serious Wrongdoing Reporting Procedure UOW Pulse Grievance Policy				
References & Legislation:	Government Information (Public Access) Act 2009 Ombudsman Act 1974 Public Interest Disclosure Act 2022 (PID Act). Independent Commission Against Corruption Act 1988. Members of Parliament Staff Act 2013.				
Audience:	Internal				
Expiry Date of Policy (if applicable):	Not Applicable				

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1 Purpose of Policy

1.1. To outline UOW Pulse’s approach to managing public interest disclosures.

1.2. To ensure compliance with section 42 of the [Public Interest Disclosure Act 2022 \(PID Act\)](#).

2 Definitions

Word/Term	Definition
Affiliate	Includes people engaged by UOW Pulse as agency staff, contractors, volunteers and work experience students.
Associate	A Director; a related entity; a director or employee of a related entity.
Audit, Risk Management & Compliance Committee	The <i>Audit, Risk Management & Compliance Committee</i> is comprised of members appointed by the Board.
Contractor/s	Individuals or entities who perform a task or provide a service to UOW Pulse, whether or not they are bound by a written contract to do so, e.g. security, cleaners.
Corrupt conduct	<p>Corrupt conduct, as defined in the Independent Commission Against Corruption Act 1988 (NSW) ("the ICAC Act"), is deliberate or intentional wrongdoing, not negligence or a mistake. It must involve or affect a NSW public official or public sector organisation.</p> <p>While it can take many forms, corrupt conduct occurs when:</p> <ol style="list-style-type: none"> 1. a staff member or affiliate improperly uses, or tries to improperly use, the knowledge, power or resources of their position for personal gain or the advantage of others; 2. a staff member or affiliate dishonestly exercise their official functions, or improperly exercise their official functions, breaches public trust or misuses information or material acquired in their official functions; 3. a staff member of affiliate influences, or tries to influence, a public official (including UOW Pulse employees) to use their position in a way that affects the probity of the public official’s exercise of functions; 4. a staff member of affiliate who engages in conduct that impairs, or could impair, public confidence in public administration; 5. a staff member of affiliate influences, or tries to influence, a public official (including UOW Pulse employees) to use their position in a way that affects the probity of the public official’s exercise of functions; or 6. a staff member of affiliate who engages in conduct that impairs, or could impair, public confidence in public administration.
Detrimental action	<p>Any action causing, comprising or involving:</p> <ol style="list-style-type: none"> 1. injury, damage or loss; 2. intimidation or harassment; 3. discrimination, disadvantage or adverse treatment in relation to employment; 4. dismissal from, or prejudice in, employment; or 5. disciplinary proceedings.
Discloser	A person who makes a report of known or suspected serious wrongdoing. This includes employees, contractors, consultants or any other individual performing public duties on behalf of UOW Pulse. A discloser may also be commonly known as a ‘whistleblower’.
Disclosure	Any report of actual or suspected wrongdoing within UOW Pulse. Note: some, but not all, disclosures are protected disclosures.

Fraud	<p>Deliberate and premeditated activity that involves the use of deception to gain advantage and/or obtain a financial benefit to the detriment of UOW Pulse.</p> <p>Examples include but are not limited to:</p> <ol style="list-style-type: none"> 1. acts or omissions; 2. theft; 3. making false statements; 4. evasion; and 5. manipulation of information.
Government information contravention	<p>A failure to comply with the system through which people can access government information, ie. a failure to properly fulfil functions under the GIPA Act. Examples include, but are not limited to:</p> <ol style="list-style-type: none"> 1. destroying, concealing, or altering records to prevent them from being released; 2. knowingly making decisions that are contrary to the GIPA Act; and 3. directing another person to make a decision that is contrary to the GIPA Act.
Investigation	An enquiry or enquiries regarding a specific matter, which can include auditing.
Maladministration	<p>An act or omission of a serious nature that is contrary to law, unreasonable, unjust, oppressive or improperly discriminatory and based wholly or partly on improper motives. Examples include, but are not limited to:</p> <ol style="list-style-type: none"> 1. awarding contracts and tenders to parties that are related by family, friendship, or association without merit; 2. failing to decide in accordance with official Policy for no appropriate reason; 3. breaches of natural justice / procedural fairness; 4. unauthorised disclosures of confidential information; 5. failure to provide information where there is a legal obligation to do so.
Manager	A public official to whom the public official reports directly or indirectly, or, a public official who directly, or indirectly supervises the public official in the exercise of the public official's function.
Mandatory Public Interest Disclosure (PID)	A report about serious wrongdoing that is made by a person because they have a legal obligation to make the report, or because making that report is an ordinary aspect of their role or function at UOW Pulse.
Nominated Disclosure Coordinator (NDC)	A person responsible for receiving voluntary public interest disclosures on behalf of UOW Pulse. For the purposes of this Policy, the Nominated Disclosure Coordinator (NDC) is the UOW Pulse Chief Operating Officer.
Principal Officer	For the purposes of this Policy, the Principal Officer is the CEO of UOW Pulse.
Protected disclosure	The terms 'protected disclosure' and 'public interest disclosure' are often used interchangeably. Current applicable legislation refers to 'public interest disclosures'. Legislation provides protections for those making public interest disclosures, which is why the terms are often used interchangeably. Making such disclosures is also commonly referred to as 'whistleblowing'. (See also Public Interest Disclosure).
Public Interest Disclosure (PID)	A report of serious wrongdoing that involves corrupt conduct, maladministration, serious and substantial waste of public money or government information contravention. It may be a voluntary PID, mandatory PID or witness PID, as defined in the PID Act .
Public official	<p>Public official means a person employed in or by an agency or otherwise in the service of an agency a person having public official functions or acting in a public official capacity whose conduct or activities an integrity agency is authorised by another Act or law to investigate:</p> <ol style="list-style-type: none"> 1. an individual in the service of the Crown a statutory officer;

	<ol style="list-style-type: none"> 2. a person providing services or exercising functions on behalf of an agency, including a contractor, subcontractor or volunteer; 3. an employee, partner or officer of an entity that provides services, under contract, subcontract or other arrangement, on behalf of an agency or exercises functions of an agency, and are involved in providing those services or exercising those functions; 4. a Judicial Officer; 5. a Member of Parliament (MP), including a Minister; and 6. a person employed under the Members of Parliament Staff Act 2013.
Reasonable grounds	Reasonable grounds means a set of facts or circumstances that would indicate a judgement to be believed beyond suspicion.
Report	Any disclosure of actual or suspected wrongdoing within UOW Pulse. The terms report and disclosure are often used inter-changeably. Note: some, but not all, reports/disclosures are protected disclosures.
Serious wrongdoing	Serious wrongdoing for the purposes of this Policy generally relates to wrongdoing that is so serious that it is clearly in the public interest that it be reported, for example, corrupt conduct, fraud, maladministration, serious and substantial waste of public money. It does not refer to general misconduct that is covered by other UOW Pulse policy documents, for example, bullying or harassment.
Serious Wrongdoing Reporting Committee (SWRC)	The Serious Wrongdoing Reporting Committee is a high-level committee that assists the Chief Executive Officer and Senior Executive to discharge UOW Pulse's responsibilities with regard to the management of, and response to, allegations of serious wrongdoing at UOW Pulse.
Serious and substantial waste of public money	The uneconomical, inefficient, or ineffective use of resources, authorised or unauthorised, resulting in a loss or wastage of public funds or resources. Examples include, but are not limited to: <ol style="list-style-type: none"> 1. Providing or accepting a bribe; 2. Use of UOW Pulse funds or resources for personal use; 3. Purchasing unnecessary or inadequate goods and services; 4. Manipulating a tender process to achieve a desired outcome; 5. Misappropriate or misuse of UOW Pulse property; 6. Overstaffing in particular areas without merit; 7. Failing to make a decision in accordance with official Policy for no appropriate reason; 8. Providing false or misleading information; 9. Unauthorised disclosure of confidential information; 10. Destroying, concealing or altering records to prevent them from being released; 11. Luxurious, indulgent or excessive expenditure without merit; 12. Destroying, concealing or altering records to prevent them from being released; 13. Luxurious, indulgent or excessive expenditure without merit.
Staff	All people employed by UOW Pulse including conjoint appointments, whether on continuing, permanent, fixed term, maximum term, casual or cadet or traineeship basis. Any references to staff in this policy should be understood to mean both staff/employees and affiliates.
Voluntary Public Interest Disclosure (PID)	A report made by a person because they decided, of their own accord, to come forward and disclose what they know.

Whistleblower	A 'whistleblower' is commonly understood to a person who makes a disclosure about illegal or illegitimate practices, such as fraud or maladministration, within the organisation.
Witness Public Interest Disclosure (PID)	A witness PID arises where a person discloses information during an investigation of serious wrongdoing following a request for requirement of the investigator
Work-related grievance	A grievance (complaint) about any matter in relation to an employee's engagement or former engagement, that has personal implications for the employee, for example: <ol style="list-style-type: none"> 1. An inter-personal conflict between one employee and another; 2. A decision relating to the engagement, transfer or promotion of the employee; 3. A decision relating to the terms and conditions of engagement of the employee; 4. A decision to suspend or terminate the engagement of the employee, or otherwise, to discipline the employee.
Wrongdoing	See 'Serious Wrongdoing'

3 Application & Scope

3.1 This Policy applies to, and for the benefit of, all public officials in NSW, including:

- (a) All permanent, fixed term, maximum term and casual employees of UOW Pulse;
- (b) Affiliates, conjoint employees, and anyone working for, or representing UOW Pulse;
- (c) Consultants, contractors, and their employees working for UOW Pulse; and
- (d) Individuals, such as volunteers, who may perform public duties on behalf of UOW Pulse.

3.2. This Policy does not apply to:

- (a) People who have received services from UOW Pulse and want to make a complaint about those services;
- (b) People, such as providers, who provide services to UOW Pulse, for example, employees of a company that sold computer software to UOW Pulse.

4 Principles

4.1. UOW Pulse takes reports of serious wrongdoing seriously. UOW Pulse is committed to building a 'speak up' culture where our staff, students, associates, and affiliates are encouraged to report any conduct that they reasonably believe involves wrongdoing.

4.2. UOW Pulse encourages staff to report all wrongdoing regardless of whether they think it is a serious wrongdoing. It is important to understand what is or may be occurring within the UOW Pulse environment. UOW Pulse will then ensure the report is handled appropriately under the [PID Act](#), or if it is not a PID, in line with other UOW Pulse policies and procedures. Even where a report is not a PID, it will be managed in accordance with UOW Pulse policy documents for dealing with reports and complaints, where relevant.

4.3. UOW Pulse relies on our staff, volunteers, contractors and subcontractors speaking up when they become aware of wrongdoing. This Policy, along with the associated Serious Wrongdoing Reporting Procedure, documents UOW Pulse's commitment to building a 'speak up' culture. Part of that 'speak up' culture is having in place a framework that facilitates public interest reporting of wrongdoing by:

- (a) Protecting those who speak up from detrimental action;
- (b) Imposing duties on UOW Pulse to take appropriate action to investigate or otherwise deal appropriately with reports of wrongdoing.

4.4. UOW Pulse is committed to:

- (a) Promoting a culture of trust, integrity, ethical behaviour, accountability and transparency where persons are comfortable about reporting wrongdoing;

- (b) Encouraging and supporting persons to come forward if they have witnessed what they consider to be wrongdoing within UOW Pulse;
- (c) Treating all reports of wrongdoing with confidentiality and care, regardless of whether or not they meet the criteria for protection under the [Public Interest Disclosures Act 2022](#);
- (d) Dealing with reports impartially, promptly and reasonably and, if some form of wrongdoing has been found, taking appropriate action;
- (e) Keeping an internal report of the progress of their report and broadly of any outcomes; and
- (f) Ensuring managers and supervisors at all levels understand the benefits of reporting wrongdoing, are familiar with this policy and procedures for internal reporting of wrongdoing, and aware of the needs of those who make or are the subject of a report.

5 Public Interest Disclosures (PIDs)

5.1. This Policy relates primarily to reports of voluntary PIDs and how UOW Pulse will manage voluntary PIDs.

5.2. People who make mandatory PID or a witness PID are still entitled to protection. More information about protections is available in Section 8 of this Policy.

5.3. Public interest disclosures protected by the [PID Act](#):

- (a) Voluntary PID: This is where the person makes a report of serious wrongdoing because they decided, of their own accord, to come forward and disclose what they know;
- (b) Mandatory PID: This is where the person has made a report about serious wrongdoing because they have a legal obligation to make the report, or because making that report is an ordinary aspect of their role or function at UOW Pulse; and
- (c) Witness PID: This is where a person discloses information during an investigation of serious wrongdoing following a request for requirement of the investigator.

5.4. For a report to be considered a voluntary PID it must meet the following requirements under the [PID Act](#):

- (a) The report must be made by a public official as specified in the Policy; and
- (b) The report must be made to a person who can receive reports of serious wrongdoing as identified as specified in this Policy; and
- (c) The reporter must honestly and reasonably believe that the information shows or tends to show serious wrongdoing; and
- (d) The report is made orally or in writing; and
- (e) The report is voluntary (meaning it is not a mandatory or witness PID); and
- (f) Actual proof of the serious wrongdoing is not required, however a mere allegation with no supporting information is unlikely to meet the requirement of belief on reasonable grounds.

6 What is Serious Wrongdoing

6.1. Serious wrongdoing is:

- (a) Corrupt conduct, such as a UOW Pulse employee accepting a bribe or engaging with organised crime;
- (b) Fraud (a subset of corruption, such as acting dishonestly in breach of public trust);
- (c) Serious maladministration, such as UOW Pulse systematically failing to comply with proper recruitment processes when hiring staff;
- (d) Government information contravention, such as destroying, concealing or altering records to prevent them from being released under a Government Information Public Access application;
- (e) Privacy contravention, such as unlawfully accessing a student's personal information on UOW Pulse's database; or

- (f) A serious and substantial waste of public money – such as an agency not following a competitive tendering process in accordance with UOW Pulse Policy.

6.2. When making a report, you are not required to state to UOW Pulse that serious wrongdoing is being reported and/or what category of serious wrongdoing is being reported.

7 Reporting Wrongdoing

7.1 Who can make a report?

7.1.1. The report must be made by a public official, which includes:

- (a) A UOW Pulse staff member;
- (b) A consultant, contractor or other individual performing public duties on behalf of UOW Pulse; or
- (c) A public official from another agency.

7.1.2. A public official can make a PID about serious wrongdoing related to any agency, not just UOW Pulse. This means that UOW Pulse may receive PIDs from public officials outside of UOW Pulse. It also means that a person can make a PID to any agency, including an integrity agency like the Independent Commission Against Corruption (ICAC) and the [NSW Ombudsman](#). See the Serious Wrongdoing Reporting Procedure for a list of integrity agencies.

7.2 Report Format

7.2.1. In writing: an email or letter to a person who can receive reports.

7.2.2. Orally: have a private discussion with a person who can receive reports. This can be face-to-face, via telephone or virtually.

7.2.3. Anonymously: write an email or letter or call a person who can receive a report without providing a name or anything that might identify a person as the maker of the report. Even where the reporter chooses to remain anonymous, they will still be protected under the PID Act. It may be difficult, however, for UOW Pulse to investigate the matter(s) disclosed where UOW Pulse cannot contact the reporter for further information.

7.3 Internal Reporting of Serious Wrongdoing

7.3.1. A report of serious wrongdoing can be made within UOW Pulse to:

- (a) The Chief Executive Officer as Principal Officer;
- (b) A Nominated Disclosure Officer – a list of Disclosure Officers for UOW Pulse can be found in Section 9 of the Serious Wrongdoing Reporting Procedure, in this Policy (Section 14 Disclosure Officer Summary) ; and
- (c) A reporter's Manager – this is the person who directly, or indirectly, supervises the reporter. Staff may have more than one manager, a report can be made to any manager that supervises the reporter. The manager may not be a Nominated Disclosure Officer. If this is the case, the Manager will make sure that the report is communicated to a Disclosure Officer on behalf of the reporter or they may accompany the reporter to a Disclosure Officer to make the report.

7.4 External Reporting of Serious Wrongdoing

A report can be made to another public official outside of UOW Pulse, including:

- i. The Head of another agency – this means the Head of any public service agency;
- ii. An integrity agency – a list of integrity agencies is can be found on the Serious Wrongdoing Reporting Procedure;

- iii. A Disclosure Officer for another agency – ways to contact Disclosure Officers for other agencies is located in an agency’s PID Policy which can be found on their public website; and
- iv. A Minister or a member of a Minister’s staff but the report must be made in writing.

7.4.1. If you choose to make a disclosure outside of UOW Pulse, it is possible that the disclosure will be referred back to UOW Pulse so that appropriate action can be taken.

7.5 Making a Report to a Member of Parliament or Journalist

7.5.1. Disclosures to MPs or journalists are different to other reports. A person may only disclose a report of wrongdoing as a voluntary PID to an MP or journalist in the following circumstances:

- (a) The person making the report must have first made substantially the same disclosure to someone who can receive disclosure;
- (b) The previous disclosure must be substantially true;
- (c) The person making the report did not make the previous disclosure anonymously;
- (d) The person making the report did not give a written waiver of their right to receive information relating to their previous disclosure;
- (e) The person making the report did not receive the following from UOW Pulse:
 - i. Notification that UOW Pulse will not investigate the serious wrongdoing and will also not refer the previous disclosure to another agency;
 - ii. The following information at the end of the investigation period:
 - Notice of UOW Pulse’s decision to investigate the serious wrongdoing;
 - A description of the results of an investigation into the serious wrongdoing;
 - Details of proposed or recommended corrective action as a result of the previous disclosure or investigation;
- (f) Investigation period means:
 - i. After six months from the previous disclosure being made;
 - ii. After twelve months if you applied for an internal review of the agency’s decision within six months of making the disclosure; or
 - iii. If all of the above requirements are met, disclosure to an MP or journalist may be a voluntary PID.

7.6 Deeming that a Report is Voluntary PID

7.6.1. The Chief Executive Officer (CEO) or their delegate can, in certain circumstances, and at their sole discretion, deem that a report is a voluntary PID even if the report does not otherwise have all the features of a voluntary PID.

7.6.2. Where a report is deemed as a voluntary PID, reporters are provided with protections under the [PID Act](#).

8 Protection of Reporters

8.1. If UOW Pulse assesses a report to constitute a PID, the reporter is entitled to special protections under the PID Act.

8.2. UOW Pulse is committed to taking all reasonable steps to protect anyone from detriment because of having made a PID.

- 8.3. UOW Pulse is committed to maintaining the confidentiality of reporters as much as possible while the PID is being dealt with.
- 8.4. UOW Pulse will not tolerate any type of detrimental action being taken against a reporter because they have made a report, or are believed to have made a report.

8.1 Protection from Detrimental Action

- 8.1.1. A person cannot take detrimental action against another person because they have made a voluntary PID or are considering making a PID. Detrimental action includes bullying, harassment, intimidation or dismissal.
- 8.1.2. Once UOW Pulse becomes aware that a voluntary PID has been made, UOW Pulse will undertake a risk assessment and take steps to mitigate the risk of detrimental action occurring against the reporter.
- 8.1.3. It is a criminal offence for someone to take detrimental action against a person because they have made or may make a voluntary PID. It is punishable by a maximum penalty of 200 penalty units or imprisonment for five years or both.
- 8.1.4. A person may seek compensation where unlawful detrimental action has been taken against them.
- 8.1.5. A person can apply for a court order (injunction) where detrimental action is threatened or has occurred (for example, an order to prevent dismissal or to require reinstatement).
- 8.1.6. Note that a person who makes a PID can still be subject to reasonable management action (such as ordinary performance reviews and performance management). Provided such action is not taken because of the PID, it is not detrimental action under the [PID Act](#).

8.2 Immunity from Civil and Criminal Liability

- 8.2.1. Some public officials are often subject to a duty of confidentiality that prevents them disclosing certain information that they obtain or become aware of at work. Sometimes, in order to make a PID, public officials will need to breach or disregard such confidentiality duties. If that happens, a public official cannot be disciplined, sued or criminally charged for breaching confidentiality.

8.3 Confidentiality

- 8.3.1. Public officials and agencies must not disclose information tending to identify a person as the maker of a voluntary PID unless doing so is permitted by the PID Act.
- 8.3.2. UOW Pulse will protect the identity of reporters as much as reasonably possible.
- 8.3.3. The person receiving the disclosure must discuss any limitations on confidentiality with the reporter as soon as practical after receiving the report.
- 8.3.4. A reporter may request a meeting at an alternative location away from their immediate work area, the work area of the subject/s of the disclosure or the work area of the person receiving the disclosure.
- 8.3.5. UOW Pulse will not disclose the identity the reporter or any information that is likely to lead to the identification of the reporter unless the prior consent of the reporter is obtained in writing.
- 8.3.6. Breaching the confidentiality of a reporter may be considered an offence under the relevant legislation.

8.4 Protection from Liability for Own Past Conduct

- 8.4.1. The Attorney General can give the maker an undertaking that a disclosure of their own past conduct will not be used against them if a person discloses their own wrongdoing or misconduct while making a report. This undertaking can only be given on application by an integrity agency to the Attorney General.

9 Reporting Detrimental Action

- 9.1. If a reporter experiences adverse treatment or detrimental action, such as bullying or harassment, this should be reported immediately.

- 9.2. A reporter can report any experience of adverse treatment or detrimental action directly to a Senior Manager, The Chair of the UOW Pulse Board, Chief Executive Officer, or a Nominated Disclosure Officer.
- 9.3. A reporter can also report any experience of adverse treatment to an external integrity agency.

10 Review and Dispute Resolution

10.1 Internal Review

10.1.1. Reporters who make voluntary PIDs can seek internal review of the following decisions made by UOW Pulse:

- (a) That UOW Pulse is not required to deal with the report as a voluntary PID; or
- (b) To stop dealing with the report because UOW Pulse decided it was not a voluntary PID; or
- (c) To not investigate the serious wrongdoing and not refer the report to another agency; or
- (d) To cease investigating the serious wrongdoing without either completing the investigation or referring the report to another agency for investigation.

10.1.2. UOW Pulse will ensure internal reviews are conducted in compliance with the [PID Act](#).

10.1.3. Where the reporter wishes to make an application for an internal review, they must apply in writing within 28 days of being informed of UOW Pulse's decision. The application should be made to the CEO and state the reasons why the reporter considers UOW Pulse's decisions should not have been made. Other relevant material may also be submitted with their application.

10.2 Voluntary Dispute Resolution

10.2.1. If a dispute arises between UOW Pulse and a person who has made a report which is, or may be, a voluntary PID, UOW Pulse may request the NSW Ombudsman to conciliate the dispute. Conciliation is a voluntary process and will only be suitable for disputes where UOW Pulse and the maker of the report are willing to resolve the dispute.

11 Roles and Responsibilities

11.1. Certain people within UOW Pulse have responsibilities under the [PID Act](#).

11.2. The CEO as the Principal Officer is responsible for:

- (a) Fostering a workplace culture where reporting is encouraged;
- (b) Receiving disclosures from public officials;
- (c) Ensuring there is a system in place for assessing disclosures;
- (d) Ensuring UOW Pulse complies with this Policy and the [PID Act](#); and
- (e) Ensuring that UOW Pulse has appropriate systems for:
 - i. Overseeing internal compliance with the [PID Act](#);
 - ii. Supporting those who make voluntary PIDs, including by minimising the risk of detrimental action;
 - iii. Implementing corrective action if serious wrongdoing is found to have occurred;
 - iv. Complying with reporting obligations regarding allegations or findings of detrimental action;
 - v. Complying with yearly reporting obligations to the NSW Ombudsman; and
 - vi. Complying with reporting to the ICAC any matter where there is a reasonable suspicion that corrupt conduct has occurred or may occur.

11.3. The Nominated Disclosure Coordinator is responsible for:

- (a) Receiving reports of serious wrongdoing from internal or external reporting persons;
 - (b) Conducting a preliminary assessment of all reports to determine if the report constitutes serious wrongdoing or requires referral to an alternative UOW Pulse process;
 - (b) Informing the Principal Officer and Chief Operating Officer;
 - (c) Informing the SWRC; and
 - (d) Being the point of contact for the reporter.
- 11.4. Disclosure Officers are responsible for:
- 11.4.1. Receiving reports from public officials;
 - 11.4.2. Receiving reports passed on to them by Managers;
 - 11.4.3. Ensuring any oral reports received are recorded in writing.
- 11.5. Managers are responsible for:
- (a) Receiving reports from to a Nominated Disclosure Officer.
- 11.6. All employees must:
- 11.6.1. Report suspected wrongdoing and misconduct;
 - 11.6.2. Use their best endeavours to assist in an investigation of serious wrongdoing if asked to do so by a person dealing with a voluntary PID on behalf of UOW Pulse;
 - 11.6.3. Treat any person dealing with or investigating reports of serious wrongdoing with respect; and
 - 11.6.4. Not take detrimental action against any person who has made, may in the future make, or is suspected to have made, a PID.

12 Recordkeeping and Reporting

- 12.1. UOW Pulse must keep full and accurate records with respect to all information received in connection with the [PID Act](#). This ensures that UOW Pulse complies with its obligations under the State Records Act 1998.
- 12.2. Uphold the principles regarding the creation, maintenance and storage of records in accordance with the Records Management Policy.
- 12.3. Deidentified reports are submitted quarterly to the Audit, Risk Management and Compliance Committee (ARMCC) providing information about reports of serious wrongdoing received to assist UOW Pulse in identifying and addressing potential systemic issues.
- 12.4. Each year UOW Pulse will provide an annual return to the NSW Ombudsman which includes:
 - (a) information about voluntary PIDs received by UOW Pulse during each return period;
 - (b) action taken by UOW Pulse to deal with voluntary PIDs during the return period; and
 - (c) how UOW Pulse promoted a culture in the workplace where PIDs are encouraged.

13 Compliance with the [PID Act](#)

- 13.1. The Principal Officer with the Chief Operating Officer and Senior Manager, Complaints Management Centre are responsible for ensuring compliance with the [PID Act](#) and the effectiveness of this Policy.
- 13.2. UOW Pulse's Audit, Risk Management and Compliance Committee (ARMCC) will receive information about non-compliance of the [PID Act](#) from the Chief Operating Officer.

14 Attachment 1: Nominated Disclosure Officers & Serious Wrongdoing Reporting Committee

Role	Position
Principal Officer	Chief Executive Officer
Nominated Disclosure Officers & Serious Wrongdoing Reporting Committee.	<p>Chief Executive Officer Alfonso Maccioni Email: alf@uow.edu.au Phone: 42 218002</p> <p>Chief Operating Officer Tony Wrightson Email: wtony@uow.edu.au Phone: 42 215662</p> <p>Head of People & Culture Nicholle Costanzo Email: nicholle@uow.edu.au Phone: 42 215912</p> <p>Head of Student Engagement & Marketing April Alexander Email: aprila@uow.edu.au Phone: 42 215415</p> <p>Head of Early Education Louise Windisch Email: windisch@uow.edu.au Phone: 42 218037</p> <p>Executive Assistant to the CEO Zoe Ballarin Email: ballarin@uow.edu.au Phone: 42 218014</p> <p>Chair of the Board of Directors James Pearson Email: jpearson@uow.edu.au</p>

15 Version Control Table

Version Control	Date Released	Approved By	Amendment
1	March 2024	Approved and endorsed by the UOW Pulse Ltd Board.	Policy created.