



Schedule 1 – Public Interest Disclosures

Part 1 - Disclosures officers and other persons to whom disclosures can be made.

Internal reports can be made to the staff members who hold the positions below. Alternative contact details may be located by copying and pasting the staff member's role from the final column, exactly as listed, into the keyword search in the University's staff directory – available at <http://scu.edu.au/staffdirectory/>

Role	Title
Disclosures Coordinator	Head, Governance Services
Disclosures Officer	Head, Coffs Harbour Campus
Disclosures Officer	Head, Gold Coast Campus
Disclosures Officer	Director, Planning Quality & Review
Disclosures Officer	Chair of Academic Board

Reports can also be made directly to the Vice Chancellor in accordance with clause 35 of the Policy.

When a report of wrongdoing is made by a staff member, the Disclosures Coordinator, a Disclosures Officer or the Vice Chancellor will provide the person with a copy of this Schedule 1 and its covering Policy and Procedure, and an acknowledgement of the receipt of the report within five working days of the making of it.

Where a staff member contemplating making a report is concerned about publicly approaching the Disclosures Coordinator, a Disclosures Officer or the Vice Chancellor, that staff member can contact the relevant officer to request a meeting away from the workplace.

Part 2 – Roles and Responsibilities.

The internal reporting requirements of this Schedule 1 and its covering Policy place responsibilities upon staff at all levels within the University.

Managers and supervisors within the University have a key role in establishing and maintaining a working environment that encourages staff to report wrongdoing and supports staff that do so.

If a staff member has a concern or a report of wrongdoing that may be a public interest disclosure under the PID Act, that staff member's manager and/or supervisor should advise them to raise the matter with a person identified in this Policy as a person who may receive a public interest disclosure.

If a manager or supervisor is aware that one of their staff has made a report, their responsibilities include:

1. keeping the identity of the internal reporter and anyone who is the subject of a report confidential, where this is practical and appropriate;



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2. providing support to the internal reporter, including ensuring that they have access to any necessary professional support;
3. ensuring that appropriate systems and strategies are in place to minimise any risk of reprisal that the internal reporter may face;
4. notifying the Disclosures Coordinator or Vice Chancellor immediately if they believe a staff member is being subjected to reprisal as a result of reporting wrongdoing;
5. effectively managing the workplace situation, particularly if there is conflict or reprisal threatens or takes place; and
6. taking appropriate action against any person who threatens or takes reprisals against a person for reporting wrongdoing.

Disclosures Officers

Disclosures Officers are responsible for receiving, forwarding and/or acting upon reports in accordance with this Policy. Disclosures Officers will:

1. clearly explain to persons making reports what will happen in relation to the information received;
2. when requested, make arrangements to ensure that the report can be made privately and discreetly (if necessary away from the workplace);
3. reduce to writing and date any reports received orally (and have the person making the report sign and date the document);
4. deal with reports impartially;
5. forward reports to the Disclosures Coordinator for assessment;
6. take all necessary and reasonable steps to ensure that the identity of persons who make reports, and the persons who are the subject of reports, are kept confidential;
7. support persons who make reports and protect them from victimisation, harassment or any other form of reprisal;
8. advise the person making the report to only discuss the matter with authorised people and to not alert anyone who is the subject of a report that a public interest disclosure has been made about them; and
9. ensure that written acknowledgement of the report and a copy of this [Policy](#) is given to the internal reporter within five (5) working days of the report being made.



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Disclosures Coordinator

The Disclosures Coordinator has a pivotal role in the internal reporting system and acts as a clearing house for reports. The Disclosures Coordinator will:

1. provide an alternative reporting channel to the Disclosures Officers and the Vice Chancellor;
2. impartially assess each report to determine:
 - a. whether the report appears to be a public interest disclosure within the meaning of the PID Act;
 - b. the appropriate action to be taken in respect of the report, for example:
 - i. no action;
 - ii. determine the appropriate person to take responsibility for dealing with the report;
 - iii. preliminary or informal investigation;
 - iv. formal investigation;
 - v. referral to the Vice Chancellor for disciplinary action in accordance with relevant industrial instrument;
 - vi. referral to an investigating authority for investigation or other appropriate action; or
 - vii. referral to the Vice Chancellor to advise the police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct).
3. consult with the Vice Chancellor;
4. be responsible for the carrying out or coordination of any internal investigation arising out of a report, subject to the direction of the Vice Chancellor in carrying out his or her functions;
5. report to the Vice Chancellor on the findings of any investigation and recommended remedial action;
6. take all necessary and reasonable steps to ensure that the identity of persons who make reports, and persons who are the subject of reports, are kept confidential;
7. support persons who make reports and protect them from victimisation, harassment or any other form of reprisal;
8. report actual or suspected corrupt conduct to the Vice Chancellor in a timely manner to enable that officer to comply with the ICAC Act; and
9. co-opt the University Legal Assistant(s) as needed, to provide administration, liaison and other support in discharging the Disclosures Coordinator's responsibilities. The Legal Assistant will ensure the confidentiality of a reporters' identity and report is appropriately maintained.



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Vice Chancellor

Reports may be made directly to the Vice Chancellor rather than by way of the internal reporting system established under this Schedule 1 and its covering [Policy and Procedure](#). In such cases the Vice Chancellor (or his or her Executive Officer acting as delegate) will:

1. impartially assess each such report to determine:
 - a. whether the disclosure appears to be a public interest disclosure within the meaning of the PID Act; and
 - b. the appropriate action to be taken in respect of the report, for example:
 - i. no action;
 - ii. determine the appropriate person to take responsibility for dealing with the report;
 - iii. preliminary or informal investigation;
 - iv. formal investigation;
 - v. disciplinary action in accordance with relevant industrial instrument;
 - vi. referral to an investigating authority for investigation or other appropriate action; or
 - vii. referral to the police (if a criminal matter) or the ICAC (if the matter concerns corrupt conduct).
2. Having undertaken an assessment the Vice Chancellor will direct that the Disclosures Coordinator (or the Vice Chancellor's Executive Officer acting as delegate) cause the following, where relevant, to occur:
 - a. that an appropriate person carries out or coordinates any internal investigation arising out of a report;
 - b. a report is made to the Vice Chancellor on the findings of any investigation and recommended remedial action;
 - c. all necessary and reasonable steps are taken to ensure that the identity of persons who make reports, and persons who are the subject of reports, are kept confidential;
 - d. support be provided to persons who make reports and protection provided to them from victimisation, harassment or any other form of reprisal; and
 - e. arising out of report of actual or suspected corrupt conduct that, sufficient and timely information is provided to the Vice Chancellor to allow him or her to comply with the ICAC Act.

In addition, the Vice Chancellor has the following responsibilities;

1. establishing and maintaining a work environment that encourages staff to report wrongdoing;

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2. establishing an effective internal reporting system to appropriately deal with reports of wrongdoing, support staff who report, and ensure reprisals are not taken against them;
3. establishing an internal reporting policy that contains a clear statement that the University is committed to the highest standards of ethical and accountable conduct and will support staff who report wrongdoing;
4. ensuring staff are aware of the policy and the protections of the PID Act through effective communication and training;
5. ensuring that an experienced and skilled Disclosures Coordinator is responsible for receiving and dealing with reports of wrongdoing;
6. ensuring adequate resources, both financial and human, are dedicated towards achieving these outcomes;
7. referring actual or suspected corrupt conduct and criminal offences to the appropriate external authorities;
8. keeping the identity of the internal reporter and anyone who is the subject of a report confidential, where this is practical and appropriate;
9. ensuring an internal reporter is advised of any decisions made about a report and, if further action is recommended, given regular progress updates and a report of the outcome;
10. providing adequate resources to any person appointed to investigate a report or to support an internal reporter;
11. ensuring that appropriate systems and strategies are in place to minimise any risk of reprisal that internal reporters face;
12. ensuring that the workplace situation is effectively managed, particularly if conflict or reprisal is threatened or takes place;
13. taking appropriate action against anyone who threatens or takes reprisals against a person for reporting wrongdoing;
14. implementing any organisational reform that is necessary to address systematic issues identified;
15. ensuring that the University prepares an annual report on the University's obligations under the PID Act within four months after the end of the reporting year; and
16. ensuring the University provides the Ombudsman with statistical information regarding the University's compliance with its obligations on a six monthly basis.