

# Code of Ethics and Conduct

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### NSW Ombudsman

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# 1. Application of the Code of Ethics and Conduct (Code)

The Code applies to:

- ongoing, temporary and casual employees of the Ombudsman's Office (**Office**), and employees on secondment to the Office
- statutory officers appointed under the *Ombudsman Act 1974*
- contractors and agency staff engaged to perform work for or on behalf of the Office
- students, interns and volunteers engaged with the Office for the purposes of work experience or in any other capacity, and
- consultants and others the Office has a business relationship with whose engagement requires adherence to the Code.

In the Code, these people are referred to as 'officers'.

The Code applies at all times when performing your work duties and in your working relations with colleagues, clients and customers, stakeholders and the government of the day.

Some aspects of the Code also apply outside your working relations and performance of work duties. For example, your obligations relating to Public Comment, Professional behaviour, Self-reporting, Child protection and other reporting extend beyond work hours and work relations and will apply to how you conduct yourself in other settings because of the effect that that conduct may have on the Office.

Your obligations under the Code are in addition to your legislative, industrial and administrative obligations, as well as other Office policies and any lawful directions given to you in the course of performing your duties.

## 2. What the Code covers

- [NSW government and Ombudsman values](#)
- [Conflict between public duty and private interests](#)
- [Gifts and benefits](#)
- [Secondary employment \(includes voluntary work\)](#)
- [Use of Office resources](#)
- [Public comment and participation in political, community and union or professional association activities](#)
- [Professional behaviour](#)
- [Self-reporting obligations](#)
- [Reporting obligations](#)
- [Breaches of this Code](#)
- [Roles and responsibilities](#)

There are links in the Code to related Ombudsman policies that officers are required to be aware of and comply with.

### 3. NSW government and Ombudsman values

As an Ombudsman officer, you are required to exercise your functions in accordance with the values of the NSW government sector and the values of the Office.

The Code incorporates the [NSW Public Service Commission Code of Ethics and Conduct](#), which outlines the NSW government core values of integrity, trust, service and accountability.

#### Office values

<b>Integrity</b>	We act lawfully, honestly, ethically and are committed to producing high-quality work in a consistent manner.
<b>Impartiality</b>	We operate independently from government and act in a non-partisan manner, providing services informed by evidence to advocate for the public interest.
<b>Fairness</b>	We strive to ensure people are treated fairly and reasonably by the government agencies with which they interact. We treat complainants and the employees of the agencies whose conduct we investigate fairly.
<b>Transparency</b>	We document our operations and processes and communicate openly with our stakeholders and provide key information about the findings, recommendations and outcomes of our work.
<b>Professionalism</b>	We work with government agencies and non-government organisations through relationships based on professionalism, trust and respect to find proactive and positive resolutions in the interest of the people and communities of NSW. We interact with the public and external stakeholders to understand their diverse contexts and emerging needs.
<b>Respect</b>	We work with complainants, stakeholders and our colleagues in an inclusive manner, treating them with dignity and respect, and mindful of diversity.

## 4. Conflict between private duty and public interests

As an Ombudsman officer you must take all reasonable steps to manage any conflict that might arise between your public duty and your private interests. This is crucial to maintaining the Office's reputation for impartiality and objectivity.

A conflict arises where a reasonable, informed observer would perceive your public duty might be influenced by your own, or someone else's, personal interests.

All conflicts of interest have three elements:

### **Public duty**

your public duty as an Ombudsman officer.

### **Private interest**

a personal interest or the interest of a family member, relative, friend or business, social or community associate.

It may be material (involving money or some other tangible benefit) or non-material.

It can arise from personal, social or work relationships, memberships, work or educational history, property ownership, political affiliations, religious beliefs or experiences (positive or negative) you have had with a particular individual or organisation.

### **Conflict**

a connection between the private interest and the performance of a particular public duty where a reasonable person would consider the private interest could influence that performance.

The chances of a conflict arising, and the type of conflict that might arise, may vary to some extent, depending on the nature of your public duty as an Ombudsman officer. Someone working in Corporate may face different types of conflicts to someone working in Investigations and Major Projects or Complaints and Resolution, or may face the same conflicts.

A conflict may be actual, potential or perceived:

### **Actual conflict**

Example: You are on a recruitment panel and realise one of the candidates is a friend, or you work in complaints assessment and are allocated a complaint that has been made by a friend.

### **Potential conflict**

Example: You work in complaint assessment and a member of your household has just started a job in a public authority that the Ombudsman oversees.

### **Perceived conflict**

A perceived conflict arises where a reasonable observer might consider that there is a conflict between your private interest and your duty as an Ombudsman officer, regardless of whether that is the case.

You are responsible for managing actual, potential or perceived conflicts. This involves taking the following steps:

#### **When starting with the Ombudsman**

**All officers:** Conflicts statutory declaration – this is the declaration that you have or complete before commencing as an Ombudsman officer.

**Executive members:** Declarations of private interests.

**Secondary employment** (which includes voluntary or unpaid work and also self-employment) application for approval. See [Secondary employment](#).

#### **As circumstances change**

**All officers:** Conflict declarations are made using [this form](#) as and when they arise because of:

- a change in your personal circumstances (which includes entering into a close personal relationship with another officer or someone who works in an entity that the Ombudsman oversees)
- a change in your role in the Office
- participating on a procurement or recruitment panel
- a new complaint or disclosure
- a new investigation or major project
- anything else that happens that might create a conflict.

**Executive members:** Declarations of private interests as a result of a change in personal circumstances.

**Secondary employment** (which includes voluntary or unpaid work and also self-employment) application for approval.

**Gift and benefit declarations** – as and when gifts or benefits (including hospitality) are received or offered.

## **4.1 Registers kept by the Office**

Conflict declarations, private interest declarations and secondary employment applications are managed by Governance and Risk. Information about conflicts, private interests and secondary employment are recorded by the Manager Governance and Risk on a central register.

This register, along with the Gifts and Benefits register, can only be accessed by the Ombudsman, Chief Operating Officer, Chief Deputy Ombudsman, Legal Counsel, Manager Governance and Risk, and People and Culture. However:

1. Executive members and managers may, on request, be provided with reports of conflicts of interests pertaining to officers in their management line
2. all managers have access to a list of names of officers who have conflicts, but not any details about those conflicts (this is to ensure that managers know whether they need to make inquiries about officers they supervise), and
3. de-identified statistical reports may be provided to the Ombudsman and Executive for the purposes of ensuring visibility and effective management of risks.

## 5. Gifts and benefits

### 5.1 Gifts and benefits offered to you

A gift or benefit is:

- a) any item, service, prize, ticket, voucher, cheque or money order, debit card, pre-paid card, meal, hospitality, travel or accommodation upgrade, in cash or non-cash form
- b) provided by an entity the Office oversees or by a complainant, client, applicant, supplier or potential supplier to or of the Office
- c) which has an intrinsic value to you, a member of your household, relative, friend or associate.

### 5.2 Soliciting gifts and benefits

You must never seek or solicit any gift, benefit or hospitality in your capacity as an Ombudsman officer.

You must not arrange for or induce a member of your household, relative, friend or associate to solicit or accept a gift, benefit or hospitality.

### 5.3 Being offered a gift or benefit

The action you must take upon being offered a gift or benefit will depend on the value of the gift or benefit and the circumstances in which it is offered. To work out what you should do in a given circumstance, use the [flowchart](#).

When a gift or benefit cannot be accepted, it should be politely declined at the time of offer. You should explain that it is contrary to Office policy to accept.

### 5.4 Reporting bribes or attempted bribes

If you are offered a gift, benefit or hospitality and believe the intention of the person was to influence the way you or the Office performs a duty, or that might otherwise be considered a bribe, you must refuse the offer, even if the gift, benefit or hospitality would otherwise be acceptable.

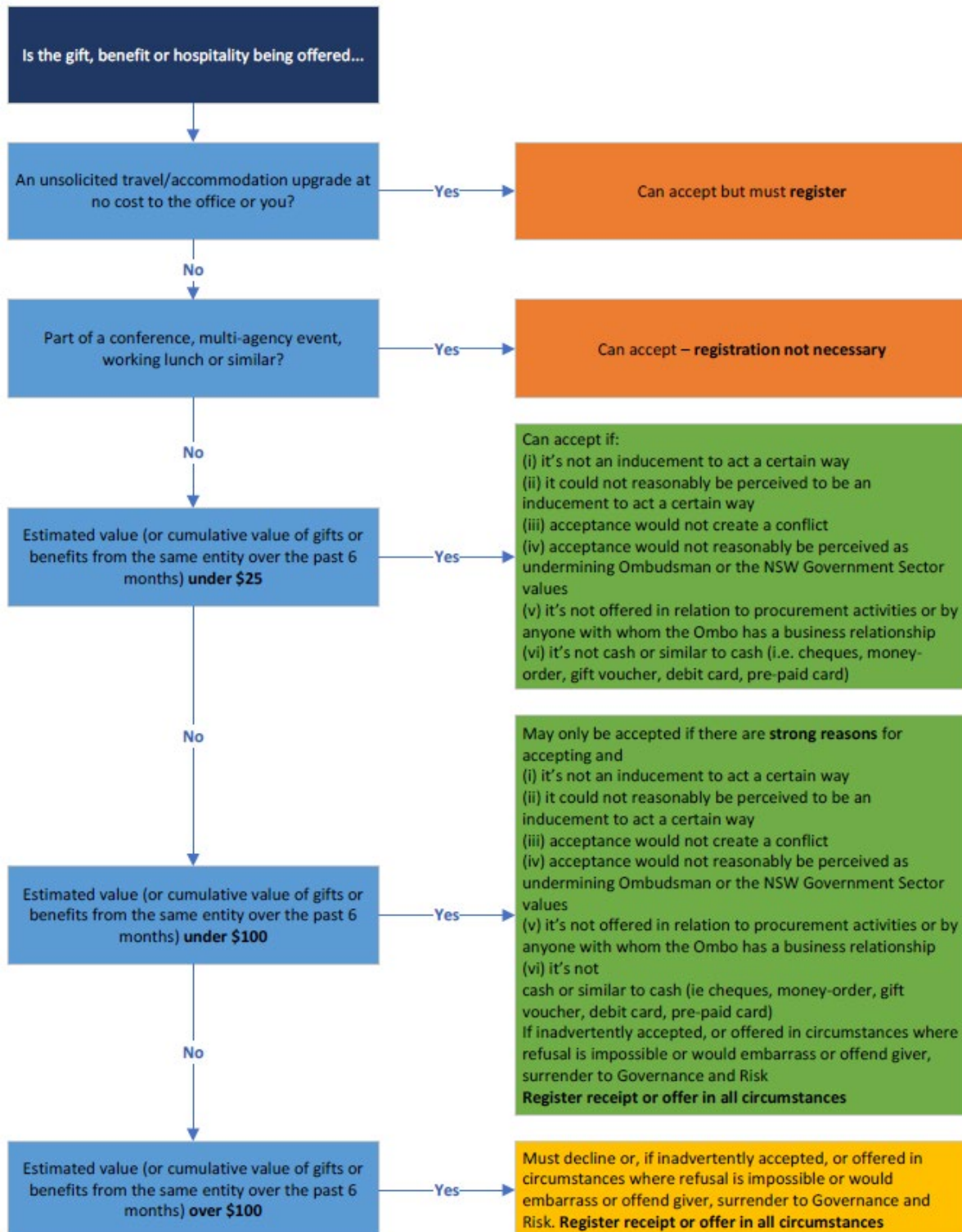
Any attempt to bribe an officer, or acceptance of a bribe, is corrupt conduct, may also constitute a criminal offence, and must be reported immediately to a member of the Executive.

### 5.5 Inadvertent acceptance of a gift or benefit

Occasionally a gift or benefit may be inadvertently accepted, such as a card which following receipt is found to contain a gift voucher or money, or a wrapped gift not opened in front of the giver. Inadvertent acceptance of a prohibited gift or benefit in good faith will not be a breach of the Code provided you immediately act in accordance with the management process set out below.

If an accepted gift is found to be prohibited, it must be immediately declared and advice sought from an Executive member as to the appropriate disposal. If not prohibited, the gift or benefit must be managed in accordance with the Code.

## 5.6 Gifts and benefits flowchart





## 5.7 Registration of gifts and benefits

You must declare any gift or benefit that is required to be declared under this Code as soon as practical by completing the [declaration form](#) and providing to your manager. If the gift or benefit was accepted, the manager must complete the relevant section regarding how it will be disposed.

Once complete, [this form](#) must be emailed to the Manager Governance and Risk who will review the approved action for compliance with the Code and update the Gifts and Benefits Register. This register may only be accessed by the Ombudsman, Chief Operating Officer, Chief Deputy Ombudsman, Legal Counsel, and Manager Governance and Risk.

## 5.8 Disposal of surrendered gifts and benefits

The Chief Operating Officer is responsible for determining appropriate disposal of gifts or benefits which have been surrendered to the Manager Governance and Risk in accordance with the Code.

In the case of perishable items such as chocolates or food hampers, an appropriate method of disposal is often to share the item amongst staff or donate to charity. Where it is required that the gift will be shared amongst staff then a physical surrender of the gift is not required, however the disposal method must be recorded in the register.

All non-perishable goods will be stored in a secure cupboard and an inventory of contents maintained by the Manager Governance and Risk. At the end of the financial year a review of the contents will be conducted against the inventory. The disposal of the gifts must occur at least once per year and be recorded.

## 5.9 Hospitality

The gifts and benefits [flowchart](#) can also be used to make decisions about offers of hospitality.

Examples of low-risk hospitality, where it will probably be ok to accept, include:

- functions where you attend in an official capacity representing the Office, for example a pen or notepad
- hospitality provided as part of a conference package where the Office has paid a fee for you to attend, for example tea, coffee or a modest meal
- catered briefings or lunches where invitees from a range of organisations are present
- occasional working lunches, where the hospitality is incidental and of low value.

Examples of higher-risk hospitality, which should not be accepted, include:

- restaurant meals, such as invitations to lunches or dinners to 'seal the deal', or to 'celebrate' finalisation of a procurement process or the signing of a contract
- invitations to corporate boxes or marquees
- invitations to functions held in private homes
- invitations which extend to family members, relations, friends and associates.

If hospitality is accepted in good faith, but a third-party attempts to use the occasion to raise a materially significant matter relating to their business or private affairs, you should politely decline to discuss the matter and, if appropriate, propose that a formal meeting be organised for a later date.

Where a travel or accommodation provider offers a travel or accommodation upgrade for operational reasons, at no charge to the staff member or the Office, they may accept the upgrade, but must declare it.

## 5.10 Offering gifts, benefits and hospitality

Ombudsman staff may, on occasion, provide small gifts (including Ombudsman merchandise) or hospitality to external stakeholders. This is permitted when the gift or hospitality:

- is for a business purpose
- is part of a meeting hosted by the Ombudsman's office, work, training or community engagement event
- is proportionate and reasonable in the circumstances
- does not cause – and could not be seen to cause – a conflict of interest
- could not be construed as an inducement to act in a certain way
- is consistent with the government sector core values of integrity, trust, service and accountability
- is purchased through an appropriate process and is documented
- does not provide a benefit to you, members of your family or friends
- is in keeping with the Code.

Generally, hospitality should not be extended to consultants or other providers of goods or services unless authorised by a member of the Executive.

You do not need to declare the appropriate gifting of gifts or hospitality to external stakeholders on the gifts and benefits register. However, you should report to your manager if you believe that another officer has acted in a way that is unethical or a breach of the Code. You can also report suspected cases of fraud and corruption as outlined in the [Internal Reporting Policy](#).

## 6. Secondary employment (includes voluntary work)

The Office acknowledges that you may wish to undertake paid or volunteer work, or self-employment, in addition to your employment with the Office. In this Code and in the Office, 'secondary employment' includes unpaid or volunteer work.

### 6.1 Approval is required

You must not engage in secondary employment, even while on leave, without prior approval. This is because secondary employment can introduce significant conflict of interests, and may also impact your health and welfare, which might diminish your ability to perform your role or create health and safety risks within the Office.

Secondary employment approval applications are made using [this form](#), and, if granted, are for a maximum of 12 months, after which you will be required to renew your application.

### 6.2 Risks must be managed

Secondary employment will only be approved where conflicts of interests and other risks can be resolved or managed.

When undertaking secondary employment, you are required to manage any conflicts of interest that arise as a result of your secondary employment, which includes advising your supervisor of any new conflicts or any escalation of an existing conflict as soon as you become aware of it.

If, following approval, it becomes apparent that risks are not being effectively managed, approval may be withdrawn. You will be consulted prior to any withdrawal of approval, and will have the opportunity to respond. Where after consultation approval is withdrawn, reasons will be provided in writing. An employee may request the decision to decline an application be reviewed by another member of the Executive team.

If you are supervising an officer who is undertaking secondary employment, you must monitor the officer's work performance to ensure the officer's secondary employment does not adversely affect the proper and efficient performance of their duties, or create a work health or safety risk. If either of these issues arise, you must consider whether secondary employment approval might need to be withdrawn.

## 7. Use of Office resources

You must use Office resources efficiently, economically and prudently. This includes:

- ensuring decision making about the use of the resources is reasonable and appropriately authorised
- treating the resources with care and ensuring where appropriate that they are secured against theft or misuse
- not creating a risk or liability for the Office in the use of Office resources (e.g. by breaching copyright or other intellectual property obligations).

Any use of Office resources for private purposes must be minimal, reasonable and in accordance with any other relevant Office policies. Office consumables, such as printing paper or stationery, must not be used for secondary employment.

See also the Office's [Technology and Device Management Policy](#).

## 8. Participation in political, community and union or professional association activities

You must perform your functions in an impartial, politically neutral manner.

You have a right to participate in political and community activities and to pursue private interests, provided that:

- you do so in compliance with the [Media and Social Media Policy](#)
- participation does not conflict with your duty as a public servant to perform your duties in a politically neutral manner
- participation does not interfere with Office duties, and
- any conflict that arises is declared and dealt with in accordance with this Code.

### 8.1 Public comment

Public comment is any comment made where it is reasonably expected that it will be seen or heard by members of the public. This includes public comment through open social media accounts. You must not make any comment on behalf of the Ombudsman unless authorised to do so.

As a private individual, you have the right to participate in public debate on political and social issues. However, in doing so, you must comply with the [Media and Social Media Policy](#).

### 8.2 Union or professional association representatives

If you are elected or nominated as spokesperson for a professional association or union, you are entitled to make public comments in relation to Office matters provided it is clear that:

- you are making the comments in your capacity as a representative of the association or union, and
- the comments represent the association or union views, and not necessarily those of the Ombudsman's Office.

### 8.3 Lobbyists

Staff must comply with the NSW government Lobbyists Code of Conduct published on the NSW Electoral Commission's website.

## 9. Professional behaviour

### 9.1 Work health and safety (WHS)

You are expected to understand your work health and safety responsibilities and be proactive in ensuring the workplace is safe and secure for everyone. This includes:

- taking reasonable care for your own WHS and that of others
- adhering to relevant Office policies and procedures
- co-operating with managers to ensure compliance with WHS obligations.

These responsibilities are set out in the [WHS Policy](#).

### 9.2 Professional presentation

You are expected to present yourself professionally when performing work functions, which includes:

- maintaining a clean, neat and tidy appearance
- dressing appropriately to your duties, particularly when attending external meetings, hearings, presentations or other activities which involve engaging in person with external stakeholders including the public, and
- not wearing clothing or attire that might reasonably be seen to be offensive to colleagues or external stakeholders.

### 9.3 Use of alcohol and drugs

You must not consume any alcohol or take any drugs (other than as prescribed for you) while on duty.

You are otherwise responsible for ensuring that your capacity to perform your duties, and the health and safety of others, is not impaired by the use of alcohol or drugs.

You are encouraged to confidentially disclose any substance-related problems you may be experiencing so that appropriate action can be taken to support you and maintain a safe workplace. You may access counselling support from the Employee Assistance Provider.

### 9.4 Working with others

We are all required to treat colleagues, customers, clients and internal and external stakeholders with dignity and respect, and in accordance with the Ombudsman values and NSW government core values.

You are also required to comply with the Office's [Bullying, Harassment and Discrimination Policy](#) and [Grievance Management Policy](#).

### 9.5 Personal conduct at work-related internal and external social functions

The obligations set out under Working with others apply also when you are attending social functions related to work such as internal or external end of year parties, farewells or celebrations where it would be evident to others that the function is related to the Office, whether these are held within the office or in a public location.

Even if you are not performing official duties on these occasions, you have a duty to treat colleagues and others with dignity and respect.

## 10. Self-reporting obligations

### 10.1 Criminal offences

You must, as soon as possible (and, in any event, within three working days) notify your manager and the Manager People and Culture in writing if you are charged with:

- a 'serious offence', or
- any offence involving dishonesty, or which (if substantiated) may impact your fitness or ability (or perceived fitness or ability) to hold your role or undertake part or all of the inherent requirements of your role.

A 'serious offence' is an offence punishable by imprisonment for 12 months or more (including an offence committed outside NSW that would be an offence if committed in NSW). It is your responsibility, if you are charged with any offence, to check whether it is a 'serious offence' that requires you to report it to your manager.

Following careful consideration, the Ombudsman may suspend a staff member from duty until a criminal charge of this nature has been dealt with.

You must also, as soon as possible (and, in any event, within three working days) notify your manager and the Manager People and Culture in writing if you are convicted or found guilty of such an offence.

### 10.2 Bankruptcy

If you become bankrupt, you must immediately notify your manager and the Manager People and Culture.

# 11. Reporting obligations

## 11.1 Reportable conduct scheme

The Ombudsman is a 'public authority' for the purpose of the *Children's Guardian Act 2019*. This means that if you become aware of a reportable allegation or a conviction that you consider is a reportable conviction, you must report the matter to the Ombudsman. The Ombudsman must then give the Children's Guardian written notice of the reportable allegation or conviction considered to be a reportable conviction.

For information about the reportable conduct scheme, see <https://ocg.nsw.gov.au/>.

## 11.2 Risk of significant harm

Any other staff member who, in the course of their duties, receives information that gives them reasonable grounds to suspect that a child or young person, or class of child or young persons, is at risk of significant harm, should report the grounds for that suspicion or belief to the Department of Communities and Justice, in accordance with section 24 of the *Children and Young Persons (Care and Protection) Act 1998 (CYP Act)*.

The secrecy obligations imposed by the Ombudsman Act do not prevent a report from being made. An individual who makes a report or provides information in good faith also has the protection afforded under the CYP Act.

## 11.3 Child abuse offences

If, in the course of carrying out your functions as an Ombudsman officer or in any other context, you come to know or believe, or ought reasonably come to know, that:

- (a) a child abuse offence has been committed against another person, and
- (b) you have information that might be of material assistance in securing the apprehension of the offender or the prosecution or conviction of the offender for that offence

you must provide that information to the Police. Failure to do so may amount to a criminal offence under section 316A of the *Crimes Act 1900*.

## 11.4 Corrupt conduct

The Ombudsman has an obligation to report to the NSW Independent Commission Against Corruption (ICAC) any matter that the Ombudsman suspects on reasonable grounds concerns or matters that may concern corrupt conduct under section 11 of the *ICAC Act (1988)*.

Corrupt conduct can be committed by either a public official or a private individual because it includes conduct that might adversely affect the exercise of official conduct by public officials.

You must use this [briefing note form](#) when referring an allegation of corrupt conduct to the Ombudsman. The register of all referrals made by the Ombudsman may only be accessed by the Ombudsman, Chief Operating Officer, Chief Deputy Ombudsman, Legal Counsel, and Manager Governance and Risk.

See also the Office's [Fraud and Corruption Control Policy](#).



## 11.5 Serious indictable offences

If, in the course of carrying out your functions as an Ombudsman officer, or in any other context, you come across information that leads you to know or believe that:

- (a) a 'serious indictable offence' (an offence that is punishable by imprisonment for five or more years) has occurred, and
- (b) you have information that might be of material assistance in securing the apprehension of the offender or the prosecution or conviction of the offender for that offence

you must provide that information to the Police. Failure to do so may amount to a criminal offence under section 316 of the *Crimes Act 1900*.

See also the Office's [Fraud and Corruption Control Policy](#).

## 11.6 WHS incidents

You must report all WHS incidents as soon as reasonably practicable to your manager, Business Partner Safety and Wellbeing, and Manager People and Culture. These notifications may be shared with the WHS Committee and the Executive.

The Office has a duty to immediately notify SafeWork NSW of a 'notifiable incident' and to notify the insurer within 48 hours.

See also the Office's [WHS Policy](#).

## 11.7 Cyber security incidents and data breaches

You must report all cyber security incidents as soon as reasonably practicable to your manager and IT Helpdesk. These notifications may be shared with the ICT Subcommittee and the Executive.

The Office may report cyber security incidents to the Department of Premier and Cabinet and Cyber Security NSW according to the Office's [Cyber Security Policy](#).

You must report all data breaches as soon as reasonably practicable to your manager and Manager Governance and Risk using [this form](#). These notifications may be shared with the Executive.

The Office may report data breaches on a voluntary basis to the NSW Information and Privacy Commission.

## 11.8 Breaches of the Code

A breach of this Code may amount to misconduct.

If you see another officer act in a way that is contrary to the Code, you must report the incident to your supervisor, manager, or your relevant Executive in the first instance.

If you believe certain conduct is not just unethical, but may also be corrupt, a serious and substantial waste of government resources, serious maladministration or a breach of government information and privacy rights, then report your concerns to the Office's Public Interest Disclosures Coordinator or the Ombudsman.

## 12. Roles and responsibilities

### 12.1 Ombudsman

The Ombudsman is responsible for:

- leading and promoting the Code within the Office
- ensuring the general conduct and management of the functions and activities of the Office are in accordance with the core values of the NSW government sector and the Office
- approving amendments to the Code.

### 12.2 Chief Operating Officer

The Chief Operating Officer is responsible for:

- overseeing the implementation of systems and processes that support adherence to the Code
- through the Manager Governance and Risk, monitoring compliance with the Code
- approving the appropriate disposal of surrendered gifts and benefits in accordance with the Code.

### 12.3 Officers

Officers are responsible for:

- understanding and abiding by the Code
- taking refresher training about the Code requirements when and as directed
- declaring all actual, perceived or potential conflicts, secondary employment and gifts and benefits
- understanding legislation and Office policies and procedures that support professional and ethical behaviour, and demonstrating those behaviours
- seeking assistance from a manager when unsure of what behaviour or action is expected
- promoting the Code through demonstrating ethical and professional behaviour
- reporting possible breaches of the Code to relevant officers.

### 12.4 Managers and Executive

Members of the Executive and managers that supervise officers are also responsible for:

- leading, modelling and promoting implementation of the Code and ethical, fair and professional conduct within the Office
- ensuring Office culture, practices and systems conform with the Code
- ensuring relationships with suppliers and other contractors remain on a professional footing
- documenting, implementing and monitoring strategies and actions that may assist in preventing breaches of the Code, including but not limited to:
  - ensuring that conflicts are avoided or effectively managed
  - ensuring officers have been issued with the Code and understand its requirements
  - ensuring staff complete all necessary training on the Code and associated policies.

### 12.5 Manager People and Culture

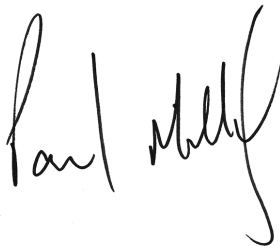
The Manager People and Culture is responsible for ensuring training on the Code is included in Induction for new starters.

## 12.6 Manager Governance and Risk

The Manager Governance and Risk Officer is responsible for:

- monitoring the implementation of and maintaining the Code in accordance with relevant compliance requirements
- registering conflicts of interests, gifts and benefits, secondary employment and personal interest declarations in accordance with the Code
- receiving, registering and storing surrendered gifts and benefits in accordance with the Code
- providing reports to the Executive regarding the Office's implementation of activities to support staff awareness of the Code, and Office compliance with related legislation and relevant government directives.

## 13. Ombudsman approval

A handwritten signature in black ink, appearing to read 'Paul Miller', written in a cursive style.

Paul Miller  
**NSW Ombudsman**