



Human resources procedures

Public Interest Disclosures (PID)

The Parliamentary Budget Office (PBO) is committed to the highest standards of ethical and accountable conduct. The PBO encourages the reporting of wrongdoing under the *Public Interest Disclosure Act 2013* (PID Act), will act on disclosures where appropriate and protect disclosers from any reprisals or threats of reprisals because of making a disclosure. This document outlines the PBO's procedures for facilitating and dealing with public interest disclosures for the purposes of section 59(1) of the PID Act.

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What are public interest disclosures?

1. A public interest disclosure (a PID) is a disclosure by a current or former public official of suspected wrongdoing in the Commonwealth public sector.¹
2. An internal disclosure is the most common type of public interest disclosure. The individual making an internal disclosure must:
 - be a current or former public official (or deemed to be a public official)
 - make their disclosure to the correct person within an Australian Government agency (their supervisor or an authorised internal recipient²)
 - provide information that they believe tends to show, on reasonable grounds, disclosable conduct within an Australian Government agency or by a public official.

Attachment A summarises what is an internal public interest disclosure.
3. In limited circumstances a public official may disclose such information to a person outside government. This is known as an external disclosure or emergency disclosure. They can also make a disclosure to a legal practitioner for the purposes of getting advice about making one of the other forms of public interest disclosure.

What kinds of disclosable conduct are covered by the PID Act?

4. The kinds of conduct that a disclosure can be made about includes conduct that:
 - contravenes a Commonwealth, state, or territory law
 - occurred in a foreign country and contravenes a foreign law that applies to the agency, official or service provider
 - perverts the course of justice
 - is corrupt
 - constitutes maladministration, including conduct that is based on improper motives or is unreasonable, unjust, oppressive, or negligent

¹ In most cases, raising concerns early may make it easier for the PBO to act.

² The PBO’s *Human resources (HR) delegations and authorisations* details the position that hold delegations for the purposes of the PID Act.

- is an abuse of public trust
 - involves fabrication, falsification, plagiarism, or deception relating to scientific research, or other misconduct in relation to scientific research, analysis, or advice
 - results in wastage of public money, or public property
 - unreasonably endangers health and safety
 - endangers the environment
 - is prescribed by the PID rules.
5. Disclosable conduct also includes conduct by a public official that:
- involves or is engaged in for the purposes of abusing their position as a public official, or
 - could give reasonable grounds for disciplinary action against the public official.

What is not disclosable conduct?

6. The conduct of members of parliament is not covered by the PID Act (because they are not 'public officials' as defined below). However, the PBO and other parliamentary departments and their employees are covered.
7. Disclosable conduct does not include:
- an individual disagreeing with:
 - a government policy or proposed policy
 - action or proposed action by a minister, the Speaker of the House of Representatives, or the President of the Senate
 - expenditure or proposed expenditure related to such policy or action.
 - aspects of court and tribunal operations, including:
 - the conduct of judicial officers
 - the judicial functions of court staff, tribunal staff or tribunal members
 - any other conduct related to a court or tribunal unless it is of an administrative nature and does not relate to the management or hearing of matters before the court or tribunal.
 - proper performance of the functions and proper exercise of the powers of an intelligence agency or its officials.

Who is a public official?

8. Section 69 of the PID Act defines a public official as a current or former:
- public servants and parliamentary service officers
 - service providers under a Commonwealth contract
 - Defence Force members
 - Australian Federal Police appointees
 - statutory office holders
 - staff of Commonwealth companies
 - individuals taken to be public officials.
9. Individuals and organisations that provide goods or services under a Commonwealth contract are also considered as public officials for the purposes of the PID Act.

'Deemed' public official

10. An authorised officer may deem an individual to be a public official if they reasonably believe the individual has information about wrongdoing and proposes to make a disclosure. Examples may include:
- a current or former volunteer with an agency
 - a member of an advisory body to a Commonwealth agency (where the members terms of engagement do not meet the definition of a public official)
 - an employee of an organisation that receives grant funding from the Australian Government, or
 - state and territory department officials who work alongside Commonwealth officials.

What support or protections exist under the PID Act?

11. The PID Act provides a means for protecting current and former public officials from adverse consequences of disclosing information that, in the public interest, should be disclosed.

Confidentiality

12. A general secrecy provision exists under the PID Act that protects any information that an individual obtains while conducting a disclosure investigation, or in connection with the performance of a function, or exercise of a power.
13. The Principal Officer (the PBO's Principal Officer is the Parliamentary Budget Officer) is obligated to establish procedures to provide for the confidentiality in the investigation process.

Protection for the discloser

14. The PID Act provides for:
- protection of the discloser's identity
 - immunity from civil, criminal, or administrative liability
 - support and protection from reprisal
 - recourse to court for remedies for reprisal action.

These protections and immunities apply to both internal and external (or emergency) disclosures made in accordance with the PID Act.

15. Even if the discloser's report of wrongdoing is incorrect or unable to be substantiated, they are still protected under the PID Act, provided:
- their report meets the criteria for a PID as outlined above, **and**
 - they reasonably believe or believed at the time of the disclosure that the information tends to show disclosable conduct.

Protecting the discloser's identity

16. Consistent with our obligations under the PID Act, the PBO will take reasonable effort to protect the discloser's identity. This is in addition to the general secrecy provisions contained within the PID Act.
17. The PID Act allows for the disclosure of an individual's identity in certain circumstances, and that such disclosure is sometimes necessary to effectively deal with the PID.

18. Disclosers do not have to identify themselves and may remain anonymous. If the disclosure comes from an email address from which the individual's identity cannot be determined and the discloser does not identify themselves in the email, it should be treated as an anonymous disclosure.³
19. Alternatively, a discloser may wish to use a pseudonym throughout the PID process. This may be appropriate in circumstances where the discloser is identifiable to their manager or an authorised officer but decides to hide their identity to others.⁴

Protection for witnesses in a PID investigation

20. All current and former public officials are obliged to cooperate with a PID investigation.
21. The PID Act provides protection for any individual (including the discloser) who provides information when requested during a PID investigation. These protections include immunity from criminal or civil liability and protection from detriment and reprisal.

Officials exercising powers or performing functions under the PID Act

22. Under the PID Act, a Principal Officer or their delegate, an authorised officer or a manager of a discloser is not liable to any criminal or civil proceedings or any disciplinary action for acting in good faith in the exercise of powers or functions.

Matters relating to policy costings or budget analyses

23. In fulfilling their duties, PBO employees may be exposed to sensitive or confidential information relating to the work of Parliament or parliamentarians. PBO employees have ongoing statutory confidentiality obligations, which apply following their cessation.
24. If the disclosure relates to a policy costing or proceedings in Parliament (such as advice provided to the Parliament) and does not meet the criteria as outlined in the PID Act, an individual may be in contravention of section 64V of the *Parliamentary Services Act 1999* or committing an offence against the relevant house of the Parliament.
25. The PBO strongly recommends an individual who is contemplating making such a disclosure should seek legal advice before doing so.

Procedures for dealing with a public interest disclosure (PID)

26. **Attachment B** outlines the process for handling an internal public interest disclosure.

³ The PBO will attempt to investigate an anonymous public interest disclosure as far as its practicable to do so. In some cases, this may hinder the PBO's ability to effectively investigate the disclosure.

⁴ Consistent with the approach taken in the Australian Privacy Principles, and in addition to anonymity, pseudonymity should be made available as an option.

Step 1 – a disclosure is made

27. The PID Act does not require the disclosure to prove that there has been disclosable conduct when they make a disclosure. An individual making a disclosure only needs to provide sufficient information to tend to show one or more instances of disclosable conduct.
28. An individual making a public interest disclosure does not need to expressly state, or even intend that a disclosure is made under the PID Act. Simply conveying information about suspected wrongdoing to an individual who is entitled to receive a disclosure under the PID Act (an authorised officer or manager) is sufficient.⁵
29. An individual submitting a public interest disclosure should:
 - be clear and factual, and avoid speculation, personal attacks and emotive language that may divert attention from the issue in their disclosure, and
 - not attempt to investigate the matter themselves before making a disclosure (as this may hinder a future investigation).
30. An authorised officer may ask the discloser for any supporting correspondence or other documents, such as file notes or a diary of events, and the names of any individuals who witnessed the conduct or who may be able to verify what the discloser is alleging.
31. Once a disclosure is made, the PBO must decide whether and how to investigate it.

Step 2 – initial consideration and allocation

32. Once an authorised officer has received a disclosure of suspected wrongdoing (either from the discloser or via the discloser's manager), the PID Act requires certain steps to be taken.⁶

Step 2.1 – determine if the information is an internal disclosure

33. When an authorised officer receives a disclosure, they must consider the information and decide whether it meets the criteria for an internal disclosure under the PID Act. This includes whether they are an authorised recipient for that disclosure.
34. The initial assessment of a disclosure should be performed promptly. The authorised officer must allocate a disclosure within **14 days** of receiving it, unless there is a good reason why they need additional time.
35. An internal disclosure is made when:
 - an individual who is or has been a public official
 - discloses to an authorised internal recipient or to their manager, who refers the information to an authorised internal recipient
 - information which tends to show (an objective test), or the discloser believes on reasonable grounds tends to show (a subjective test), one or more instances of disclosable conduct.

⁵ The PBO's *Human resources (HR) delegations and authorisations* details the position that hold delegations for the purposes of the PID Act.

⁶ The authorised officer may undertake preliminary inquiries to obtain sufficient information to be able to make this determination.

The subjective test – belief on reasonable grounds

36. A belief is more than a suspicion or assertion. The individual making the disclosure must honestly hold the view that wrongdoing is more likely than not to have occurred. It is not sufficient for the discloser to personally hold the belief that wrongdoing has occurred; they must have ‘reasonable grounds’ for their belief.
37. Personal prejudice or animosity towards someone would not on its own be ‘reasonable grounds’ for a belief that wrongdoing has occurred. Some tangible support for the belief would be necessary.⁷

The subjective test – tends to show

38. An allegation with no support information is not sufficient to tend to show that wrongdoing has occurred or may be occurring; there must be sufficient information to support the allegation.⁸ If there is not enough information, the discloser may be asked to provide additional information.

Step 2.2 – an authorised officer decides if they are satisfied or not with the disclosure

If the authorised officer is so satisfied:

39. If the authorised officer is satisfied that the information is an internal disclosure, the disclosure would be allocated for further handling and investigation as outlined at [Step 3 below](#).

If the authorised officer is not so satisfied:

40. If the authorised officer is not satisfied that there is reasonable basis for considering the information to be an internal disclosure, it will not be allocated. If the disclosure is determined to not meet the legislative requirement for an internal disclosure, the authorised officer should make reasonable attempts to contact the discloser in writing and advise them of:
 - the reasons why the disclosure is not considered an internal disclosure, and
 - any other options that they might have under Commonwealth law.
41. The authorised officer may decide that the disclosure relates to conduct that may need to be addressed under another PBO policy or procedure (such as the *Human resources procedures – Determining suspected breaches of the Parliamentary Service Code of Conduct or Governance – Fraud control policy*).

Step 2.3 – allocate the disclosure

42. The authorised officer may allocate the handling of the disclosure to one or more agencies, including the PBO, the Ombudsman, the Inspector-General of Intelligence and Security (IGIS) or a prescribed investigative agency. In most cases, a PID involving suspected disclosable conduct relating to the PBO, will be allocated to the PBO, unless that is not appropriate.
43. When considering which agency (or agencies) to allocate a disclosure to, the authorised officer must consider the following principles:
 - an agency should not handle the disclosure unless some or all the disclosable conduct relates to that agency
 - if the agency is the Ombudsman, some or all the conduct relates to an agency other than an intelligence agency or the IGIS
 - if the agency is the IGIS, some or all the conduct relates to an intelligence agency

⁷ This could be based on direct observation of wrongdoing, evidence such as documentary records or missing items of value, or corroboration by other people.

⁸ The discloser does not need to prove their allegation. They only need to provide sufficient information to notify the PBO that disclosable conduct may have occurred or be occurring.

- if the agency is a prescribed investigative agency, that the agency has the power to investigate the disclosure otherwise than under the PID Act.
44. If the authorised officer intends to allocate a disclosure to another agency other than the PBO, this may only be done with the consent of an authorised officer of the other agency.

Step 2.4 – give notice of the allocation

45. Once the authorised officer decides to allocate a disclosure to an agency, they must inform:
- the principal officer of the agency to which the disclosure is allocated (if the disclosure is allocated to the PBO, the Parliamentary Budget Officer must be advised)
 - the Ombudsman (or the IGIS, if allocated to one of the intelligence agencies)
 - the discloser.

What records must the authorised officer make of their decision?

46. The authorised officer should make a written record of:
- their allocation decision, the reasons for the decision and the receiving agency's consent to the allocation (if allocated to another agency for handling)
 - whether the discloser was notified of the allocation decision and the details of how that happened
 - their risk assessment and any action taken to protect or support the discloser.

Step 3 – conduct a risk assessment

47. A risk assessment involves assessing the specific behaviour and circumstances that may result in reprisals. An accurate and objective risk assessment enables the PBO to put suitable strategies in place to treat the risks and defend itself against any allegations of having failed to protect a discloser.
48. An initial risk assessment should be completed as soon as practicable after a disclosure is received, or after the PBO is notified that a disclosure concerning the PBO has been received (for example, if the Ombudsman or investigative agency decides to investigate a disclosure made directly to them). The principal officer (Parliamentary Budget Officer) may appoint a PID risk reprisal officer to undertake the risk assessment.
49. The *Governance– Risk management framework and policy* outlines the PBO's overarching framework for identifying, responding to, and managing risk. **Attachment C** provides an example risk assessment matrix that may be used in conducting a risk assessment in response to a disclosure.

Risk assessment for anonymous disclosures

50. If an anonymous disclosure is made, a risk assessment should still be conducted to assess whether the discloser's identity can be readily ascertained or may become apparent during an investigation.

Support for disclosers

51. Regardless of the outcome of the risk assessment, the PBO will take all reasonable steps to provide active support for the discloser, including:
- acknowledgement for having come forward with a report of suspected wrongdoing
 - an offer of support and information about what options are available
 - an assurance that the PBO will take all reasonable steps necessary to protect them.

52. Apart from a manager (if appropriate) or an authorised officer, the following sources of support may be helpful to a discloser:
- friends and family
 - a peer support person appointed to check in on the wellbeing of the discloser regularly
 - PBO's Bullying and Harassment Support Officer (see *Human resources policy – Appropriate workplace behaviour* for details)
 - PBO's Employee Assistance Program.

Ongoing support requirements

53. The authorised officer or other appropriate officials involved in handling the PID should contact the discloser periodically to advise them of progress of their disclosure, considering confidentiality requirements, and ensure they are not suffering any detriment.
54. If a disclosure is not allocated for investigation or an investigation is unable to substantiate their allegations, sufficient information should be provided to help them understand the reasons.

Support for witnesses and other officials

55. The discloser may not be the only individual who requires support. Witnesses and any official who is the subject of allegations may find the PID process stressful. They should be advised of the arrangements the PBO has in place to support them, if required.

Reprisal is a crime

56. Taking reprisal action is a criminal offence, punishable by imprisonment for two years or 120 penalty units, or both. It is not necessary to prove that an individual made or intended to make a public interest disclosure, what is relevant is the intention and action (or omission) of the individual who took the reprisal.
57. An individual also commits an offence if they threaten to make a reprisal and either intend to threaten to cause fear or are reckless about this occurring. The threat may be expressed or implied, conditional, or unconditional. It is not necessary to prove that an individual who was threatened feared that the threat would be carried out.
58. If the PBO has evidence that an official employed by the agency has taken or threatened reprisal action, the matter may be referred to the Australian Federal Police. The PBO will also consider whether other administrative or disciplinary action is appropriate.

Step 4 – invest the disclosure

59. The principal officer, or their delegate are required to investigate a disclosure allocated to the PBO for handling under the PID Act.
60. An internal disclosure may be investigated in one of two ways:
- under a separate investigative power⁹
 - under the PID Act.
- In almost all circumstances, a disclosure allocated to the PBO would be investigated under the PID Act.
61. The starting point of the investigation is the information that is provided by the discloser. There are time limits for the investigation and requirements for a written investigation report.

⁹ Investigation under a separate investigative power is only relevant for disclosures allocated to the Ombudsman, IGIS or a prescribed investigative agency.

62. Who should investigate? The principal officer is responsible for conducting investigation and may delegate the investigative function to an officer who belongs to the PBO.¹⁰
63. Investigators must ensure that they have no actual or perceived conflict of interest. Unless there are compelling reasons not to do so, the investigator should be separate from the workgroup where the alleged wrongdoing has occurred.

PID investigation requirements

64. A PID investigation is conducted in a matter determined by the principal officer, or their delegate, subject to the requirements of the PID Standard. There are additional mandatory requirements for investigations into possible fraud or a possible breach of the Code of Conduct.

Time limit for investigations

65. Investigations under the PID Act must be completed within **90 days** of the date the disclosure was allocated for investigation. The PID investigation is complete when a report of the investigation is prepared.
66. If the PBO is unable to complete the investigation within the usual **90-day** period, the Ombudsman may grant one or more extensions of time.
67. Exceeding the time allowed under the PID Act does not invalidate the investigation. The PBO remains obligated to complete the PID investigation and prepare a report. If the investigation is not completed within **90 days** (or the longer period as granted by the Ombudsman), the discloser may be entitled to make an external disclosure under the PID Act.

An administrative investigate

68. An investigation under the PID Act is an administrative investigation. This means that the individual conducting the investigation must comply with the administrative law principles of general application (such as procedural fairness).
69. The formality of the investigation should be commensurate with the seriousness and nature of the alleged disclosable conduct and the importance of the evidence. The investigator's report should contain sufficient detail appropriate to the nature of the investigation.
70. General guidance for investigators can be found in the [Australian Government Investigation Standards 2011](#) (AGIS), issued by the Attorney-General.¹¹

PID Standards for conducting investigations

71. Part 3 of the PID Standard sets out mandatory requirements for PID investigations, that apply to all investigations under the PID Act.

Standard of proof

72. The standard of proof in a PID investigation is the civil standard – a fact is only taken to be proved if there is sufficient evidence to prove it 'on the balance of probabilities'. This means a principal officer, or their delegate, cannot make a finding that there has been disclosable conduct unless they are satisfied based on the evidence gathered during the investigation is more likely than not that the disclosable conduct has occurred.

Evidence

73. The evidence relied upon in a PID investigation must be relevant. Any finding of fact in a PID investigation must be based on logically probative evidence.

¹⁰ The delegate could be an individual already employed by the PBO or another individual contracted to conduct the investigation.

¹¹ The guidance provides information on topics such as investigation planning, interviewing witnesses and finalising investigations.

Procedural fairness

74. In an administrative investigation, the investigator must ensure that an individual subject to an allegation is accorded procedural fairness (also known as 'natural justice').
75. Procedural fairness does not mean that an individual must be told about any allegations made about them as soon as the disclosure is received, or an investigation has commenced. An individual who is subject to allegations of wrongdoing should be given information about their rights and obligations under the PID Act, and about the PBO's investigation procedures and any other relevant matter (such as Code of Conduct proceedings).

Maintaining confidentiality of the investigation

76. Disclosures should be assessed and investigated discreetly, with a strong emphasis on maintaining confidentiality of both the discloser and any individual who is the subject of the disclosure.
77. It is an offence for an individual who has information obtained while conducting a PID investigation or in connection with their powers and functions under the PID Act to disclose or use the information unless a relevant exemption applies.
78. To satisfy confidentiality requirements, the PBO will ensure that:
 - all paper and electronic records are secure and only able to be accessed by authorised officers, investigators and other officers involved in maintaining the disclosure
 - other materials such as interview taps are stored securely with access only by officers involved in handling the disclosure
 - communications and documents relating to the investigation are not sent to an email address to which other staff have access or to a printer or fax machine in an open area.

Is a different type of investigation appropriate?

79. Once an investigator has investigated the disclosure sufficient to reach a conclusion that one or more instances of disclosable conduct may have occurred, they may decide that it would be more appropriate for the matter to be dealt with under another Commonwealth law. Examples may include investigating alleged fraud or a possible breach of the Code of Conduct.
80. If another type of investigation is appropriate, the investigator may conclude at that point. The investigator must prepare a report and include details of what action has been taken, or will need to be taken, to refer the information on to be dealt with under other law or procedure.

Step 5 – prepare an investigation report

81. After an internal disclosure has been investigated, the principal officer, or their delegate, must prepare a written report of the investigation. The PID investigation is only completed when the principal officer has prepared the report.

Content of the PID investigation report

82. The PID investigation report must set out (where relevant):
 - the matters considered in the investigation, including
 - the disclosable conduct alleged by the discloser
 - any other possible disclosable conduct subsequently identified
 - the duration of the investigation (that is the number of days between allocation and the date the report was prepared)
 - the steps taken to gather evidence
 - a summary of the evidence

- the principal officer's findings, based on evidence including:
 - whether there was any disclosable conduct, and if so, what type
 - the laws, rules, and procedures which the disclosable conduct relates to
 - any action taken, or currently in train to address those findings¹²
 - recommendations about other action to address those findings.
83. If the investigation was inconclusive in any respect, the report should say so and explain why. If parts of the disclosed information were not investigated, the report should explain the reasons for the decision not to investigate those matters.

Findings of investigation

84. Any findings of fact made by the must be based on relevant evidence, sufficient to satisfy the principal officer, or their delegate, on the balance of probabilities of the existence of that fact
85. The report should also make a finding regarding any claims of detrimental action against the discloser.

Step 6 – provide the report to discloser

86. The principal officer must provide a copy of the report to the discloser within a reasonable time of preparing it (provided that contacting the discloser is reasonably practicable).
87. The copy of the report given to the discloser may have some information deleted if it is likely to enable the identification of any individual (the discloser or another individual, such as individual under investigation), or if including the information would cause the document to:
- be exempt for the *Freedom of Information Act 1982*
 - have a national security or other protective security clearance, or
 - contains intelligence information or sensitive law enforcement information.

After the investigation

88. What happens at the end of the investigation will vary with the circumstances. The principal officer must take appropriate action in response to recommendations and other matters contained in the investigation report.

What happens if the disclosure is not substantiated?

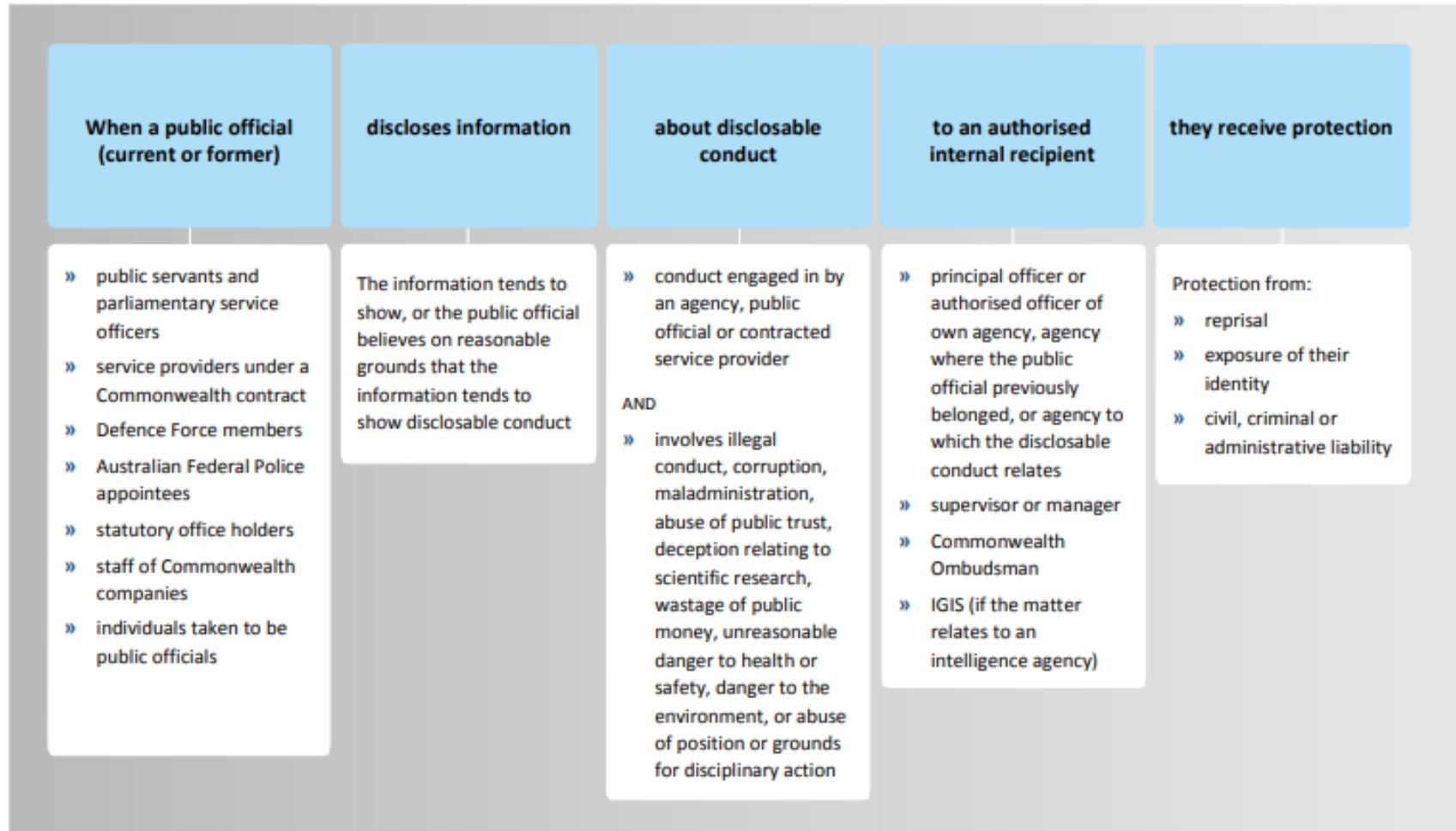
89. There may be several reasons why a disclosure is not substantiated, including insufficient evidence. The discloser should be given as much information as possible about the outcome of the investigation, consistent with the confidentiality limitations.
90. Regardless of the outcome, the discloser should be assured that they will still be protected under the PID Act for making a disclosure and that the PBO will continue to support them.

¹² The action to address the findings of the PID investigation could include a different type of investigation or referral of the matter to the police.

What if the discloser is not satisfied with the PBO's action?

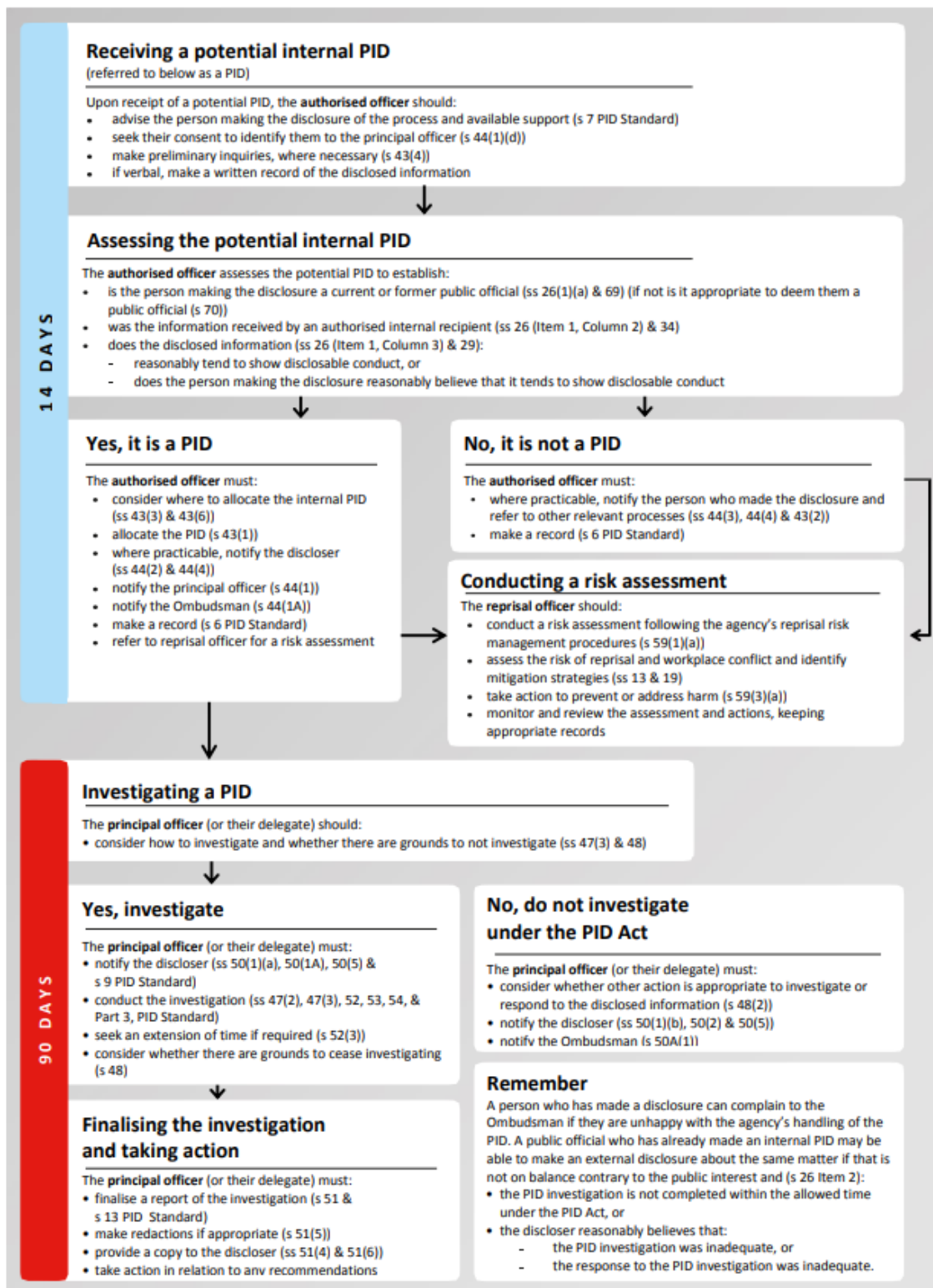
91. An individual who has made an internal disclosure may not be satisfied with the PBO's decision not to investigate the matter. If the disclosure is investigated, they may believe that the investigation or the PBO's response was inadequate. These are one of the conditions an individual may make an external disclosure.
92. A discloser who is unhappy with the process or how they have been treated may submit a complaint to the Ombudsman.

Attachment A – what is an internal public interest disclosure?



Source: Commonwealth Ombudsman (April 2016), *Agency guidance to the Public Interest Disclosure Act 2013*

Attachment B – Handling an internal disclosure under the PID Act



Source: Commonwealth Ombudsman (April 2016), *Agency guidance to the Public Interest Disclosure Act 2013*

Attachment C – Example risk assessment matrix

	Risk	Risk sources and impacts	Risk rating	Treatment strategies
1	Assault		Consequence: Likelihood: Risk rating:	
2	Verbal assault			
3	Stalking			
4	Cyber-bullying			
5	Silent treatment in the workplace			
6	Interference to personal items in workplace			
7	Excluded from legitimate access to information			
8	Excluded from promotion			
9	Excluded from workplace sanctioned social events			
10	Unjustified change to duties/hours of work			
11	Dismissal			
12	Unjustified refusal to leave			
13	Onerous/unjustified audit of ICT access/flex sheets			
14	Onerous/unjustified audit of expenditure of Commonwealth funds			
15	Other			