



Office
of Sport

Continuous Disclosure Policy and Procedure

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Document amendment history

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V1.0	Initial release	M. Audit, Risk & Governance	22/8/16	CDOC16/38779

Policy

1 Policy Statement

Continuous disclosure is one of the key components of an effective corporate governance framework to facilitate accountability and integrity.

The Office of Sport (OoS) will continuously disclose to the public and identified key stakeholders, information on current and planned work, performance outcomes and expenditure. This information will be disclosed through email, parliamentary reports and web-based publications with the OoS annual report being the main document to disclose key information on the OoS activities.

As required by the *Government Information (Public Access) Act 2009* (GIPA), the OoS also has a regularly reviewed program for the release of government information. The 'Proactive Release of GIPA Information' program provides for regular reviews and reporting to management on the public release of information under the GIPA Act.

1.1 Legislative context

The NSW Audit Office's *'Governance Lighthouse'*, developed as a best practice model of public sector governance, recommends the development and publication of a continuous disclosure policy as one of the key components of an effective governance framework (component 13).

2 Scope

This policy applies to all employees (permanent, temporary or contract) of the OoS.

3 Definitions

Continuous disclosure

Continuous disclosure in the public sector relates primarily to the regular public disclosure on

- information that a reasonable person would expect to have a material effect on service delivery and
- performance against corporate goals, key indicators and expenditure of public funds.

Management

All levels of management at the OoS, including Executive Directors, Directors and Managers.

4 Roles and Responsibilities

4.1 Chief Executive

The OoS Chief Executive (CE) has ultimate responsibility for ensuring the OoS continuously discloses relevant information to the public and key stakeholders and for encouraging the adoption of a continuous disclosure culture. The CE, in consultation with OoS legal and corporate advisors, will determine the "materiality" of information and the appropriate disclosure requirements.

4.2 Executive Director Corporate Services

The Executive Director, Corporate Services (ED CS) is accountable for ensuring management and staff are educated on the OoS continuous disclosure policy and procedure requirements. The ED CS is also responsible for ensuring the development and execution of a program for the 'Proactive Release of GIPA Information' and other proactive and reactive disclosure requirements.

4.3 Managers

Management at all levels are accountable for the regular identification, collation, provision and review of information to be disclosed to the public and key stakeholders. Information is to be current, relevant and balanced. All managers are responsible for demonstrating a commitment to continuous disclosure.

Procedure

5 Continuous Disclosure Process

Continuous disclosure strengthens transparent decision-making and other government processes and provides opportunities for agencies to better meet stakeholder requirements and expectations. A pro-disclosure culture can also assist agencies to regularly inform the public of any significant issues (both positive and negative) as and when they occur.

5.1 Identify Key Stakeholders and their Information Needs

To achieve an effective disclosure environment, managers will identify key stakeholders and

- Determine the specific information needs and requirements of each stakeholder group
- Consider stakeholders access to available and relevant information
- Seek stakeholder feedback regarding their disclosure expectations and perceived needs
- Manage stakeholder expectations by providing ongoing strategic planning updates, details of specific events, annual and interim reporting and budget processes, if relevant and
- Ensure information is easily accessible, easy to understand and widely disseminated.

5.2 Determine Mandated and Internal Reporting Timeframes

Managers will identify any mandated and internal reporting timeframes and ensure processes are in place to gather the required information to ensure reporting is made within the required timeframes.

5.3 Maintain the Website

Managers will ensure processes are in place to maintain the currency, relevancy and balance of required continuous disclosure information on the website within their span of control.

5.4 Support a Continuous Disclosure Culture

Managers will demonstrate a commitment to continuous disclosure. There are a number of advantages in adopting a continuous disclosure culture including

- Good governance
- Open government
- A better informed public on government decision-making processes and the impact of decisions on them (the 'public interest test')
- Supporting evaluation of the success of government activities
- Maintaining the public's confidence in the integrity of government
- Meeting stakeholder obligations and
- Compliance with relevant regulations and legislation i.e. the GIPA Act.