

3.1 PURCHASING POLICY

Policy Owner:	Corporate and Community Services
Person Responsible:	Deputy Chief Executive Officer, Senior Finance Officer
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Objective: The Shire of Corrigin (the Shire) is committed to delivering best practice in the purchasing of goods, services and works that align with the principles of transparency, probity and good governance and complies with the *Local Government Act 1995* (the Act) and Part 4 of the *Local Government (Functions and General) Regulations 1996*, (the Regulations) Procurement processes and practices to be complied with are defined within this policy and the Shire's prescribed procurement procedures.

Policy: Ensure that all purchasing activities:

- demonstrate that best value for money is attained for the Shire.
- are compliant with relevant legislations, including the Act and Regulations.
- are recorded in compliance with the *State Records Act 2000* and associated records management practices and procedures of the Shire.
- mitigate probity risk, by establishing consistent and demonstrated processes that promotes openness, transparency, fairness, and equity to all potential suppliers.
- ensure that the sustainable benefits, such as environmental, social, and local economic factors are considered in the overall value for money assessment; and
- are conducted in a consistent and efficient manner across the Shire and that ethical decision making is demonstrated.

1. Ethics and Integrity

1.1 Code of Conduct

All officers and employees of the Shire undertaking purchasing activities must have regard for the Code of Conduct requirements and shall observe the highest standards of ethics and integrity. All officers and employees of the Shire must always act in an honest and professional manner which supports the standing of the Shire.

1.2 Purchasing Principles

The following principles, standards and behaviours must be observed and enforced through all stages of the purchasing process to ensure the fair and equitable treatment of all parties:

- full accountability shall be taken for all purchasing decisions and the efficient, effective, and proper expenditure of public monies based on achieving value for money.
- all purchasing practices shall comply with relevant legislation, regulations, and requirements consistent with the Shire's policies and Code of Conduct.
- purchasing is to be undertaken on a competitive basis where all potential suppliers are treated impartially, honestly, and consistently.
- all processes, evaluations and decisions shall be transparent, free from bias and fully documented in accordance with applicable policies, audit requirements and relevant legislation.
- any actual or perceived conflicts of interest are to be identified, disclosed, and appropriately managed; and

- any information provided to the Shire by a supplier shall be treated as commercial-in-confidence and should not be released unless authorised by the supplier or relevant legislation.

2. Value for Money

2.1 Policy

Value for money is determined when the consideration of price, risk and qualitative factors that are assessed to determine the most advantageous outcome to be achieved for the Shire.

As such, purchasing decisions must be made with greater consideration than obtaining lowest price, but also to incorporate qualitative and risk factors into the decision.

2.2 Application

An assessment of the best value for money outcome for any purchasing process should consider:

- all relevant Total Costs of Ownership (TCO) and benefits including transaction costs associated with acquisition, delivery, distribution, as well as other costs such as but not limited to holding costs, consumables, deployment, maintenance, and disposal.
- the technical merits of the goods or services being offered in terms of compliance with specifications, contractual terms and conditions and any relevant methods of assuring quality, including but not limited to an assessment of levels and currency of compliances, value adds offered, warranties, guarantees, repair and replacement policies, ease of inspection, ease of after sales service, ease of communications etc.
- financial viability and capacity to supply without risk of default (competency of the prospective suppliers in terms of managerial and technical capabilities and compliance history).
- a strong element of competition in the allocation of orders or the awarding of contracts. This is achieved by obtaining a sufficient number of competitive quotations wherever practicable.
- the safety requirements associated with both the product design and specification offered by suppliers and the evaluation of risk when considering purchasing goods and services from suppliers.
- purchasing of goods and services from suppliers that demonstrate sustainable benefits and good corporate social responsibility; and
- providing opportunities for businesses within the Shire's boundaries to be given the opportunity to quote for providing goods and services wherever possible.

3. Purchasing Requirements

3.1 Legislative / Regulatory Requirements

The requirements that must be complied with by the Shire, including purchasing thresholds and processes, are prescribed within the Regulations, this Policy and associated purchasing procedures in effect at the Shire.

3.2 Policy

Purchasing that is **\$250,000 or below in total value** (excluding GST) must be in accordance with the purchasing requirements under the relevant threshold as defined under section 3.5 of this Purchasing Policy.

Purchasing that **exceeds \$250,000 in total value** (excluding GST) must be put to public Tender when it is determined that a regulatory Tender exemption, as stated under 4.5 of this Policy is not deemed to be suitable.

3.3 Purchasing Value Definition

Determining purchasing value is to be based on the following considerations:

3.3.1 Exclusive of Goods and Services Tax (GST).

3.3.2 The actual or expected value of a contract over the full contract period, including all options to extend; or the extent to which it could be reasonably expected that the Shire will continue to purchase a particular category of goods, services or works and what total value is or could be reasonably expected to be purchased. A best practice suggestion is that if a purchasing threshold is reached within three years for a particular category of goods, services or works, then the purchasing requirement under the relevant threshold (including the tender threshold) must apply.

3.3.3 Must incorporate any variation to the scope of the purchase and be limited to a 10% tolerance of the original purchasing value.

3.4 Purchasing from Existing Contracts

Where the Shire has an existing contract in place, it must ensure that goods and services required are purchased under these contracts to the extent that the scope of the contract allows. When planning the purchase, the Shire must consult its Contracts Register in the first instance before seeking to obtain quotes and tenders on its own accord.

3.5 Purchasing Thresholds

The table below prescribes the purchasing process that the Shire must follow, based on the purchase value:

Purchase Value Threshold	Purchasing Requirement
Up to \$1,000	Purchase directly from a supplier using a Purchase Order or credit card issued by the Shire.
Over \$1,000 and up to \$5,000	Obtain at least one (1) oral or written quotation from a suitable supplier, either from: <ul style="list-style-type: none"> an existing panel of pre-qualified suppliers administered by the Shire; or a pre-qualified supplier on the WALGA Preferred Supply Program or State Government Common Use Arrangement (CUA); or from the open market. Where the purchase is of an urgent or emergency nature the purchase is permitted without a quote.
Over \$5,000 and up to \$50,000	Obtain at least two (2) written quotations from suppliers following a brief outlining the specified requirement, either from: <ul style="list-style-type: none"> an existing panel of pre-qualified suppliers administered by the Shire; or from the open market. <p style="text-align: center;">Or</p> Obtain at least one (1) written quotation from a pre-qualified supplier on the WALGA Preferred Supply Program or State Government CUA.

	Where the purchase is of an urgent or emergency nature the purchase is permitted without undertaking the quotation process.
Purchase Value Threshold	Purchasing Requirement
Over \$50,000 and up to \$250,000	<p>Obtain at least three (3) written quotations from suppliers by formal invitation under a Request for Quotation, containing price and detailed specification of goods and services required. The procurement decision is to be based on pre-determined evaluation criteria that assesses all value for money considerations in accordance with the definition stated within this Policy.</p> <p>Quotations within this threshold may be obtained from:</p> <ul style="list-style-type: none"> • an existing panel of pre-qualified suppliers administered by the Shire; or • a pre-qualified supplier on the WALGA Preferred Supply Program or State Government CUA; or • from the open market. <p>Requests for quotation from a pre-qualified panel of suppliers (whether administered by the Shire through the WALGA preferred supply program or State Government CUA) are not required to be invited using a Request for Quotation form, however at least three written quotes are still required to be obtained.</p>
Over \$250,000	Where the purchasing requirement is not suitable to be met through a panel of pre-qualified suppliers, or any other tender-exempt arrangement as listed in this Policy, conduct a public Request for Tender process in accordance with Part 4 of the <i>Local Government (Functions and General) Regulations 1996</i> , this policy and the Shire's tender procedures. The procurement decision is to be based on pre-determined evaluation criteria that assesses all value for money considerations in accordance with the definition stated within this Policy.
Emergency Purchases (Within Budget)	<p>Where goods or services are required for an emergency response and are within scope of an established Panel of Pre-qualified Supplier or existing contract, the emergency supply must be obtained from the Panel or existing contract using relevant unallocated budgeted funds.</p> <p>Where due to the urgency of the situation; a contracted or tender exempt supplier is unable to provide the emergency supply <u>OR</u> compliance with this Purchasing Policy would cause unreasonable delay, the supply may be obtained from any supplier capable of providing the emergency supply. An emergency supply is only to be obtained to the extent necessary to facilitate the urgent emergency response and must be subject to due consideration of best value and sustainable practice.</p>

	The rationale for policy non-compliance and the purchasing decision must be evidenced in accordance with the Shire of Corrigin Record Keeping Plan.
Emergency Purchases <i>No budget allocation available)</i>	Where no relevant budget allocation is available for an emergency purchasing activity then, in accordance with s.6.8 of the <i>Local Government Act 1995</i> , the President must authorise, in writing, the necessary budget adjustment prior to the expense being incurred. The CEO is responsible for ensuring that an authorised emergency expenditure under s.6.8 is reported to the next ordinary Council Meeting. The Purchasing Practices prescribed for Emergency Purchases (within budget) above, then apply.
LGIS Services Section 9.58(6)(b) <i>Local Government Act 1995</i>	The suite of LGIS insurances are established in accordance with s.9.58(6)(b) of the <i>Local Government Act 1995</i> and are provided as part of a mutual, where WALGA Member Local Governments are the owners of LGIS. Therefore, obtaining LGIS insurance services is available as a member-base service and is not defined as a purchasing activity subject to this Policy. Should Council resolve to seek quotations from alternative insurance suppliers, compliance with this Policy is required.

3.6 Tendering Exemptions

An exemption to publicly invite tenders may apply in the following instances:

- the purchase is obtained from a pre-qualified supplier under the WALGA Preferred Supply Program or State Government Common Use Arrangement.
- the purchase is from a Regional Local Government or another Local Government.
- the purchase is acquired from an Australian Disability Enterprise and represents value for money.
- the purchase is from a pre-qualified supplier under a Panel established by the Shire; or
- any of the other exclusions under Regulation 11 of the Regulations apply.
- the purchase is acquired from a person registered on the WA Aboriginal Business Directory, as published by the Small Business Development Corporation, where the consideration under contract is worth \$250,000 or less and represents value for money.
- an emergency situation as defined by the *Local Government Act 1995*.
- the purchase is from a Department of Finance Common Use Arrangements (where Local Government use is permitted), a Regional Local Government or another Local Government.
- the purchase is under auction that has been authorised by Council.
- the contract is for petrol, oil, or other liquid or gas used for internal combustion engines; or

3.7 Inviting Tenders Under the Tender Threshold

Where considered appropriate and beneficial, the Shire may consider publicly advertising Tenders in lieu of undertaking a Request for Quotation for purchases under the tender threshold. This decision should be made after considering the benefits of this approach in comparison with the costs, risks, timeliness, and

compliance requirements and whether the purchasing requirement can be met through the WALGA Preferred Supply Program or State Government CUA.

If a decision is made to undertake a public Tender for contracts expected to be \$250,000 or less in value, the Shire's tendering procedures must be followed in full.

3.8 Expressions of Interest

Expressions of Interest (EOI) will be considered as a prerequisite to a tender process (Functions and General Regulation 21) where the required supply evidence one or more of the following criteria:

- a) Unable to sufficiently scope or specify the requirement.
- b) There is significant variability for how the requirement may be met.
- c) There is potential for suppliers to offer unique solutions and / or multiple options for how the purchasing requirement may be obtained, specified, created, or delivered.
- d) Subject to a creative element; or
- e) Provides a procurement methodology that allows for the assessment of a significant number of potential tenderers leading to a shortlisting process based on non-price assessment.

All EOI processes will be based upon qualitative and other non-price information only.

3.9 Unique Nature of Supply / Sole Source of Supply

Where the purchasing requirement is over the value of \$5,000 and of a unique nature that can only be supplied from one supplier, the purchase is permitted without undertaking a tender or quotation process. This is only permitted in circumstances where the Shire is satisfied and can evidence that there is only one source of supply for those goods, services or works. The Shire must use its best endeavours to determine if the sole source of supply is genuine by exploring if there are any alternative sources of supply. Once determined, the justification must be referenced on the Purchase Order prior to a contract being entered into.

From time to time, the Shire may publicly invite an expression of interest to effectively determine that one sole source of supply still genuinely exists.

3.10 Anti-Avoidance

The Shire shall not enter into two or more contracts or create multiple purchase order transactions of a similar nature for the purpose of "splitting" the value of the purchase or contract to take the value of the consideration of the purchase below a particular purchasing threshold, particularly in relation to Tenders and to avoid the need to call a public Tender.

3.11 Emergency Purchases

An emergency purchase is defined as an unanticipated and unbudgeted purchase which is required in response to an emergency situation, or imminent risk to public safety to protect or make safe property of infrastructure assets, as provided for in the *Local Government Act 1995*. In such instances, quotes and tenders are not required to be obtained prior to the purchase being undertaken.

An emergency purchase does not relate to purchases not planned for due to time constraints. Every effort must be made to anticipate purchases required by the Shire in advance and to allow sufficient time to obtain quotes and tenders, whichever may apply.

A State of Emergency declared under the *Emergency Management Act 2005* and therefore, Functions and General Regulations 11(2)(aa), (ja) and (3) apply to vary the application of this policy.

3.12 Contract Renewals, Extensions and Variations

Where a contract has been entered into as the result of a publicly invited tender process, then *Functions and General Regulation 21A* applies.

For any other contract, the contract must not be varied unless

- a) The variation is necessary in order for the goods or services to be supplied and does not change the scope of the contract; or
- b) The variation is a renewal or extension of the term of the contract where the extension or renewal options were included in the original contract.

Upon expiry of the original contract, and after any options for renewal or extension included in the original contract have been exercised, the shire is required to review the purchasing requirements and commence a new competitive purchasing process in accordance with this Policy

A decision to approve a contract variation must be made by Council resolution, unless within the *Functions and General Regulations 20 and / or 21A* delegated authority of the CEO.

4. Records Management

Records of all purchasing activity must be retained in compliance with the *State Records Act 2000 (WA)*, the Shire's Records Management Policy and associated procurement procedures.

For each procurement activity, such documents may include:

- The Procurement initiation document such as a procurement business case which justifies the need for a contract to be created (where applicable).
- Procurement Planning and approval documentation which describes how the procurement is to be undertaken to create and manage the contract.
- Request for Quotation/Tender documentation.
- Copy of public advertisement inviting tenders, or the notice of private invitation (whichever is applicable).
- Copies of quotes/tenders received.
- Evaluation documentation, including individual evaluators note and clarifications sought.
- Negotiation documents such as negotiation plans and negotiation logs.
- Approval of award documentation.
- All correspondence to respondents notifying of the outcome to award a contract.
- Contract Management Plans which describe how the contract will be managed; and
- Copies of contract(s) with supplier(s) formed from the procurement process.

5. Sustainable Procurement and Corporate Social Responsibility

The Shire is committed to providing a preference to suppliers that demonstrate sustainable business practices and high levels of corporate social responsibility (CSR).

Where appropriate, the Shire shall endeavour to provide an advantage to suppliers demonstrating that they minimise environmental and negative social

impacts and embrace CSR. Sustainable and CSR considerations must be balanced against value for money outcomes in accordance with the Shire's sustainability objectives.

6. Buy Local Policy

As much as practicable, the Shire must:

- where appropriate, consider buying practices, procedures and specifications that do not unfairly disadvantage local businesses.
- consider indirect benefits that have flow on benefits for local suppliers (i.e., servicing and support).
- ensure that procurement plans address local business capability and local content.
- explore the capability of local businesses to meet requirements and ensure that Requests for Quotation and Tenders are designed to accommodate the capabilities of local businesses.
- avoid bias in the design and specifications for Requests for Quotation and Tenders – all Requests must be structured to encourage local businesses to bid; and
- provide adequate and consistent information to potential suppliers.

To this extent, a qualitative weighting may be afforded in the evaluation of quotes and tenders where suppliers are located within the boundaries of the Shire, or substantially demonstrate a benefit or contribution to the local economy.

A regional price preference may be afforded to locally based businesses for the purposes of assessment. Provisions are detailed within Council Policy 2.11 *Regional Price Preference*.

7. Exemptions

The following exemptions to the Purchasing Thresholds and Processes apply:

- Live Shows, Artistic Performances, Digital Movies: For the procurement of live shows, artistic performances, and digital movies a purchase order is required to be raised, however, only one quotation needs to be obtained due to there being only one supplier.
- Insurance (LGIS) brokers, utilities, and the like: For the procurement of Insurance (LGIS) brokerage and utilities normally only one supplier is available.
- Staff Corporate Uniforms: The staff corporate uniform is exempt from seeking quotations.
- All Freight: All freight is exempt from seeking quotations but where possible attain the best price for the best required freight service.
- Travel/Airfares: The procurement of airfares for travel purposes is exempt from seeking quotations but the Shire must be equitable in procuring this service from all local travel suppliers if and when the pricing is comparable.
- Staff Housing (Leasing of Property): Leasing property for the purpose of providing staff housing is exempt from seeking quotations but the Shire must be equitable in procuring this service from all local suppliers if and when the pricing is comparable, taking into consideration what housing is required to accommodate staff needs and what is available on the rental market at that time.
- Souvenirs and Tourism Merchandise For the procurement of souvenirs and tourism merchandise for on sale at the Shire office or Resource Centre, these items will be exempt from seeking quotations provided the quality of the merchandise is proven or known.
- Subscriptions

The list of individualised purchases from local suppliers below are exempt from quotations but purchases need to be alternated between those local suppliers in respect to each individualised purchase. Comparing price, quality and service factors must be taken into account; should purchase items be of the same quality and service, then the lowest priced local supplier should be engaged for the purchase:

- Newspapers, books, and periodical deliveries purchased locally for in-house provision and for the Shire are exempt from seeking quotations.
- Catering of Food Catering of food from local suppliers for in-house meetings (not external meetings or events) are exempt from seeking quotations.
- Catering of alcoholic and non-alcoholic drinks including milk and water from local suppliers for in-house provision and for Shire events/functions are exempt from seeking quotations.
- Stationery items

8. Purchasing From Disability Enterprises

Local Government (Functions and General) Regulations 1996 Regulation 11(2)(i) provides a tender exemption if the goods or services are supplied by an Australian Disability Enterprise.

The Shire of Corrigin will first consider undertaking a quotation process with other suppliers (which may include other Australian Disability Enterprises) to determine overall value for money for the shire.

Where the Shire of Corrigin makes a determination to contract directly with an Australian Disability Enterprise for any amount, including an amount over the Tender threshold of \$250,000 (ex GST), it must be satisfied through alternative means that the offer truly represents value for money.

If the contract value exceeds \$50,000 (ex GST), a formal Request for Quotation will be issued to the relevant business. The rationale for making the purchasing decision must be recorded in accordance with the Shire of Corrigin Record Keeping Plan.

A qualitative weighting may be afforded in the evaluation of quotes and tenders to provide advantages to Australian Disability Enterprises.

9. Panels of Pre-Qualified Suppliers

9.1 Policy Objectives

In accordance with Regulation 24AC of the *Local Government (Functions and General) Regulations 1996*, a Panel of Pre-qualified Suppliers ("Panel") may be created where most of the following factors apply:

- the Shire determines that a range of similar goods and services are required to be purchased on a continuing and regular basis.
- there are numerous potential suppliers in the local and regional procurement-related market sector(s) that satisfy the value for money test.
- the purchasing activity under the intended Panel is assessed as being of a low to medium risk.
- the Panel will streamline and will improve procurement processes; and
- the Shire has the capability to establish, manage the risks and achieve the benefits expected of the proposed Panel.

The Shire will endeavour to ensure that Panels will not be created unless most of the above factors are firmly and quantifiably established.

9.2 Establishing a Panel

Should the Shire determine that a Panel is beneficial to be created, it must do so in accordance with Part 4, Division 3 the *Local Government (Functions and General) Regulations 1996*. Panels may be established for one supply requirement, or a number of similar supply requirements under defined categories within the Panel.

Panels may be established for a minimum of two (2) years and for a maximum length of time deemed appropriate by the Shire. Evaluation criteria must be determined and communicated in the application process by which applications will be assessed and accepted.

Where a Panel is to be established, the Shire will endeavour to appoint at least three (3) suppliers to each category, on the basis that best value for money is demonstrated. Where less than three (3) suppliers are appointed to each category within the Panel, the category is not to be established.

In each invitation to apply to become a pre-qualified supplier (through a procurement process advertised through a state-wide notice), the Shire must state the expected number of suppliers it intends to put on the panel. Should a Panel member leave the Panel, they may be replaced by the next ranked Panel member determined in the value for money assessment should the supplier agree to do so, with this intention to be disclosed in the detailed information set out under Regulation 24AD(5)(d) and (e) when establishing the Panel.

9.3 Distributing Work Amongst Panel Members

To satisfy Regulation 24AD(5) of the Regulations, when establishing a Panel of pre-qualified suppliers, the detailed information associated with each invitation to apply to join the Panel must either prescribe whether the Shire intends to:

9.3.1 Obtain quotations from each pre-qualified supplier on the Panel with respect to all purchases, in accordance with Clause 0; or

9.3.2 Purchase goods and services exclusively from any pre-qualified supplier appointed to that Panel, and under what circumstances; or

9.3.3 Develop a ranking system for selection to the Panel, with work awarded in accordance with Clause 0(b).

In considering the distribution of work among Panel members, the detailed information must also prescribe whether:

a) each Panel member will have the opportunity to bid for each item of work under the Panel, with pre-determined evaluation criteria forming part of the invitation to quote to assess the suitability of the supplier for particular items of work. Contracts under the pre-qualified panel will be awarded on the basis of value for money in every instance; or

b) work will be awarded on a ranked basis, which is to be stipulated in the detailed information set out under Regulation 24AD (5) (f) when establishing the Panel. The Shire is to invite the highest ranked Panel member, who is to give written notice as to whether to accept the offer for the work to be undertaken. Should the offer be declined, an invitation to the next ranked Panel member is to be made and so forth until a Panel member accepts a Contract.

Should the list of Panel members invited be exhausted with no Panel member accepting the offer to provide goods/services under the Panel, the Shire may then invite suppliers that are not pre-qualified under the

Panel, in accordance with the Purchasing Thresholds stated in section 5.5 of this Policy. When a ranking system is established, the Panel must not operate for a period exceeding 12 months.

In every instance, a contract must not be formed with a pre-qualified supplier for an item of work beyond 12 months, which includes options to extend the contract.

9.4 Purchasing from the Panel

The invitation to apply to be considered to join a panel of pre-qualified suppliers must state whether quotations are either to be invited to every member (within each category, if applicable) of the Panel for each purchasing requirement, whether a ranking system is to be established, or otherwise.

Each quotation process, including the invitation to quote, communications with panel members, quotations received, evaluation of quotes and notification of award communications must all be made through eQuotes, or any other electronic quotation facility.

9.5 Recordkeeping

Records of all communications with Panel members, with respect to the quotation process and all subsequent purchases made through the Panel, must be kept.

For the creation of a Panel, this includes:

- The Procurement initiation document such as a procurement business case which justifies the need for a Panel to be created.
- Procurement Planning and approval documentation which describes how the procurement is to be undertaken to create and manage the Panel.
- Request for Applications documentation.
- Copy of public advertisement inviting applications.
- Copies of applications received.
- Evaluation documentation, including clarifications sought.
- Negotiation documents such as negotiation plans and negotiation logs.
- Approval of award documentation.
- All correspondence to applicants notifying of the establishment and composition of the Panel such as award letters.
- Contract Management Plans which describe how the contract will be managed; and
- Copies of framework agreements entered into with pre-qualified suppliers.

The Shire is also to retain itemised records of all requests for quotation, including quotations received from pre-qualified suppliers and contracts awarded to Panel members. A unique reference number shall be applied to all records relating to each quotation process, which is to also be quoted on each purchase order issued under the Contract.

Information with regards to the Panel offerings, including details of suppliers appointed to the Panel, must be kept up to date, consistent and made available for access by all officers and employees of the Shire.

10. Purchasing Policy Non Compliance

The Purchasing Policy is mandated under the *Local Government Act 1995* and Regulation 11A of the *Local Government (Functions and General) Regulations 1996* and therefore the policy forms part of the legislative framework in which the Local Government is required to conduct business.

Where legislative or policy compliance is not reasonably able to be achieved, records must evidence the rationale and decision making processes that substantiate the non-compliance.

Purchasing activities are subject to internal and external financial and performance audits, which examine compliance with legislative requirements and the Shire of Corrigin policies and procedures.

If non-compliance with; legislation, this Purchasing Policy, or the Code of Conduct, is identified it must be reported to the Chief Executive officer or the Deputy Chief Executive Officer. A failure to comply with legislation or policy requirements, including compliance with the Code of Conduct when undertaking purchasing activities, may be subject to investigation, with findings to be considered in context of the responsible person's training, experience, seniority, and reasonable expectations for performance of their role.

Where a breach is substantiated, it may be treated as:

- a) an opportunity for additional training to be provided.
- b) a disciplinary matter, which may or may not be subject to reporting requirements under the *Public Sector Management Act 1994*; or
- c) where the breach is also identified as potentially serious misconduct, the matter will be reported in accordance with the *Corruption, Crime and Misconduct Act 2003*.