



Future Health Research and Innovation Fund Advisory Council

Code of Conduct

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Policy Reference: FFAC-P-2

Version: 2.0

1. Introduction

The Western Australian Future Health Research and Innovation (FHRI) Fund Advisory Council (Advisory Council) is an advisory body established¹ by the Minister for Medical Research (the Minister)² under the *Western Australian Future Health Research and Innovation Fund Act 2012* (the Act).³

The Act provides for the Advisory Council to determine its own procedure subject to any matters determined by the Minister for Medical Research (the Minister).⁴

The Advisory Council is subject to:

- legislative requirements under the Act
- requirements set out in the Instruments of Appointment
- the Advisory Council governance and policy documents and
- the *FHRI Scheme Governance Framework* (the *Governance Framework*)
- any Statement of Expectation issued by the Minister.

This *Code of Conduct* should be read in conjunction with the documents listed above.

2. Purpose

The purpose of the *Code of Conduct* is to set out the standards of ethical and professional conduct with which the Advisory Council must comply.

3. Applicability

The *Code of Conduct* applies to the Chair and all members of the Advisory Council, whenever conducting the business of, or representing, the Advisory Council. This includes voting and non-voting members, any alternate member appointed under section 4H(5) of the Act and any nominee under sections 4G(3)(a), (b).

4. Mandatory requirements

Compliance with the *Code of Conduct* is a condition of appointment as a member of the Advisory Council as specified in the relevant Instrument of Appointment.

Advisory Council members are required to sign an acknowledgment of having read and understood the *Code of Conduct* (refer Appendix 1).

The *Code of Conduct* is based on the resources and relevant instructions of the Public Sector Commission⁵ consistent with directions contained in the Premier's Circular 2025/15 'State Government Boards and Committees'.⁶

Members must comply with the following policies and procedures of the Advisory Council:

- Charter (Policy Ref: FFAC-P-1)
- Code of Conduct (Policy Ref: FFAC-P-2)

¹ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4G.

² Whilst the Act references the Minister for Health, on 08/02/2022 the Governor committed the Act (except Part 3) to the Minister for Medical Research and all references to the Minister for Health in the Act are to be read as the Minister for Medical Research.

³ [Western Australian Future Health Research and Innovation Fund Act 2012 \(WA\)](#)

⁴ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4H(2,3).

⁵ Public Sector Commission (PSC), *Governance Manual for WA Government Boards and Committees* (October 2023), Government of Western Australia, 2023; PSC, 'Commissioner's Instruction 40 Ethical Foundations', Government of Western Australia, 2023.

⁶ Department of Premier and Cabinet (DPC), *Premier's Circular 'State Government Boards and Committees'*, Number 2025/15 Issued 01/07/2025, Government of Western Australia, 2025.

- Conflict of Interest Policy (Policy Ref: FFAC-P-3)
- Gifts, Benefits and Hospitality Policy (Policy Ref: FFAC-P-4)

5. Standards of Conduct and Integrity

The foundations of the *Code of Conduct* are to be consistent with the Public Sector Code of Ethics, as required by the Public Sector Commission *Commissioner's Instruction 40 Ethical Foundations*.

Accordingly, this *Code of Conduct* defines the minimum standards of conduct and integrity for Advisory Council members as follows:

Standard 1: Integrity

- We act honestly and uphold the trust placed in us by the community
- We use our position and authority for the purpose intended.
- We provide objective and timely advice to the government of the day.
- We ensure our behaviour upholds the good reputation of our public sector body and the public sector.

Standard 2: Impartiality

- We make considered and unbiased decisions based on merit.
- We place the public interest over our personal interest.
- We declare and manage conflicts of interest.
- We implement government priorities, policies and decisions impartially.

Standard 3: Respect for others.

- We communicate with and treat people with respect.
- We treat people fairly, having regard for their diverse backgrounds.
- We work together constructively, inclusively and professionally.

Standard 4: Trust and accountability

- We take accountability for our time, decisions, actions and behaviours.
- We are responsive and provide considered advice and information to our clients, customers and stakeholders.
- We make decisions that ensure the best use of resources for now and the future.
- We access, use and disclose information only where we are authorised to do so.
- We record our decisions for transparency allowing for review and scrutiny.

Integrity in decision-making can be guided by the following 4 questions that relate to honesty, transparency, diligence and consistency:⁷

- Am I doing the right thing?
- How would others judge my actions?
- How could my actions impact on others?
- Should I discuss this with someone else?

Further information on practical aspects and guidance for Advisory Council members in matters relating to conduct and integrity is provided in Appendix 2.

⁷ PSC, *Governance Manual for WA Government Boards and Committees (October 2023)*, Government of Western Australia, 2023.

6. Non-compliance with the *Code of Conduct*

Suspected non-compliance with the *Code of Conduct* may be reported either to the Chair of the Advisory Council or the Director General of the Department of Health. However suspected non-compliance with the *Code of Conduct* where alleged misconduct may have occurred, must be reported in accordance with the Advisory Council's misconduct process set out in the Advisory Council's *Charter*.

Further information on definitions and reporting of misconduct is provided in Appendix 3.

7. Training

Training is to be undertaken as part of induction and refresher training to be undertaken no less than every three years by each Advisory Council member. This training is via the Department of Health 'Accountable and Ethical Decision-making' (AEDM) training course and with consideration of the *Code of Conduct*.

8. Compliance and monitoring

Advisory Council members must sign the Acknowledgement Form as soon as practicable when commencing as a new or reappointed member (refer Appendix 1). Advisory Council members must provide the signed Acknowledgement Form before undertaking any role as an Advisory Council member. The Chair of the Advisory Council is responsible for monitoring compliance via signing for the receipt of the Acknowledgement Form. Compliance with the *Code of Conduct* will be monitored through the following:

- using review processes to assess compliance with the *Code of Conduct* and adherence to associated policies and guidelines, for example, a review of the Advisory Council's *Gifts, Benefits and Hospitality Register*
- performance evaluation surveys of Advisory Council members
- review of any feedback, complaints or issues raised.

The Chair is supported by the secretariat in monitoring and review activities.

9. Record keeping

The secretariat will maintain the corporate files of relevant information including:

- Acknowledgement Forms (Form Ref: FFAC-P-2-F-1)
- related correspondence and papers

The files are the property of the Department of Health. Record keeping obligations must be complied with, including those obligations under the *State Records Act 2000* (WA) and the *Freedom of Information Act 1992* (WA).

10. Related policies and supporting information

The following information relates to, or informs and/or supports, the implementation of this *Code of Conduct*:

Advisory Council policies

- *Advisory Council Charter* (Policy Ref: FFAC-P-1)
- *Advisory Council Conflicts of Interest Policy* (Policy Ref: FFAC-P-3)
- *Advisory Council Gifts, Benefits and Hospitality Policy* (Policy Ref: FFAC-P-4)

Government resources

- Premier's Circular 2025/15 State Government Boards and Committees
- Public Sector Commission: *Governance Manual for Western Australian Government Boards and Committees (October 2023)*
- Public Sector Commission *Commissioner's Instruction 40 Ethical Foundations*
- Public Sector Commission *Commissioner's Instruction 16 Government Representatives Contact with Registrants and Lobbyists*
- Public Sector Commission website www.psc.wa.gov.au
 - Conduct and integrity
 - Governance of WA government Boards and Committees
 - Remuneration for Government Boards and Committees
 - Commissioner's Instructions
- Corruption and Crime Commission website www.ccc.wa.gov.au

11. Document control

Approval

The Advisory Council is authorised to determine its own procedure subject to any matters determined by the Minister.⁸ The Advisory Council is responsible for approval of this *Code of Conduct*.

Review

The Advisory Council will review this *Code of Conduct* annually, or at another interval not exceeding five years.

Document Control table

Version	Effective from	Effective to	Approved date	Approved by	Description
1.0	22/02/2021		22/02/2021	Advisory Council	Advisory Council endorsement of the Policy at its meeting of 22 February 2021
1.1	03/08/2022			Minor update – retention of formal approved date as 22/02/2021	Deleted references to rescinded documents and updated document name changes where this occurred. Updated phone numbers in Attachment 1.
1.2	NA	NA	NA	NA	Formal review March 2026. - Version drafted for review/approval. - Version 1.2 endorsed by FHRI Fund Advisory Council on 31/03/2026 inclusive of any update required re s9 PSM Act. - For legal review ahead of Minister review/approval.
1.3	NA	NA	NA	NA	Draft finalisation May 2026. Minor edits. Version 1.3 submitted to Minister for approval.

⁸ Western Australian Future Health Research and Innovation Fund Act 2012 (WA) s 4H(2,3).

2.0	27/07/2026		27/07/2026		Noted by Minister 27/07/2026. Version finalised for release as v2.0 based on FHRI Fund Advisory Council endorsement 31/03/2026.
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Appendices

Appendix 1 – Code of Conduct Acknowledgement Form (Form Ref: FFAC-P-2-F-1)

Appendix 2 – Conduct and integrity in practice

Appendix 3 – Information on Misconduct and Reporting Misconduct

APPENDIX 1

Future Health Research and Innovation Fund Advisory Council Code of Conduct

Future Health Research and Innovation Fund Advisory Council Code of Conduct Acknowledgement Form

I have read and understood the Advisory Council's *Code of Conduct* (Policy Ref: FFAC-P-2) and agree to comply with it in accordance with the terms of the Instrument of Appointment.

I am committed to working in accordance with the Public Sector Commission *Commissioner's Instruction No 40 – Ethical Foundations* and the *Code of Conduct*, and accept my responsibilities within this framework.

Confirmation of acknowledgement: Advisory Council member

Full Name			
Signature		Date	

Receipt of acknowledgment: Advisory Council Chair*

Full Name			
Role			
Signature		Date	

**Where the Advisory Council Chair is also the member making the acknowledgement, this form will be receipted by a senior representative of the Department of Health.*

Please forward a completed signed copy of this acknowledgement form to the secretariat in the Office of Medical Research and Innovation, Department of Health via:

FHRI.Fund@health.wa.gov.au

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*Future Health Research and Innovation Fund Advisory Council Code of Conduct***Conduct and Integrity in Practice****Personal behaviour**

As Advisory Council members, we will understand our role and public duties by actively learning and staying informed about:

- the role and purpose of the Advisory Council and the statutory, regulatory and policy requirements that apply when carrying out our public duties
- the political and social environment in which the Advisory Council operates
- all relevant issues and activities affecting the Advisory Council.

As Advisory Council members, we will put the public interest first, ahead of our own personal and pecuniary interests, and act with loyalty, in good faith, ethically and with integrity by:

- exercising our powers and discharging our duties in the best interests of the Advisory Council of which we are members
- making decisions fairly, impartially and promptly and considering all available information, legislation, policies, procedures and ethical codes
- being accountable and transparent
- discharging our functions and responsibilities lawfully, with reasonable care and diligence and as efficiently and effectively as possible
- treating members of the public, stakeholders and fellow Advisory Council members with respect, courtesy, honesty, and fairness, having proper regard for their interests, rights, safety and welfare
- fulfilling the Advisory Council's statutory purposes and requirements and, to the extent permitted by the Advisory Council's enabling legislation, serving the State Government of the day
- maintaining and contributing to a harmonious, safe and productive work environment and professional relationships
- understanding the consequences of misconduct and actions that may be taken if we do not comply with the *Code of Conduct* and associated policies.

As Advisory Council members, we will make an active contribution by:

- attending all Advisory Council meetings where possible
- participating and working cooperatively with fellow Advisory Council members and stakeholders to achieve agreed goals
- diligently preparing for meetings by reading and considering papers circulated with the agenda
- expressing our concerns to the Chair or other relevant authority about consultations, decisions or actions we believe may be contrary to the Advisory Council's public duty
- providing impartial advice to the State Government, ensuring such advice is well-informed and evidence-based
- taking personal responsibility for our own behaviour, understanding and accepting the consequences for misconduct, non-compliance with the *Code of*

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Conduct, Charter or other aspects of the Advisory Council governance documents / policies.

Communication

As Advisory Council members we will comply with relevant requirements as outlined in the *Charter*.

Official information, confidentiality and recordkeeping

As Advisory Council members we will comply with relevant requirements as outlined in the *Charter*.

Use of confidential information

As Advisory Council members, regarding official information obtained through our duties and its use, we will:

- maintain confidentiality and not disclose any official information or documents deemed confidential or sensitive, other than as required by law or where proper authorisation is given. If we are unsure, we will seek direction from the Chair of the Advisory Council.
- not improperly use information obtained in the course of our duties, or use such information for direct or indirect personal or commercial gain for ourselves or others, or to do harm to other people or the Advisory Council. For example, speculating on shares on the basis of confidential information or disclosing the contents of any official papers to unauthorised persons.
- respect confidential information and observe any restrictions agreed by the Advisory Council (subject to *Freedom of Information Act 1992* (WA) requirements)
- respect privacy of individuals and the security of personal information
- protect intellectual property, including using and granting permission to use intellectual property
- raise concerns of improper communications or use of information with the Chair, or other relevant authority.

Security of information

As Advisory Council members, we will:

- require the secure storage of sensitive or confidential information
- ensure recorded information under our control, in both paper and electronic form, is kept in a secure place, including when stored on laptops, tablets and USB devices
- be diligent in handling Advisory Council records including using via any online document management system as required and appropriately handling any hard copy documents (such as secure sensitive documents, rather than leaving them out in the workplace, meeting rooms, at home or in vehicles where persons who are non-Advisory Council members may access them)
- avoid discussing Advisory Council business in public places where there is a likelihood of being overheard

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- dispose of duplicate copies of records and confidential waste in accordance with record keeping and archive procedures.

Amendment or falsification of records

As Advisory Council members, we will:

- not falsify, destroy, alter or damage public records or back-date information
- understand how and when information may be released or shared.

Use of public resources

As Advisory Council members we will comply with relevant requirements as outlined in the *Charter*. This includes integrity in relation to remuneration, travel expenses and allowances.

As Advisory Council members we will use the resources of the State, monies, employees and equipment effectively and economically, only for Advisory Council business. We will comply with any applicable legislation, policies and procedures when using public resources.

Conflicts of interest and gifts, benefits and hospitality

As Advisory Council members we will comply with relevant requirements as outlined in the *Charter, the Conflict of Interest Policy and the Gifts, Benefits and Hospitality Policy*.

Fraudulent or corrupt behaviour

As Advisory Council members, we will:

- act ethically and not engage in fraudulent or corrupt behaviour
- not engage in conduct that is dishonest or may cause harm to a person
- not engage in any minor or serious misconduct as defined in the *Corruption, Crime and Misconduct Act 2003* (WA)
- report any information about actual or potentially fraudulent, corrupt or illegal activities to the Chair or, if necessary, the Corruption and Crime Commission
- report suspected breaches of the *Code of the Conduct*
- abide by our Advisory Council's risk management plan and accountability requirements.

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Information on Misconduct and Reporting Misconduct

The following information is reproduced from Section 8 of the Public Sector Commission 'Governance Manual for WA Government Boards and Committees' (October 2023).

It is recommended that information from the Public Sector Commission and/or the Corruption and Crime Commission be sourced and reviewed at the time it is required to ensure accuracy and currency.

The highest level of integrity and conduct is essential for all boards and committees. If a member sees something that concerns them, they should speak up. This may be as simple as talking with the board chair or contacting the Public Sector Commission to ask a few questions to help decide if it is something to be reported.

If it should be reported, there are a number of options. The *Corruption, Crime and Misconduct Act 2003* (CCM Act) defines misconduct and describes 2 types of misconduct – serious misconduct and minor misconduct.

Serious misconduct

Serious misconduct is defined in sections 4(a), (b) and (c) of the CCM Act and occurs when a public officer:

- corruptly acts or corruptly fails to act in the course of their duties
- corruptly takes advantage of their position for the benefit or detriment of any person
- while acting or purporting to act in an official capacity commits an offence that carries a penalty of 2 or more years' imprisonment.

Serious misconduct relies to some extent on the term 'corruptly'. Corrupt conduct tends to show a deliberate intent or improper purpose and motivation. It may involve:

- deliberate failure to perform the functions of office properly
- exercise of a power or duty for an improper purpose
- dishonesty.

There are specific categories of serious misconduct and all allegations of serious misconduct are notified to the Corruption and Crime Commission.

Further information about serious misconduct and notification responsibilities is on the Corruption and Crime Commission.

Minor misconduct

While it is called 'minor' misconduct in the legislation, it is misconduct significant enough that if proved could lead to a public officer's employment or a board member's appointment being terminated.

Under the CCM Act, minor misconduct is behaviour by a public officer which:

- adversely affects the honest or impartial performance of the functions of a public authority or public officer or
 - involves performing functions in a manner that is not honest or impartial
 - involves a breach of the trust placed in the public officer

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- involves the misuse of information or material that the public officer has acquired in connection with their functions whether the misuse is for the benefit of the public officer or the benefit or detriment of another person
- is a disciplinary offence providing reasonable grounds for termination of employment including termination of board membership.

Allegations of minor misconduct are notified to the Public Sector Commission. For boards that do not have employees (such as advisory boards), notification is usually the responsibility of the chair. For boards that have employees (such as the board of management of a public authority), notification is usually the responsibility of the CEO on behalf of the relevant public sector agency.

Reporting misconduct

Public interest disclosures

Board members are subject to the *Public Interest Disclosure Act 2003* (PID Act). This means they can report wrongdoings by public authorities, public officers and public sector contractors undertaking public functions if they believe the wrongdoings to be true. Board members can also be the subject of reports under the PID Act. Anyone making a report under the PID Act receives certain protections if they report to a nominated PID officer. Reports to other people or organisations do not receive the protections under the PID Act. Your chair or executive officer can let you know who the PID officer is. Board members may also be subjects of notifications of misconduct under the PID Act.

Lobbying

Lobbying is accepted as a legitimate part of the political process. It is communicating with a government representative to influence government decisions either directly or indirectly in person or electronically. Communication does not have to be for any type of reward (financial or otherwise). It is important for lobbyists to operate according to the highest standards of professional conduct and adhere to high moral standards. The government has established a code of conduct to ensure contact between lobbyists and government representatives meets public expectations of transparency, integrity and honesty. This includes interactions between government boards and lobbyists. Registered and accredited lobbyists who are members of government boards must not represent the interests of third party clients to a government representative on any matters that relates to the functions of the board. They should also not engage someone to undertake lobbying activities for them. The *Integrity (Lobbyist) Act 2016* prohibits individuals and companies from lobbying on behalf of third parties unless they have been accepted onto the Register for Lobbyists by the Public Sector Commissioner and thereby accredited as registered lobbyists to government.