



**Australian Government**  
**Fraud Fusion Taskforce**

# Fraud Fusion Taskforce Ethics Guide

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# 1. Introduction

The Fraud Fusion Taskforce (FFT) is committed to applying ethics in practice to support ethical conduct and decision making in relation to its activity and to achieve its purpose and objectives.

This document outlines the FFT's ethics in practice approach, by setting out the values, principles, and standards of conduct that intend to guide the work of the Taskforce. It provides a foundation for ethical decision-making, supporting the Taskforce to operate with integrity, fairness, and accountability.

The FFT Ethical Principles of this guide were co-designed with the NDIA's Reform for Outcomes (RFO) Integrity Working Group.

The document provides guidance to all Taskforce members, advisors, and any person engaged in Taskforce activities. It applies to conduct during meetings, decision-making, communication, and external engagement.

# 2. Purpose and scope

This guide can support the mitigation of ethical risks for the FFT. The guide sets out the intended outcomes of the FFT, defining ethical values and principles. The multi-agency taskforce can use these to promote good conduct and thoughtful decision making.

The guide provides support for applying an ethics in practice approach, for consideration in the activity of the FFT, to ensure ethically sound governance and operations. FFT activity includes:

- Intelligence and prioritising operations to address and reduce fraud.
- Strategic prevention of fraud.
- Protecting recipients of government programs and payments.
- Ensuring the protection and privacy of data and information.

### 3. Legal and regulatory obligations

Australian Public Service (APS) employees have an obligation to comply with the Australian Government sector ethical framework and in particular, embody the principles set out in the APS Values and Code of Conduct and behave with honesty and integrity.

The Australian Government sector ethical framework is defined as the application of legislation and rules including the Public Governance, Performance and Accountability Act 2013 (PGPA Act), Public Governance, Performance and Accountability Rule 2014 (PGPA Rule), Public Service Act 1999 (PS Act) and the APS Commissioner's Directions 2022 (Commissioner's Directions).

In conjunction with using this guide, member agencies should also consider other guiding governance, policies and frameworks including the Privacy Act 1988, Australian Government Investigation Standards (AGIS) 2022, Policy for the responsible use of AI in government, FFT Memorandum of Understanding (MoU), FFT Terms of Reference (ToRs) and FFT Data Governance Framework.

Participating member agencies and their personnel will also need to have regard to ethical and legal frameworks that apply to each Australian Government agency and specific agency policies and frameworks (e.g. NDIA Participant Safeguarding Policy, Services Australia Fraud Investigation Branch Vulnerability Framework and Australian Tax Office's data ethics processes) that will guide agency ethical decision-making.

## 4. Guiding ethical principles

The Taskforce commits to the following core values and principles:

### 4.1 APS Values

Impartial	Committed to service	Stewardship
The APS is apolitical and provides the government with advice that is frank, honest, timely and based on the best available evidence.	The APS is professional, objective, innovative and efficient, and works collaboratively to achieve the best results for the Australian community and the government.	The APS builds its capability and institutional knowledge and supports the public interest now and into the future, by understanding the long-term impacts of what it does.

Respectful	Ethical	Accountable
The APS respects all people, including their rights and their heritage.	The APS demonstrates leadership, is trustworthy, and acts with integrity, in all that it does.	The APS is open and accountable to the Australian community under the law and within the framework of Ministerial responsibility.

## 4.2 FFT Ethical principles

1. We will place the safety and wellbeing of recipients (e.g. NDIS participants and customers) of government programs and payments at the centre of our work.
2. We will have empathy for people who are impacted or experience fraud situations and will ensure confidentiality and that appropriate support is available by working with frontline business areas.
3. We will be clear about the purpose of our activity and outcomes subject to security and privacy constraints.
4. We will communicate in an accessible and easy to understand way with all stakeholders.
5. We recognise that our activity (decisions, actions, and operations) will impact on the community and individuals.
6. We will ensure a person oversees or reviews decisions if we use automation to gather information.
7. We will always respect people's privacy in accordance with the law and balance the need to share information against the risk.
8. We will collect, manage, share and use data and information in accordance with the law and that all parties understand and agree with how data will be used.
9. We will ensure that our activity is informed and supported by evidence and the use of the available evidence is ethical.
10. We will engage and take advice from stakeholders on how we conduct our activities.
11. We will quickly respond to issues, risks, or complaints.
12. We will always act within the law.

## 5. Standards of conduct

All members are expected to:

- Act with honesty, professionalism, and integrity
- Respect confidentiality and protect sensitive information.
- Declare and appropriately manage any real, potential, or perceived conflicts of interest.
- Engage constructively, valuing diverse views and expertise.
- Avoid personal gain or misuse of position.
- Ensure communications and records are accurate and clear.

## 6. Ethical considerations

When making decisions, members should:

- Consider the evidence, long term impacts, and community interest.
- Weigh competing values fairly and consistently.
- Consider the principles of this guide to resolve dilemmas.
- Seek guidance and support where potential or realised ethical matters are identified.

## 7. Governance and responsibilities

Member Agencies – are responsible for role modelling ethical behaviour, identifying and escalating ethical matters through the function of committees and working groups, or when undertaking any other FFT activities. Consideration must be given to the values and principles outlined in this guide.

Committee and Working Group Chairs/Co-Chairs – are responsible for facilitating and managing ethics and risk discussions, supporting ethical decision-making, documenting and escalating ethical matters.

The Inter-Departmental Committee (IDC) Co-Chairs/Leadership – are responsible for promoting an ethical culture, addressing issues, and supporting members in ethical decision-making.

The Secretariat/Taskforce Management Office – are responsible for documenting ethical

matters and decisions gathered through committees and working groups and providing support for in/out of session escalations.

## **8. Procedures for raising ethical matters**

**Raising Matters:** Members may raise ethical matters confidentially with the IDC Co-Chairs and/or Chairs/Co-Chairs of committees and working groups.

**Conflicts of Interest:** Members must declare any conflicts at the earliest opportunity. Chairs and Co-Chairs of committees and working groups will determine how these will be managed. All declared conflicts of interest will be recorded by TMO and notified to IDC Co-Chairs.

## **9. Support and guidance**

Appendix A – Ethical behaviours.

Appendix B – Guidance for applying ethics in practice.

Members can also strengthen their understanding of the importance of acting ethically and with integrity, by accessing information and learning resources through the Australian Public Service Commission, Ethics Advisory Service and the Australian Public Service Academy.

Members are encouraged to seek advice where ethical matters are complex or unclear.

## 10. Document review

This guide will be reviewed every 12 months, or earlier if required, to ensure it remains current and effective. Feedback from members will be considered as part of the review process.

## 11. Appendices

### 11.1 Appendix A: Ethical behaviours

The guide below provides a set of 'Everyday Behaviours' that link directly to the guiding principles. These give taskforce members clear, practical examples of how principles should show up in daily work.

#### 11.1.1 Integrity

- Always present information truthfully and completely.
- Speak up if you see conduct that risks compromising the taskforce's work.
- Avoid shortcuts that undermine ethical or investigative standards.

#### 11.1.2 Accountability

- Keep accurate and timely records of decisions, evidence, and actions.
- Be open to questions and feedback about your work.
- Admit mistakes promptly and take steps to correct them.

#### 11.1.3 Fairness and Impartiality

- Declare any personal or professional interests that may affect your judgement.
- Base decisions only on verified facts and evidence.
- Treat all individuals under investigation with respect, regardless of outcome.

#### **11.1.4 Transparency**

- Explain the rationale for decisions whenever possible.
- Share information appropriately within the taskforce to support consistency.
- Ensure processes are documented so they can be reviewed to ensure compliance with relevant regulations or standards.

#### **11.1.5 Respect and Professionalism**

- Communicate courteously, even in difficult or high-pressure situations.
- Value the contributions of colleagues and member agencies.
- Use resources and authority only for legitimate, taskforce related purposes.

#### **11.1.6 Confidentiality**

- Store and handle documents and data securely.
- Discuss sensitive matters only with those who are authorised and need to know.
- Never use confidential information for personal or external gain.

#### **11.1.7 Public Trust**

- Remember that your actions reflect on the entire taskforce.
- Make decisions that would stand up to public and media scrutiny.
- Uphold the reputation of the taskforce through ethical conduct at all times.

## **11.2 Appendix B: Guidance for applying ethics in practice**

### **11.2.1 APS Value – Impartial**

We will ensure that our activity is informed and supported by evidence and use of the available evidence is ethical.

We will be clear about the purpose of our activity and outcomes subject to security constraints.

This means:

- Our work and decisions will always be evidence-informed and consider appropriate authoritative and substantive information, considering relevant subject matter expertise.
- Where required, we will engage with qualified experts to ensure our decision logic is legally valid and evidentially sound.
- We will develop and review our processes to incorporate controls that are necessary and effective for our evidence-driven work.
- We will be transparent about the evidence-basis and key factors for our decisions with those who need to know.
- We will provide impartial advice to Government.

Consideration should be given to:

- decision outcomes
- if legal advice is required
- evidence driven controls and
- impartial advice to government.

### **11.2.2 APS Value – Committed to service**

We will engage and take advice from stakeholders on how we conduct our activities.

We will quickly respond to issues, risks or complaints.

This means:

- We will engage with purpose and intent with our key stakeholders, including those with lived experience of focus programs.

- We will collaborate with other agencies to build and maintain a sound ethical basis for all our activity and ensure this is reflected in our policy, processes and systems.
- We will seek to ensure efficient, effective and sustainable systems and processes that are financially sustainable.
- We will implement approachable and inclusive pathways for communication with stakeholders.
- We will maintain confidentiality for people that report concerns or other matters in relation to our programs of focus.
- We will ensure people are properly heard and, where it is legal and safe, will receive an appropriate and timely response.

Consideration should be given to:

- people with lived experience
- collaborating with other agencies
- any documented systems and processes
- inclusive pathways and
- confidentiality and legal considerations

### **11.2.3 APS Value – Accountable**

We will always act within the law.

We will ensure a human oversees or reviews decisions if we use automation to gather information.

This means:

- We will always operate within the law and ensure processes comply with relevant legislation.
- We will ensure our governance; strategic and operational frameworks provide a legally and ethically sound basis for decisions.

- We will obtain appropriate legal advice, including final advice on key matters from our legal experts.
- Where there is doubt about legal compliance we will not act in areas of doubt or areas of ambiguity.
- We will provide human oversight and be accountable for our activities involving data and the decisions we make.
- We will seek to reduce the administrative burden on our stakeholders while upholding the integrity of our programs.

Consideration should be given to:

- any legal issues
- alignment to other FFT frameworks
- how human oversight is embedded in any automation and
- any unintended consequences for stakeholders.

#### **11.2.4 APS Value – Respectful**

We will place the safety and wellbeing of recipients (e.g. NDIS participants and customers) of government programs and payments at the center of our work.

We will have empathy for people who are impacted or experience fraud situations and will ensure confidentiality and that appropriate support is available by working with frontline business areas.

We will communicate in an accessible and easy to understand way with all stakeholders.

This means:

- Our strategies and operations will carefully consider any risk to participants, customers and other stakeholders who may be impacted by FFT decisions, activities and actions.

- The likely benefit must justify any risk of harm or distress to participants, customers and other stakeholders.
- We will carefully consider safeguards for participants and customers in the design and development of processes and systems to improve integrity in government programs and payments.
- We will have appropriate regard to prevention of trauma, harm minimisation, dignity, inclusion, cultural respect and safety.
- We will ensure easy to understand and effective communications with participants and customers on our activity and outcomes.
- Where required we will adapt our language and communication in response to individual needs.

Consideration should be given to:

- any risk to participants, customers and other stakeholders
- benefit must justify any risk of harm.
- safeguards and safeguarding policies with tools to determine participant or customer risk and
- accessible communication.

### **11.2.5 APS Value – Ethical**

We will collect, manage, share and use data and information in accordance with the law and that all parties understand and agree with how data will be used.

We will always respect people’s privacy in accordance with the law and balance the need to share information against the risk.

This means:

- Ensure that the individual and community information we hold is kept safe, protected and shared securely only as authorised by law.

- We recognise our actions' impact on the community and individuals, so we will be clear about our intent when we collect, manage, share and use data and information and consider the risks.
- We will only collect, manage, share and use data and information where necessary to perform our functions.
- We will protect the data and information in our care. When we acquire or share data and information, we will agree on how the data and information will be securely stored, used, retained and destroyed.

Consideration should be given to:

- how data and information will be securely stored, used, retained and destroyed and
- how only appropriate data is shared.

#### **11.2.6 APS Value – Stewardship**

We recognise that our activity (decisions, actions and operations) will impact on the community and individuals.

This means:

- We will have regard for the public interest and those that support it, within our decision-making.
- Where allowed under law and in public interest, we intend to be transparent with the community about what we are doing and how it is working.
- Our work will always have public value and will appropriately consider the risk-benefit ratio and associated cost.

Consideration should be given to:

- any public interest and
- risk benefit of activity