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Australian Government
Services Australia



Taskforce
Integrity

Fraud Fusion Taskforce Management Office Meeting Minutes

Meeting details

Title: Minutes of meeting for Fraud Fusion Taskforce Transition Meeting
 Venue: MS Teams
 Event date: 27 April 2023
 Start: 12:00pm
 Finish: 13:30pm
 Chair: s 47F(1) Program Coordination Lead NDIA
 Attendees: **Services Australia (SA):** s 22, s 22, s 22, s 22, and s 22.
National Disability Insurance Agency (NDIA): s 47F(1), s 47F(1), s 47F(1), s 47F(1), and s 47F(1)
 Apologies: SA - s 22 and s 22

Agenda items

Item
1. Welcome, Introduction and Apologies
The chair welcomed new members and invitees and noted apologies.
2. MERI Framework / Reporting
NDIA (s 47F(1)) provided an update in relation to the Monitoring, Evaluation, Reporting and Improvement (MERI) Framework. The NDIA are developing a register of shared reporting requirements between agencies <u>and the regular reporting cadence</u> and will share reports <u>documents</u> with SA once developed. NDIA are undertaking a stocktake exercise in terms of monitoring valuation reporting and are requesting an understanding of SA co-leads and stakeholders to consider including SA information views/ needs. SA (s 22) raised timeframes for establishing reporting, and if NDIA are considering End of Financial Year (EOFY) reporting. s 22 enquired about the expectations for EOFY reporting and sharing of this reporting register from 1/7/2023. SA (s 22) explained that our annual report process commences at the end of May and that SA require a 2 week sign off period for all reports. NDIA (s 47F(1)) will ensure SA are first aligned in reporting which will be broader than EOFY this will include support for respective agencies. Further work is required to capture this, seeking preliminary reporting so will contact s 22 if unable to meet 1/7/2023. NDIA to email SA Taskforce Integrity. Interested in stakeholders outside of SA.

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Item
NDIA would like to identify a couple of key staff to sort out reporting within the next couple of weeks to include consideration from communications with view to a joint reporting framework.
SA (s 22 Reporting requirements and expectations will be raised by SA GM at IOC

Action items

Item	Action	Responsibility	Due date
2.	Distribute MERI Framework <u>and</u> Reporting <u>register/runway/cadence</u> to SA FFT positional mailbox and copy in s 22 and s 22	s 47F(1)	
	Distribute stakeholder information	s 22	

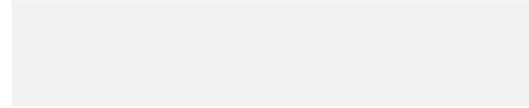
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s 22

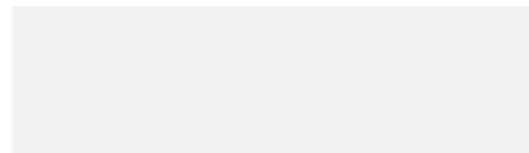
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- Ethics Framework engagement and the design of the framework will occur in May.

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Fraud Fusion Taskforce

Inter-Departmental Committee Meeting Minutes

8 August 2023, 1400-1600 AEST

Co-Chairs: John Dardo, Chief Transformation Officer, National Disability Insurance Agency (**NDIA**)
Chris Birrer, Deputy CEO Payments and Integrity, Services Australia

Contact: s 47F(1), Secretariat, Fraud Fusion Taskforce, NDIA **P: s 47F(1)**

Attendees:

Boyd Doherty, National Manager, Operational Strategy, Australian Criminal Intelligence Commission (**ACIC**) (*proxy*)

Elizabeth Brayshaw, A/g First Assistant Secretary Integrity Framework, Attorney General's Department (**AGD**)

Rebecca Fealy, Assistant Commissioner, Fraud & Criminal Behaviours, Australian Taxation Office (**ATO**) (*proxy*)

Tracy Mackey, Commissioner, NDIS Quality and Safeguards Commission (**NDIS Commission**)

Presenters/Observers:

Richard Honey, Branch Manager, Fraud Fusion Taskforce Capability Branch, NDIA

s 47F(1), Director, Fraud Fusion Taskforce, NDIA

Stuart Fisher, Branch Manager, Fraud Intelligence and Investigations Branch, NDIA

Robyn Shannon, A/g Deputy Secretary Disability and Carers, Department of Social Services (**DSS**)

s 47F(1), Superintendent Economic Corporate Crime and Corruption, Australian Federal Police (**AFP**)

Melissa Clements, Deputy Commissioner Regulatory Operations (Registrar), NDIS Commission

Jason Lucchese, General Manager, Fraud Control and Investigations Division, Services Australia

Luke Morrish, National Manager, Intelligence Branch, Services Australia

s 47F(1), Director, Fraud Fusion Centre, ACIC

s 47F(1) A/g Director, Fraud Fusion Taskforce and Government Payments Program, ATO

Apologies:

Grant Nicholls, Deputy Commissioner Crime, AFP

John Ford, Deputy Commissioner, Integrated Compliance, ATO

Kitsa Papadopoulos, General Manager, Fraud Fusion Taskforce, NDIA

Jennifer Hurst, Executive Director, Intelligence Operations, ACIC

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9. Program management update (noting)**9.1 Ethics and Human Oversight Framework**

Richard Honey introduced the item, and provided an update on the Ethics and Human Oversight Framework:

- The TMO is seeking further feedback from IDC members on the Ethics and Human Oversight Framework.

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Outcome:

The IDC took the papers for agenda items 9.1 and 9.2 as read.

ACTION: All members to provide further feedback on the Ethics and Human Oversight Framework to the TMO.

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	Action Item	Description	Agency	Due date
	s 22			
	15.	All members to provide further feedback on the Ethics and Human Oversight Framework to the TMO.	All members TMO	18 August 2023
	s 22			

OFFICIAL: SENSITIVE**Fraud Fusion Taskforce Inter-Departmental Committee Meeting of 23 April 2024**

Agenda Item: **FFT Reporting Framework**
Paper Type: For Noting
IDC Sponsor: National Disability Insurance Agency
Timing: 23 April 2024

1. Purpose

- 1.1. For the Inter-Departmental Committee to note the evolution of the Fraud Fusion Taskforce (FFT) Reporting Framework.

2. Recommendation

- 2.1. IDC note the:
- 2.1.1. FFT Reporting Framework and elements of reporting, the responsibilities of each FFT agency and the reshaping of the Evaluation Framework.
 - 2.1.2. July – November 2023 Corporate Report (Attachment B)

3. FFT Reporting Framework

- 3.1. The FFT Reporting Framework has five elements:

s 22

3.1.2. Element 2 Assurance – Quarterly

- 3.1.2.1. The TMO will collect information on a quarterly reporting cycle to monitor compliance with FFT Frameworks and associated processes. Assurance information will be requested from member agencies at consistent time intervals aligned to corporate reporting where possible. The Committees and working groups will also help facilitate information gathering from member agencies including identifying the appropriate agency contact and delegate.
- 3.1.2.2. Quarterly updates will be provided to IDC for noting and will be inclusive of all FFT Frameworks. This information will be used to track and review the effectiveness and usefulness of the Frameworks and if required, the Frameworks and associated processes will be updated.
- 3.1.2.3. The TMO is currently developing an assurance framework and templates that will be provided to member agencies through the governance forums.

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Fraud Fusion Taskforce Inter-Departmental Committee Meeting of 23 April 2024

3.1.2.4. Frameworks to be reported on:

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3.1.2.4.2. FFT Ethics and Human Oversight Framework

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3.1.7. Evaluation Framework

3.1.7.1. The Evaluation Framework is proposed to be an outcome-based evaluation model utilising information collected from the FFT Reporting Framework and annual reports.

3.1.7.2. The evaluation is set to occur at the end of year 4 of the Taskforce to evaluate the effectiveness of the FFT to provide learnings to future taskforce's that are created or to propose improvements if the FFT is extended.

4. Next Steps

4.1. The revised Framework will be noted in the FFT update distributed to all agencies post IDC. Specific details such as templates, calendars and communications will be developed and issued to all member agencies in May 2024.

5. Background

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Fraud Fusion Taskforce Inter-Departmental Committee Meeting of 23 April 2024

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5.2. Evaluation Framework

- 5.2.1. Previously noted in the FFT MOU, a MERI (Monitoring, Evaluation, Reporting, and Improvement) Framework was proposed for creation.
- 5.2.2. This framework was yet to be developed and faced considerable challenges regarding monitoring due to the progressive operationalisation of the FFT and the number of agencies involved.
- 5.2.3. In response to the updated reporting system being proposed, changing MERI to the Evaluation Framework is proposed.
- 5.2.4. Evaluation Framework will focus on an outcomes-based process to determine taskforce successes and learnings at the end of the four-year duration.
- 5.2.5. This differs from MERI which focuses on consistent monitoring and reviews. The MERI approach has shown potential to be burdensome and stretch each individual agencies resources thinner if consistent and specific activities are required by each member agency to meet its needs.

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Prepared by:	Author:	Approved by:
Division:	Richie Honey	Kitsa Papadopoulos
Phone:	s 47F(1)	s 47F(1)
Date prepared:	10 April 2023	
Version:	V1	

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Fraud Fusion Taskforce Inter-Departmental Committee Meeting of 23 April 2024

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Fraud Fusion Taskforce

Inter-Departmental Meeting Minutes

6 August 2024, 13:00 – 15:00 AEST

Location: NDIS Offices, Ground Floor, Meeting Room 4 90 Denison Street, Deakin ACT 2600

Co-Chairs: John Dardo, Chief Transformation Officer, National Disability Insurance Agency (NDIA) Chris Birrer, Deputy Chief Executive Officer, Payments and Integrity Services Australia (via MS teams) (joined at 1:39pm)
Contact: s 47F(1) , Director, Governance, Assurance & Risk P: s 47F(1) Secretariat, Fraud Fusion Taskforce, NDIA
Members Attorney Generals Department (AGD) Pierre Skorich, A/g Assistant Secretary, Fraud Prevention and Anti-Corruption (proxy for Elizabeth Brayshaw) Australian Criminal Intelligence Commission (ACIC) s 47F(1) , Director, Fraud Fusion Centre (proxy for Jen Hurst) Australian Federal Policy (AFP) Adam Rice, Manager, Economic, Corporate Crime and Corruption, Crime Command (arrived at 1:05pm) Australian Tax Office (ATO) John Ford, Deputy Commissioner Fraud and Criminal Behaviours (via MS teams) NDIS Quality and Safeguards Commission (NDIS Commission) Catherine Myers, Deputy Commissioner, Regulatory Operations (Registrar) (proxy for Mike Phelan)
Observers Australian Federal Policy AFP s 47F(1) , Acting Superintendent (via MS teams) s 47F(1) A/g Commander (via MS teams) Australian Tax Office (ATO) Helen Wilson, Assistant Commissioner, System Integrity Program (via MS teams) s 47F(1) Director, Government Payments Program, and Fraud Fusion Taskforce (via MS teams) Department of Social Services (DSS) Amanda Lee, Group Manager (arrived at 1:10pm) Rob Stedman, Branch Manager National Disability Insurance Agency (NDIA) Kitsa Papadopoulos, General Manger, Fraud Fusion Taskforce Richard Honey, Branch Manager, Fraud Fusion Taskforce Capability Branch

OFFICIAL: SENSITIVE**NDIA Quality and Safeguards Commission (NDIS Commission)**

Mahashini Krishna, Assistant Commissioner, Regulatory Campaigns and Projects

Services Australia

Peter Timson, General Manager, Fraud Control and Investigations Division

s 47F(1) , Acting National Manager, Fraud Investigations Branch, proxy s 47F(1) (via MS teams)

s 22 , Director, Intelligence Branch (via MS teams)

Apologies**Attorney Generals Department (AGD)**

Elizabeth Brayshaw, First Assistant Secretary, Integrity Frameworks Executive

Australian Federal Police (AFP)

Kirsty Schofield, Assistant Commissioner

s 47F(1) , Inspector (via MS teams)

Australian Criminal Intelligence Commission (ACIC)

Jen Hurst, Executive Director, Intelligence Operations

Anita Van Hilst, National Manager, Operational Strategy

Department of Social Services (DSS)

Robyn Shannon, Deputy Secretary, Disability and Carers Stream

Services Australia

Luke Morrish, National Manager, Intelligence Branch

Barb Smith, Acting National Manager, Intelligence Branch

s 47F(1) , National Manager, Fraud Investigations Branch

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8. FFT Governance Framework Brief (for noting)

Richard Honey (NDIA) presented the FFT Governance Framework Update.

Richard Honey noted the implementation of the NDIA's Ethics Committee and lessons learned will be considered throughout the operationalisation of the FFT Ethics and Human Oversight Framework.

Richard Honey noted the significant challenges of assigning risk ownership for shared FFT Strategic Risks. FFT Committees have been assigned as the accountable entities for shared strategic risks.

A standard agenda item will be included for all FFT governance committees moving forward to undertake a deep dive into the specific risks at each FFT governance committee meeting.

Outcome:

The IDC endorsed the proposed implementation approach of the FFT Governance Frameworks and approach for FFT Committees to be accountable for identified shared strategic risks.

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Fraud Fusion Taskforce 6 August 2024 Meeting | Action Item Register

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From: s 47F(1) s 47F(1) @ndis.gov.au> on behalf of
s 47E(d) @ndis.gov.au>
Sent: Wednesday, 4 September 2024 10:59 AM
To: s 47F(1) @acic.gov.au'; s 47F(1) @acnc.gov.au';
s 47F(1) @acnc.gov.au'; s 47F(1) @agedcarequality.gov.au'; s 47E(d)
@afp.gov.au'; s 47F(1)@afp.gov.au'; s 47F(1) @afp.gov.au'; s 47E(d)
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s 47F(1) @psr.gov.au'; s 47E(d) s 47F(1) @tpb.gov.au';
s 47F(1) @tpb.gov.au'
Cc: s 47E(d) s 47F(1) ; s 47F(1) ; s 47F(1)
Subject: FFT24-001: FFT Ethics and Human Oversight Framework [SEC=OFFICIAL:Sensitive]
Attachments: 2024 08 28 Ethics and Human Oversight Framework_V1.12 August 2024.pdf
Categories: File

Caution: Do not click any links or open any attachments unless you trust the sender and believe the content to be safe.

Good morning FFT Members,

The purpose of this email is to provide visibility of the IDC endorsed FFT Ethics and Human Oversight Framework and outline the implementation approach.

Background:

- IDC endorsed the FFT Ethics and Human Oversight Framework and implementation approach at the 6 August meeting.
- TMO have commenced engaging with key stakeholders to test the tools that apply the FFT ethical decision-making model to specific FFT initiatives and projects.
- The first six months of implementation will be focused on testing the application of the Framework, through the following specific FFT projects:
 - SPC Project- Standards of Publication

- SPC Project- Suitability Red Lines
- Operation Pamela
- Professional Sector Disruption Project
- This targeted approach will assist the TMO to undertake a review of the effectiveness of the Framework and provide an enhanced Framework and supporting tools to the FFT Agencies.
- It is anticipated the next iteration of the Framework and tools will be provided to the Inter-Departmental Committee by the end of 2024/ early 2025, based on implementation insights.

Next Steps:

- An implementation update will be provided at the next IDC Meeting on 1 October, and SPC Meeting on 16 October.
- FFT Agencies will be provided with an implementation update early 2025, after the Inter-Departmental Committee review the next iteration of the Framework and tools.

Please do not hesitate to contact me if you have any queries or wish to discuss.

Regards

s 47F(1)

A/g Branch Manager, Fraud Fusion Taskforce Capability
Integrity Transformation & Fraud Fusion Taskforce Group

National Disability Insurance Agency

Mobile s 47F(1)

Emails 47F(1) [@ndis.gov.au](mailto: @ndis.gov.au)

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Australian Government
Fraud Fusion Taskforce

Fraud Fusion Taskforce Ethics and Human Oversight Framework

Version: 1.12
Date: August 2024
Author: NDIA Fraud Fusion Taskforce and Integrity Capability Division
Commencement: Endorsed by IDC on 6 August 2024.

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Contents

Fraud Fusion Taskforce Ethics and Human Oversight Framework	1
1. Introduction	3
1.1 Legislation and Resources	3
1.2 Framework Development	3
1.3 Consultation	4
1.4 Important Terms	4
1.5 Contact Officer	4
2. Purpose and Scope	5
2.1 Other FFT Frameworks	5
2.2 Other Ethical and Legal Frameworks and Policies	5
3. Ethical Approach	6
3.1 Key principles for ethical decision-making	7
3.2 APS Values and FFT Ethical Principles	7
3.3 FFT Ethical decision-making model	9
4. Roles and Responsibilities	10
5. Operating Environment	11
5.1 Consultation with Stakeholder Groups	11
5.2 Advice to Government and other Key Stakeholders	11
5.3 Embedding Risk Management	11
5.4 Data ethics	12
5.5 Accountability and Human Oversight	12
5.6 Continuous Improvement and Assurance	12
6. Implementation of the Framework	13
6.1 Initial Implementation	13
6.2 Reporting	13
6.3 Post Implementation Review	14
7. Appendices	16
7.1 Appendix 1: FFT Ethical Decision-Making Model (Full version)	16
7.2 Appendix 2: Application of the Framework Guidance	18

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1. Introduction

The Fraud Fusion Taskforce (FFT) is committed to applying a sound ethical framework 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 ethical decision-making framework. It was developed to recognise the need for a clearly articulated ethical framework to guide cross-agency decision-making, actions, operations and intended outcomes of the FFT. It defines ethical values, principles and how these may be applied by the multi-agency taskforce to support ethical conduct and decision-making.

The vision for the FFT Ethics and Human Oversight Framework (the/this Framework) is a robust process with a documented ethical basis for the work of the FFT, and to give assurance to all key stakeholders that the conduct and decision-making of the FFT is ethically sound.

'The goal is to enable and support thoughtful decision-making that is consciously informed by core values and principles'¹.

The Framework aligns with the focus and key reforms of the Australian Government to strengthen integrity across the [Australian Public Service \(APS\)](#). A rigorous ethical framework is based on honesty and transparency, lack of bias, respect for participants and customers, and appropriate ethical review and decision-making by qualified persons.

1.1 Legislation and Resources

The FFT Ethics and Human Oversight Framework has been prepared to align with best practice as follows:

- [APS Code of Conduct](#) and APS Values
- *Public Service Act 1999*
- *Public Service Regulations 1999*
- the *Public Governance, Performance and Accountability Act 2013*

1.2 Framework Development

The Australian Government's agenda to strengthen integrity across the APS was a key consideration in development of the FFT Ethics and Human Oversight Framework. The measures and outcomes for integrity improvement including the work of the [APS Integrity Taskforce](#) will be referred to during implementation and continuous improvement of this Framework.

¹ Australian Institute of Company Directors and The Ethics Centre (October 2019) Ethics in the Boardroom: A decision-making guide for directors, p9.

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1.3 Consultation

The FFT Ethics and Human Oversight Framework has been developed in consultation with the Parties of the MOU (19 Commonwealth APS member agencies) and the FFT Committees. The FFT Ethical Principles of this Framework were co-designed with the NDIA's Reform for Outcomes (RFO) Integrity Working Group.

1.4 Important Terms

The below key terms are used in this Ethics and Human Oversight Framework and are defined as follows:

Ethics – moral values and principles that govern behaviour and guide ethical judgement.

Human Oversight – refers to the agency where a human operator or supervisor of a (algorithm-based or automated) system can pose to mitigate any harm or malfunction caused by the system. It can ensure that the system does not undermine human autonomy or cause other adverse effects and may be achieved through governance mechanisms, such as human-directed or involved approaches.

Recipient – a person who is the intended recipient of support and/or payment from government programs and payments as determined by the relevant legislation and government policy ('customer', 'NDIS participant' or another term that may apply).

Values – are qualities or standards of behaviour. This Framework adopts the Australian Public Service (APS) Values which are expected standards of behaviour for all Australian Public Service employees and are set out in section 10 of the *Public Service Act 1999*.

Principles – Principles are fundamental beliefs or rules governing one's behaviour. There are three fundamental principles for ethical decision-making and 12 FFT Ethical Principles to guide FFT activity.

1.5 Contact Officer

Any queries about the FFT Ethics and Human Oversight Framework should be directed to **s 47E(d)** @ndis.gov.au.

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2. Purpose and Scope

This FFT Ethics and Human Oversight Framework is an important part of effective risk management for the FFT. This Framework provides an ethical decision-making model that has been designed for FFT, to identify, evaluate, and resolve ethical issues concerning FFT activity (decisions, actions, and operations) and monitor and re-evaluate outcomes of FFT decisions, actions, and operations).

The FFT Ethics and Human Oversight Framework outlines considerations that need to be addressed in the activity of the FFT to achieve 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.

The Ethics and Human Oversight Framework will be implemented to ensure FFT governance, strategic and operational activity is conducted in accordance with the APS Values and FFT Ethical Principles outlined in the Framework to safeguard the interests of recipients of government programs and payments.

2.1 Other FFT Frameworks²

The application of the FFT Ethics and Human Oversight Framework should refer to and consider other FFT Frameworks once they come into effect. The application of the frameworks below is discussed in section 4 (Operating Environment) of this document.

- FFT Communications and Engagement Strategy
- FFT Risk Management Framework and FFT Strategic Risk Register
- FFT Data Governance Framework and Fraud Fusion Centre Data Governance Plan
- FFT Reporting Framework
- FFT Evaluation Framework
- FFT Prioritisation Framework and Case Catalogue.
- FFT Conflict of Interest Policy

2.2 Other Ethical and Legal Frameworks and Policies

Participating member agencies and their personnel will also need to have due 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,

² FFT frameworks, policies and artefacts available upon request. Electronic access is under development.

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Services Australia Fraud Investigation Branch Vulnerability Framework and Australian Tax Office's data ethics processes) that will guide agency ethical decision-making.

When making decisions in accordance with the FFT Ethics and Human Oversight Framework, agencies and their personnel are guided by the purpose, scope, and objectives of the FFT. Where the FFT Ethics and Human Oversight Framework and Australian Government legislation are inconsistent, legislation takes precedence.

3. Ethical Approach

Decisions with ethical implications are not always readily apparent, often require consideration of competing concerns and can be impacted by time constraints. Understanding the key principles for ethical decision-making and applying the APS Values and FFT Ethical Principles will guide FFT decision-makers and personnel.

The image below provides an overview of the capability maturity scale for entities in the Commonwealth ethical landscape, beginning with the APS Values & Code of Conduct (mandatory), the FFT Ethics and Human Oversight Framework and Individual Agency policies and frameworks (best practice).

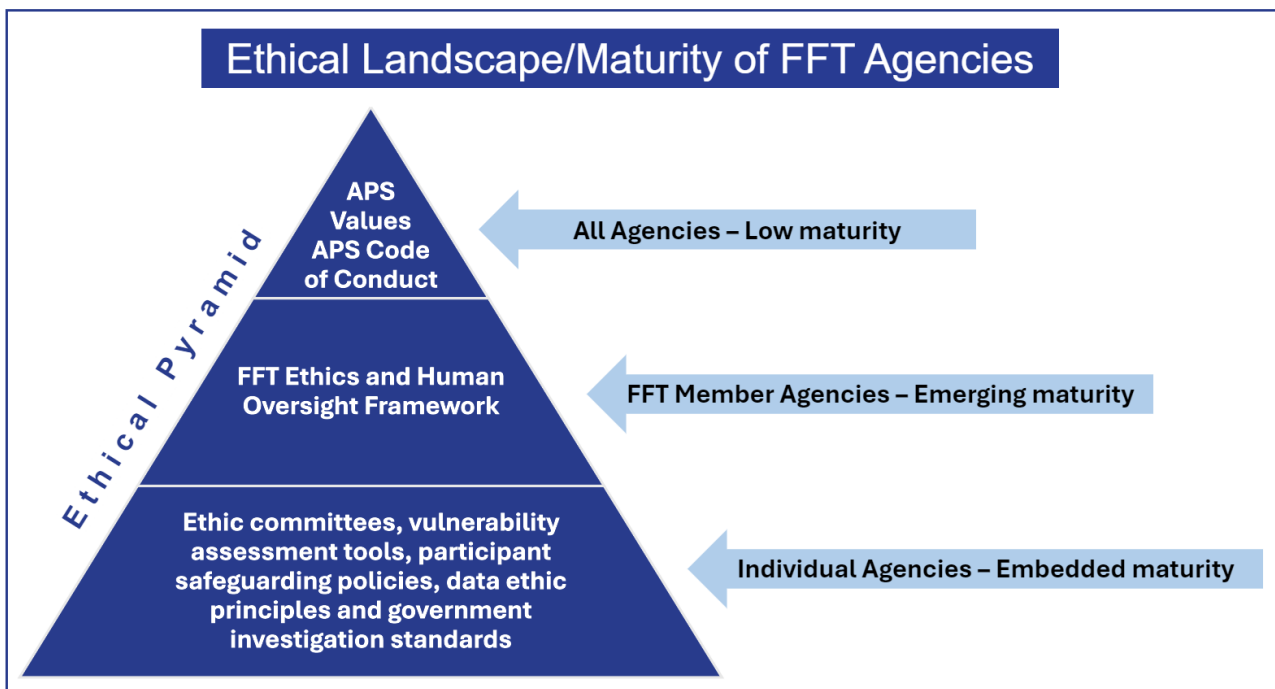


Figure 1: Ethical Landscape/Maturity of FFT Agencies

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3.1 Key principles for ethical decision-making

Ethical decision making most commonly involves the well-being of others as a critical criterion in the evaluation process as well as active consideration of how to resolve matters in which there are competing interests/consequences across multiple stakeholders.

The following key principles underpin ethical decision-making:

- Transparency – to make clear and consistent decisions.
- Responsibility – to consider the implications of an action/s before making a final decision.
- Empathy – to understand the feelings of another person or group of people³.

3.2 APS Values and FFT Ethical Principles

The FFT Ethics and Human Oversight Framework applies the APS Values and specific ethical principles developed for the FFT to guide ethical decision-making for sound governance, strategy, and operations. For the purposes of this Framework, a situation that would involve ethical considerations is a situation where the APS Values and FFT Ethical Principles apply.

3.2.1 APS Values

Values are qualities or standards of behaviour.

- Impartial
- Committed to Service
- Accountable
- Respectful
- Ethical
- Stewardship (pending)

3.2.2 FFT Ethical Principles

Principles are rules or beliefs governing one's behaviour. These principles will guide ethical decision-making by the FFT. Further explanation and application of the FFT Ethical Principles is in Appendix 2.

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.

³ Elsey, W (n.d) Council Post: Three Key Principles to Guide Ethical Decision-Making in the Digital Era [online] Forbes. Available at <https://www.forbes.com/sites/forbesbusinessdevelopmentcouncil/2022/02/07> [Accessed 19 January 2024] p4-5

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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 person⁴ 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

⁴ Person means an authorised FFT officer or APS employee

3.3 FFT Ethical decision-making model

The FFT Ethical and Human Oversight Framework has the FFT Ethical Decision-Making Model (Model), a process to work through ethical issues and guide ethical decision-making. The process incorporates assessing an issue or situation, developing options including the potential consequences of each option, analysing which option best aligns with the APS Values and FFT Ethical Principles, and then acting on those conclusions and making a decision.

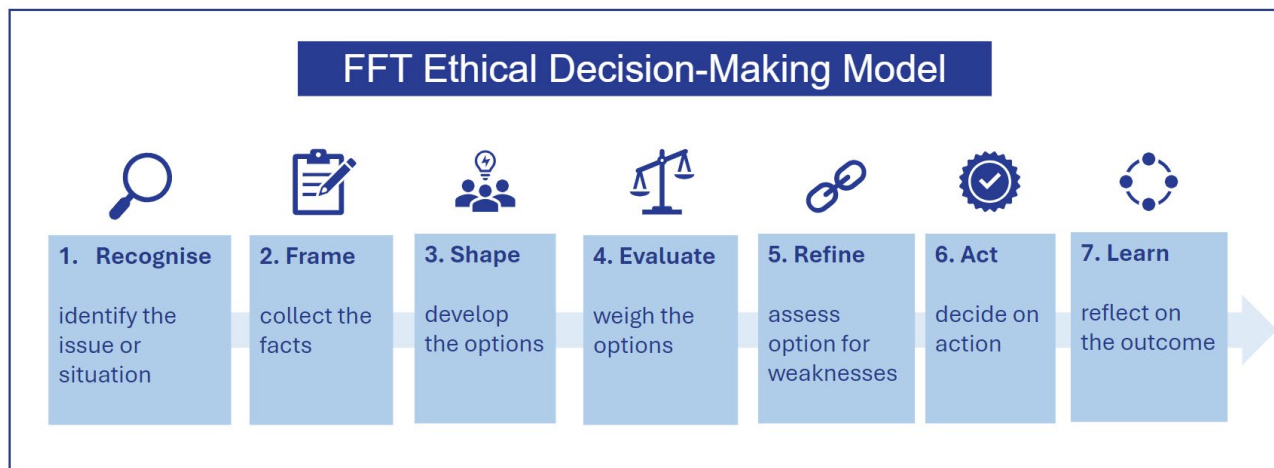


Figure 2: FFT Ethical Decision-Making Model (high level version).

The seven-step process offers a clear and simple basis for addressing the ethical dimension of any decision. As with all processes, it is not a substitute for judgement. A high-level version of the model is shown below, and a full version is in Appendix 1. The FFT Ethical Decision-Making Model is supported by guidance material and tools including:

- the FFT Ethical and Human Oversight Framework Factsheet,
- the FFT Ethical Decision-Making Process Map,
- the FFT Ethical Decision-Making Assessment Tool and
- the FFT Ethical Decision-Making Register

The ethical decision-making model developed for FFT draws on ReFLECT⁵, an APS decision-making model, the Australian Institute of Company Directors ethical decision-making model developed with the Ethics Centre and the NSW Council of Social Services (NCOSS) A Guide to Ethical Decision Making.

⁵ Australian Public Service Commission (2023) The ReFLECT model: a decision-making model for APS Values and Code of Conduct [The REFLECT model \(apsc.gov.au\)](https://www.apsc.gov.au/the-reflect-model)

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4. Roles and Responsibilities

POSITION/GROUP	ROLE AND RESPONSIBILITIES
Party to the MOU	• Demonstrates and promotes a culture and character that reflects the purpose, APS Values and FFT Ethical Principles (the ethical framework) of the FFT. • Liaises with the Taskforce Management Office (TMO) on the monitoring of ethical issues and considerations and associated risks.
Inter-Departmental Committee (IDC)	• Establishes and maintains the FFT's Ethical and Human Oversight Framework. • Endorses the Framework and guidance material. • Ensures ethical conduct and decision-making in relation to the activity of FFT. • Considers ethical situations and risks as part of Taskforce planning processes using tools in this Framework and makes and records ensuing decisions. • Monitors outcomes of decisions for ongoing ethical concerns. • Oversees the integrated risk management of FFT ethical risks. • Notifies higher authorities and/or ethic committees of ethical matters where appropriate. • Where appropriate, nominates senior personnel from participating FFT agencies to represent their agency on the FFT assurance activities.
Strategic Prevention Committee (SPC), Intelligence and Operations Committee (IOC) and Working Groups	• Identifies, analyses and consults on any ethical situations or issues in relation to new or ongoing work of the Committees and in accordance with ethical decision-making model. • Documents ethical issues, alternative actions and any requirement for evaluation by the IDC. • Documents any risks associated with the alternative actions to inform evaluation of IDC. • Records any risks associated with selected decision and action on relevant risk register.
Taskforce Management Office (TMO)	• Supports the Parties and FFT Committees with implementation of the Framework including: ○ FFT guidance materials, templates and tools. ○ documenting and reporting ethical issues, risks and decisions. ○ regular review of the effectiveness of the Framework

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5. Operating Environment

Ethical situations need to be managed in the context of achieving the FFT's purpose and objectives and should have regard to the FFT's operating environment. Considerations are discussed below. Appendix 2 provides a practical application of the Framework.

5.1 Consultation with Stakeholder Groups

The ethical decision-making model requires consultation with relevant stakeholders on ethical issues that arise in the context of FFT activity (Step 2). More broadly and through the FFT Communications and Engagement Plan, the FFT will regularly engage and consult with stakeholder groups on the FFT's implementation and achievement of its objectives. The FFT will continue to build trust with participants and customers, including through engagement, co-design, and communication initiatives to support participants and customers as part of the FFT Communications and Engagement Plan. The FFT will also leverage off existing sector-led engagement and co-design working groups. This structured engagement will provide stakeholder and community feedback on FFT activity and be used to inform ethical decision-making.

5.2 Advice to Government and other Key Stakeholders

The FFT will provide objective and timely advice to government on matters of FFT significance that would require government awareness and/or input. The use of the Framework will ensure that advice is considered, informed and evidence based.

The FFT Communications and Engagement Strategy and FFT Reporting Framework and the FFT Evaluation Framework will provide rigor around timely dissemination of evidence-informed advice to government, including relevant Ministers. These will also address engagement with, and reporting to, other key stakeholders by the FFT to meet their needs.

5.3 Embedding Risk Management

In applying the values and principles of the FFT Ethics and Human Oversight Framework, the FFT will have regard to risk-based decision-making.

All ethical risks will be managed through an integrated risk management framework for the FFT. The FFT risk matrix will be used for decision guidance and allocation of treatment options. Ethical risks should be addressed in strategic and operational risk assessments for all key activity of the FFT and recorded on relevant FFT risk registers.

If an ethical risk is rated in the High to Critical outcome stage, a treatment plan or ethical decision-making process should be undertaken using the FFT ethic decision-making model and measured against the FFT risk matrix. If the outcome does not comply with the

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APS Values and FFT Ethical Principles, it may expose the FFT to the risk of failing to meet the framework's objectives and broader FFT objectives.

The FFT will appropriately manage conflicts of interest including through its governance processes and FFT Conflict of Interest Policy. All new activity will be determined to be ethically acceptable before it commences. The FFT will appropriately utilise evidence and the decision-making model to make decisions in a rational, legally valid and procedurally fair manner.

5.4 Data ethics

The values and principles concerning data in the FFT Ethics and Human Oversight Framework will be embedded into the FFT strategic and operating frameworks in accordance with legislative requirements. The implementation of these arrangements will be defined in the FFT Data Governance Plan. Participating agencies will also be informed by their own agency's data ethic frameworks which will inform decision-making by the FFT.

5.5 Accountability and Human Oversight

The FFT is committed to the application of sound ethical conduct and decision-making in relation to its activity and to achieving its purpose and objectives. Each agency is bound to uphold ethical conduct throughout their work and are accountable for their own actions regarding any activity relating to FFT. Each agency is required to follow the ethical conduct mentioned within this Framework in addition to following their own individual legislative requirements or internal processes.

Ethically sound decision-making processes regarding the continued need for human oversight is the responsibility of each member agency. Each member agency will follow their own legislation and previously established processes to imbed required human oversight as outlined in this framework.

5.6 Continuous Improvement and Assurance

The application of the Ethics and Human Oversight Framework by the FFT will be subject to FFT assurance processes. The NDIA Ethics Committee and other ethic committees in participating agencies will act as an assurance process for decisions of individual agencies.

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6. Implementation of the Framework

The *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and APS Code of Conduct sets out the obligations of officials for making decisions and ethical obligations. To assist personnel to meet their obligations, the FFT Ethics and Human Oversight Framework will be embedded in the work of the FFT including:

- updating relevant policies, procedures and documents to facilitate the effective implementation of the FFT Ethics and Human Oversight Framework
- ensuring there is regular recording of the active implementation of the FFT Ethics and Human Oversight Framework in each step of the decision-making process
- developing guidance and support on how to implement the FFT Ethics and Human Oversight Framework and use the decision-making tools and
- undertaking regular assurance reviews of FFT compliance with the FFT Ethics and Human Oversight Framework and make any necessary improvements.

The FFT will have appropriate regard to relevant measures and outcomes for integrity improvement from other important government initiatives underway, including the [APS Integrity Taskforce](#) and [Integrity Agencies Group](#), to ensure ethical integrity is embedded into FFT governance and operations.

6.1 Initial Implementation

The first six months of implementation will be focused on the FFT Committees and working groups. The Framework will be tested through its application to specific FFT projects. This targeted approach will assist the TMO to review the effectiveness of the Framework, make improvements and provide an enhanced Framework and supporting tools to the FFT membership.

6.2 Reporting

The *Public Governance, Performance and Accountability Act 2013* (PGPA Act) requires each agency to establish and maintain systems relating to risk and control. Timely and accurate reporting is essential to monitoring the FFT's performance to ensure:

- FFT will follow the principles of the PGPA Act in its approach to risk management.
- FFT Committees can maintain appropriate oversight of FFT activities and operations.
- FFT can appropriately manage all risks including emerging and ethical risks and
- FFT is complying with its Frameworks.

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The FFT Reporting Framework has framework assurance and risk reporting requirements. FFT framework assurance and risk reporting may be used for annual reporting purposes and at the discretion of the FFT.

6.2.1 FFT Framework Assurance Reporting

The Taskforce Management Office (TMO) will coordinate assurance activities to monitor compliance with FFT Frameworks and Registers. This includes compliance with the Ethics and Human Oversight Framework. This will ensure the Inter-Departmental Committee (IDC) has effective oversight and can monitor the successful adoption of the Framework.

The quarterly assurance process will include the FFT Committees and working groups providing documented ethical decision outcome information to the TMO for review. This information will inform the assurance reporting to IDC.

6.2.2 FFT Risk Reporting

FFT Committees and working groups provide oversight to specific areas of strategic operations and are responsible for identifying and managing risks including emerging and ethical risks that impact FFT activity, operations and decisions on an ongoing basis.

All risks including emerging and ethical risks should be reported through meeting minutes and managed through operational registers. Risks that require escalation to IDC will be communicated to the TMO for recording on the FFT Strategic Risk Register.

Reporting on risk to IDC will occur quarterly through the FFT Strategic Risk Register.

The FFT Strategic Risk Register will be provided to IDC to discuss and consider:

- any identified risks that impact FFT operations, and recommended treatments,
- potential risks raised by FFT member agencies and
- whether identified risks sit on FFT Strategic Risk Register, the respective agency's risk register, or both.

Risks rated as 'High' or above must be escalated to and monitored by the IDC. The relevant risk owners are responsible for regularly reporting on these risks and implementing risk mitigation strategies to ensure the risk rating is maintained at an acceptable level. FFT Committees and working groups should review and update the Strategic Risk Register regularly.

6.3 Post Implementation Review

The FFT is committed to continuous improvement.

The TMO will manage an ethical decision register that catalogues ethical decisions and facilitates the monitoring of decision outcomes by the decision-makers. Assurance activity

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will include assessing and analysing decision outcomes for trends and learnings. FFT will be able to use the information to reflect on outcomes, refine their ethical decision-making and sets precedents for future decisions with an ethical dimension.

At least every six months, the Ethics and Human Oversight Framework will be reviewed by a sub-set of FFT member agencies to evaluate its effectiveness, update if required and report back to IDC. The TMO will manage a framework review register to record feedback provided anytime during implementation which will assist the six-monthly Framework review process. This could include referring the FFT Ethical Principles back to the Reform for Outcomes Fraud Working Group for co-designing enhancements to the Framework.

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7. Appendices

7.1 Appendix 1: FFT Ethical Decision-Making Model (Full version)

STEP 1: Recognise

Purpose: Initial analysis of the issue or situation.

Recognise a potential issue or situation which requires a decision and the appropriate decision-maker.

- what is the issue or situation?
- is it an ethical issue or a legal or technical decision, complaint, or performance issue?
- who has the power and authority to decide?
- is there sufficient information available to decide now?

STEP 2: Frame

Purpose: To define and understand the precise nature of the ethical issue to be decided.

Gather, review and document the available and relevant information about the ethical issue including:

- what are the circumstances?
- what are the facts?
- any assumptions being made about the issue?
- identify relevant legislation, policies and/or guidance information (APS wide and agency specific)
- are there any 'non-negotiables' (e.g. relevant laws that must be obeyed)?
- which stakeholders have a legitimate interest in this issue?
- what is the nature of each legitimate stakeholder interest and are stakeholder interests aligned or divergent?
- identify and prioritise which APS Values and FFT Ethical Principles relate to the ethical issue? (Prioritise the APS Values and FFT Ethical Principles that most closely align with the issue or situation or have a link to a FFT Strategic Risk.)

STEP 3: Shape

Purpose: To develop options that could resolve the ethical issue.

Develop options to resolve the ethical issue or situation. Nothing should be 'off the table' in this step.

- what type of ethical issue (e.g. fraud, non-compliance, potential harm, automation)?
- what are the options or courses of action available?
- discuss and review the options with colleagues, managers, and relevant stakeholders identified in *STEP 2. Frame*.
- are there any likely consequences to important stakeholders?

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- are any consequences already in the FFT Risk Consequence Table?
- if possible, compare with similar FFT ethical decisions where a reasonable precedent has been established.

STEP 4: Evaluate

Purpose: Apply a matrix of values and principles to evaluate the options.

Take two or three of the best options and rate the options against the identified APS Values and FFT Ethical Principles in *Step 2 – Frame*.

- weigh up the options against the identified relevant APS Values and FFT Ethical Principles to determine the best option.

The purpose of rating the options is to ensure that, as a minimum, the APS Values and FFT Ethical Principles are used as the ‘index for judgement’ for determining the best option.

STEP 5: Refine

Purpose: Identify and eliminate weaknesses in the proposed course of action.

Take the option that has fared best in the matrix to identify its major areas of weakness. Adjust the proposal to eliminate the weaknesses without damaging the overall integrity and utility of what has been proposed.

- what are the weaknesses and risks with the preferred option?
- will the option produce the most good and do the least harm?
- apply the accountability test – would the decision stand up to public scrutiny/independent review?

STEP 6: Act

Purpose: All ethical decision-making is practical – it ultimately requires that a decision be given effect.

Come to a decision and act on it.

- document the decision, including the reasoning behind the decision and the decision-maker.
- document any identified risks associated with the decision or course of action on the relevant risk register.

STEP 7: Learn

Purpose: Reflect on the decision and what can be learned from it and applied in the future.

Regularly monitor the decision outcome and/or course of action and communicate the learnings across the FFT and/or agency.

- what was the outcome of the decision?
- is the relevant committee/agency comfortable with the decision?
- how did it turn out for all concerned?
- what was learnt from the decision?

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7.2 Appendix 2: Application of the Framework Guidance

The Guidance provides context of the APS Values and FFT Ethical Principles in the FFT operating environment. The Guidance will assist with applying the FFT Ethical Decision-Making Model and recording the process on the FFT Ethical Issue Questionnaire.

APS VALUE	ETHICAL PRINCIPLES	APPLICATION	CONSIDERATIONS
Respectful	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. 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 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.

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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.
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 framework, 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.	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

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		We will ensure people are properly heard and, where it is legal and safe, will receive an appropriate and timely response.	
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.
Stewardship (pending)	We recognise that our activity (decisions, actions and operations) will impact on the community and individuals.	This means: - We will have regard to the public interest and those that support it, within our decision-making. - Where allowed under law and in the public interest, we will endeavour 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

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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.
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s 22

From: Smith, Barb
Sent: Friday, 12 September 2025 9:03 PM
To: s 47F(1) ; s 22 ; s 47F(1) ; Helen Wilson
Cc: s 47E(d) s 47F(1) ; s 47F(1) ; s 47E(d)
Subject: RE: Next Steps> FFT Ethics and Human Oversight Framework [SEC=OFFICIAL]

Hi s 47F(1)

Apologies for my absence at the meeting, we had an urgent operational priority. I have no redline issues with the current version or proposed next steps and support the revised positioning as a guide.

Kind regards

Barb Smith

National Manager, Fraud Investigation Branch
 Fraud Control and Investigations Division
 Phone: s 47F(1) Mobile: s 47F(1)



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Services Australia acknowledges the Traditional Custodians of the lands we live on. We pay our respects to all Elders, past and present, of all Aboriginal and Torres Strait Islander nations.

From: s 47F(1) @ndis.gov.au>
Sent: Thursday, 11 September 2025 3:27 PM
To: Smith, Barb s 47F(1) @servicesaustralia.gov.au>; s 22 @servicesaustralia.gov.au>; s 47F(1)
 @ato.gov.au>; Helen Wilson s 47F(1) @ato.gov.au>
Cc: s 47E(d) @ndis.gov.au>; s 47F(1) @ndis.gov.au>;
 s 47F(1) @ndis.gov.au>; s 47E(d)
 s 47E(d) @servicesaustralia.gov.au>
Subject: Next Steps> FFT Ethics and Human Oversight Framework [SEC=OFFICIAL]

Caution: Do not click any links or open any attachments unless you trust the sender and believe the content to be safe.

Good afternoon,

Thanks to all that joined us in today's session to discuss the revised version of the FFT Ethics and Human Oversight Framework.

As discussed, here is an update to underpin this session.

Overview to date:

- Version 1.0 of the Framework was endorsed in 2024 by IDC (PDF attached).
- Testing was undertaken with several FFT projects/initiatives to pilot implementing the Framework.
- The testing determined tools/artefacts and assurance process was difficult to implement.
- Taskforce Management office (TMO) sought and analysed feedback, resulting in V2.0 being positioned as a guidance document rather than a framework to support FFT member agencies (word doc attached).
- TMO sought additional feedback from SA/ATO and considerations into V2.0.
- TMO embedded control process for ethics and risk by including these as standing agenda items across all committee and working groups.
- TMO documents ethical issues, risks and decisions gathered through committees and working groups and provides support for escalation.
- TMO provided V2.0 draft to SA/ATO for consultation prior to IDC Out of Session (OoS) endorsement.

Next steps:

- Version 2.0 to be repositioned as a guide (removing all reference to a framework) – reflected in the attached word document.
- TMO to include reference to the *'Policy for responsible use of AI in government'* – Digital Transformation Agency.
- TMO to consider consultation with smaller FFT agencies on V2.0.
- TMO is now undertaking assurance mapping of existing FFT artefacts to further embed ethics and risk.
- I will talk to the OoS process at next week's IDC, pending feedback from SA and ATO via this process.
- SA/ATO endorse latest version of V2.
- TMO to conduct IDC OoS endorsement process post September IDC.

Any questions, please do not hesitate to reach out! Please highlight any redline issues prior to next week's IDC.

Kind regards,

s 47F(1)

s 47F(1) (she/her)
 Acting Branch Manager, Fraud Fusion Taskforce Capability
 Integrity Transformation & Fraud Fusion Taskforce Group
National Disability Insurance Agency
 M s 47F(1)
 Email s 47F(1) [@ndis.gov.au](mailto:s 47F(1)@ndis.gov.au)

Executive Assistant s 47F(1) | s 47F(1) [@ndis.gov.au](mailto:s 47F(1)@ndis.gov.au)



The NDIA acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to Elders past, present and emerging.



From: s 47F(1) **On Behalf Of** s 47F(1)
Sent: Wednesday, 10 September 2025 12:52 PM
To: Smith, Barb s 47F(1) [@servicesaustralia.gov.au](mailto:s 47F(1)@servicesaustralia.gov.au); s 22 [@servicesaustralia.gov.au](mailto:s 22@servicesaustralia.gov.au)
s 22 [@servicesaustralia.gov.au](mailto:s 22@servicesaustralia.gov.au); s 47F(1) [@ato.gov.au](mailto:s 47F(1)@ato.gov.au); Helen Wilson
s 47F(1) [@ato.gov.au](mailto:s 47F(1)@ato.gov.au)
Cc: s 47E(d) [@ndis.gov.au](mailto:s 47E(d)@ndis.gov.au)
Subject: FFT Ethics and Human Oversight Framework

Good afternoon all,

Please find attached the draft revised FFT Ethics and Human Oversight Framework v2.1, as a pre-read prior to our meeting tomorrow at 11:00am.

Our intention is to seek OoS IDC endorsement with ATO and SA support.

Look forward to seeing you all tomorrow.

Kind regards,

s 47F(1) (she/her)
Acting Branch Manager, Fraud Fusion Taskforce Capability
Integrity Transformation & Fraud Fusion Taskforce Group
National Disability Insurance Agency
M s 47F(1)
Emails 47F(1) [@ndis.gov.au](mailto:s 47F(1)@ndis.gov.au)

Executive Assistant s 47F(1) | s 47F(1) [@ndis.gov.au](mailto:s 47F(1)@ndis.gov.au)



The NDIA acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to Elders past, present and emerging.



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Australian Government
Fraud Fusion Taskforce

Fraud Fusion Taskforce

Ethics Guide

Version: 2.0

Date: October 2025

Author: NDIA Fraud Fusion Taskforce Capability Branch

Commencement: Endorsed by IDC on 31 October 2025

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Contents

1. Introduction 3

2. Purpose and Scope..... 3

3. Legal and Regulatory Obligations 3

4. Guiding Ethical Principles 4

5. Standards of Conduct..... 5

6. Ethical Considerations 5

7. Governance and Responsibilities 5

8. Procedures for Raising Ethical Matters..... 5

9. Support and Guidance..... 6

10. Document Review 6

11. Appendices..... 7

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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.

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4. Guiding Ethical Principles

The Taskforce commits to the following core values and principles:

APS Values

Impartial

The APS is apolitical and provides the government with advice that is frank, honest, timely and based on the best available evidence.

Committed to Service

The APS is professional, objective, innovative and efficient, and works collaboratively to achieve the best results for the Australian community and the government.

Accountable

The APS is open and accountable to the Australian community under the law and within the framework of Ministerial responsibility.

Respectful

The APS respects all people, including their rights and their heritage.

Ethical

The APS demonstrates leadership, is trustworthy, and acts with integrity, in all that it does.

Stewardship

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.

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.

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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.

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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.

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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.



Australian Government
Fraud Fusion Taskforce

ETHICAL BEHAVIOURS

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.

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.

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.

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.

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.

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.

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.

OFFICIAL**11.2. Appendix B: Guidance for applying ethics in practice**

The Guidance provides context of the APS Values and FFT Ethical Principles and applying these in the FFT operating environment.

<u>APS VALUE</u>	FFT ETHICAL PRINCIPLES	APPLICATION	CONSIDERATIONS
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.
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

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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.
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.

OFFICIAL

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.
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

s 22

From: s 22 @servicesaustralia.gov.au> on behalf of s 47E(d) @servicesaustralia.gov.au>
Sent: Monday, 3 November 2025 8:09 AM
To: s 47F(1) ; s 47E(d) ; s 47F(1) s 47F(1) ; s 47F(1)
Cc: s 47E(d) ; s 47F(1); s 22 ; s 22
Subject: RE: DCEO APPROVED - IDC Co-CHAIR APPROVAL | FW: FOR ACTION: Due 17/10: FFT IDC | Out of Session Endorsement Request | FFT Ethics Guide [SEC=OFFICIAL:Sensitive]

Good morning s 47F(1)

Our team have followed up on the below.

Please note, the Ethics Guide was endorsed by IDC Co-Chair Chris Birrer on 31 October 2025.

Kind regards,

s 22 | A/g Assistant Director
 Fraud Fusion Taskforce Program Delivery | FFT Investigations
 Fraud Investigation Branch
 FRAUD CONTROL & INVESTIGATIONS DIVISION



SERVICES AUSTRALIA

servicesaustralia.gov.au | Follow us on     



I acknowledge the Traditional Custodians of the lands we live on.

I pay my respects to all Elders, past and present, of all Aboriginal and Torres Strait Islander nations.

From: s 47F(1) s 47F(1) @ndis.gov.au>
Sent: Thursday, 30 October 2025 6:55 PM
To: s 22 @servicesaustralia.gov.au>; s 47F(1) @servicesaustralia.gov.au>
Cc: s 47E(d) @ndis.gov.au>; s 47F(1) @ndis.gov.au>;
 s 47E(d) @servicesaustralia.gov.au>; s 47F(1)
 s 47F(1) @ndis.gov.au>; s 47F(1) @ndis.gov.au>
Subject: RE: Seeking Meeting> FFT Ethics & Human Oversight Framework [SEC=OFFICIAL:Sensitive]

Caution: Do not click any links or open any attachments unless you trust the sender and believe the content to be safe.

Hi s 22 and s 47F(1)

We have quorum in the TMO for the IDC endorsement of the FFT Ethics Guide (see attached email), however I note that we do not have a formal response from SA.

Can I please seek your advice/assistance to confirm SA endorsement?

I know you are supportive of the refreshed approach, and I am keen to ensure we land Co-Chair endorsement on this important artefact.

Happy to chat, please let me know!

Kind regards,

s 47F(1)

s 47F(1) (she/her)

Acting Branch Manager, Fraud Fusion Taskforce Capability

Integrity Transformation & Fraud Fusion Taskforce Group

National Disability Insurance Agency

M s 47F(1)

Email s 47F(1) [@ndis.gov.au](mailto:s 47F(1)@ndis.gov.au)

Executive Assistant s 47F(1) | s 47F(1) [@ndis.gov.au](mailto:s 47F(1)@ndis.gov.au)



The NDIA acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to Elders past, present and emerging.



Annexure C

Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)

Between: ACNC (“the New Party”) and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: 15 September 2023

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):

ACNC

As a Party, the Australian Charities and Not-for-profits Commission (ACNC) will provide data to the Fraud Fusion Taskforce through a resource contribution to the ACIC led Intelligence program, access to relevant databases and support for appropriate data interface and analysis.

Primary responsibilities:

- *Operational support to investigate and take action against fraud within its powers.*
 - *General intelligence and analytics advice and support within current functions.*
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

S 47F(1)

Susan Woodward AM, ACNC Commissioner

(Name and Title of New Party i.e., applying
Agency Representative)

Date: 15 September 2023

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC

S 47F(1)

John Dardo, Deputy CEO, Integrity Transformation & Fraud Fusion Taskforce

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 29 October 2024

Annexure C

Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)

Between: Australian Skills Quality Authority (“the New Party”) and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: 15 April 2024

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1)

Saxon Rice, Chief Executive Officer
(Name and Title of New Party i.e., applying

Agency Representative)

Date: _____

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Chair:

s 47F(1)

John Dardo - Deputy CEO Integrity Transformation and Fraud Fusion Taskforce
(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 15 April 2024

Annexure C**Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)**

Between: NIAA ("the New Party") and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: _____

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1) _____

RACHAEL JACKSON, CHIEF OPERATING OFFICER
(Name and Title of New Party i.e., applying

Agency Representative)

Date: 1 July 2024

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Chair:

s 47F(1) _____

John Dardo, Deputy CEO, Integrity Transformation and Fraud Fusion Taskforce, NDIA

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 26 July 2024

OFFICIAL: SENSITIVE

Annexure C

Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)

Between: Tara Proctor-Horne & Board ("the New Party") and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: 11/7/24

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1) _____

Michael J. Neill

(Name and Title of New Party i.e., applying

Agency Representative)

Date: 11/7/24

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Ch

s 47F(1)

John Dardo, Deputy CEO, Integrity Transformation and Fraud Fusion Taskforce, NDIA

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 26 July 2024

Annexure C

Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)

the Aged Care Quality

Between: and Safety Commission ("the New Party") and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: _____

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

(s 47F(1)) _____

Janet Anderson PSM, Commissioner

(Name and Title of New Party i.e., applying

Agency Representative)

Date: 4/9/2024 | 12:39 AEST

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co

(s 47F(1)) _____

John Dardo, Deputy CEO, Integrity Transformation & Fraud Fusion Taskforce
(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 29 October 2024

Annexure C**Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)**

Between: Professional Services Review ("the New Party") and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: 16.10.2024

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1)

Antonio DiDio Director, PSR
(Name and Title of New Party i.e., applying
Agency Representative)

Date: 16.10.2024

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Chair:

s 47F(1)

John Dardo, Deputy CEO, Integrity Transformation & Fraud Fusion Taskforce
(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date _____

OFFICIAL: SENSITIVE

Annexure C**Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)**

Between: DISR ("the New Party") and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: 28 Feb 2025

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1)_____

(Name and Title of New Party i.e., applying

Agency Representative)

Date: 28 Feb 2025

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Chair:

s 47F(1)_____

Chris Birner
Deputy CEO, Services Australia

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 1 April 2025

OFFICIAL: Sensitive

OFFICIAL: SENSITIVE

Annexure C**Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)**Office of the Registrar of Aboriginal
and Torres Strait IslanderBetween: Corporations ("ORIC") ("the New Party") and the other Parties to the
Fraud Fusion Taskforce and MOU.Effective date: 21 March 2025

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

s 47F(1)

New Party:Signed on behalf of the New Party (the Agency) by the intended SES Band ²/₃ representative:**s 47F(1)**Andrew Huey, Acting Registrar of Aboriginal and Torres Strait Islander Corporations

(Name and Title of New Party i.e., applying

Agency Representative)

Date: 25/3/2025**Existing Parties:**Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC
Co-Chair:**s 47F(1)**Chris Birron, Deputy CEO, Services Australia

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 1 April 2025

OFFICIAL: Sensitive

Annexure C**Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)**

Between: _____ (“the New Party”) and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: _____

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1) _____

Anna Booth, Fair Work Ombudsman

(Name and Title of New Party i.e., applying

Agency Representative)

Date: _____

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Chair: **s 47F(1)**

Kitsa Papadopoulos - Acting DCEO (NDIA)

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 29/09/2025

Annexure C

Fraud Fusion Taskforce New Party Addendum – to become a Party to the Fraud Fusion Taskforce and Memorandum of Understanding (MOU)

Between: Comcare (“the New Party”) and the other Parties to the Fraud Fusion Taskforce and MOU.

Effective date: _____

1. The New Party wishes to become a Party to the Fraud Fusion Taskforce and the MOU.
2. The existing Parties to the Fraud Fusion Taskforce and MOU wish to accept the New Party as one of the Parties, subject to the following conditions (to be included in services to be performed in variation to Annexure A to the MOU):
(Insert relevant conditions)
3. A Fraud Fusion Taskforce IDC Co-Chair, on behalf of the existing Parties, accepts the New Party to the Fraud Fusion Taskforce and MOU, subject to the terms of the MOU (including any subsequent amendments thereto) and any conditions in this Addendum, as of the above stated effective date.

New Party:

Signed on behalf of the New Party (the Agency) by the intended SES Band 3 representative:

s 47F(1) _____

Colin Radford, Chief Executive Officer

(Name and Title of New Party i.e., applying

Agency Representative)

Date: _____

Existing Parties:

Signed on behalf of the IDC and existing Taskforce Parties by the Fraud Fusion Taskforce IDC Co-Chair:

s 47F(1) _____

John Dardo, Deputy CEO Integrity Transformation & Technology Services, NDIA

(Name and Title of Fraud Fusion Taskforce IDC Co-Chair)

Date 28/04/26



Fraud Fusion Taskforce Transition Plan

31 July 2023 Progress update

From 1 July 2023 Taskforce Integrity became Services Australia's operational response under the Fraud Fusion Taskforce (FFT) banner.

Project Management	Governance	Operational processes	Reporting
Actions ✓ Register a new project with the Enterprise Project Office (EPO). - Develop project artefacts – project management plan, benefits .realisation, risk management plan (in progress). ✓ Engage with NDIA Taskforce. Management Office (TMO) and align project management activities - Close down Taskforce Integrity Project with EPO (in progress).	Reviews ✓ Review existing intelligence and investigations governance committees Terms of Reference and role with FFT. Actions ✓ Establish intelligence and investigations workflow to support the agency and link to external FFT pipelines. ✓ Establish executive support function for attendance at SPC, IOC and IDC. - Contribute to data governance strategy and processes with partner agencies (ongoing).	Actions - Establish information release process and seek legal advice (in progress). ✓ Conduct Privacy Impact Assessment, as required (in progress). ✓ Continue current investigation management processes. ✓ Continue current Services Australia and AFP joint investigation model. - Update investigation operational guidelines.	Reviews ✓ Review and make any necessary changes to ICT systems (IMS, RMS and IRS). Actions ✓ Establish a new cost centre for financial reporting. - Identify reporting requirements and schedule for TMO reporting. ✓ Determine intelligence outcomes and business rules. ✓ Determine investigative outcomes and business rules. ✓ Develop financial report.
Resources and staffing	Communications	Stakeholders/partnerships	
Reviews - Review and update job statements, performance agreements and ensure role clarity (in progress). Actions ✓ Funding provided to extend Taskforce Integrity will fund Services Australia FFT operational activities from 1 July 2023. ✓ Equipment belonging to Taskforce Integrity remains the property of Services Australia FFT staff.	Actions ✓ Establish Fraud Fusion Taskforce (Services Australia) mailbox - Develop communications strategy in consultation with NDIA (in progress). ✓ Update internal communications i.e. webpages and org structure - Update public websites (on hold pending branding sign off). ✓ Send out FCID staff messaging - Update media holding lines. - Rebrand and update operational documents (on hold pending branding sign off).	Reviews - Review partner agency agreements, including AFP secondment process (in progress). Actions - Develop bilateral agreements as required, in consultation with partner agencies. - Notify key internal and external stakeholders.	

Fraud Fusion Taskforce Transition Plan - DRAFT

1 July 2023 to 30 June 2024

From 1 July 2023 Taskforce Integrity became Service Australia's operational response under the Fraud Fusion Taskforce (FFT) banner.

Project Management	Governance	Operational processes	Reporting
Actions - Manage project delivery in relation to taskforce integrity elements of Fraud Fusion Taskforce - Establish post 30 June 2024 plan	Reviews - Review existing intelligence and investigations operating model and connection with FFT. Actions - entrench intelligence and investigations workflow to support the agency and link to external FFT pipelines. - Maintain executive support function for attendance at SPC, IOC and IDC. - Contribute strategy and processes with partner agencies.	Actions - Manage information release process and the pursuit of seek legal advice. - Conduct Privacy Impact Assessments, as required. - Move investigation process under Investigation Branch and merge activity under BAU as funding source terminates - Operate Services Australia Intelligence assessment Centre and Seconded employees - Continue current Services Australia and AFP joint investigation model	Actions - Implement intelligence outcomes and business rules in consultation with partner agencies. - Implement investigative outcomes and business rules in consultation with partner agencies. - Implement financial report—expenditure business rules to be determined in consultation with partners. - Intelligence expenses reported from 2022-23. - Investigation expenses reported from 2023-24.
Resources and staffing	Communications	Stakeholders/partnerships	
Actions Implement the agree structural changes to enable split Intelligence and Investigation functions	Actions - Update internal communications i.e. webpages and org structure - Update public websites (on hold pending branding sign off). - Send out FCID staff messaging. - Update media holding lines. - Rebrand and update operational documents.	Reviews - Review partner agency agreements, including AFP secondment process. Actions - Develop bilateral agreements as required, in consultation with partner agencies. - Notify key internal and external stakeholders.	

Contact

If you have any questions please contact the Fraud Fusion Taskforce via email at:

▶ s 47E(d) @ servicesaustralia.gov.au.