



Department of
the Premier and Cabinet

PRIS Privacy and Responsible
Information Sharing

Privacy and Responsible Information Sharing

Advisory Committee

Code of Conduct

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Introduction

The Code of Conduct (the Code) sets out the principles and behavioural expectations that apply to individuals serving as members of the Privacy and Responsible Information Sharing (PRIS) Advisory Committee (the Committee).

The Committee is established under the *Privacy and Responsible Information Sharing Act 2024* (PRIS Act), to provide advice to the Chief Data Officer in the performance of the Chief Data Officer's functions. Members are subject to the requirements of the PRIS Act and the *Privacy and Responsible Information Sharing (Information Sharing) Regulations 2024* (Information Sharing Regulations).

The Code is consistent with Commissioner's Instruction 40: Ethical Foundations and supports the Public Sector Code of Ethics. It should be read in conjunction with the Committee's Terms of Reference and the Governance Manual for Western Australian Government Boards and Committees.

Principle one: Personal behaviour

The public expects members to act with integrity and with regard for the Government's policies, priorities and the public interest. This applies during Committee meetings and when representing the Committee in public forums.

Members of the Committee are appointed as individuals on the merits of their knowledge, experience, influence, and professional networks and not as representatives of specific organisations.

Members of the Committee will:

- be well informed about the role and purpose of the Committee;
- be actively engaged in the work of the Committee;
- put the interests of the public ahead of their own by acting responsibly, ethically, and with integrity;
- treat all Committee members, stakeholders, the Government and members of the public with respect, fairness, good faith and professionalism, having proper regard for their rights, safety and welfare;
- provide fair and impartial advice considering all available information, legislation and policies that are in the public interest; and
- report incidents and unacceptable behaviours to the chairperson, while maintaining professional and respectful working relationship.

Principle two: Communication and information handling

Appropriate handling of information is essential to maintaining public trust and enabling the Committee to provide high-quality advice.

Information relating to the Committee's functions is information created, received, or held in the course of the Committee's official functions. Members may also have access to sensitive information in the course of their role.

Members are expected to communicate responsibly and handle information lawfully and with discretion and sound judgement.

Members will:

- handle OFFICIAL information only for legitimate Committee purposes and within the scope of their role;
- safeguard all information from unauthorised access, use or disclosure;
- exercise discretion in public forums, including when speaking at events, engaging with stakeholders or using social media;
- not make public statements, comments or disclosures on behalf of the Committee unless authorised to do so; and
- comply with any directions or protocols relating to communication with Ministers, Members of Parliament, their staff, lobbyists and the media.

Principle three: Fraudulent or corrupt behaviour

Fraud is defined as dishonest activity causing actual or potential financial loss to a person or organisation.

Corrupt conduct occurs when a member uses or tries to use their position for personal gain or to the detriment of others.

Fraudulent or corrupt behaviour undermines public trust and confidence in the Committee and the Government, and their ability to conduct ethical decision-making. It can damage the reputation of the Committee, the Government and the broader public sector.

Members will:

- not engage in fraudulent or corrupt behaviour; and
- report suspected instances of fraudulent or corrupt behaviour to the chairperson, who will consider the appropriate response.

Principle four: Use of public resources

Committee members are required to use the Government's resources responsibly. Unauthorised use of public resources will be subject to the relevant criminal legislation.

Members have a responsibility to safeguard public resources they use in their official duties and ensure reasonable precautions are taken to prevent loss, damage or unauthorised use.

Members will:

- avoid unnecessary or inefficient use of public resources;
- not use public resources for party political purposes, commercial or financial gain;
- maintain appropriate documentation to support claims for sitting fees, travel, accommodation and use of other public resources;
- ensure that public resources are only used for Committee-related business; and
- report any loss, damage or unauthorised use of public resources to the chairperson immediately.

Principle five: Record keeping and use of information

Correspondence and documents created or received relating to the Committee's business are considered government records. These include, but are not limited to, memos, shorthand notes, text messages, emails and workbooks.

Government records are subject to the requirements of the State Records Act 2000 and the provisions of the Freedom of Information Act 1992.

Members will:

- ensure that all official actions, decisions and relevant discussions are accurately recorded and any corrections are made promptly;
- ensure that information and records within their control (in paper or electronic form) are kept secure;
- ensure all documents are handled and stored according to their sensitivity;
- treat agenda papers as confidential and refrain from replicating or distributing them to anyone else; and
- not disclose official information to unauthorised persons.

Principle six: Conflicts of interest and receiving gifts and benefits

A conflict of interest arises when a member's personal, professional, social, commercial, political or other interests interfere with, could reasonably be perceived to interfere with, or have the potential to influence their duties as a member of the Committee.

Conflicts of interest may be direct or indirect, and may be actual, potential or perceived to exist. A conflict of interest can arise in various forms and circumstances, whether or not it results in improper conduct.

The receiving of a gift, benefit or hospitality may immediately, or in the future, give rise to a conflict of interest. A conflict of interest may exist if the gift, benefit or hospitality influences, or could reasonably be perceived to influence the member's relationship or mutual obligation with the third party, in connection with their duty as a Committee member.

A foreign interference risk may arise where a member's interest or relationship is, or could reasonably be perceived to be, influenced by a foreign organisation or entity, in a way that may affect the duty of the Committee member.

It is not always possible to avoid a conflict of interest, and having one is not necessarily a problem. It is vital that it is promptly declared and managed appropriately.

Part 2, Division 4 of the *Privacy and Responsible Information Sharing (Information Sharing) Regulations 2025* (Information Sharing Regulations) sets out requirements and procedures relating to material personal interests.

Members will:

- declare actual, potential or perceived conflicts of interest to the Committee, as soon as possible after they are identified by the member.
- declare actual, potential or perceived foreign interference risks to the Committee, as soon as they are identified by the member.

- include in their disclosure how they intend to manage the conflict of interest and ensure that all relevant information is accurately recorded in the Conflict of Interest Register.
- refrain from being present at a meeting while the matter in which the member has a material personal interest is being considered.
- refrain from voting on a matter in which the member has a material personal interest.
- refrain from signing or assenting to, or being involved in the consideration of, a proposed resolution in writing without a meeting in respect of a matter in which the member has a material personal interest.
- ensure that relationships with individuals, organisations and groups known to them do not affect their ability to provide impartial and reasonable advice.
- not use their role on the Committee to solicit gifts, benefits and hospitality for themselves or others.
- ensure that any offer of gifts, benefits or hospitality to them as part of their work and activities as a Committee member does not compromise their role on the Committee in making fair and impartial decisions.
- declare any gifts or benefits received as part of their work and activities.

Principle seven: Reporting suspected breaches of the code

Committee members have a responsibility to report a suspected breach of this Code and are encouraged to report suspected breaches to the chairperson or secretariat. The chairperson will consider an appropriate course of action and may consult the Public Sector Commission.

A suspected breach may be investigated by the Public Sector Commissioner for minor misconduct, or the Corruption and Crime Commissioner for serious misconduct.

Ordinary members may be removed from office on the grounds specified in regulation 8 of the Information Sharing Regulations, including misconduct.