



Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**

APVMA Policy

Public Interest Disclosure

Formal direction to all employees

I, Scott Hansen, Chief Executive Officer of the Australian Pesticides and Veterinary Medicines Authority (APVMA) hereby endorse this Policy in accordance with section 13(5) of the Public Service Act 1999, this document constitutes a formal direction. As a result, failure to comply with this Policy may constitute a breach of the APS Code of Conduct.

This direction takes effect on 20th May 2026 and will remain in effect until further notice.

Scott Hansen
Chief Executive Officer

Purpose of this document

The APVMA is committed to maintaining the highest standards of integrity, transparency and accountability. The Public Interest Disclosure Policy (the Policy) supports this commitment by providing a framework for reporting, assessing and responding to suspected wrongdoing within the APVMA and the Commonwealth public sector.

The Policy establishes a safe, fair and lawful process for making public interest disclosures, including how concerns are raised, managed and, where appropriate, investigated. By encouraging staff to speak up and ensuring disclosures are handled appropriately, the Policy helps protect individuals from reprisal, supports early identification of issues, and promotes continuous improvement.

Effective management of public interest disclosures reinforces public confidence in the APVMA as a trusted, transparent and fair regulator. It also ensures the APVMA meets its legislative obligations and supports the APVMA's Integrity Framework by embedding a strong speak-up culture and shared responsibility for integrity.

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Policy statement

1. The APVMA being perceived by the Australian public as a trusted, transparent and accountable regulator is critical to maintaining confidence in Australian agricultural and veterinary (agvet) chemical regulation. Encouraging the reporting of wrongdoing and ensuring disclosures are handled appropriately is essential to achieving this objective.
2. The *Public Interest Disclosure Act 2013* (PID Act) provides a framework for reporting and investigating suspected wrongdoing in the Commonwealth public sector and for protecting individuals who make disclosures from reprisal.
3. The APVMA is committed to fostering a culture that supports integrity, ethical behaviour and accountability, and where public officials feel safe to report wrongdoing without fear of adverse consequences.
4. The APVMA will ensure that all public interest disclosures are assessed, managed and, where appropriate, investigated in a manner that is lawful, impartial, timely and consistent with the PID Act, the Public Interest Disclosure Standard 2013 and guidance issued by the Commonwealth Ombudsman.
5. The APVMA will not tolerate reprisal action against any person who makes a public interest disclosure in accordance with the PID Act and will take all reasonable steps to prevent, identify and address reprisal.
6. This Policy applies the reasonable person test when assessing disclosures and related risks, including whether a reasonable and independent person would consider the disclosed conduct, or a response to the disclosure, to be improper, unfair or adverse.

Objective of this Policy

7. The objective of this Policy is to:
 - a) affirm the APVMA's commitment to the effective operation of the Public Interest Disclosure Scheme
 - b) encourage the reporting of suspected wrongdoing within the APVMA and the Commonwealth public sector
 - c) provide clarity about who may make a public interest disclosure and what conduct may be disclosed
 - d) outline roles and responsibilities for managing public interest disclosures
 - e) ensure disclosers are supported and protected from reprisal, and
 - f) support the fair, consistent and effective investigation of disclosures and the implementation of appropriate outcomes.

Application

8. This Policy applies to:
 - a) Any person currently or previously employed by the APVMA, including full-time, part-time, ongoing, non-ongoing and SES employees, and

- b) Individuals and entities engaged by the APVMA under Commonwealth contracts, where they fall within the definition of a public official under the PID Act (together referred to as 'public officials' in this Policy).

General definition

- 9. A public interest disclosure is a disclosure of information by a current or former public official that concerns suspected wrongdoing in the Commonwealth public sector, made in accordance with the PID Act.
- 10. Disclosable conduct includes conduct by an agency or a public official that may:
 - a) contravene a law of the Commonwealth, a State or a Territory
 - b) constitute corruption, abuse of public trust or perversion of the course of justice
 - c) amount to maladministration, including conduct that is negligent, unjust, unreasonable or oppressive
 - d) involve the misuse or wastage of public resources
 - e) unreasonably endanger health, safety or the environment
 - f) involve scientific research misconduct, or
 - g) give reasonable grounds for disciplinary action against a public official.
- 11. Disclosable conduct may have occurred before or after 15 January 2014 and may relate to a person who is no longer a public official, provided the conduct occurred in connection with their duties as a public official.

Obligation to disclose wrongdoing

- 12. Public officials who become aware of information that may constitute disclosable conduct are encouraged to report that information in accordance with the PID Act and this Policy.
- 13. A public official is not required to prove wrongdoing when making a disclosure. It is sufficient that the information tends to show, or the individual honestly believes on reasonable grounds, that disclosable conduct has occurred.

Making a public interest disclosure

- 14. A public interest disclosure may be made:
 - a) to an APVMA authorised officer, or
 - b) to a supervisor or manager, who must refer the matter to an authorised officer as soon as reasonably practicable.
- 15. Disclosures may be made orally or in writing, anonymously or using a pseudonym, and do not need to expressly state that they are made under the PID Act.
- 16. The APVMA encourages disclosers to identify themselves where possible to assist confidentiality, protection and effective investigation, noting that anonymous disclosures will be acted upon where practicable.

Confidentiality

17. The APVMA will take all reasonable steps to protect the confidentiality of:
 - a) the identity of the discloser, and
 - b) the identity of any person against whom allegations are made.
18. Information will only be disclosed where authorised by the PID Act or where reasonably necessary for the purposes of investigating the disclosure, affording procedural fairness, or managing risks of reprisal.
19. Unauthorised disclosure of identifying information may constitute a breach of the PID Act and the APS Code of Conduct.

Protection from reprisal

20. The APVMA will not tolerate any form of reprisal, threatened reprisal or detrimental action against a person because they have made, propose to make, or are suspected of having made a public interest disclosure.
21. The APVMA will:
 - a) assess and manage reprisal risks
 - b) monitor the welfare of disclosers, and
 - c) take prompt action to prevent, investigate and respond to suspected reprisal.
22. A person who intentionally makes a false or misleading disclosure is not afforded protections under the PID Act.

Decision to investigate

23. Once a disclosure is allocated for handling, the Principal Officer or delegate must decide whether the disclosure is to be investigated, in accordance with the discretionary grounds set out in the PID Act.
24. Where a decision is made not to investigate, or to discontinue an investigation, the APVMA will notify the discloser (where contact details are known) and the Commonwealth Ombudsman, as required by law.

Roles and responsibilities

Principal Officer

25. The Chief Executive Officer (CEO) is the Principal Officer under the PID Act and is responsible for:
 - a) promoting a culture that supports reporting of wrongdoing
 - b) establishing and maintaining PID procedures
 - c) appointing authorised officers
 - d) ensuring disclosures are managed and investigated appropriately

- e) protecting disclosers from reprisal, and
- f) reporting to the Commonwealth Ombudsman.

Authorised Officers

26. Authorised officers are responsible for receiving, assessing, recording and allocating public interest disclosures and for supporting disclosers in accordance with the PID Act.

Managers and supervisors

27. Managers and supervisors must:
- a) maintain awareness of PID obligations
 - b) escalate disclosures to authorised officers promptly
 - c) maintain confidentiality, and
 - d) support staff who make disclosures.

Employees

28. All employees must:
- a) assist investigations as required
 - b) maintain confidentiality of disclosures
 - c) refrain from reprisal action, and
 - d) support the effective operation of the PID Scheme.

Governance, assurance and review

29. The Integrity function within Governance, Risk & Assurance holds functional responsibility for integrity and oversight of the PID Scheme, including maintaining this Policy and supporting materials.
30. The APVMA will review this Policy periodically to ensure it remains current, effective and compliant with legislative requirements and Ombudsman guidance.

Record keeping and privacy

31. Records relating to public interest disclosures will be created, stored and managed securely in accordance with:
- a) the Privacy Act 1988
 - b) the Archives Act 1983, and
 - c) the APVMA's information management and privacy policies.
32. Access to PID records will be restricted to individuals with a legitimate need to know.

Legislative framework

- *Public Interest Disclosure Act 2013*
- *Public Interest Disclosure Standard 2013*

- *Public Service Act 1999*
- *Public Service Regulations 2023*
- *Public Governance, Performance and Accountability Act 2013*
- *Crimes Act 1914*
- *Criminal Code Act 1995*
- *Privacy Act 1988*
- *Work Health and Safety Act 2011*

Internal policies and guidance

- Integrity Framework
- Public Interest Disclosure Procedures
- Fraud and Corruption Control Policy
- Code of Conduct
- Work Health and Safety Policy