

 QIMR Berghofer	Complaints about the Public Official Policy	Effective: 9/12/2025
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1 PURPOSE AND SCOPE

1.1 Purpose

The Council Chair is the public official of The Council of the Queensland Institute of Medical Research (the Council) for the purposes of the [Crime and Corruption Act 2001](#) (CC Act).

This policy sets out how the Council will deal with a complaint (or information or matter)¹ that involves or may involve corrupt conduct, as defined in the CC Act, by the Council Chair.

1.2 Rationale

This policy is designed to assist the Council to:

- (a) Comply with s.48A of the CC Act.
- (b) Promote public confidence in the way suspected corrupt conduct by the Council Chair is dealt with (s.34(c) CC Act).
- (c) Promote accountability, integrity, and transparency in the way the Council deals with a complaint that is reasonably suspected to involve, or may involve, corrupt conduct by the Council Chair.

1.3 Scope

This policy applies:

- (a) if there are grounds to suspect that a complaint may involve corrupt conduct by the Council Chair; and
- (b) to all persons who hold an appointment in, or are employees of, the Council.

For the purpose of this policy, a complaint includes information or matter.²

2 NOMINATED PERSON

Having regard to s.48A(2) and (3) of the CC Act, this policy nominates the Chair of the Audit, Risk and Finance Committee as the nominated person to notify³ the CCC of the complaint and to deal with the complaint under the CC Act.⁴

The provisions of the CC Act that regulate how the Council Chair as the public official of the Council is to notify or deal with a complaint also apply to the nominated person.⁵

3 COMPLAINTS ABOUT THE COUNCIL CHAIR

If a complaint may involve an allegation of corrupt conduct by the Council Chair, the complaint may be reported to:

- the nominated person; or
- the CCC directly, via [this form](#) on the CCC's website; or

¹ See s. 48A(4) of the CC Act and the definitions in clause 3.

² See s. 48A(4) of the CC Act.

³ Pursuant to s. 38 of the CC Act.

⁴ Under Chapter 2, Part 3, Division 4, Subdivision 2 of the CC Act.

⁵ See s. 48A(3) of the CC Act.

- a person to whom there is an obligation to report under an Act⁶ (this does not include an obligation imposed by ss. 38 or 39(1) of the CC Act).

If there is uncertainty about whether or not a complaint should be reported, it is best to report it to the nominated person.

3.1 Complaints received by the nominated person

If the nominated person reasonably suspects that a complaint involves or may involve corrupt conduct by the Council Chair, they are to:

- (a) notify the CCC of the complaint;⁷ and
- (b) deal with the complaint, subject to the CCC's monitoring role, when pursuant to s. 46 of the CC Act, the CCC refers the complaint to the nominated person to deal with.⁸

3.2 Complaints received by the Council Chair

If the Council Chair receives a complaint that may involve corrupt conduct on their part, they must:

- (a) report the complaint to the nominated person as soon as practicable and may also notify the CCC; and
- (b) take no further action to deal with the complaint unless requested to do so by the nominated person.

4 RECORDKEEPING REQUIREMENTS

Should the nominated person decide that a complaint, or information or matter, about alleged corrupt conduct by the Council Chair is not required to be notified to the CCC under s.38 of the CC Act, the nominated person must make a record of the decision that complies with s.40A of the CC Act.

5 RESOURCING THE NOMINATED PERSON

If pursuant to s.46 of the CC Act, the nominated person has responsibility to deal with the complaint:

- (a) the Council will ensure that sufficient resources are available to the nominated person to enable them to deal with the complaint appropriately;⁹
- (b) the nominated person is to ensure that any consultations for the purpose of securing resources sufficient to deal with the complaint appropriately are confidential and are not disclosed, other than to the CCC, without:
 - (i) authorisation under a law of the Commonwealth or the State; or
 - (ii) the consent of the nominated person;
- (c) the nominated person must, at all times, use their best endeavours to act independently, impartially, and fairly having regard to:

⁶ See s. 39(2) of the CC Act.

⁷ Pursuant to s. 38 of the CC Act.

⁸ Under ss. 43 and 44 of the CC Act.

⁹ Under ss. 43 and 44 of the CC Act.

- (i) the purposes of the CC Act;¹⁰
- (ii) the importance of promoting public confidence in the way suspected corrupt conduct in the Council is dealt with;¹¹ and
- (iii) the Council's statutory, policy and procedural framework.

If the nominated person has responsibility to deal with the complaint, they are delegated the same authority, functions, and powers as the Council Chair to direct and control staff of the Council as if the nominated person is the Council Chair for the purpose of dealing with the complaint only.

6 LIAISING WITH THE CRIME AND CORRUPTION COMMISSION

The Council Chair is to keep the CCC and the nominated person informed of:

- the contact details for the Council Chair and the nominated person; and
- any proposed changes to this policy.

7 CONSULTATION WITH THE CRIME AND CORRUPTION COMMISSION

The Council Chair will consult with the CCC when preparing any policy about how the Council will deal with a complaint that involves or may involve corrupt conduct by the Council Chair.

8 STATUTORY REFERENCE

Unless otherwise stated, all statutory references are to the *Crime and Corruption Act 2001* (Qld).

9 REVIEW

This policy will be reviewed at least every three years, with any amendments to be approved by the Council and notified to the CCC.

10 DEFINITIONS

Crime and Corruption Commission (CCC)	the Commission continued in existence under the CC Act
CC Act	Crime and Corruption Act 2001 (Qld)
Complaint	includes information or matter: see the definition in s.48A(4) of the CC Act
Contact details for Nominated person	Mitchell Petrie Chair, Audit, Risk & Finance Committee Mobile: + 61 417 739 644 E-mail: mitchellpetrie31@outlook.com
Corrupt conduct	see s. 15 of the CC Act
<i>Corruption in Focus</i>	www.ccc.qld.gov.au/publications/corruption-focus ; see chapter 2, page 26

¹⁰ See s. 57 of the CC Act and the CCC's corruption purposes and functions set out in ss. 4(1)(b), 33, 34 and 35 of the CC Act.

¹¹ See s. 34(c) of the CC Act.

Council	The Council of the Queensland Institute of Medical Research, continued in existence by section 6 of the QIMR Act <i>In this Policy, the term 'Council' refers to the body corporate established under section 7 of the QIMR Act, which is also a UPA under the CCC Act.</i>
Council Chair	The chairperson of the Council appointed under s. 14(1)(a) of the QIMR Act
Deal with	see Schedule 2 (Dictionary) of the CC Act
Institute	The Queensland Institute of Medical Research continued in existence by section 5(1) of the QIMR Act
Nominated person	see section 2 of this policy
Public official	see s. 48A & Schedule 2 (Dictionary) of the CC Act
QIMR Act	<i>Queensland Institute of Medical Research Act 2025 (Qld)</i>
UPA	Unit of public administration, see s. 20 of the CC Act

11 RELATED DOCUMENTS

- Public Interest Disclosure Policy
- Public Interest Disclosure Procedure
- Misconduct and Serious Misconduct Policy
- Policy on the Responsible Conduct of Research and Research Misconduct

12 CONTACT OFFICER

Manager, Governance & Risk

13 AMENDMENT HISTORY

Version	Date approved	Approved by/Scope of change	Date due for review
1.0	9 December 2025	New policy, approved by the Council	December 2028

SCHEDULE 1 – MEANING OF CORRUPT CONDUCT

Corrupt conduct is defined in s.15 of the Crime and Corruption Act to mean:

- 1) **Corrupt conduct** means conduct of a person, regardless of whether the person holds or held an appointment, that—
 - (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of—
 - (i) a unit of public administration; or
 - (ii) a person holding an appointment; and
 - (b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that—
 - (i) is not honest or is not impartial; or
 - (ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or
 - (iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and
 - (c) would, if proved, be—
 - (i) a criminal offence; or
 - (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.
- 2) **Corrupt conduct** also means conduct of a person, regardless of whether the person holds or held an appointment, that—
 - (a) impairs, or could impair, public confidence in public administration; and
 - (b) involves, or could involve, any of the following—
 - (i) collusive tendering;
 - (ii) fraud relating to an application for a licence, permit or other authority under an Act with a purpose or object of any of the following (however described)—
 - (A) protecting health or safety of persons;
 - (B) protecting the environment;
 - (C) protecting or managing the use of the State's natural, cultural, mining or energy resources;
 - (iii) dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets;
 - (iv) evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue;
 - (v) fraudulently obtaining or retaining an appointment; and
 - (c) would, if proved, be—
 - (i) a criminal offence; or
 - (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment