



HL7 AUSTRALIA CODE OF ETHICS AND CONDUCT

Applicable from: 01 April 2026

Contents

Contents	1
1 Introduction	2
2 Scope and Application.....	2
3 Relationship to HL7 Australia Governance Processes	3
4 Ethical Principles.....	4
5 Expected Conduct.....	5
6 Standards Development Principles	6
7 Standards Development and Decision-Making Practices	7
8 Conflicts of Interest, Improper Advantage, Confidentiality and Compliance	8
9 Proper Use of HL7 Australia Products and Resources.....	9
10 Raising Concerns and Supporting Compliance	9
11 Review and Amendment.....	10
12 Interpretation	10
Annex A – Conduct Management Procedure.....	12

1 Introduction

- 1.1 This Code of Ethics and Conduct (**Code**) establishes principles and minimum standards of behaviour expected of persons participating in the activities of HL7 Australia.
- 1.2 The purpose of this Code is to:
- (a) promote integrity, professionalism, and trust in HL7 Australia activities;
 - (b) support effective, open, and consensus-based standards development and maintenance;
 - (c) provide a respectful, inclusive, and safe environment for participation in HL7 Australia activities;
 - (d) support the objects and values of HL7 Australia, and the proper administration of its governance framework; and
 - (e) provide a foundation for addressing conduct inconsistent with the expectations of HL7 Australia.
- 1.3 This Code is intended to be read and applied holistically. The ethical principles in Part 4 inform the specific obligations in Parts 5 to 10.
- The conduct management procedure in Annex A provides a practical framework for reporting, assessing, and resolving concerns.
- 1.4 This Code sets out non-negotiable minimum standards of behaviour. It is not intended to be exhaustive but provides a framework and foundation for expected behaviour.

2 Scope and Application

- 2.1 This Code applies to all persons participating in HL7 Australia activities, including:
- (a) Individual Members (including Honorary Life Members and Student Members);
 - (b) Organisation Members including their Representatives and Participants;
 - (c) directors, office bearers, and members of committees and other governance bodies;
 - (d) persons participating in the HL7 Australia Technical Steering Committee (AU-TSC), Work Groups, any Community Process Coordination Committee, (including the Australian FHIR Coordination Committee, AFCC), and other standards development activities;
 - (e) employees, contractors, consultants, and volunteers; and

- (f) non-members who attend or otherwise participate in HL7 Australia activities.
- 2.2 This Code applies to conduct occurring in, or in connection with, HL7 Australia activities (**HL7 Australia Activities**), including meetings, ballots, project work, educational events, communications and consultations, and any other activity reasonably associated with HL7 Australia. It also applies to the use of HL7AU Content (as defined in the [HL7 Australia IP Policy](#)) and to any collaboration spaces, tools or shared environments, including those hosted by HL7 International.
- 2.3 This Code applies irrespective of whether an activity is conducted in person, remotely, asynchronously, or by electronic means.
- 2.4 For the avoidance of doubt, the application of this Code to a person does not depend upon whether that person is acting in a paid, unpaid, elected, appointed, voluntary, representative, or observer capacity.

3 Relationship to HL7 Australia Governance Processes

- 3.1 HL7 Australia, through the Board, is responsible for the governance, interpretation, implementation, and enforcement of this Code across HL7 Australia Activities, in accordance with its governance processes.
- 3.2 This Code is intended to be read consistently with:
 - (a) the Constitution of HL7 Australia Ltd (**Constitution**), including clause 8 (Values), clause 20 (Dispute resolution), clause 21 (Disciplining Members), clause 48 (Duties of Directors), and clause 49 (Conflicts of interest);
 - (b) the HL7 Australia By-laws (**By-laws**), including Part 2 Membership Classes, Part 5 Technical Governance, Part 6 Elections, and Part 7 Confidentiality; and
 - (c) the [HL7 Australia Governance and Operations Manual \(AU-GOM\)](#), including §02 (Codes of Ethics, Conduct and Diversity), §03 (Intellectual Property), §04 (HL7 Australia Technical Steering Committee) (**AU-TSC**), §05 (HL7 Australia Work Group Collective) (**AU-WGC**), §09 (Governance), and §10 (External engagement).
- 3.3 If there is ambiguity, conflict, or other inconsistency between this Code and:
 - (a) the Constitution, the Constitution prevails to the extent of the inconsistency;
 - (b) the By-laws, the By-laws prevail to the extent of the inconsistency; and
 - (c) the AU-GOM, any Work Group Decision Making Practices or other HL7 Australia technical governance document (any or each being a **Technical Governance Document**), this Code prevails to the extent of the inconsistency.

- 3.4 For the purposes of sub-clause 3.33.3(c) and for the avoidance of doubt, a provision in a Technical Governance Document that relates to matters in this Code, is more specific than or goes beyond the more general provisions in this Code and does not conflict with the overall tenor of this Code does not constitute an inconsistency under that clause.
- 3.5 This Code incorporates the underlying principles of the [HL7 International Code of Ethics](#) and the [HL7 International Code of Conduct](#), (**HL7 International Codes**), extending and adapting them to incorporate internationally accepted elements of good standardisation practice and to align with the legislative context and governance frameworks within which HL7 Australia operates.
- 3.6 A person participating in an HL7 International activity or using resources supplied or owned by HL7 International may also be bound by the HL7 International Codes.

4 Ethical Principles

- 4.1 Persons subject to this Code must act in accordance with the following principles:
- **Integrity and professionalism.** Persons must act honestly, in good faith, and in a professional manner, and must avoid conduct that may improperly bring HL7 Australia, its Members or its processes into disrepute.
 - **Respect and inclusiveness.** Persons must treat others with respect and courtesy, recognise the diversity of professional opinions, and support an inclusive environment free from harassment, bullying, coercion, or discrimination.
 - **Transparency and openness.** Persons must engage openly in discussions and decision-making processes, disclose relevant information in a fair and timely manner, and refrain from disseminating false, misleading, or materially incomplete information.
 - **Impartiality and consensus.** Persons must support fair, balanced, and consensus-based processes, recognise the importance of compromise and reasoned deliberation, and avoid conduct intended to distort, dominate, or improperly influence outcomes.
 - **Public and community benefit.** Persons must recognise that HL7 Australia standards work is undertaken for the net benefit of the Australian community, and more broadly for healthcare interoperability and public benefit, over and above the interests of any individual, organisation, or sector.

- **Technical rigour and quality.** Persons must contribute in good faith to the development, review, and maintenance of standards and related work products that are technically sound, evidence-based, fit for purpose, and subject to appropriate scrutiny, challenge, and peer review.
- **Care, diligence and competence.** Persons must act with attentiveness, care, diligence, and skill, and should contribute within the limits of their competence while remaining open to learning, consultation, and review.
- **Confidentiality, privacy, and proper stewardship.** Persons must protect confidential information, respect privacy and data protection obligations, and exercise care in the handling of HL7 Australia, HL7 International, Members' and contributors' materials, intellectual property, and other assets.

5 Expected Conduct

5.1 A person subject to this Code must:

- (a) engage constructively, respectfully and in good faith in HL7 Australia Activities;
- (b) respect the role of chairs, co-chairs, facilitators, committee members, and other persons responsible for facilitating process and orderly discussion;
- (c) contribute to consensus-based decision-making and accept duly made decisions, subject to any applicable rights of review, reconsideration, or appeal;
- (d) attend meetings regularly when engaged in HL7 Australia Activities;
- (e) contribute actively to meetings, ballots, and other HL7 Australia Activities, having prepared adequately for the matters under consideration;
- (f) exercise powers and responsibilities with due care, diligence, and attention;
- (g) respond appropriately and respectfully to concerns raised under this Code; and
- (h) only raise concerns under this Code in good faith and for proper purpose.

5.2 A person subject to this Code must not engage in conduct that a reasonable person would consider to be:

- (a) harassment, bullying, intimidation, discrimination, vilification, coercion, physical violence, trolling, or illegal behaviour;
- (b) use of offensive, abusive, menacing, threatening, insulting, humiliating, derogatory, racist, discriminatory, disrespectful, or demeaning language, or behaviour;

- (c) dissemination of disrespectful, threatening, misleading, or otherwise unprofessional information or material;
- (d) engaging in conduct that disrupts, obstructs, or undermines HL7 Australia Activities or governance processes;
- (e) knowingly making false or misleading statements that may reasonably be expected to cause harm to HL7 Australia, its processes, or to any person or organisation associated with HL7 Australia or participating in its activities; or
- (f) purporting to speak on behalf of HL7 Australia without authority.

5.3 The following are examples of conduct that contravene this Code:

- (a) verbal abuse of another person, whether delivered in person or via a carriage service;
- (b) the use, promulgation or communication of sexualized language or imagery; or
- (c) making disrespectful comments in public or private that malign another person or damage their reputation.

5.4 A person subject to this Code may not publish another person's private information, including a physical or electronic address, without explicit permission.

5.5 Persons participating in meetings or online collaboration spaces must observe meeting etiquette and rules of engagement appropriate to the forum, including by allowing others a fair opportunity to be heard, using collaboration tools in a manner consistent with orderly process, and avoiding repeated reopening of closed matters without new and relevant information.

6 Standards Development Principles

The following principles underpin the conduct of HL7 Australia standards development activities. These principles are consistent with generally accepted standards development practices and support the ethical expectations and behaviours set out in this Code.

- **Openness** — participation in HL7 Australia Activities is accessible to relevant stakeholders, and that information about how to participate (including in work groups and ballots) is made reasonably available.
- **Transparency** — key materials, discussions, and decisions are appropriately documented and visible to participants, including through collaboration platforms and records of meetings and ballots.

- **Balance** — a reasonable diversity of stakeholders and perspectives is encouraged and considered, and that no single interest or group unduly dominates outcomes.
- **Due process** — prescribed HL7 Australia processes are followed in a fair and consistent manner, and that participants have a reasonable opportunity to contribute, raise concerns, and have those concerns considered.
- **Consensus** — general agreement reached through HL7 Australia processes (including ballots and work group deliberations), characterised by the absence of sustained and significant opposition.
- **Technical integrity** — outputs and decisions are based on sound technical reasoning and evidence, and reflect good standards development practice, rather than personal, organisational, or commercial interests.

7 Standards Development and Decision-Making Practices

- 7.1 Persons participating in standards development, technical governance or related decision-making must uphold the principles of openness, transparency, balance, due process, consensus, and technical integrity.
- 7.2 Without limiting clause 7.1, a person must:
- (a) work for the net benefit of the Australian community and the proper advancement of healthcare;
 - (b) contribute within the mandate of the role they hold and the scope of the relevant group, project, or work item;
 - (c) support the development of a clear purpose, scope, and work plan for standards activities in which they participate;
 - (d) engage with peer review, stakeholder input, and reasoned technical challenge in good faith;
 - (e) avoid suppressing or mischaracterising relevant technical, scientific, operational or implementation information;
 - (f) avoid using standards processes primarily as a vehicle for private commercial advantage, personal advancement, or sectoral obstruction; and
 - (g) respect the rights of others to recognition for their work and contributions.

- 7.3 A person must not knowingly manipulate, distort, or misuse a ballot, consensus process, review process, or meeting process, including by withholding material information necessary to a fair and informed consideration of the issues at stake.
- 7.4 A person should only perform work in areas in which the person has, or is able responsibly to obtain, the competence reasonably required to contribute effectively and safely.

8 Conflicts of Interest, Improper Advantage, Confidentiality and Compliance

- 8.1 A person subject to this Code must:
- (a) declare any actual, potential, or perceived conflict of interest that is relevant to a matter under consideration.
 - (b) not misuse a position, relationship, access to information, or participation in HL7 Australia Activities to obtain an improper personal, professional, organisational, or financial advantage for themselves, any organisation, or any other person.
 - (c) not engage in marketing or promotional activities for any organisation, collaborative, product, or service in a manner that suggests endorsement by, or association with, HL7 Australia or HL7 International where no such endorsement or association exists.
 - (d) not disparage any product, service or organisation, while participating in HL7 Australia Activities or representing HL7 Australia.
 - (e) not engage in any activity that may give rise to a perceived or actual conflict of interest between HL7 Australia and any other person or organisation.
 - (f) protect confidential information in accordance with Part 7 of the By-laws (Confidential Information) and not disclose confidential information except as otherwise permitted under Part 7 of the By-laws.
 - (g) comply with applicable laws and regulatory obligations, including laws relating to privacy, intellectual property, workplace behaviour, workplace health and safety, bribery, corruption, and anti-competitive conduct.
 - (h) not offer, promise, seek or accept any improper financial or other benefit in connection with HL7 Australia or HL7 Australia Activities.
 - (i) avoid collusive or anti-competitive conduct and comply with applicable competition and antitrust guidance relevant to HL7 Australia Activities.

- 8.2 A conflict of interest declared under clause 8.1(a) must be managed in a fair, transparent and timely manner in accordance with applicable governance processes of the relevant work group, committee or the Board, and any direction of the relevant co-chair or chair.

9 Proper Use of HL7 Australia Products and Resources

A person subject to this Code must:

- (a) support, promote and encourage the proper and authorised use of HL7 Australia and HL7 International standards, resources, names, trademarks and intellectual property in accordance with the HL7 Australia IP Policy and any applicable licences, policies, terms and conditions;
- (b) not knowingly use, or support, condone or permit the use of, HL7 Australia or HL7 International standards, resources, names, trademarks or intellectual property in a manner that is misleading, unauthorised or inconsistent with the HL7 Australia IP Policy or any applicable licence, policy, term or condition;
- (c) not misrepresent the use or application of any HL7 Australia or HL7 International standard in any product, service or organisation; and
- (d) act responsibly in relation to HL7 Australia resources, facilities and assets.

10 Raising Concerns and Supporting Compliance

- 10.1 A person who becomes aware of conduct that may breach this Code should raise the matter in accordance with Annex A.
- 10.2 Persons subject to this Code must support compliance with it and must not hinder or discourage good faith reporting, review, or resolution of concerns.
- 10.3 Where appropriate, concerns should first be raised and addressed at the lowest practical level consistent with safety, fairness, and effectiveness.
- 10.4 More serious matters, repeated concerns, or matters involving significant power imbalance, intimidation, discrimination, safety risk, governance risk, reputational risk, confidentiality, or possible unlawful conduct should be escalated promptly in accordance with Annex A.
- 10.5 Persons exercising leadership or governance responsibilities within HL7 Australia bear a heightened responsibility to model compliance with this Code, support respectful and inclusive participation, and address conduct concerns in a timely and appropriate manner.

11 Review and Amendment

- 11.1 This Code is to be reviewed periodically by the Board, or by such body or persons as the Board may designate.
- 11.2 The Board may issue guidance or approve implementation documents consistent with this Code, including procedures, guidance notes, templates, training materials, and role-specific protocols.
- 11.3 This Code may be amended by resolution of the Board and may be referenced from the AU-GOM, the By-laws and other HL7 Australia governance documents as adopted by the Board from time to time.

12 Interpretation

- 12.1 In this Code, unless the context dictates otherwise:

HL7 Australia means HL7 Australia Ltd ABN 37 629 010 297 with its registered office at Level 16, Tower 2 Darling Park, 201 Sussex Street Sydney NSW 2000.

HL7 International means Health Level Seven International Incorporated, a not-for-profit global standards developing corporation incorporated in New Jersey, United States of America, with its principal place of business in Ann Arbor, Michigan, United States of America.

Code means this Code of Ethics and Conduct as amended from time to time.

Constitution means the constitution of HL7 Australia as amended from time to time.

By-laws means the By-laws approved by the Board under authority of clause 60 of the Constitution.

HL7 Australia IP Policy means the HL7 Australia Intellectual Property Policy as published by HL7 Australia via the [Main HL7 Australia Website](#), and may be accessed [here](#).

HL7 Australia Activities has the meaning given in clause 2.2.

HL7AU Content has the meaning given in the HL7 Australia IP Policy and includes HL7 Australia Documents, standards, specifications, implementation guides, software, tools, and other content made available by or on behalf of HL7 Australia, including through its websites, collaboration platforms, and arrangements with third parties.

A reference to a clause is a reference to a clause in this Code.

- 12.2 A term that is defined in the Constitution, covers the same subject and is not differently defined in this Code has the meaning given to it in the Constitution.
- 12.3 The rules of interpretation of the Constitution as set out in clauses 75 of the Constitution apply to the interpretation of this Code.
- 12.4 Questions concerning the interpretation of this Code are to be referred to the Board or to a person or body authorised by the Board to provide guidance.

Annex A – Conduct Management Procedure

This Annex provides a practical procedure for the reporting, assessment and resolution of concerns arising under the Code. It aims to support, and not to replace, any higher-order rights, powers or procedures under the Constitution, By-laws, or applicable law.

A1 Purpose and guiding principles

- A1.1 This Annex establishes a practical conduct management procedure for matters arising under the Code.
- A1.2 Matters to be dealt with under this Annex are to be managed:
- (a) fairly and proportionately;
 - (b) in accordance with the principles of natural justice and procedural fairness;
 - (c) as promptly as is reasonably practicable;
 - (d) with due regard to confidentiality, privacy, and safety; and
 - (e) at the lowest practical level consistent with the seriousness and nature of the concern.

A2 Making a report or raising a concern

- A2.1 A concern may be raised informally or formally.
- A2.2 An informal concern may be raised with the relevant co-chair(s), chair, convenor, project lead, committee chair, or other person responsible for the activity in which the issue has arisen, or with another appropriate person within HL7 Australia where the person raising the concern considers it more appropriate to do so.
- A2.3 A formal concern may be raised with the Board, the Secretary, any Director or another designated point of contact approved by the Board.
- A2.4 A person raising a concern should, as far as reasonably practicable, provide:
- (a) a description of the conduct or issue;
 - (b) the date, forum, or circumstances in which it occurred;
 - (c) the persons involved;
 - (d) any available supporting information or documents; and
 - (e) the outcome or intervention sought, if known.
- A2.5 A concern may be raised confidentially where appropriate. HL7 Australia should endeavour to protect the confidentiality of a person raising a concern, subject to the requirements of fairness, proper process, and applicable law.

A2.6 A person raising a concern under clause A2.2 or clause A2.3 is not required to raise the matter with any specific recipient, where they reasonably consider that:

- (a) the specific recipient is the subject of the concern or may have a conflict of interest;
- (b) the specific recipient has a close working relationship with the subject of the concern; or
- (c) it would otherwise be inappropriate or uncomfortable for the person raising the concern to do so,

and may instead raise the concern with another appropriate person or through the formal pathway.

A3 Initial assessment

A3.1 Upon receiving a concern, the recipient must undertake, or cause to be undertaken, an initial assessment of its apparent nature and seriousness.

A3.2 The initial assessment should consider:

- (a) whether the matter appears to fall within the scope of the Code;
- (b) whether any immediate protective or procedural action is needed;
- (c) the apparent seriousness of the conduct;
- (d) the appropriate level at which the matter should be handled;
- (e) whether the matter may be capable of informal resolution; and
- (f) whether the matter may engage the Constitution, the By-laws, AU-GOM, employment or contractual arrangements, or legal obligations.

A3.3 Without limiting clause A3.2, matters involving alleged discrimination, harassment, bullying, retaliation, serious misconduct, workplace health and safety, confidentiality breaches, conflicts of interest, potential illegality, or significant governance or reputational risk should ordinarily be escalated beyond informal resolution by co-chair(s) or a chair.

A4 Informal resolution

A4.1 Where appropriate, a matter may be resolved informally, including by one or more of the following:

- (a) clarification of expectations under the Code;
- (b) reminding participants of meeting rules or behavioural expectations;

- (c) private discussion with the person concerned;
- (d) facilitated discussion or mediated conversation between affected persons;
- (e) an apology, acknowledgement or undertaking as to future conduct; or
- (f) a direction concerning future participation in the relevant activity.

A4.2 Informal resolution is not appropriate where the nature, seriousness or repetition of the conduct requires formal consideration.

A5 Formal review or investigation

A5.1 Where a matter is not suitable for informal resolution, or where informal steps have been unsuccessful, the matter may be referred for formal review or investigation.

A5.2 A formal review or investigation may be undertaken by the Board, by a committee or panel authorised by the Board, or by an independent person appointed by the Board for that purpose.

A5.3 A person whose conduct is the subject of a formal review or investigation must be informed of the substance of the concern and given a reasonable opportunity to respond, subject to any necessary interim measures and subject always to safety, confidentiality, and legal obligations.

A5.4 A formal review or investigation may include the collection and review of documents, correspondence, meeting records, witness accounts, and other relevant information.

A5.5 The reviewer or investigator must act impartially and avoid conflicts of interest.

A6 Interim measures

A6.1 Pending the outcome of a matter, interim measures may be implemented where reasonably necessary to preserve orderly process, protect persons, protect confidentiality, or reduce governance, legal or reputational risk.

A6.2 Interim measures may include directions about participation in a meeting or forum, temporary removal from a role, temporary exclusion from a particular activity, or temporary communication protocols.

A6.3 Interim measures are precautionary only and do not of themselves determine that a breach of the Code has occurred.

A7 Outcomes

A7.1 Following assessment, review, or investigation, HL7 Australia may determine that:

- (a) no further action is required;

- (b) informal resolution or guidance is sufficient;
- (c) a concern is substantiated in whole or in part; or
- (d) the matter should be referred or managed under another applicable process.

A7.2 Where a concern is substantiated in whole or in part, one or more of the following outcomes may be imposed or recommended, as appropriate:

- (a) informal counselling or guidance;
- (b) a verbal or written warning;
- (c) an apology, acknowledgement or undertaking;
- (d) direction concerning future conduct;
- (e) removal from an activity, forum, or meeting;
- (f) removal from a role, office, or representative function, where permitted by the applicable governing document or appointment terms;
- (g) restriction or suspension of participation in identified HL7 Australia Activities;
- (h) referral of a Member to the Board for disciplinary action under clause 21 of the Constitution, including warning the Member, temporary suspension of membership, or termination of membership; or
- (i) such other lawful and proportionate action as is available under the applicable governance framework.

A8 Escalation and appeals

A8.1 A matter may be escalated at any time where its seriousness, complexity, sensitivity, or consequences warrant escalation.

A8.2 If a matter has been handled initially at co-chair, chair, convenor, or committee level, it may be referred to the Board if:

- (a) the issue remains unresolved;
- (b) the matter concerns a governance officeholder or leadership participant;
- (c) there is an actual or perceived conflict of interest at the lower level;
- (d) disciplinary or membership consequences may arise; or
- (e) the matter otherwise warrants Board consideration.

A8.3 Any appeal or review right is subject to the Constitution, the By-laws, and any decision of the Board under the applicable governing document.



A9 Record keeping

- A9.1 HL7 Australia should maintain appropriate records of formal concerns, material informal concerns, reviews, investigations, and outcomes.
- A9.2 Records must be kept securely and accessed only by persons with a proper governance or administrative need, subject to any legal rights or obligations.