National Anti-Corruption Commission

Decision minute

To	Ben Gauntlett, Deputy Commissioner
Through	47F(1) Operations
From	47F(1) Operations VIC
File Ref	47E(d)
Topic	47E(d) – Finalisation recommendation

1. Decision required

1.1 The purpose of this Decision Minute is to request that you reconsider how to deal with the corruption issue being investigated under 47E(d) pursuant to section 41(5) of the *National Anti-Corruption Commission Act 2022* (Cth) (NACC Act), in line with the findings as summarised in the Final Investigation Report (FIR).

2. Authority for decision

2.1 Following a thorough investigation of the corruption issues, it is the opinion of investigators and myself that corrupt conduct has not been established. Under the NACC Act you may choose to finalise 47E(d) in one of two ways:

a. Reconsider the corruption issue and decide to take no further action pursuant to section 41(6); or

b. Prepare a report pursuant to section 149 of the NACC Act.

3. Reasons for recommended decision

47E(d) & 47F(1)

3.2 At the time of the events relevant to this investigation, the responsible Commonwealth entity was the Department of Health and Aged Care (DoHAC). Since that time, the Department has been renamed the Department of Health, Disability and Ageing (DHDA). For consistency, this decision minute refers to the Department as DoHAC throughout.

47E(d) & 47F(1)

3.6 The Commissioner decided to investigate the matter pursuant to section 41(1)(a) of the NACC Act. A thorough investigation has been undertaken involving but not limited to:

a. A review of material provided by referrers.

b. Requests for information 47E(d)

c. Interviews with a range of witnesses 47E(d)

3.7 A FIR has been prepared, which should be read in conjunction with this decision minute. I believe the FIR accurately details the inquiries conducted, evidence collected and findings 47E(d)

3.8 I submit that during the investigation, all reasonable and necessary avenues were pursued. Evidence obtained supports that:

47E(d) & 47F(1)

47E(d)

4. Recommendation

4.1 I recommend that you:

a. Reconsider how to deal with the corruption issue by taking no further action pursuant to s 41(6) of the NACC Act.

Approved.

b. Notify 47F(1) 47F(1) 47F(1) of the outcome 47E(d)

Approved with input to be given to correspondence to 47F(1) 47F(1) 47F(1)

c. Notify the Department of Health and Aged Care now known as the Department of Health, Disability and Ageing of the outcome 47E(d)

47E(d)

47F(1)

Ben Gauntlett

Deputy Commissioner

1/07/2026

National Anti-Corruption Commission

Final Investigation Report

47E(d)

47E(d)

Date	26 May 2026
File Ref	ATT202618626

Executive Summary

47E(d) investigated allegations of corrupt conduct arising from the procurement and administration of the Future Fit Program (FFP) by the Department of Health and Aged Care (DoHAC), 47E(d)

47E(d) & 47F(1)

However, having regard to the totality of the evidence, the investigation did not identify conduct meeting the threshold of corruption. 47E(d)

47E(d) & 47F(1)

Accordingly, this investigation concludes, 47E(d) , the available evidence does not support a finding of corrupt conduct.

1. Background

1.1 At the time of the events relevant to this investigation, the responsible Commonwealth entity was the Department of Health and Aged Care (DoHAC). Since that time, the Department has been renamed the Department of Health, Disability and Ageing (DHDA). For consistency, this report refers to the Department as DoHAC throughout.

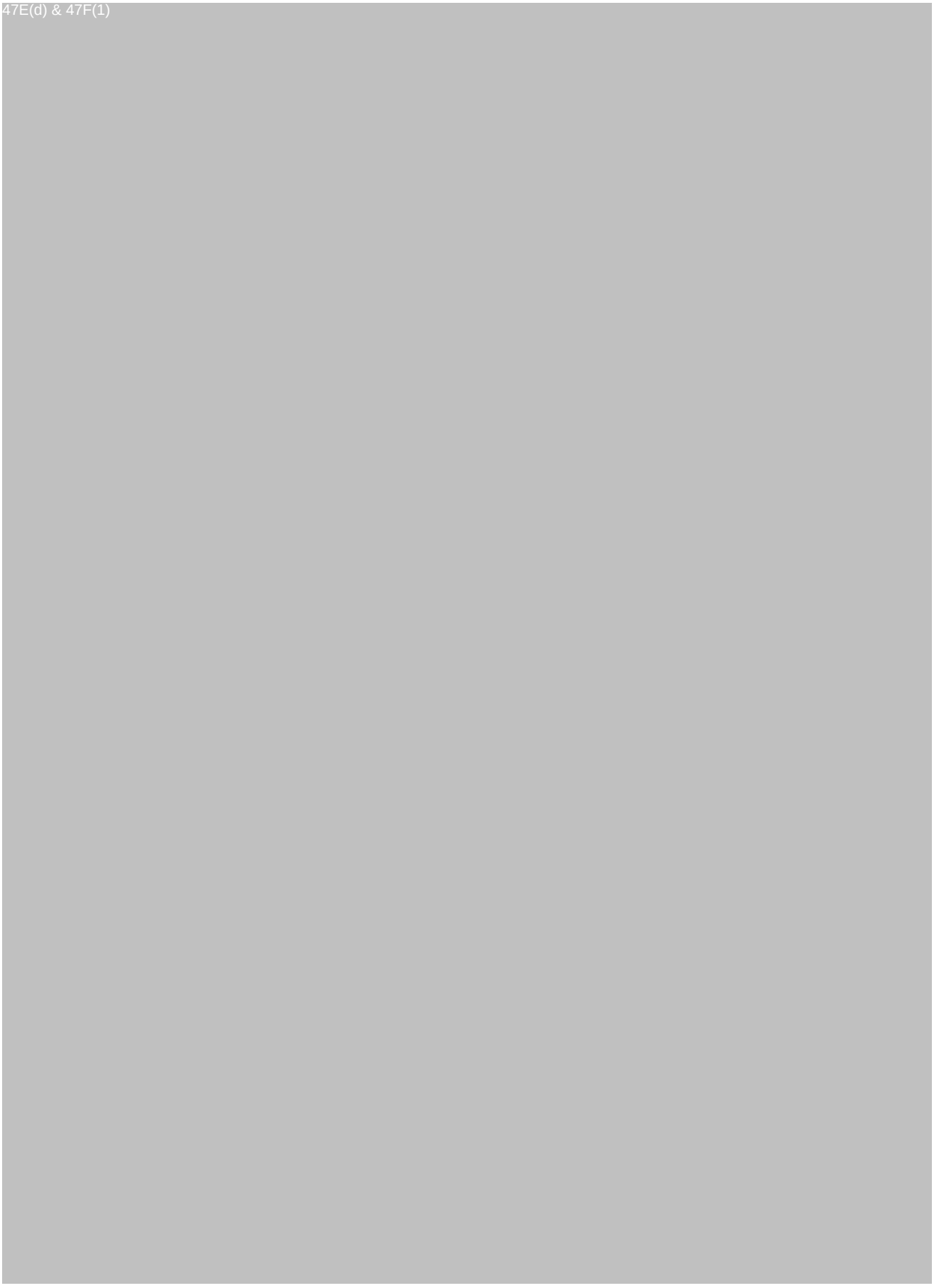
1.2 The FFP was an Australian Government initiative administered by DoHAC to support reform and improve the sustainability, governance, and service delivery capability of the Meals on Wheels (MoW) network.

1.3 MoW is a national not-for-profit service delivery network comprising hundreds of independently operated providers delivering meals and welfare support to vulnerable and older Australians. 47E(d)

47E(d)

Referrals to the Commission

47E(d) & 47F(1)



47E(d) & 47F(1)

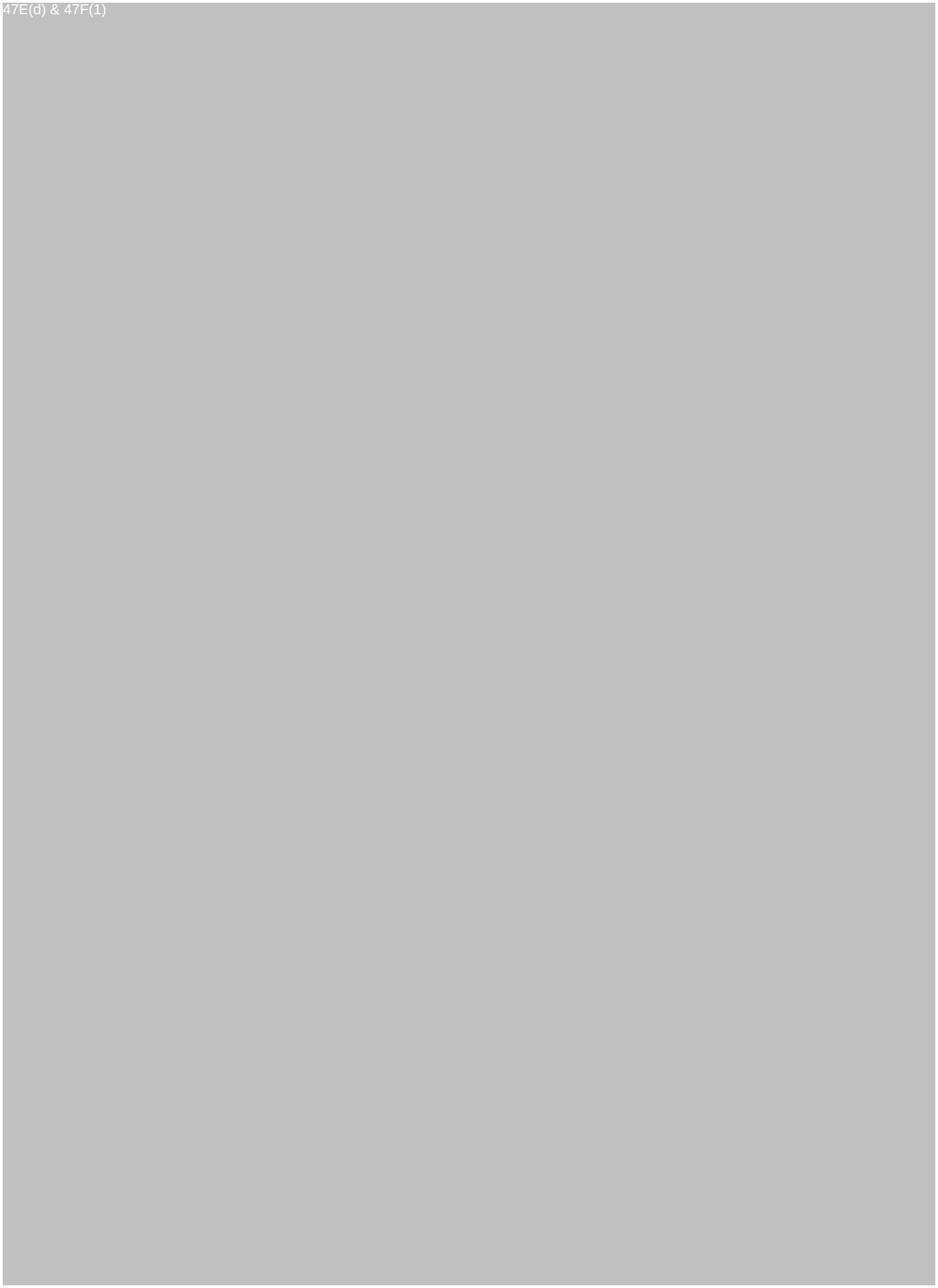
47E(d) & 47F(1)

47E(d)

2. Corruption Issues

47E(d) & 47F(1)

47E(d) & 47F(1)


47E(d) & 47F(1)

47E(d)

6. Investigation

6.1 The Commission conducted a comprehensive investigation into matters relating to the delivery of the FFP, including extensive review and analysis of documentary, electronic, and witness material.

Review of material from referrers

47E(d) & 47F(1)

47E(d)

Request for Information - DoHAC

47E(d) & 47F(1)

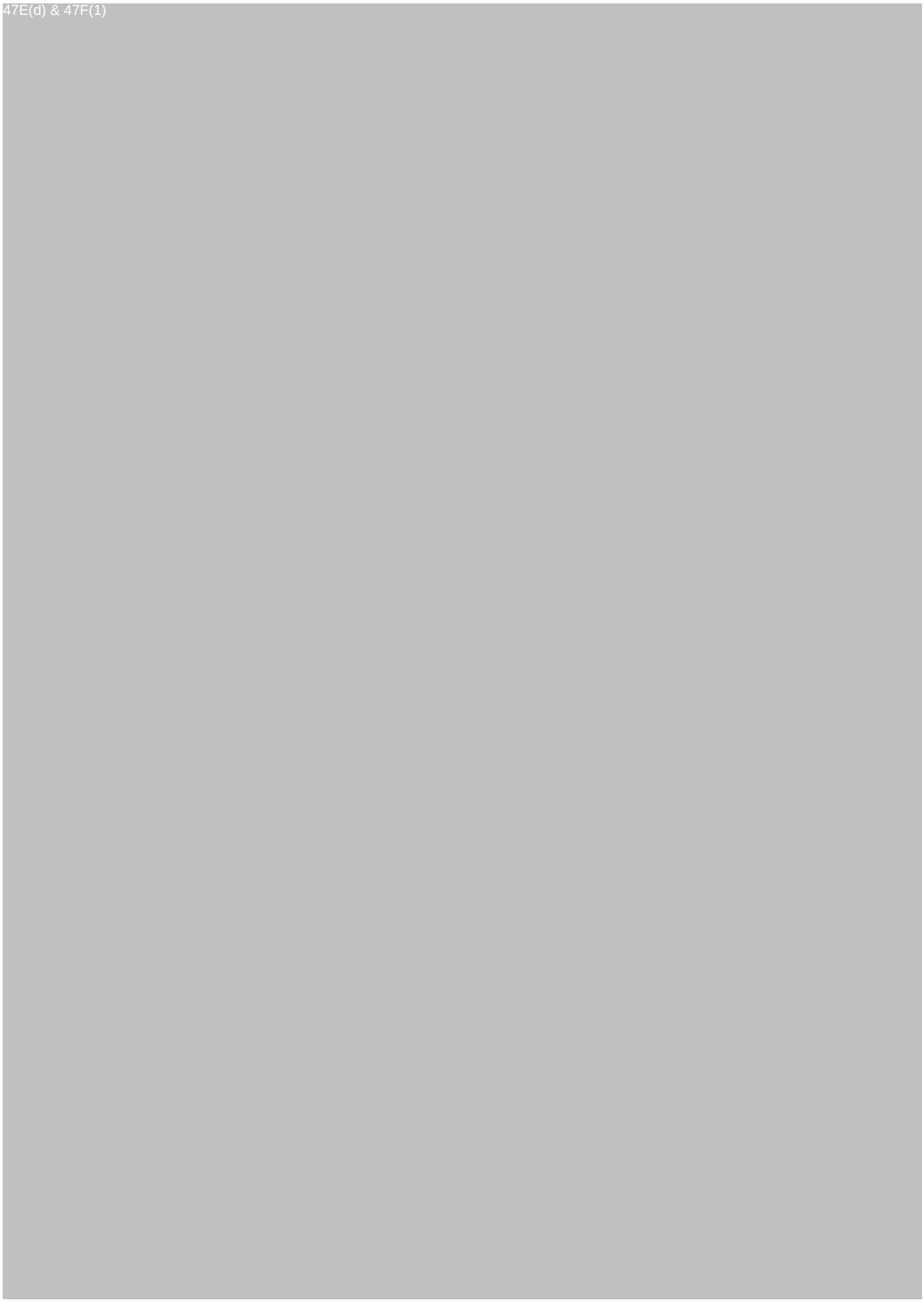
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47E(d) & 47F(1)

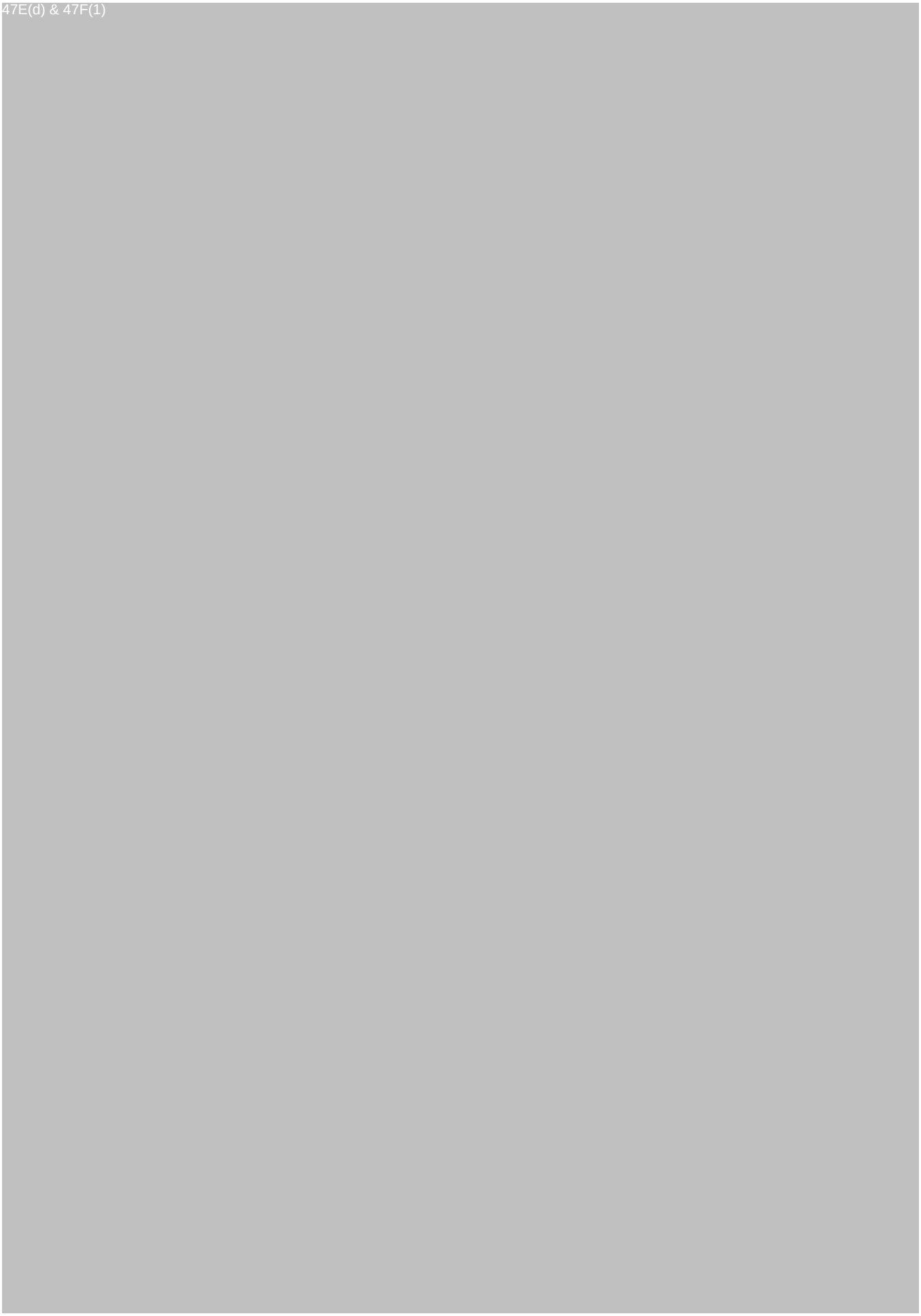
7. Interviews

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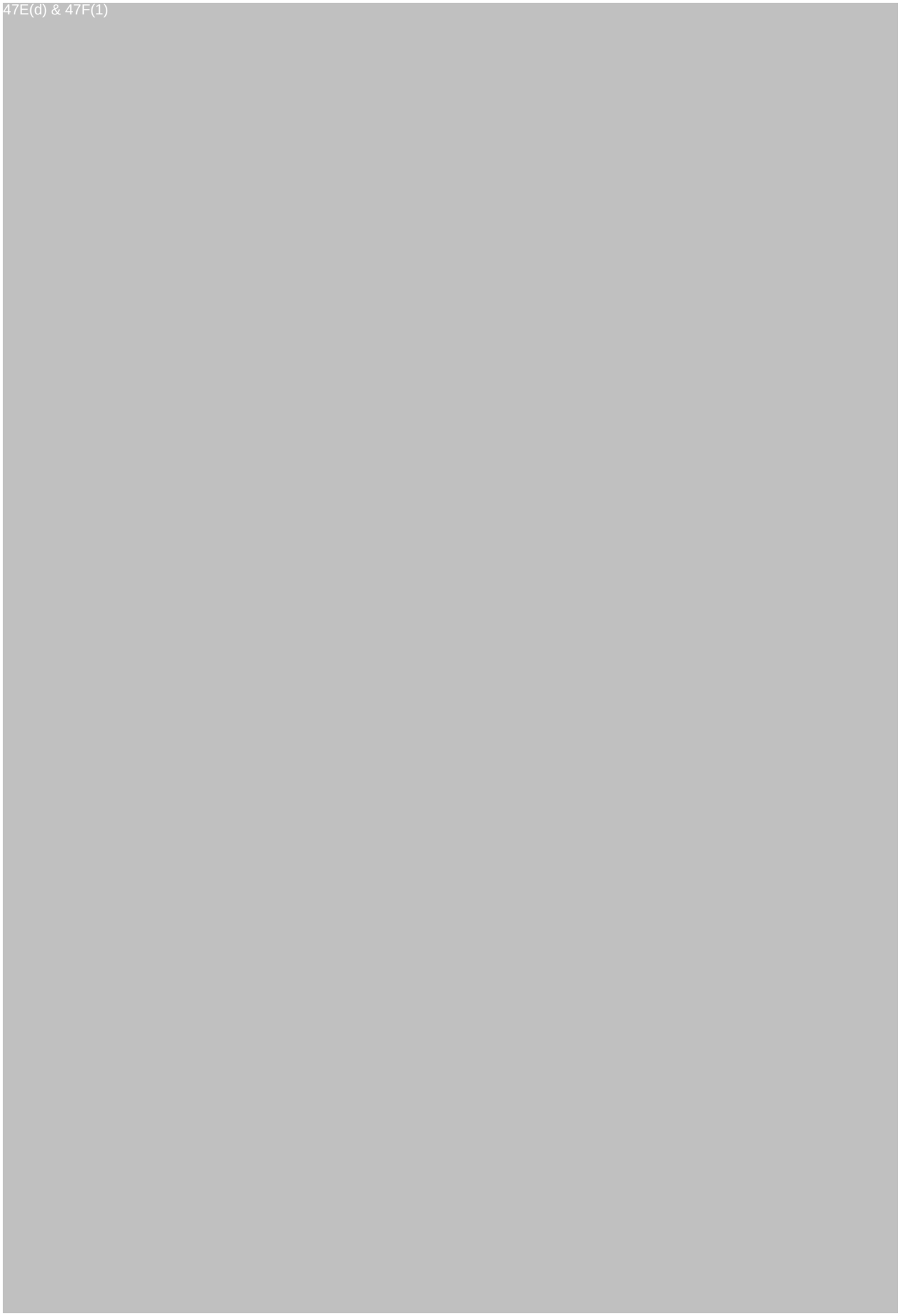
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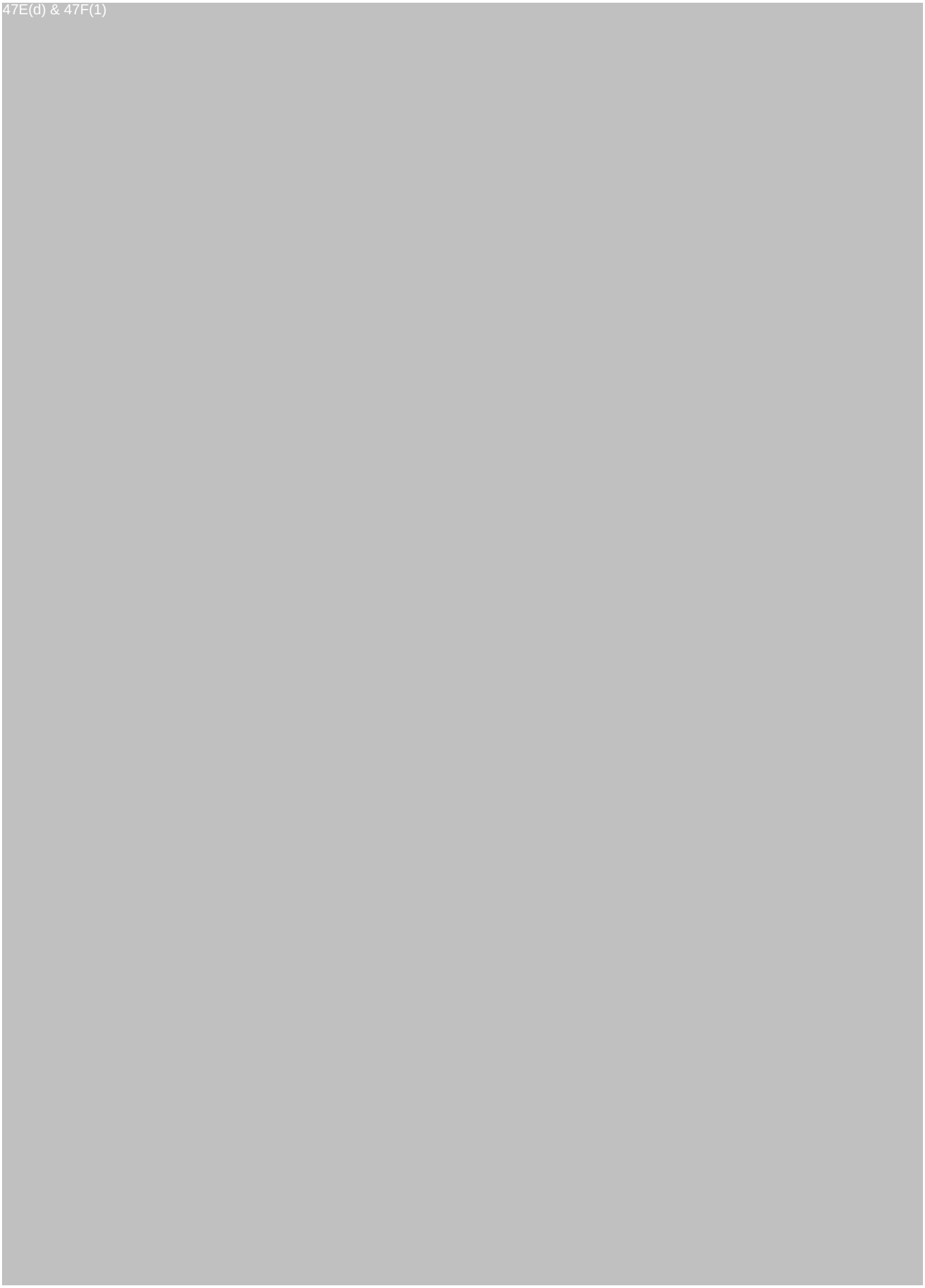


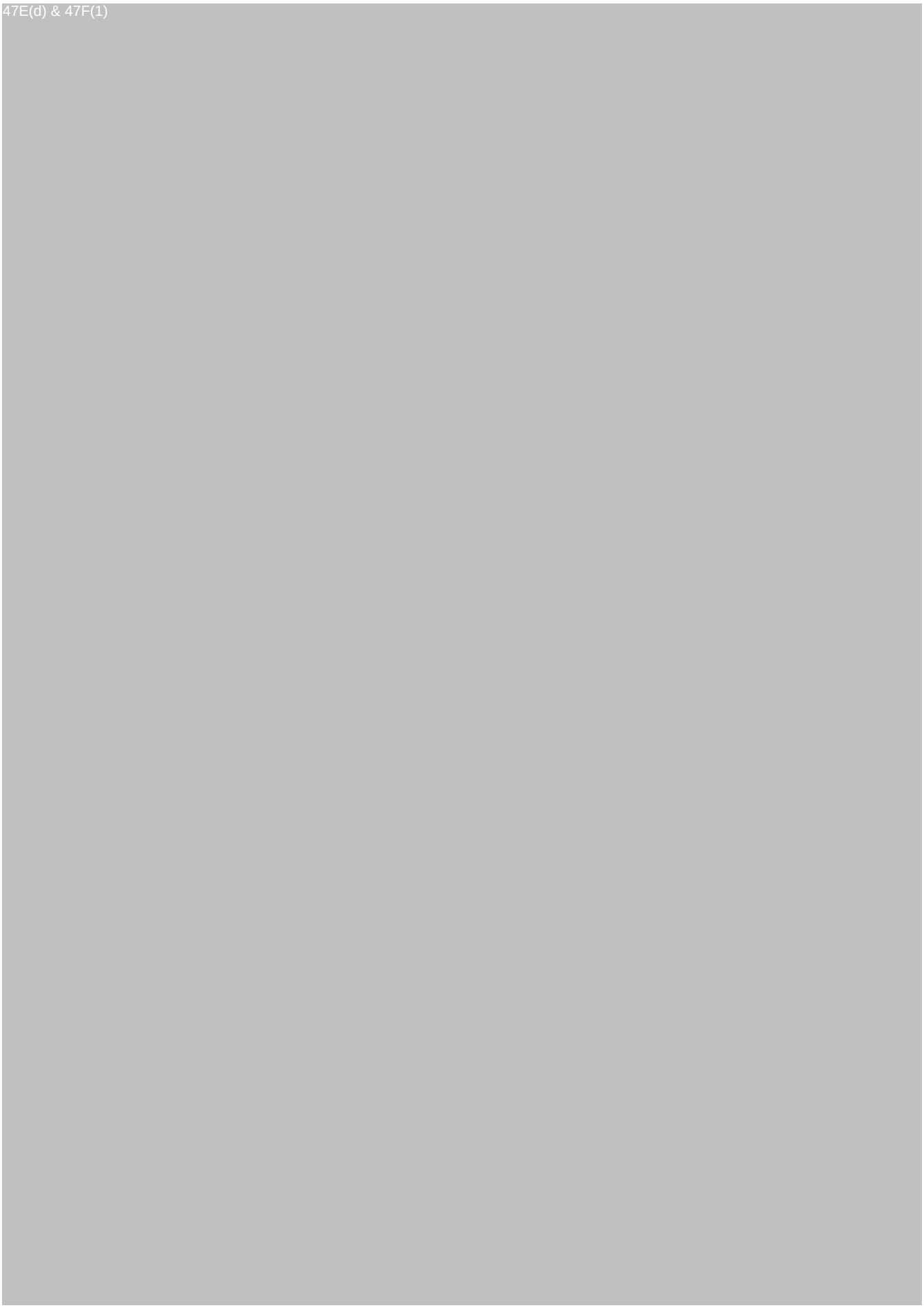
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47E(d) & 47F(1)

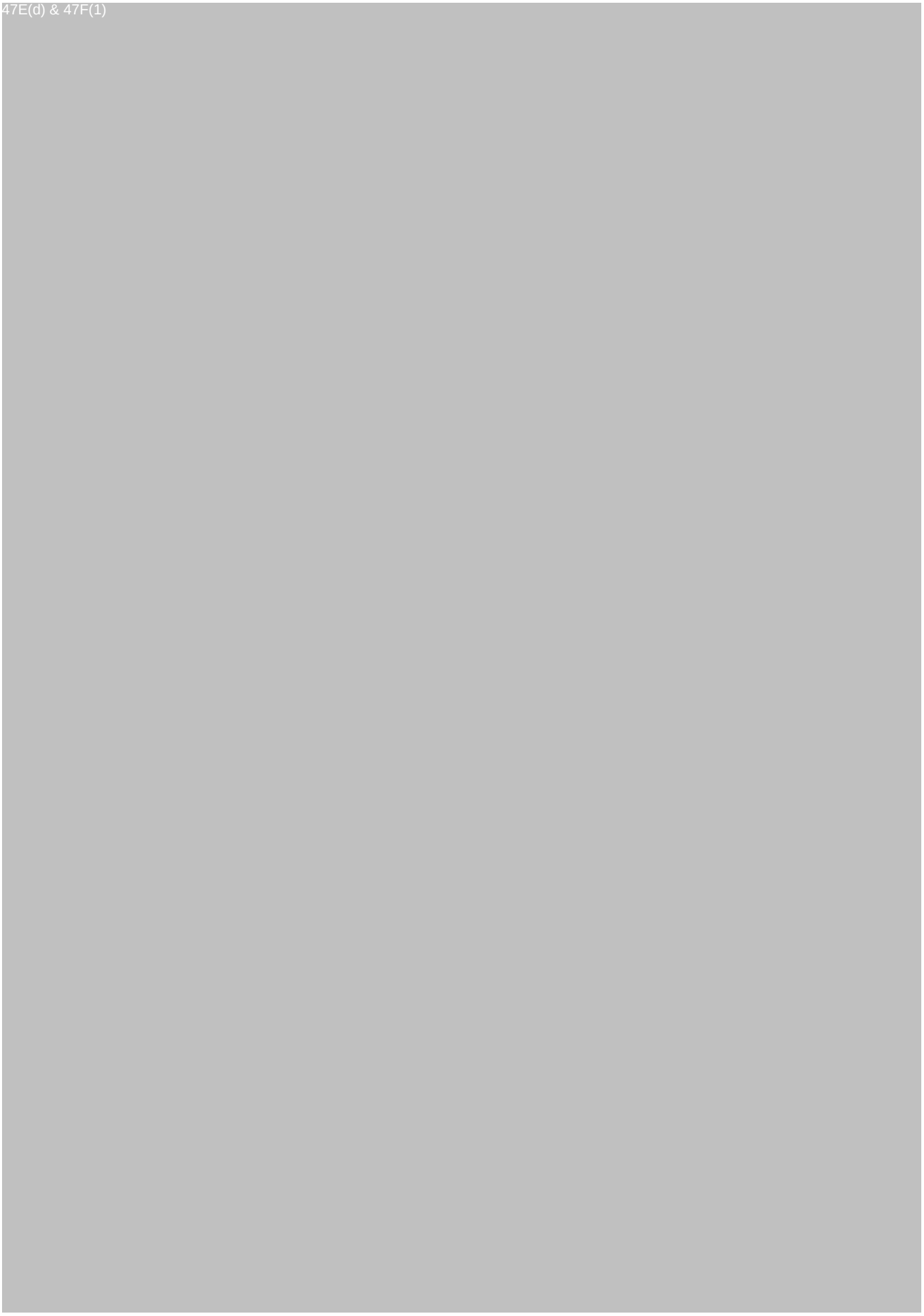
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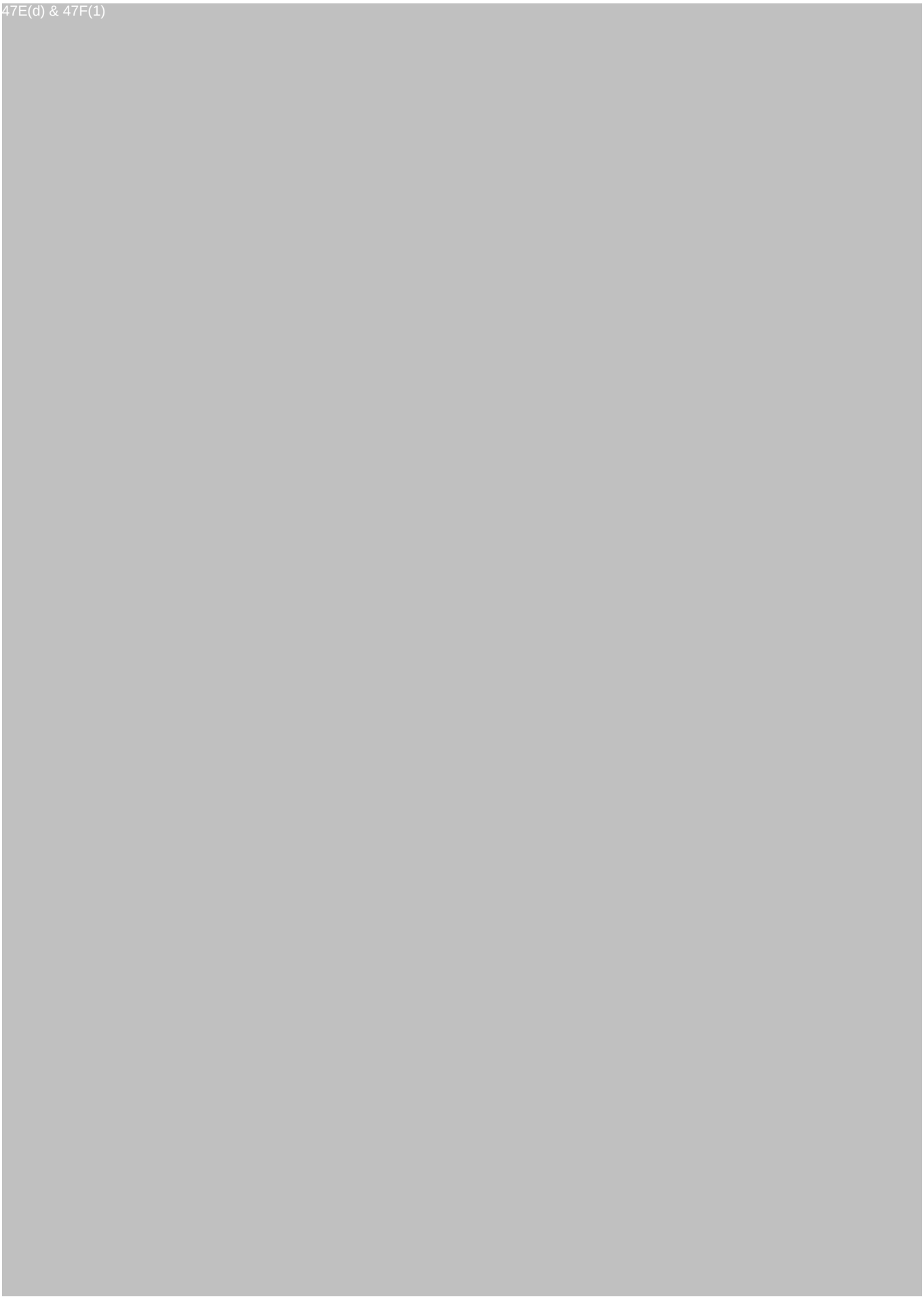

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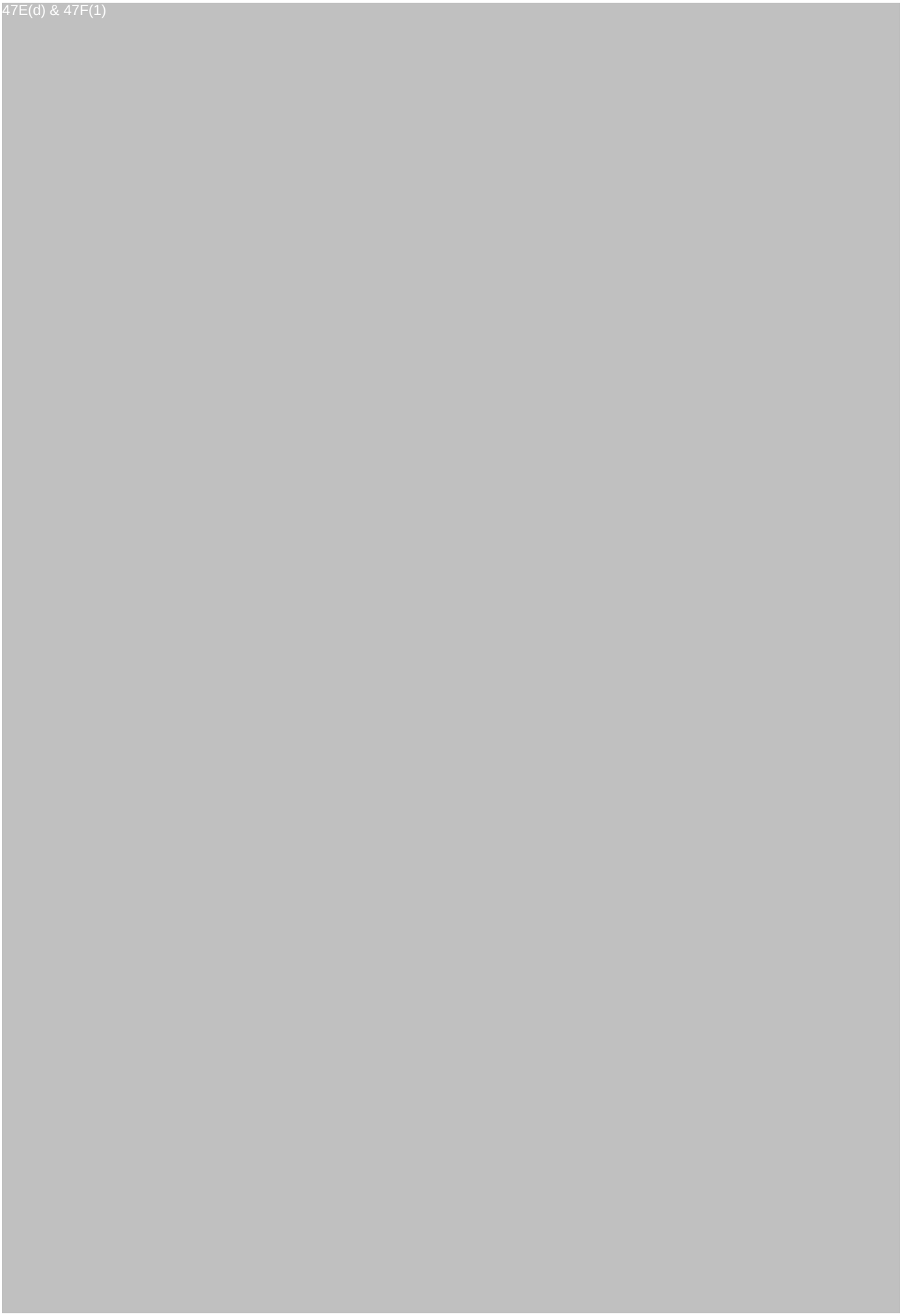

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47E(d) & 47F(1)

47E(d) & 47F(1)

8. Other Issues

47E(d)

47E(d) & 47F(1)

Legal Advice[32]

42(1)

42(1)

Witness Interviews

47E(d) & 47F(1)

47E(d) & 47F(1)

Further information provided by 47F(1)

47E(d) & 47F(1)

47E(d) & 47F(1)

9. Conclusion

9.1 This investigation considered two primary corruption issues:

47E(d) & 47F(1)

9.2 Having regard to the totality of the evidence, there is insufficient evidence to substantiate either corruption issue.

47E(d) & 47F(1)

47E(d) & 47F(1)

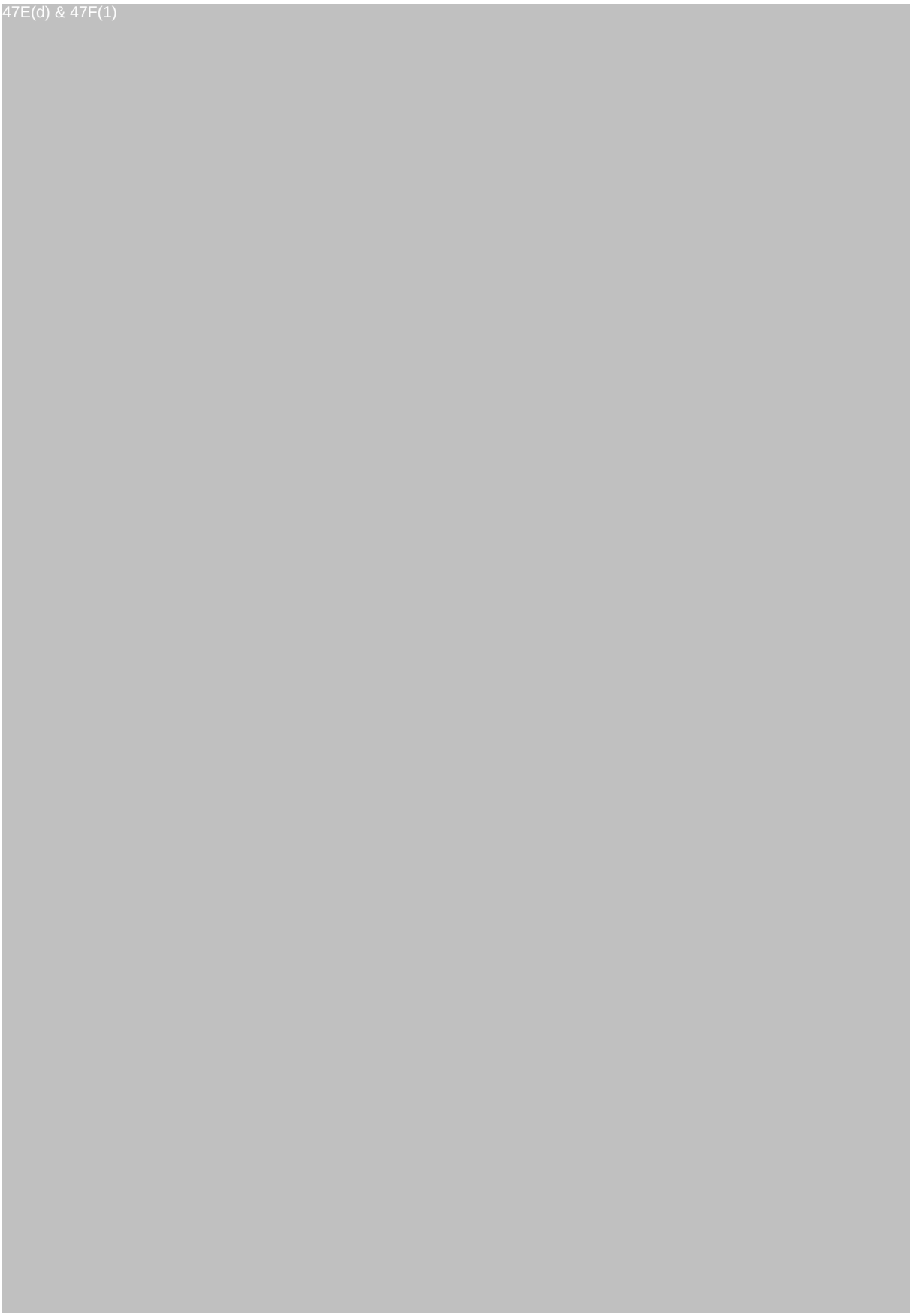
9.7 Accordingly, 47E(d) the evidence does not support a finding of corrupt conduct in respect of either corruption issue.

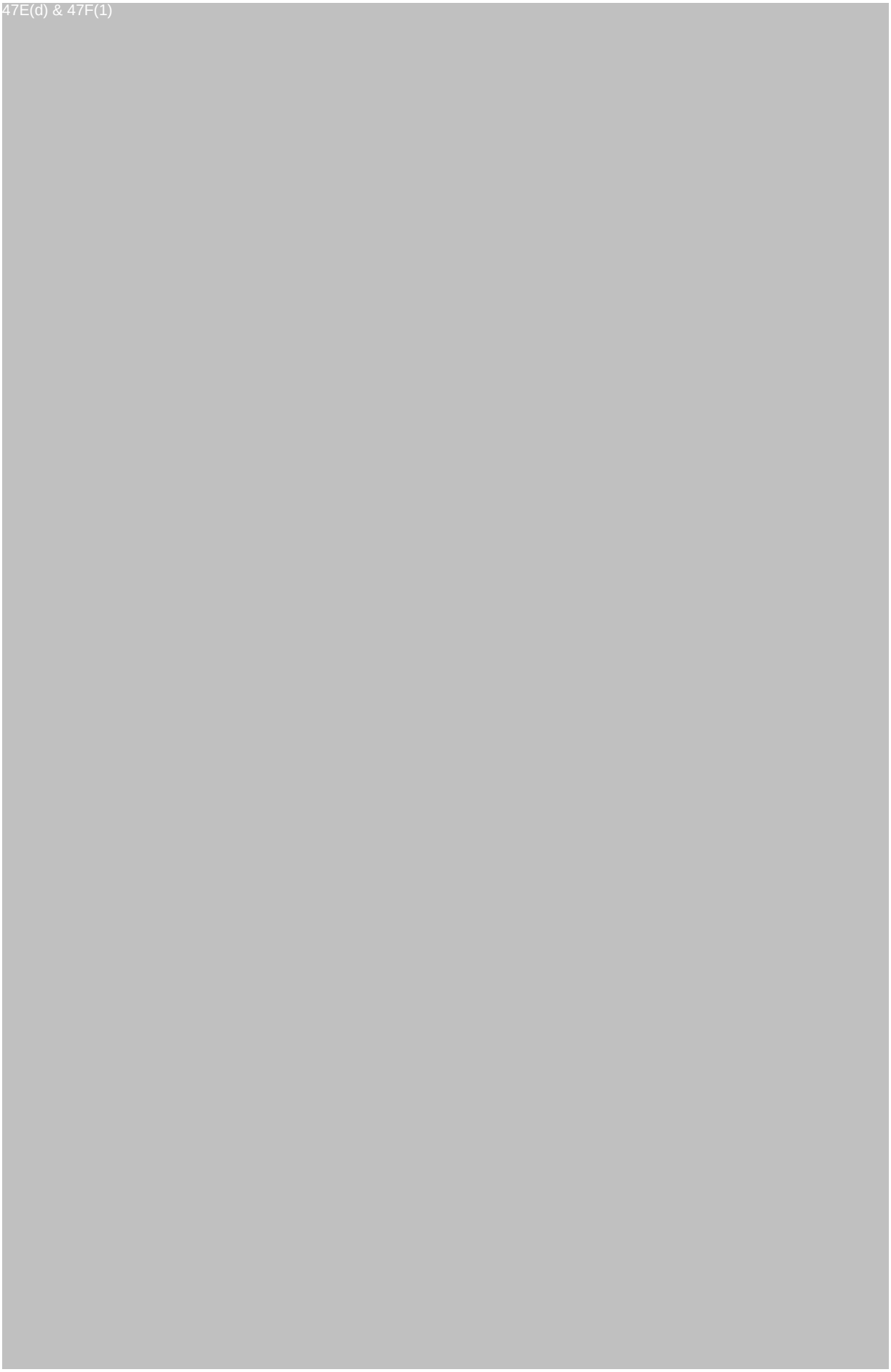
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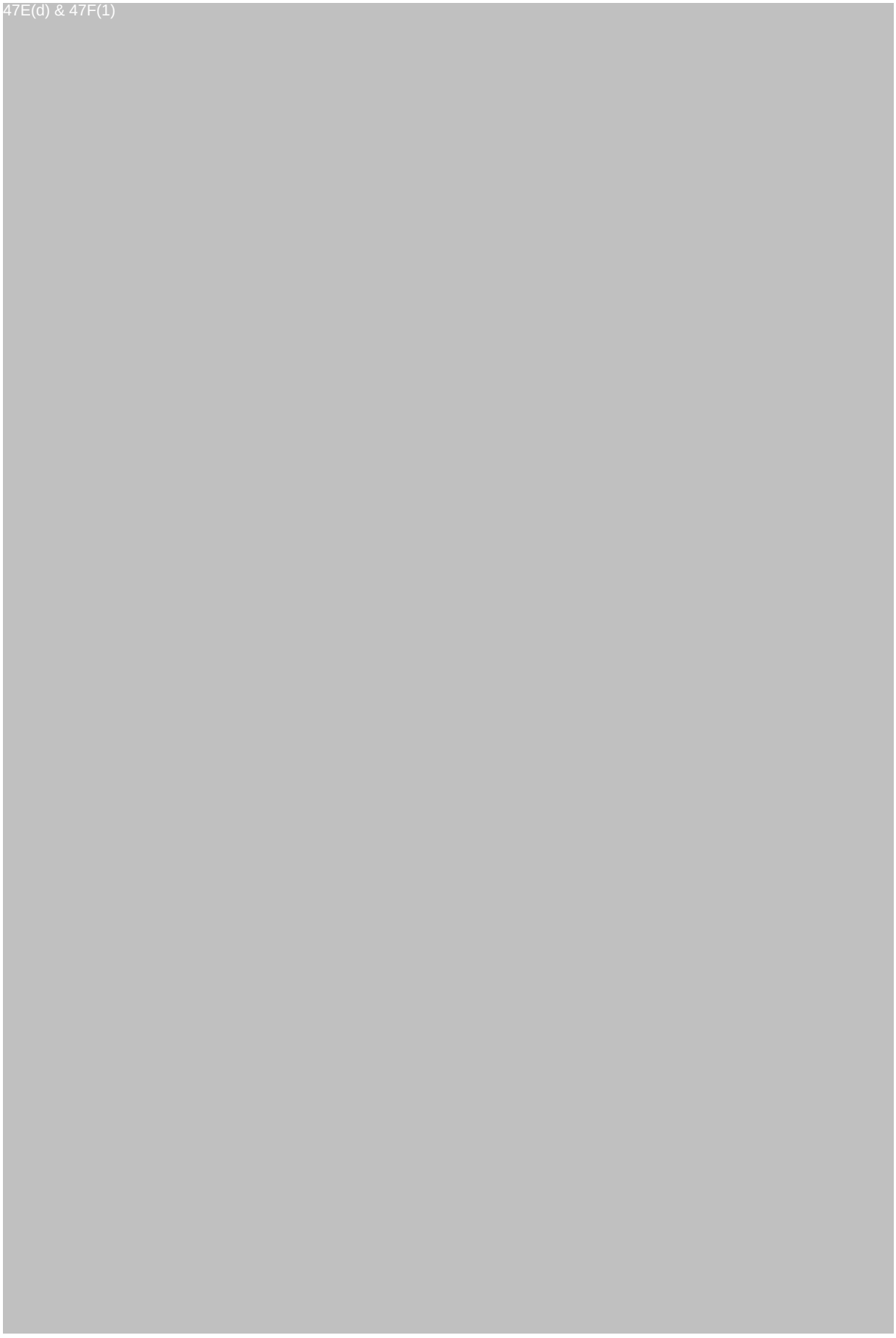
Appendix A

Summary of Referrals

47E(d) & 47F(1)




47E(d) & 47F(1)


47E(d) & 47F(1)