

Executive summary

Serco Australia is pleased to provide this submission to the Taskforce Flaxton Inquiry.

Regrettably, the potential for corruption is an issue which virtually all prisons must contend with. Corrupt activities affect the safety, security, good order and discipline of a facility, put the health and wellbeing of staff, prisoners and the public at risk, facilitate the commission of further crime, impinge on individuals' human rights, and undermine efforts to reduce recidivism.

To discourage corruption, it is important to proactively build a positive, values-based culture of integrity. Staff culture at a Correctional Centre should promote honesty, accountability, responsibility, rewarding continuous improvement and setting out clear consequences for transgressions. Sound compliance and assurance processes must become an integral part of the way the prison operates.

Uncovering corrupt behaviour requires many open lines of communication to gather intelligence, hear concerns and address complaints. [REDACTED]

[REDACTED]. It is [REDACTED] important to maintain multiple avenues for prisoners and staff to raise concerns with effective independent bodies that they trust.

Independent oversight is a vital element in ensuring that corruption cannot occur at any level in the system. Inspectorates, Ombudsmen, Official Visitors, Crime & Corruption Commissions and others are essential to mitigate the risk of systemic corruption, or ignorance of corruption. Robust checks and balances, including contracts or service level agreements, can also play an important role.

We acknowledge the limits of physical security measures when it comes to dealing with corrupt employees who are familiar with a Correctional Centre's systems. Nevertheless, it is important to implement those which give the fewest opportunities possible for corruption to occur. Comprehensive surveillance, as well as technology and techniques to detect and disrupt, are important deterrents.

A stable, well-resourced correctional system provides the best possible environment to implement these proactive and reactive measures to prevent corruption. Correctional facilities whose resources are significantly stretched will find that unfortunately, more opportunities are created for corrupt activity to occur. Overcrowding, undue 'churn' of prisoners and turnover of staff can be disruptive, and make creating and maintaining a positive culture more challenging.

Inquiry overview

In March 2018, the Queensland Crime and Corruption Commission (CCC) announced that Taskforce Flaxton would conduct an examination of corruption and corruption risks in Queensland Corrective Services (QCS) facilities. To support its examination, the CCC called for public submissions by way of written feedback in response to Taskforce Flaxton's issues paper.

The CCC is examining:

- 1) Corruption and the risks of corruption in QCS facilities;
- 2) Features of the legislative, policy and operational environment that may enable corrupt conduct to occur or are vulnerable to corrupt conduct;
- 3) Reforms to better prevent, detect and deal with corrupt conduct within QCS facilities.

Serco makes this submission having operated prisons in Queensland since 2008. Serco has managed Southern Queensland Correctional Centre (SQCC) on behalf of QCS since it was commissioned in January 2012. Serco previously operated Borallon Prison at Ipswich from 2008 to 2012.

Background

Serco Australia

Serco is an Australian proprietary limited company. Serco provides services on behalf of a range of Australian governments and in the private sector in the portfolios of defence, health, transport, justice, immigration and citizen services. These services include:

- Management and rehabilitation of offenders in prisons in Queensland, Western Australia and New Zealand;
- Provision of on-shore immigration facilities and detainee services;
- Delivery of non-clinical services at Fiona Stanley Hospital in Perth;
- Management of the Australian Defence Force medical equipment fleet repair, maintenance and calibration, as well as the pharmaceuticals and medical consumables supply chain;
- Road safety in Victoria through its traffic camera services;
- Public transport advice for travellers in Perth, Brisbane and New South Wales;
- Maintenance of Melbourne's parks and gardens.

Serco is owned and operated by Serco Group plc (Serco Group), a company incorporated in the United Kingdom and listed on the London Stock Exchange. Serco Group provides services throughout Europe, North America, the Middle East and Asia Pacific.

Serco Group partners with governments, agencies and companies seeking operational, management and consulting expertise in the justice, immigration, health, aviation, business process outsourcing, defence, education, environmental services, facilities management, home affairs, information and communications technology, knowledge services, local government, science and nuclear, transport and employment sectors.

As is the case for Serco Australia, Serco Group's primary business is service provision to government and the management of critical national infrastructure, particularly in the operation of hospitals, correctional facilities, detention centres, transport services, and defence facilities.

Serco in Queensland

Serco has had a presence in Queensland since first establishing in Australia some 20 years ago. We employ almost 1000 people across the state.

We are proud to operate SQCC for the State Government through QCS. A report by the Queensland Auditor General in 2016 found that Serco saved the state government almost \$20 million in three years of operation between 2012 and 2014, 21 per cent cheaper than the public sector comparator.

We also provide services in Queensland for the Federal Department of Home Affairs, the Australian Taxation Office and the Department of Defence. We operate a number of sites in Brisbane and the regions for these contracts.

Experience in delivery of services to the corrective services sector

Serco manages critical custodial and justice services on behalf of governments in Australia, New Zealand and the UK. These range from prison management, prisoner escort and court services to electronic monitoring and the rehabilitation and reintegration of ex-offenders back into the community. Serco also manages surveillance, secure storage, and command and control support services for law enforcement agencies.

This means we can transfer best practice, as well as tap into proven technology solutions and Serco's specialist cross-sector capabilities in areas such as facilities management and complex case management. We have an international Centre of Excellence for Justice dedicated to maximising the benefits of our experience. We are recognised for working with Governments and Departments to identify issues and work with policy makers to meet the needs of the community.

Correctional Facilities

In the correctional facilities which Serco operates, we deliver on our operating philosophy through:

- Putting safety and security first;
- A Responsible Prisoner Model that promotes respect, encourages positive behaviours and allows prisoners to learn and take responsibility for managing their own circumstances and outcomes;
- Addressing the individual needs of prisoners through Individual Management Plans;
- Criminogenic programs;
- Restorative justice programs;
- Prisoner employment;
- Prisoner education, accreditation and skills training;
- Prisoners re-establishing and maintaining relationships with their families and children; and
- Maintaining security and good order through positive staff-prisoner relationships and interaction based on mutual respect.

Serco does not own the facilities in which it delivers services. The prisons themselves are typically owned by the State or by public private partnership (PPP) consortiums contracted to the State – in which case they ultimately become a state-owned asset.

The services delivered are the operation and management of the prison in compliance with performance standards. Serco is responsible for supervising prisoners, monitoring and maintaining prison security and managing the welfare of each prisoner. The requirements for Serco are typically the same or greater than those for public sector counterparts. Such requirements are covered by legislation. In a number of cases, Serco has a contractual incentive to address prisoners' offending behaviour in order to reduce the likelihood that they will reoffend and return to custody. Population management (i.e. the number and classification of inmates sent to prisons) is controlled by the State.

Acacia Prison

Acacia Prison is the largest correctional facility in Australia, accommodating up to 1,475 medium-security, convicted male prisoners. Located in Western Australia, Acacia opened in 2001 with an operating capacity of 650. Serco has managed the facility since 2006, and has successfully overseen a number of periods of expansion to create Australia's largest prison. Serco is contracted to run Acacia until 2021.

Clarence Correctional Centre

Serco is part of the NorthernPathways consortium that was chosen in March 2017 to design, build, operate and maintain the Clarence Correctional Centre. Servicing the northern part of NSW, it will be a 1,700-bed correctional complex comprising 1,000 maximum security male beds, 300 maximum security female beds and 400 minimum security male beds.

Wandoo Reintegration Facility

Wandoo Reintegration Facility is a unique minimum security facility in Western Australia for 18 to 28 year old offenders to help them gain life skills and to reintegrate into society on release. The WA Office of the Inspector for Custodial Services found that "Wandoo provides a positive, purposeful and safe regime, and has performed well across all key measures."

Other facilities

Serco also operates Kohuora Auckland South Corrections Facility in New Zealand as well as HM Prisons Ashfield, Doncaster, Dovegate, Kilmarnock, Lowdham Grange and Thameside in the United Kingdom.

Southern Queensland Correctional Centre

Serco has operated prisons in Queensland since 2008 and SQCC has been managed by Serco since it was commissioned in January 2012. Our strong management and rehabilitation program at the facility was recently recognised with a contract extension.

SQCC is Queensland's newest, most modern, and technologically advanced Correctional Centre. The facility is operated by Serco under a management and operation agreement with QCS.

Our operating philosophy is focused on five key areas, which support QCS' commitment to community safety and crime prevention through the humane containment, supervision and rehabilitation of offenders:

- Security: physical, dynamic, and procedural security measures ensure community safety through secure containment;
- Safety: a commitment to ensuring the safety of everyone living, working in and visiting the facility;
- Respect: prisoners are treated with dignity and respect;
- Purposeful activity: structured days provide a wide range of services, programs and skilling opportunities, tailored to each prisoner's needs, to build on their strengths and support their post-release plan; and
- Re-entry: Prisoners are prepared for release into the community through pathways designed to reduce the likelihood of reoffending.

Rather than allowing criminogenic behaviour to increase during their time in custody, we are committed to ensuring that prisoners leave our care as better citizens. Serco's culture and programs aim to reduce reoffending and provide prisoners with the skills to succeed in living constructive, crime-free lives in the community on release.

Independent validation of Private Sector performance in the operation of Queensland Prisons was given in the Queensland Audit Office *Report into the Management of privately operated prisons*, Report 11: 2015-16 which found that:

- Cost efficiencies at SQCC generated a 21.4 per cent improvement on the public sector comparator between 2012 and 2014;
- The cost savings are being delivered while providing a level of service commensurate with publicly run prisons; and
- When compared against public prisons, the private operators' performance is comparable in almost all areas we examined, but QCS monitors the performance of its private operators at a more detailed level than it does for its public prisons.

Values

Serco has four values which staff are required to embody in everything they do, every day. These are Trust, Care, Innovation and Pride.

- Trust means that we deliver on our promises; are open, straightforward and honest; do the right thing; and take personal responsibility for getting things done;
- Care means that we take care of each other, and those we serve, and we aim to make a positive difference to people's lives;
- Innovation means that we share our knowledge and experience and embrace change, knowing that if we don't provide innovation and value for money to our customers, our competitors will;
- Pride means that we know that the work we do is important, and we take pride in doing it well.

These values are the basis of our business and establish our culture.

Culture

One of the key proactive measures to preventing corruption is the creation of a positive culture within the Correctional Centre. A staff culture of honesty, integrity, responsibility and accountability supports professional, ethical behaviour and is not conducive to corrupt behaviour. This must be supported by leadership and management which is open and transparent, fair and reasonable, which actively rewards positive behaviours and sets out clear and timely consequences for negative ones.

Employees in a strong culture who are proud to take care of prisoners are far less likely to do them harm or act in a manner where their fellow staff are negatively impacted. Where they understand the purpose and the mission of the Correctional Centre, they will be aware of the wider ramifications of what might otherwise seem to be a small transgression. Where they see moral and ethical behaviours actively modelled by their managers and peers they are less likely to behave immorally. We understand that corruption often arises from dissatisfaction, and where people are purposefully employed in a pleasant and friendly workplace, they are less likely to be drawn into poor behaviours.

Leaders and managers must set a supportive culture focused positively on continuous improvement, where 'the standard you walk past is the standard you accept'. Shortcomings should be dealt with quickly, effectively and fairly, so that problems are addressed before they can escalate. Doing the right thing should be seen as everyone's job, and no one should be in a position where they feel they can, or have to, 'turn a blind eye', decide that an issue is 'too difficult', or protect someone who is doing the wrong thing.

At Serco, we set out the kind of culture we want to create with a clearly articulated set of Values. Our Code of Conduct describes the standards all employees must meet and the types of behaviour we expect to see in our interactions with colleagues, with service users, with suppliers and with the wider community. Where this is not met we are quick to act to support staff to meet these levels of performance, and ultimately, if they are not met, to manage staff from the organisation.

Code of Conduct

Serco has a Code of Conduct that establishes the standards expected of all employees, at all times, across all parts of the business.

It is a mandatory component of every employee's induction, as well as their annual refresher training. It provides guidance to all staff on what is expected of them across a range of topics including:

- Our People: Fair treatment and equal opportunity, respectful workplace, drug and alcohol abuse, and human rights;
- Our Business: Bribery, corruption and facilitation payments, gifts and hospitality, conflicts of interest, political activity and payments, competition and anti-trust, working with suppliers, and insider trading;
- Our World: Health and safety, environment, and community engagement;
- Our Assets: Financial integrity, confidential information and records, keeping information secure, Business communications and technology electronic publishing, external communications and public disclosure;
- Dealing with Ethical Issues: Stop and think, speaking up.

In addition, in our management of all correctional facilities, we draw on the following objectives:

- Safe and secure delivery;
- Decency and respect;

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- Optimised rehabilitation and reintegration;
 - Professional and accountable service;
 - Healthcare services reflective of the needs of custodial patients;
 - Uninterrupted facilities management services;
 - Value for money and transparent outcomes.

All staff are provided with related training, including Anti-Discrimination Act 1977, Crime and Corruption Act 2001 (Queensland), Fair Work Act 2009 and UK Bribery Act. The Code of Conduct details the requirement to report all suspected or actual breaches in professional standards, corruption or criminal offence immediately to Serco, the State and/or the relevant law enforcement authorities.

Serco's leadership are required to lead by example in the professional behaviour required. All managers complete the anti-bribery and corruption training at induction, refreshed subsequently on an annual basis. This is reinforced through a regular performance review process.

At SQCC, the supervisor to staff ratio allows sufficient time for individual supervision, to support a culture of disclosure, accountability and open communication. The performance management process addresses staff who are unable to comply with the behaviour outlined in the Code of Conduct.

Standards of Professional Behaviour

Serco's Counselling and Disciplinary Procedure addresses the course of action to be taken in the event of a breach in professional standards, corruption or a criminal offence. The course of action is decided on a case-by-case basis. We ensure that any suspected or actual professional breach of standards, corruption, or a criminal offence is immediately reported to the State and/or the relevant law enforcement authorities.

We manage staff breaches of professional standards, corruption or a criminal offence following an appropriate internal or external investigation, in compliance with the Serco procedure for the management of discipline, under-performance and misconduct.

In addition, Serco reports serious breaches of its standards to QCS as per contractual requirements.

Investigation and reporting of staff professional misconduct

The Professional Boundaries Policy and Code of Conduct provide guidance to staff about the professional standards required and how we will respond to misconduct. Serco provides full cooperation with:

- QCS when it elects to investigate a professional conduct matter;
- The priority of police investigations over internal investigations;
- Any additional required alignment to QCS.

All investigations are conducted according to the principles of natural justice and procedural fairness. A formal investigation is conducted when any of the following apply:

- The incident has major consequences (disorder, damage, injury);
- There is serious harm to any person;

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- Breaches of Serco Policies and Procedures, Code of Conduct and Values;
 - It is likely that misconduct has occurred which may require formal disciplinary action;
 - Where there is a specialist element to the investigation e.g. financial impropriety, fraud, sexual harassment or discrimination.

Staff breaches of professional standards, corruption or a criminal offence are addressed in line with Serco's procedure for the management of discipline, under-performance and misconduct.

Recruitment

Setting the culture of a Correctional Centre and expectations of employees begins at recruitment, in making clear to people what kind of workplace it is, and in selecting candidates who are suitable for the environment. The recruitment process eliminates those with criminal histories and conflicts of interest, and beyond that our process can capably identify individuals who are unsuitable for custodial roles, or roles in correctional facilities in general. All employees are subject to a police check on employment. Serco has now added an annual federal criminal history check. It is a QCS requirement that a staff member discloses any involvement with police.

Training

The eight week Initial Training Course (ITC) provides an opportunity to impress the culture of the facility on new recruits, let them know that they are supported, and set out clear expectations in terms of behaviour. The SQCC General Manager clearly identifies corruption and corruption risks during the training, including the areas where recruits could be vulnerable including misuse of information and inappropriate relationships. The General Manager also addresses governance and assurance, highlighting the high levels of scrutiny. Serco's Code of Conduct is also covered, as well as a piece on Ethics and the misuse of power without checks and balances, using the Stanford experiment as an example.

Relevant elements of the ITC include:

- Accommodation Overview
- At Risk
- Breaches
- Case Management
- Communication Skills
- Complex Behaviours
- Conduct Interviews
- Conflict Resolution
- Crime Scene Preservation
- Cultural Awareness
- Drug and Alcohol awareness
- Escorts
- First Officer Response and Contingencies
- Headcounts & Musters
- Incentives and Earned Privileges scheme
- Integrated Offender Management System

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- IMOS Offender Management Theory
 - Legislation and Security
 - Logbooks, Note Books and Registers
 - Manage Aggressive Prisoners
 - Medical Presentation
 - Observation Skills
 - Officer Safety
 - Report Writing
 - Searches including IONSCAN
 - Stress Management
 - Substance Testing
 - Unit Management
 - Workplace Health and Safety
 - Working Effectively with Complex behaviours

After the course, probationary officers have a maximum of 12 months to complete their Certificate III in Correctional Practice. In addition to this, all staff undergo annual refresher training. For example, this reviews de-escalation tactics as well as training in approved use of force techniques.

Intelligence

Intelligence analysis is key to detecting the potential for corruption early, and to responding when it does occur. ■

Staff are trained to report any intelligence received through an Intel Note. ■

■ Intelligence analysts collect, monitor, investigate and report intelligence information received to ensure that corruption and/or breaches of professional standards are promptly identified, addressed, and the appropriate authorities are notified.

Physical measures

We have a number of physical measures in place to deter and detect corrupt behaviours.

The vast majority of staff activity is seen and recorded. Custodial staff wear body cameras. SQCC is largely covered by CCTV. Serco notes that in correctional facilities where areas exist that are not covered by CCTV, staff and prisoners are likely to be aware of these.

A biometric scan is required to enter and leave the Centre. Searching measures are in place on entry. All belongings must be x-rayed on entry to the facility. Staff are subject to metal detection on their person. It is not

possible to conduct a physical pat-down search under Queensland legislation. Serco notes that recently, affordable models of mobile phone have come to market which SQCC's current point of entry search measures cannot detect.

Search dogs are used as part of SQCC's security regime and are trained to detect drugs.

SQCC has an IONSCAN machine which allows for the detection of trace amounts of particles (in this case narcotics) on the clothes and belongings of people entering or leaving the facility. At SQCC, staff are searched periodically using this machine. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Oversight

No matter how robust a Correctional Centre's own processes are, it is vital to have external and independent oversight in order to ensure assurance and compliance, as well as to promote continuous improvement.

The contracted sector is subject to greater scrutiny than its public sector counterparts. External scrutiny of contracted prisons comes from several areas. A key differentiator is that the state Contract Management Unit has full time contract managers with unhindered 24/7 access to all information and areas of prison operation. Contracts are also structured in a way to ensure that all issues are reported accurately and in a timely manner. The penalty for failing to report is rightly high and in some instances can be greater than the penalty for the incident reported. In most jurisdictions there is also independent or quasi-independent scrutiny from bodies such as the Office of the Chief Inspector, the Official Visitor, Ombudsman and others. For SQCC, external scrutiny includes:

- QCS Operations;
- QCS Contract Management Unit (CMU) - As a contracted operator, Serco is overseen at SQCC not just by QCS from an operational point of view, but also by the CMU, who attend the Centre five days in every 10. They audit us against the contract, against Custodial Operations Practice Directives (COPD), and have unfettered access to the entire centre and its systems;
- QCS Ethical Standards Unit;

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- The Office of the Chief Inspector - conducts a three year full announced inspection followed by an announced follow up within 12 months, to check that recommendations have been implemented;
 - The Official Visitor - appointed by the Office of the Chief Inspector, attends the Centre weekly. They listen to prisoner complaints and if necessary, investigate the matters raised in an impartial manner, and report back to prisoners with the result of their investigations. The Official Visitor will raise any indication of corruption with the appropriate authorities;
 - The Queensland Ombudsman – attends every correctional facility annually. They typically spend three days on site. The Ombudsman examines records of breaches of prisoner discipline, looking at procedural fairness, treatment, evaluating whether treatment of prisoners is fair and balanced across all correctional facilities;
 - Office of the Health Ombudsman;
 - CCC;
 - Vincent's Audit – who carry out an independent examination of Healthcare, procured by QCS;
 - ISO9001 – who audit all of our quality systems.

Serco is motivated by its culture and its contracts to make sure that it is operating to a high level of compliance. Accordingly, we have a number of internal oversight mechanisms which also apply to SQCC:

- Contract Compliance Officer (SQCC);
- Risk, Quality & Compliance audit (Serco corporate);
- Serco Management System audit (Serco corporate);
- "Speak Up" – the Serco corporate confidential reporting process.

Complaints and concerns

Corruption can be brought to light through complaints and concerns raised by prisoners, staff, or members of the public including prisoners' visitors. There are a number of avenues through which this can occur, as part of a system designed to give people the ability to speak up anonymously if they wish, and without fear of retribution. At SQCC, we are not aware of any case where an individual has stated that they raised a complaint which was not dealt with. Avenues to raise a complaint include:

- Raising with officers / Serco management;
- Blue envelope – prisoners can raise issues, including about corruption, through the blue envelope system. This is a confidential and free service using a non-tamper locked mailbox which allows prisoners to communicate to the General Manager of the Centre, QCS or the Parole Boards. At SQCC, the letter is scanned and information entered in a register to ensure it is tracked to meet required timeframes for response. QCS audit has praised SQCC's record keeping system in this area;

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- Official Visitor;
 - Office of the Chief Inspector;
 - Queensland Ombudsman;
 - Health Ombudsman;
 - CCC;
 - QCS – including the Ethical Standards Unit;
 - Intel note – if a staff member has concerns or intelligence about corruption they can raise this through an intel Note. SQCC Intelligence Analysts then turn that into an Intelligence Report which goes onto the system. The General Manager is notified and QCS will have sight of the intelligence on the system;
 - Serco “Speak Up” confidential reporting process and Serco Information email address.

The autodial numbers of key organisations are clearly displayed for prisoners. The Ombudsman, QCS and Serco also advertise the processes for raising problems and complaints through posters and fact sheets.

An attempt by one or more corrupt member of staff to subvert or circumvent one of these complaints processes is more likely to fail because there are many other avenues which can be used.

For example, if a prisoner raised concerns with an officer but no action was taken, they might write to the General Manager or QCS using the secure, confidential ‘blue envelope’ system. If that didn’t work for any reason they could raise the matter with the Official Visitor, or use the Prisoner Telephone System to contact the Ombudsman, Health Ombudsman, CCC, Legal Aid QLD or the Aboriginal and Torres Strait Islander Legal Service.

If a member of staff raised concerns with their manager but no action was taken, they could escalate it to a more senior Serco manager up to and including the CEO. They could contact Serco’s confidential “Speak Up” service by phone or email, contact QCS including the local Contract Management Unit or the Ethical Standards Unit, reach out to the CCC or the Police. There is a clear policy and culture in SQCC that corrupt behaviour can be reported without fear of retribution, and this has proved effective. There have been two occasions where staff members have raised concerns about peers or managers which has resulted in disciplinary action and no negative ramifications for the staff member who raised the concern.

Members of the public and visitors to prisons also have a number of measures which they can and do use to raise issues, including writing to the General Manager, using the corporate Serco Information contact details, reaching out to QCS or the Police amongst others. Issues raised with Serco are immediately recorded in the complaints management system so that they can be tracked. Those contacting us are strongly encouraged to put their concerns in writing to ensure that there is a proper audit trail.

Corruption – key behaviour types

Inappropriate relationships

An inappropriate relationship with a prisoner is considered to be any interaction between an employee and a prisoner which breaches the Code of Conduct. For consideration in recruitment and training, Serco has identified key traits which make an employee more likely to be susceptible to inappropriate relationships:

- Easily befriended;
- Overly trusting or naive;
- Overly friendly or overly familiar with most people;
- Share personal problems;
- Mentally stressed;
- Not confident;
- Complacent;
- Low self esteem;
- New employee.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Staff are provided with refresher training every 12 months.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] We respond as soon as we hear information.

We have noted that non-custodial staff, [REDACTED], are at greater risk. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] We have a system in place to monitor [REDACTED]

Where a prisoner comes to SQCC with whom a member of staff has a personal relationship, e.g. family relationships, they must immediately notify intelligence under COPD.

Provision of contraband to prisoners

There are robust physical measures in place to deter and detect the smuggling of contraband, such as drugs and mobile phones, into the facility at the point of entry. There are also measures in place to detect contraband in the event that it enters the facility. [REDACTED] these measures are certainly an effective deterrent for corrupt behaviour, [REDACTED]

[REDACTED]

[REDACTED]

Bearing this in mind, intelligence gathering and analysis is vital in identifying any corrupt provision of contraband to prisoners by staff, particularly in terms of monitoring inappropriate relationships (see above).

Excessive use of force

At SQCC, where Use of Force occurs, it is always recorded as an incident, regardless of whether it is planned or unplanned. The use of handcuffs alone is also recorded as a Use of Force incident.

SQCC scrupulously records and reports all uses of force. For example, a recent Thematic Review of Use of Force by QCS' Principal Advisor, Governance Compliance and Risk found that between 1 July 2016 and 30 June 2017, there were 107 uses of force, ostensibly putting SQCC's rate per prisoner at 28%, fourth highest in the prison estate. However, of the 107, 53 (50%) related only to the application of handcuffs for relocation purposes. Incidents of offensive behaviour/threats were de-escalated through communication by staff and handcuffs applied to ensure safety during relocation. Of the remaining 54 where control and restraint technique was applied, 36 incidences occurred in the Safety Unit as an active intervention to stop self-harm. Separating the application of handcuffs and the Safety Unit interventions, this leaves 18 incidents across the 12 month review period where the spontaneous use of force via control and restraint techniques was required by staff.

SQCC is equipped with CCTV throughout the facility, and officers wear body cameras. Wherever Use of Force is applied at SQCC, we identify footage of the incident, isolate and retain it. It is our experience that questions can be raised about a use of force incident a number of years after it occurred, and it is important to retain this evidence.

At SQCC, Serco employs a Violence Reduction Coordinator who reviews use of force incidents. This allows us to reflect on incidents, learn lessons and continuously improve the methods we use to de-escalate situations and to ensure that where force is used it is done appropriately. This process would also identify where excessive use of force or staff on prisoner assaults occur, as well as helping to prove where they have not when allegations are

made. Where a prisoner sustains a significant injury, Serco actively investigates footage regardless of the reason given, in order to determine the real cause.

Every assault has to be reported to the Corrective Service Investigation Unit (CSIU). Staff on prisoner assaults must be reported on IOMS, noting that "discretion is to be used when linking accused staff member", as well as to Ethical Standards, CSIU and CMU. It will also be reported to QCS operational arm (i.e. the Deputy Commissioner) as well as to Serco corporate management.

In the case of an apparent staff on prisoner assault, we would suspend the individual pending the outcome of investigation which would result in termination if proven.

Denying prisoners access to food or medicine

The manner in which food is served in SQCC means that it would be virtually impossible for a member of staff to deprive an individual prisoner of food except in the case of the Detention Unit (DU), Safety Unit (SU) and Advanced Care Unit (ACU). However, all of these units are covered by CCTV and all avenues of complaint remain open to prisoners held there. Weekly Prisoner Advisory Committee (PAC) meetings are held, providing prisoner representatives the opportunity to raise concerns with management if there is an issue with the provision of food. Prisoner who believe they are being denied access to medicine have access to all avenues of complaint and particularly to the Health Ombudsman.

Inappropriate access to disclosure of information

Our primary focus in terms of inappropriate access to information is the Integrated Offender Management System (IOMS). Before gaining access to IOMS, every member of staff signs a user agreement. Everyone who is trained on IOMS is instructed that it is a QCS database and that access comes with responsibilities. Everyone is reminded of these obligations at least annually. More recently a series of communications has come from the Commissioner's office in relation to the misuse of IOMS. Every time a user logs on, Terms & Conditions appear and they must accept those to continue, confirming that they are accessing the system for their role and function at the centre.

Where we have identified individuals who have misused IOMS, information has come via peers at work, prisoners or people in the community reporting to the privacy commissioner. We then report the matter to QCS who are able to conduct a forensic analysis of the usage of IOMS, and will typically provide the outcome to us and to Ethical Standards. Serco is not able to conduct random checks of IOMS usage, we are only able to ask for intelligence-led checks of individuals.

Having received an audit of an employee's usage of IOMS, if we find some access there that is out of place, we initiate a disciplinary process and ask whether they acted with good reason. Examples of outcomes include:

- An employee used IOMS to look up a high profile prisoner and received a written warning;
- An employee who looked up their former spouse was taken through a disciplinary process and resigned prior to their employment being terminated;
- An employee looked up a prisoner on IOMS and passed information on to another prisoner. This would represent a criminal offence and a matter for Ethical Standards to refer for criminal charges if they deemed appropriate. The individual's employment was terminated.

In each of these cases, Ethical Standards were advised of the matters and their outcomes.

In order to look up high profile prisoners on IOMS, there is another level of security, requiring the user to enter their username, which sends an alert to the Deputy Commissioner. In our recent experience at SQCC, while there have been occasions where employees have looked up high profile prisoners, this additional level of security does not appear to have resulted in enforcement action.

Falsification of documents

On all occasions where staff are interacting and conducting tasks where a record is required, such as a cell search, removal of clothing search, or urine test, a minimum of two staff are present so that one is verifying the other. The vast majority of SQCC is under CCTV surveillance with footage recorded. Officers wear body cameras. Prisoner breach hearings are videotaped, and an appeal process and review process exists for breaches. Prisoner educational and vocational courses require extensive evidence of completion.

Serco employs a Contract Compliance Officer and Contract Compliance Coordinator – their role is to audit against our contract. They will conduct a real time review of activities and make comment, review surveillance footage and reconcile that with records and registers. QCS Contract Management Unit review processes from end to end, reviewing compliance, consistency and integrity in the process. Both our Serco and CMU audit processes help to deter, and would more than likely detect, document falsification.

Failing to report incidents as required

As outlined under 'Falsification of Documents', there are a number of failsafes and audit processes in place to ensure that incidents are reported as required.

Serco's contract has a Key Performance Indicator (KPI) on Accuracy of Reporting which applies penalties based on the number of critical reporting failures and the percentage of compliant incident reports. A critical reporting failure means a failure to record an incident that occurs at the centre on the QCS information systems; failure to notify

QCS within the timeframes established in the QCS incident reporting procedure of a critical incident that occurs at the centre; a material or substantive error or inaccuracy that is identified by QCS in a Quarterly Performance Report prepared by the Contractor which includes the provision of incorrect data in the report. A compliant incident report is an incident report that complies in all respect with the QCS incident reporting procedure.

Fraud relating to the purchasing of goods or services

Serco undertakes the purchase of goods and services at its facilities guided by the rule of law and our own robust standards that clearly define conduct. We recognise that there can be opportunity for unethical activities at several levels and comply with laws and regulations and other requirements applicable to the locations in which we operate our business.

Procurement processes are overseen centrally to help manage localised issues and to ensure high standards across all facilities. At a formal level due diligence is undertaken of all third parties to establish a level of compliance against a range of criteria including conflicts of interest management and the review of human rights impacts, corruption, sanctions and trade compliance issues.

Serco reserves the right to do such things as announced and unannounced inspections of supplier facilities, to ensure compliance with its Code. Serco Suppliers must maintain at each facility all documents necessary to demonstrate compliance with the Code. Serco Suppliers must allow representatives from Serco and, if requested, Serco's customers, full access to facilities, documents, worker records and workers for confidential interviews in compliance with local laws.

At the local level Serco's Code of Conduct clearly outlines the expected standards all our employees must meet. In addition significant training is undertaken with all employees (with increased training for those specifically engaged in procurement.) The Code clearly establishes what might constitute conflicts of interest through to fraud and other illegal conduct.

Where any activity is undertaken that breaches our Code of Conduct there are a number of sanctions, including dismissal. In addition Serco will always self-report any activity to local authorities.

Contemporary Systemic Pressures

Since 2012, SQCC has successfully operated at 35% over capacity, without incident. This has largely been achieved by accommodating prisoners on roller beds in common areas in the residential units. Our experience is that this eases the tension that can otherwise eventuate where prisoners are doubled up in Queensland.

As the number of prisoners we held increased, we immediately increased the staffing resource aligned to it. We have had the advantage of being able to be proactive and to run Initial Training Courses for new officers before vacancies appear, aiming to have a pool over and above our ASL. We have not had staff shortages. As at April 2018, we have no custodial vacancies, and a pool of casuals to draw on as needed. We do not employ people with criminal histories or conflicts of interest.

As SQCC runs its own training, we have the advantage of setting our own timing rather than relying on the capacity and timing of an academy.

As the population of the Centre increased, we increased prisoner employment opportunities to ensure that they could be purposefully engaged in work, education or training.

The 'temperature' of the prison is monitored constantly by officers and managers to identify and address any issues of concern which might arise from crowding. Prisoner Advisory Committees sit weekly which allows management to address things quickly and show prisoner representatives that we are responsive. This also helps to deal with some of the issues that might arise from having an overcrowded centre.

We recognise that creating and maintaining a positive culture is more difficult in a jurisdiction which is experiencing growing overcrowding and other contemporary systemic pressures. While this does not apply to SQCC, in a facility which is significantly stretched in terms of resources, there will unfortunately be more opportunities for corrupt activity to occur.

Expediting recruitment and training out of a perceived necessity can affect the quality of both the recruitment and the training, running the risk of putting forward more unsuitable candidates to be custodial staff, and of not training them adequately before they are deployed. A staff body with a much greater proportion of inexperienced officers will have fewer opportunities to have good examples set for them by experienced colleagues and is at greater risk of being exploited by prisoners.

A prison under significant pressure from overcrowding or other systemic pressures can be an increasingly unpleasant place to work. Generally speaking, the more dissatisfied a vulnerable member of staff is, the more likely they are to be vulnerable to corruption.