



Responding to corruption related to failure of duty: An audit of the Department of Education and the Queensland Police Service

Summary audit report

June 2019



Acknowledgments

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Summary

Background

Since 1 July 2015, the second most common type of complaint received by the Crime and Corruption Commission (CCC) about the Queensland public sector has been “failure of duty”.¹ Failure of duty allegations can involve failures to comply with legal, policy or reporting obligations or failures to execute duties to an appropriate standard. This type of conduct includes failures resulting from a lack of knowledge, competence or appropriate care or diligence but does not include deliberate acts or omissions with the intent to gain a benefit or cause detriment to another.

In the 2017–18 financial year, the CCC received 1840 allegations involving failure of duty, up 14 per cent from 2016–17 (1607 allegations). This 2016–17 figure was 16 per cent higher than in 2015–16 (1381 allegations).

An individual failure of duty allegation may not of itself be a significant concern but when aggregated the allegations may indicate broader organisational capacity deficits and/or cultural issues. Failure to implement adequate prevention measures and internal controls creates an environment that may allow an employee to engage in corruption, as corruption by an employee is often about opportunity. Agencies should take steps to reduce this opportunity. For these reasons, the CCC decided to audit this category of allegation.

The CCC audited the Department of Education and the Queensland Police Service. It examined a sample of 118 complaints (31 from the Department, 87 from Queensland Police) between 1 January 2016 and 30 June 2018. These samples consisted of randomly selected matters from the seven regions/districts of these agencies with the most complaints by volume.

Conclusions from the audit

The CCC was satisfied with the way the Department and Queensland Police have dealt with the majority of the complaints.

The CCC’s audit found that failure of duty allegations within the Department were primarily in relation to school-based employees, including deputy principals and principals, not reporting suspected student harm (including physical or sexual abuse) in accordance with legislation. The Department did have in place adequate prevention measures to mitigate the risk. Critical messages were also delivered to school-based employees aligned with the expectations of the Department, Queensland Police and the Department of Child Safety, Youth and Women to whom reports are submitted.

Conduct involved in failure of duty allegations about Queensland Police tended to occur while an officer was responding to an incident, during an investigation or while performing custodial duties and tended to be made about officers at the rank of Senior Constable. These officers are, traditionally, those most in contact with members of the public.

Recommended improvements

The CCC identified areas in which agencies could improve.

Department of Education

The CCC recommended that the Department continue with their complaints assessment and investigation reforms. The CCC recognised that the Department was in the process of implementing recent recommendations from previous CCC audits, and their investigative processes and practices are continuing to mature significantly. This is a commendable step by the Department, and shows the significance of the audit process, as lessons learned from audits brought about reforms and improvements in processes and procedures.

1 The CCC’s [Corruption allegations data dashboard](#) provides details allegations of corruption made to the CCC between 1 July 2015 and 31 March 2019.

Queensland Police

The CCC was satisfied with how Queensland Police managed the majority of the complaints. It recommended that Queensland Police ensure officers clearly record decisions in the complaints management system.

The CCC also recommended that Queensland Police consider and assess the adequacy of their prevention measures and internal controls when investigating a corruption matter (particularly those controls directly impacting on the corrupt incident and potentially allowing it to occur). Minimising opportunities for corruption and implementing effective control measures are central to good governance.

Introduction

Preventing corruption is fundamental to the CCC's vision for safe communities supported by fair and ethical public institutions.

The *Crime and Corruption Act 2001* (CC Act) sets out the roles, responsibilities and functions of the CCC relevant to its corruption audits:

- to continuously improve the integrity of, and to reduce the incidence of corruption in, the public sector [section 4(1)(b)]
- to help prevent major crime and corruption (its prevention function) [section 23]
- to raise standards of integrity and conduct in public sector agencies [section 33(1)(a)]
- to investigate² and otherwise deal with conduct liable to allow, encourage or cause corrupt conduct, and conduct connected with corrupt conduct [section 33(2)(a)]
- to audit the way a public official³ has dealt with corrupt conduct, in relation to either a particular complaint or a class of complaint [sections 47(1)(b) and 48(1)(b)].

Each financial year the CCC conducts a program of audits to examine how agencies have responded to particular types of complaints, and how robust their complaints management and corruption prevention frameworks are. The CCC also undertakes audits aimed at controlling the risks of corruption.

In 2018–19, the CCC conducted an audit examining how agencies have responded to allegations about corruption⁴ related to failure of duty.

What is a failure of duty?

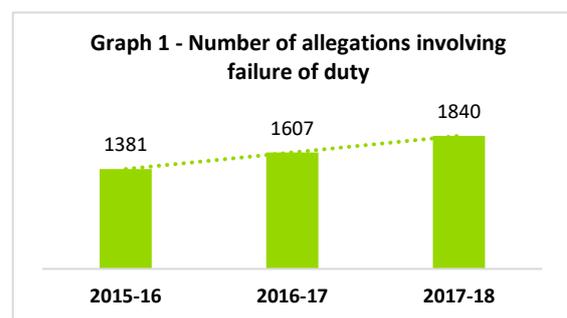
The allegation of “failure of duty” refers to a lack of compliance with legal, policy or reporting obligations and/or failure to execute duties to an appropriate standard. This type of conduct includes failures resulting from a lack of knowledge, competence or appropriate care or diligence but does not include deliberate acts or omissions with the intent to gain a benefit or cause detriment to another.

Reasons for doing this audit

Allegations that employees have failed in their public duty are the second most common type of complaint received by the CCC.⁵

Graph 1 shows the increase in numbers of failure of duty allegations received by the CCC between 2015 and 2018.

An individual failure of duty allegation may not of itself be a significant concern but when aggregated the allegations may indicate broader organisational capacity deficits and/or cultural issues. Failure to implement adequate prevention measures and internal controls creates an environment that may allow an employee to engage in corruption, as corruption by an employee is often about opportunity. Agencies should take steps to reduce this opportunity. For these reasons, the CCC decided to audit this category of allegation.



2 “Investigate” includes to examine or consider, Schedule 2 of the *Crime and Corruption Act 2001* (CC Act).

3 A public official is defined in Schedule 2 of the CC Act.

4 Corruption includes corrupt conduct or police misconduct.

5 The CCC's [Corruption allegations data dashboard](#) provides details allegations of corruption made to the CCC between 1 July 2015 and 31 March 2019.

Audit focus

The objective of the audit was to assess how appropriately agencies have responded to allegations of corruption relating to failure of duty.

Scope of the audit

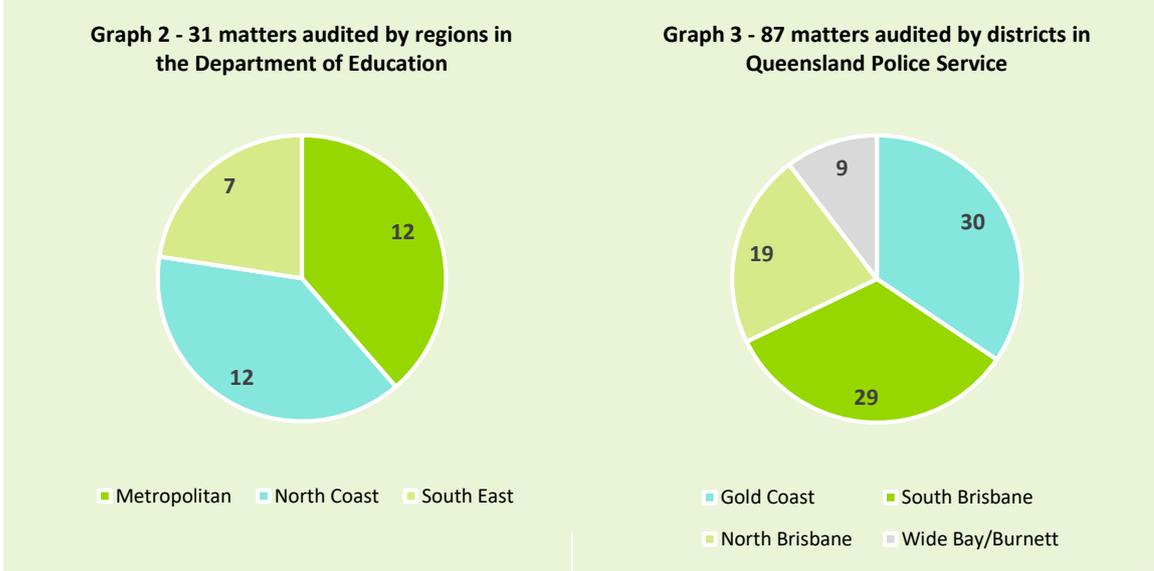
This audit involved the Department of Education and the Queensland Police Service. The CCC chose these agencies on the basis of the number of allegations of corruption relating to failure of duty made between 1 January 2016 and 30 June 2018. The CCC used its corruption allegations data as an indicator of prevalence and, therefore, measurement of risk. Potential areas of risk were identified based on the frequency of the type of conduct, work activity, officer who did the conduct, sector and location of conduct.

The CCC also used its corruption allegations data as an indicator of prevalence and selected the seven regions/districts (three in the Department, four in Queensland Police) with the highest number of complaints by volume within their respective agencies, as shown below.

Department of Education	Queensland Police Service
Regions	Districts
<ul style="list-style-type: none"> Metropolitan Region North Coast Region South East Region 	<ul style="list-style-type: none"> Gold Coast District South Brisbane District North Brisbane District Wide Bay/Burnett District

Reviewing agency response: criteria for effectiveness

A total of 118 random complaint files⁶ were audited across the regions and districts of the respective agencies, as shown in graphs 2 and 3.



⁶ Although complaints can comprise multiple allegations, this audit only focused on allegations relating to failure of duty.

The CCC examined each of the 118 matters to assess how effectively agencies were responding to complaints about corruption. It used four effectiveness criteria. Had the agency:

1. Examined current prevention measures/controls (e.g. what is missing or inadequate?)?
2. Identified the causes or contributing factors to control breakdowns?
3. Developed and implemented a prevention response to minimise the risk of similar events in the future (e.g. policies, procedures, training and other prevention control measures)?
4. Assessed the effectiveness of the prevention measures and controls (whether by a compliance function, the Internal Audit Unit or an external consultant)?

The agencies' responses to complaints about corruption were benchmarked against the CCC's publication *Corruption in focus – A guide to dealing with corrupt conduct in the Queensland public sector* (October 2014).⁷

Statistical results from this audit

The table below show how the two agencies responded to the 118 complaints.

Outcomes	
Department of Education (31 matters)	Queensland Police (87 matters)
5 Reprimand	17 Chastise subject officers
3 Chastise subject officers	2 Reprimand
2 Subject officer resigned	4 Address control deficiencies
11 Not substantiated	2 Imposition of a monetary penalty
10 Under investigation or disciplinary process ⁸	9 Not substantiated / exonerated
	2 Under investigation
	51 No further action ⁹

Activity involved in allegations of failure of duty

"Activity" means the work activity or function relevant to the conduct alleged to have occurred.

The CCC analysed the allegations of the 118 complaints to determine the main activity. This was done to help identify the types of work activities or functions that may pose a higher risk of corruption. These main activities in the two agencies are set out below.

Department	Queensland Police
<ul style="list-style-type: none"> • Failure to comply with a policy obligation (transparency of government) – specifically, student protection reporting. 	<ul style="list-style-type: none"> • Failure to provide care or access to a person. • Failure to comply with good policy, directive, order or procedure. • Failure to investigate or follow appropriate investigative practice. • Failure to take report or commence matter.

⁷ *Corruption in focus* was updated in March 2019.

⁸ Matters were under investigation, or through a disciplinary process, by the agency at the time of this audit.

⁹ "No further action" refers to taking no action, or discontinuing action, if the agency is satisfied that the complaint is frivolous or vexatious, lacks substance or credibility, or that dealing with the complaint would be an unjustifiable use of resources. Queensland Police also takes no action if it deems the conduct of police officers to be lawful and reasonable.

Department's reporting obligations – student protection

School-based employees within the Department of Education have the following reporting obligations.

- *Child Protection Act 1999 (CPA)* – It is mandatory, under section 13E of the CPA, for teachers and early childhood education and care professionals to give a written report when they reasonably suspect a child has suffered, is suffering or is at risk of suffering significant harm caused by physical or sexual abuse and may not have a parent able and willing to protect the child from harm.
- *Education (General Provisions) Act 2006 (EGPA)* – It is mandatory, under sections 365 and 365A of the EGPA, for a school staff member to immediately give a written report to the principal or principal's supervisor¹⁰ when they become aware or reasonably suspect the sexual abuse¹¹ or likely sexual abuse of a student under 18 years. The principal or supervisor must immediately give a copy of the report to Queensland Police.

Assessing reasonable suspicion of student harm

The CCC acknowledged that the task of a teacher or a departmental staff member who is assessing whether they hold a reasonable suspicion of student or child harm is not always easy.

None the less, it is essential to recognise precisely when to report reasonably suspected student harm to the principal or the principal's supervisor. In such cases, the person should seek advice from the principal or regionally based Student Protection Advisors (who provide advice and training to principals managing student protection concerns).

Queensland Police – operational policing

Queensland Police have a number of guidance and instruction documents (e.g. Manuals) in salient aspects of operational policing. Some of the Manuals are:

- Operational Procedures Manual
- Digital Electronic Recording of Interviews and Evidence Manual.¹²

The Manuals are issued pursuant to the provisions of section 4.9 of the *Police Service Administration Act 1990* (PSAA). Police officers are required to comply with the Manuals so their duties are discharged lawfully, ethically and efficiently.

There may also be local procedures in place at regional, district and station levels.

The Manuals and local procedures are some of the prevention measures for addressing the failures in law enforcement practices (i.e. activities relevant to the failure of duty allegations).

Failure of duty allegations tend to occur while an employee/officer is responding to an incident, during an investigation or while performing official duties.

In policing, many decisions must be made quickly and with regard to diverse circumstances, however, risk management will always play a critical role in decision making by officers.

10 If the suspicion relates to the principal.

11 Sexual abuse is defined in section 364 of the EGPA. The department's *Student Protection Guidelines* also provided information about types and indicators of sexual abuse.

12 The manuals are available on Queensland Police's [website](#).

Conclusions from the audit

Both the Department of Education and Queensland Police have previously participated in other recent CCC audits about their investigative practices. The CCC recognised that, subsequent to those audits, and in response to previous recommendations, these agencies have put in place, and continue to improve, processes and practices to ensure they are now responding effectively to complaints of corruption. These were commendable steps by both agencies, and shows the value of the audit process, as lessons learned from audits brought about reforms and improvements in processes and procedures.

In relation to this current audit, the CCC has communicated its conclusions and recommendations to the agencies. The aim of this audit summary is to help other Queensland public sector agencies improve their investigative and prevention capabilities.

The CCC was satisfied that in both agencies the majority of complaints/allegations that it audited about corruption relating to failure of duty activities were effectively responded to. However, it identified areas in which the agencies could improve. These included:

1. Recording outcome decisions consistently (Queensland Police)
2. Ensuring adequate prevention measures and controls (both agencies).

Improvement – Recording outcome decisions consistently (Queensland Police)

The audit identified one matter where the complaint may have been vexatious or not made in good faith, however, it was not clear to the CCC if this was the basis for Queensland Police to take “no further action” on the complaint.

The CCC brought this matter to Queensland Police’s attention so that any comments made by the case officers/reviewers/decision-makers about complaints being vexatious or not made in good faith are not confused with any other reasons for taking no further action.

Recommendations

That Queensland Police remind investigators/reviewers/decision-makers to clearly record decisions in the complaints management system.

Response: In responding to this recommendation, Queensland Police acknowledged and accepted the findings and recommendations.

Improvement – Ensuring adequate prevention measures and controls (both agencies)

This section focuses on prevention measures and controls. For example, when corrupt conduct or police misconduct was detected, did the Department of Education and Queensland Police take opportunities to prevent, or at least minimise, corruption in the workplace?

Examine current prevention measures and controls

The audit identified matters where investigators did not examine the current prevention measures and controls. For example, investigators could have asked:

- Were training and performance management not in place or inadequate?
- Were there administrative issues, or other contributing factors related to the agency’s policies and procedures?

Department	Queensland Police
In 17 matters, investigators may not have examined the prevention measures and controls. This may have been due to different investigation report templates being used over the last two to three years. The Department's current investigation report template includes a section to address issues for management. Investigators are required to complete this section to articulate issues identified during their investigation.	In eight matters, the CCC was unable to determine if investigators had reviewed the prevention measures and controls. This was because it had not been articulated in the investigation reports, Summary Reports or in Linked Documents in the complaints management system.

Every investigation process should include a review of any systemic issues or management failures that may have contributed to the alleged conduct.

Identify the causes or contributing factors to control breakdowns

The CCC identified causes and/or contributing factors to control breakdowns through review of the 118 complaint files from the two agencies (some of those factors have been identified by the agencies).

Department	Queensland Police
<ul style="list-style-type: none"> • A lack of supervision by school teachers, deputy principals and principals. • Incorrect student protection reporting policies, procedures and processes. It was identified that there was confusion in some business areas/regions around obligations under the CPA and EGPA involving sexual abuse and harm to a child. • Some school staff had not participated in mandatory student protection training. • Staff had not included sufficient and accurate details in OneSchool¹³ and Student Profile records. • Some acting principals did not have access to OneSchool, as the Approver, to finalise student protection reports. • Clear inconsistency between legislation requirements and the Department's student protection policy and procedures (see case study on page 12). • Human error. 	<ul style="list-style-type: none"> • Failure to follow instructions (comply with policies/Manuals). • Failure to conduct risk assessment prior to responding to an incident / behaviour. • Failure to activate body worn cameras. • Failure to maintain appropriate records in the complaints management system. • Lack of education and training awareness. • Human error.

As an example, the following case study demonstrates how the Department's inadequate student protection policy and procedures can lead to the under-reporting of serious matters.

13 OneSchool is the Department's OneSchool Student Protection Reporting module to Queensland Police and/or Child Safety.

Case study

It was alleged that a subject officer had failed to observe reporting responsibilities with regard to suspected sexual abuse of a student under 18 years.

The subject officer (a school-based employee) informed her supervisor immediately after reasonably suspecting sexual abuse of a student at the school. By the end of the day she forwarded an email to her supervisor and the Guidance Officer¹⁴ concerning the allegation. In addition, she reported the incident to two other superiors, one of whom was a Deputy Principal.

The written report to her supervisor was in compliance with the Department's Allegations against Employees in the Area of Student Protection procedures and the Student Protection policy. These policies, at the time, permitted the employees to report suspicion of harm to students to a number of different individuals, including a principal, a manager or a supervisor.

She, however, did not provide a written report to the school Principal. Section 365 of the EGPA is very specific regarding how staff must deal with information relating to suspected sexual abuse of a student. Staff are obliged to comply with the EGPA. This Act does not expressly permit the reporting to anyone other than the school's principal (or principal's supervisor).

The Principal became aware of the incident (through the Deputy Principal) and the appropriate steps were taken to address the matter.

On the balance of probabilities the subject officer had failed to report a suspected sexual abuse of a student under 18 years to the Principal in accordance with section 365 of the EGPA. The Department, however, did not take formal disciplinary action against the subject officer due to the fact that the student protection policy and procedures, current at the time of the incident, were not in compliance with the legislative requirements of section 365 of the EGPA. The subject officer had complied with these policies, in that she reported the incident, both verbally and in writing, to her direct supervisor and also the Deputy Principal and the Guidance Officer.

It is important that policies and procedures are clearly based on and linked to legislation, official guidelines, and examples of best practice advice. Staff should receive sufficient training specific for the activities and have demonstrated that they understand their obligations and the role they are to play in those activities. The Department had rectified these policies, implemented a student protection training package, and other prevention measures adequately.

Develop and implement the prevention response

The two agencies have made recommendations to address the prevention and/or control deficiencies in most cases. These prevention responses were:

Department	Queensland Police
<ul style="list-style-type: none">• Developed training to provide greater clarity to school-based staff for reporting suspected student harms or sexual abuse.• Updated the student protection procedure and guidelines (July 2018).• Implemented flowcharts for the school principals about their obligations in relation to student protection reporting.	<ul style="list-style-type: none">• Educated and trained police officers regarding ethics and standards.• Communicated general messages from senior officers to correct attitudes and behaviours of police officers.

Every investigation process should include the development of a prevention action plan to minimise the risk of similar events in the future.

14 A Guidance Officer at the school is a specialist teacher who delivers a broad range of services to school community members. They contribute to the development of a comprehensive student support and wellbeing program that is responsive to the needs of the school community. Guidance officers provide support and case management in responding to some of the most complex and challenging of circumstances including student protection matters.

Prevention initiatives are not optional. Effective risk management and internal controls are central to good governance, allowing an agency to minimise the costs of corrupt conduct and contribute to the integrity of the public sector.

Assess the effectiveness of its prevention measures and controls

It was not clear to the CCC whether the agencies (particularly the relevant business areas) were regularly assessing the effectiveness of their prevention measures and controls implemented. In most cases there was no evidence in Summary Reports or Linked Documents from Queensland Police. However, the CCC acknowledged there were some prevention and controls assessments by both agencies, as shown below.

Department	Queensland Police
<ul style="list-style-type: none"> Internal Audit Unit undertakes periodic audits in accordance with its Audit Plan. The Fraud and Corruption Control Committee maintains an oversight function within the department, including the review of policies, procedures, investigations and delivering ongoing training and awareness initiatives in line with recommendations made by the CCC in previous audits. Employees are encouraged to respond to the annual Working for Queensland survey to help inform the Department's strategies to build a positive workplace culture. 	<ul style="list-style-type: none"> Ethical Standards Command undertake periodic compliance inspection audits. Internal Audit Unit undertakes periodic audits in accordance with its Audit Plan. Body worn cameras used by police officers provide transparency in policing activities, enhance public trust in police, and increase police accountability. Employees are encouraged to respond to the annual Working for Queensland survey to help inform Queensland Police's strategies to build a positive workplace culture.

The CCC has legislative obligations to provide advice and make recommendations to agencies about the way they respond to complaints about corruption. However, responsibility for shaping suitable prevention strategies rests principally with the relevant agency. They are best placed to identify deficiencies in their systems and operations, and this knowledge can be used to particularise risks, identify possible controls and develop appropriate remedies.

Recommendations – Queensland Police

That Queensland Police consider and assess the adequacy of the prevention measures and internal controls when investigating a corruption matter (particularly those controls directly impacting on the corrupt incident and potentially allowing it to occur). Where improvements are required, these should be implemented as soon as practicable.

Response: Queensland Police acknowledged and accepted this recommendation.

The CCC made no corruption prevention recommendations to the Department, however, recommended that the Department continue with their investigation reforms. The Department had satisfactorily addressed the corruption risk relating to the failure to report student protection incidents appropriately.

Recommendations – Department

That the Department continue to work through their complaints assessment and investigation reforms.

Response from the Department: The Department responded to the audit as follows.

The Department acknowledged the conclusions reached by the CCC. The Department is committed to the complaints assessment and investigation reforms, to respond to complaints of corrupt conduct effectively, including mitigating fraud and corruption risks and failure of duty risks.

The Department is currently reviewing its *Integrity Framework* and *Fraud and Corruption Control Framework* to effectively prevent, detect and respond to matters involving fraud and corruption. The Executive Management Board considers the risk assessment and the mitigating controls and actions to determine if any further action is required either systemically or locally across the department.

Broader consultation with other key stakeholders was also undertaken during the development of the training to provide greater clarity to school-based staff for reporting suspected student harm or sexual abuse, including with Queensland Police and the Department of Child Safety, Youth and Women. This ensured critical messages delivered to school staff aligned with the expectations of the key agencies to whom reports are submitted.

At the commencement of 2016, a regional Principal Advisor, Student Protection (PASP) position was established in each one of the Department's regional offices to provide stronger oversight and ensure compliance with the Department's student protection policies and mandatory reporting obligations. A key responsibility of these officers is to deliver targeted training to principals, guidance officers and other school staff. They are also readily available to provide expert support and advice to staff on how to respond to student protection concerns in an appropriate and timely manner. In 2018, the PASPs delivered training to over 9900 school staff and responded to over 7500 direct enquiries related to student protection concerns in schools.

Conclusion

The CCC was satisfied with the way the Department of Education and Queensland Police have dealt with the majority of the complaints. However, the audit identified a number of improvements to complaints-handling and prevention measures.

Any agency can be vulnerable to corruption. Being an agency that is truly free of corruption is an ideal worth striving for. Agencies should implement the strategies outlined in chapter 11 of *Corruption in focus – “Reducing the incidence of corruption in the public sector”* – within their complaints-handling processes and practices. Complaints and investigations can highlight particular gaps in internal controls or practices which may expose the agency to an identifiable risk of corruption.

Summary guide – Emerging systemic issues identified from the audit

Investigators should ensure that the investigation brief includes a requirement to assess internal controls that could limit the agency's exposure to identifiable corruption risks. The investigator should specifically comment about these controls and make recommendations for improvement in order to assist the public official to fulfil their financial accountability.

Enhance internal controls

Failure of internal controls can indicate an issue in the agency's organisational culture. Reviewing the causes of internal control breakdowns – for example, human error or deliberate action – will give insights into the overall success of fraud and corruption control endeavours, and of an organisation's culture change program.

Where breaches of internal controls are detected it will be important to review these using a multi-layered approach, considering:

- What internal controls are missing or inadequate?
- If the policies, systems and processes are adequate but were simply not followed, at what point was the supervision breakdown that permitted this?
- Were the initial and ongoing modes and content of communication faulty or misdirected?
- Were the designs ineffective or subject to redundancy due to redesigned systems?
- Were the key officer/s:
 - improperly trained?
 - not supervised correctly?
 - subject to negative sub-cultures working against the integrity endeavours?
 - negligent or lazy?
- Even if there is no evidence to prove that corruption occurred in this instance, are there indications of shortcomings in policies, procedures, supervision or workplace culture which might expose the agency to the possibility of corruption in the future?

The cause of failure to fully realise culture change may arise from any one or a combination of factors in the above list. Additionally, the causes for a breakdown in the attempts to change an organisation's culture may come from issues that are not on this list.

Constantly reinforce the messages

The involvement of an officer's supervisor, officer-in-charge and management is a key factor in the success of culture change programs. If the public official, senior managers or supervisors regularly disregard the agency's rules or policies, they cannot reasonably expect others to uphold the rules or follow instructions.

Reinforcement techniques should be applied that help institutionalise proper behaviour and application of policies so the effects of the training remain. Reasonable communication means should be used to ensure that control and prevention principles remain always at the forefront of officers' minds. For example:

- find innovative ways of delivering the agency's integrity-building messages
- use real-life examples and situations that personalise the issues
- after any investigation, develop an action plan or prevention response to minimise the risk of similar events in the future. Always involve the relevant senior officers in the region/district in developing these plans so they gain a sense of ownership.



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