



# Anti-Corruption Strategy

## 2020-2025

# Contents

Commissioner’s foreword.....	3
Vision statement.....	6
What is corrupt conduct? .....	8
Objective 1 – Improve safety and security .....	11
Key initiatives .....	12
Success measures .....	16
Objective 2 – Promote integrity and impartiality .....	17
Key initiatives .....	17
Success measures .....	19
Objective 3 – Increase transparency and accountability .....	20
Key initiatives .....	20
Success measures .....	22
Objective 4 – Embed performance standards.....	23
Key initiatives .....	23
Success measures .....	24
Next Steps.....	25
Appendix 1 – Corrupt conduct in focus .....	26
Appendix 2 – Policy context.....	29
International responses to corruption and corruption risks.....	29
Australian resources.....	32
Related external reviews .....	34



## Commissioner's foreword



It is with pleasure that I endorse the Queensland Corrective Services (QCS) *Anti-Corruption Strategy 2020-2025* (Strategy). This Strategy articulates the vision outlined in our 10-year Strategic Plan, *Corrections 2030*, and highlights our commitment to keeping the people of Queensland safe. It also responds to recommendations from the Crime and Corruption Commission's (CCC) Taskforce Flaxton, to address corruption and corruption risks in Queensland's correctional environment.

QCS has a zero tolerance for corrupt conduct. We will continue to work closely with the Queensland Police Service (QPS) and CCC to comply with our ethical and legal obligations to educate, identify, investigate and discipline those staff members who engage in corrupt conduct. The public rightly holds QCS officers accountable to the highest standards of conduct. QCS will continue to act swiftly to investigate misconduct and implement proportionate, transparent disciplinary measures.

Addressing corruption in Queensland's correctional environment is a priority for the Queensland Government. Overcrowding and the hybrid public/private prison system were identified as corruption risks by the CCC. To address these issues, last year, the Queensland Government committed almost \$618.9 million to develop Stage 2 of the Southern Queensland Correctional Precinct, and an additional \$111.4 million over five years to transition the two private prisons, Arthur Gorrie and Southern Queensland Correctional Centres, to public operation. Furthermore, the government allocated \$25.2 million over four years to implement the recommendations of Taskforce Flaxton. This significant investment in corrective services is also being supported by the \$265 million already committed to reforming Community Corrections in Queensland in response to the Queensland Parole System Review (QPSR).

This Strategy contributes to these reforms by establishing a holistic, enterprise-wide approach to preventing, detecting and responding to corruption and corruption risks. The four overarching strategic objectives are:

1. **Improve safety and security:** A safe and secure work environment for all QCS officers across our organisation and the prisoners and offenders under their supervision, will set the foundations from which to build a mature, corruption-resistant organisational culture.
2. **Promote integrity and impartiality:** The Strategy will coordinate activity to prevent, detect and address corruption to ensure decisions are ethical and impartial, and staff, prisoners and offenders are treated with dignity and respect, consistent with the *Human Rights Act 2019*.
3. **Increase transparency and accountability:** The Strategy will guide the development of a suite of accessible, clearly defined policies and procedures to support professional and ethical behaviour consistent with our legal responsibilities and our ethical obligations.
4. **Embed performance standards:** The Strategy will coordinate activity already underway to implement consistent performance standards to ensure that corrective services are being delivered effectively and efficiently to fulfil our community safety and crime prevention objectives through the humane containment, supervision and rehabilitation of prisoners and offenders.

A range of initiatives will support the implementation of the Strategy across QCS. This will mean changes in the way we do business. Some of these changes have already commenced, with the transition of Arthur Gorrie Correctional Centre to public operation from 1 July 2020. QCS is committed to supporting frontline staff during this change to ensure that they have the right knowledge and tools to deliver on the agency's commitment to preventing, identifying and responding to corruption.



This Strategy provides a roadmap to position QCS as a top-tier, forward-thinking public safety agency by defining our approach to addressing corruption and corruption risks. A corruption-resistant culture will take time to mature, building upon the work already underway across our organisation to respond to Taskforce Flaxton.



Peter Martin APM  
**Commissioner**

17<sup>th</sup> November 2020



# Anti-Corruption Strategy 2020-2025

**Vision:** By 2025, Queensland correctional environments will be safer, the integrity and professionalism of QCS will reflect a strong, corruption-resistant organisational culture and there will be fewer incidents of corruption among QCS officers.

principles	<b>Safety</b>	<b>Excellence</b>	<b>Empowerment</b>	<b>Respect</b>	<b>Accountability</b>
	1. Promote safety	2. Strengthen partnering and collaboration	3. Reduce crime	4. Empower a professional workforce	5. Drive innovation
directions	The Strategy will contribute to a safer environment for all QCS officers across our organisation and the prisoners and offenders under their supervision, to support a mature, corruption-resistant organisational culture.	By strengthening our partnerships and collaboration with key stakeholders, including the CCC and the QPS, QCS will more effectively prevent, identify and respond to corruption and corruption risks.	The Strategy better positions QCS to contribute to crime prevention and community safety by building the capability and culture needed to transition into a top-tier, forward-facing public safety agency with a reputation for integrity, transparency and accountability.	The Strategy will guide the development of policies, tools and training to provide our professional workforce with the skills and knowledge they need to proactively respond to corruption risks, supported by strong and ethical leadership.	The Strategy draws on best-practice anti-corruption initiatives, including innovative technology, to build an anti-corruption framework consistent with a top-tier, forward-thinking public safety agency.
	<b>Objective 1 – Improve safety and security:</b>		<b>Objective 2 – Promote integrity and impartiality:</b>		<b>Objective 3 – Increase transparency and accountability:</b>
initiatives	<ul style="list-style-type: none"> <li>• Increase prison bed capacity to reduce overcrowding</li> <li>• Update information technology systems</li> <li>• Review Officer Safety (Use of Force) policies and practice</li> <li>• Crime Scene preservation and evidence management procedure and training</li> <li>• Develop a Drug and Alcohol Strategy</li> <li>• Review Operational Practice Directives and Guidelines</li> <li>• Improve supports for prisoners and offenders, particularly those with complex needs</li> <li>• Introduce a suite of training enhancements</li> <li>• Enhance corruption detection and response capability</li> </ul>	<ul style="list-style-type: none"> <li>• Centralise core business functions</li> <li>• Develop a QCS-specific Standard of Practice</li> <li>• Identify CCTV high-risk blind spots</li> <li>• Implement workforce drug and alcohol testing</li> <li>• Review attraction, selection and recruitment practices</li> </ul>	<ul style="list-style-type: none"> <li>• Transition private prisons to public operation</li> <li>• Implement a complaints management framework</li> <li>• Ensure integrity, probity and accountability during procurement</li> <li>• Develop a Public Interest Disclosure Policy and Declarable Association Policy</li> <li>• Review of overtime and rostering practices</li> <li>• Develop a model for staff rotation Policy</li> <li>• Support an independent inspectorate</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen public reporting</li> <li>• Develop and Organizational Performance Framework and implement regular reporting</li> <li>• Develop and implement an organisation-wide cultural change program</li> </ul>	
	<ul style="list-style-type: none"> <li>• Increased prison bed capacity and reduced overcrowding</li> <li>• Reduced number/proportion of prisoner-on-prisoner, prisoner-on-staff and offender-on-staff assaults and incidents</li> <li>• Increased detection and seizure of contraband at correctional facilities</li> <li>• Increased staff awareness of level of authorisation required for access to and disclosure of confidential information</li> <li>• Reduced number of substantiated Prisoner and Human Rights complaints</li> <li>• Enhanced training and support for all QCS officers</li> </ul>	<ul style="list-style-type: none"> <li>• Improved public perception of QCS</li> <li>• Strengthened processes to identify and manage corrupt behaviour</li> <li>• Reduced time taken to assess and investigate allegations of corrupt conduct and misconduct</li> <li>• Identification of CCTV high-risk blind spots</li> <li>• Reduced proportion of staff testing positive for alcohol or other drugs</li> <li>• Improved staff satisfaction with attraction, retention and selection processes</li> </ul>	<ul style="list-style-type: none"> <li>• Increased transparency in complaints reporting</li> <li>• Increased staff awareness of definitions of conflict of interest</li> <li>• All conflicts of interest are documented and kept in a central repository, including 'nil' responses</li> <li>• Compliance with the Queensland Procurement Policy and internal processes for all procurement activity</li> <li>• More equitable distribution of overtime</li> <li>• Development of a staff rotation model</li> </ul>	<ul style="list-style-type: none"> <li>• Increased consistency of performance reporting across the Queensland correctional system</li> <li>• Implementation of the Anti-Corruption Strategy is publicly reported annually</li> <li>• Operational performance reviews are embedded and support improved performance over time</li> <li>• Increased monitoring and reporting of cultural change initiatives</li> <li>• Increased sense of shared purpose, culture and vision among our staff</li> </ul>	
measures					

## Vision statement

Consistent with the principles of [Corrections 2030](#), the **vision** for this Strategy is that:

*By 2025, Queensland correctional environments will be safer, the integrity and professionalism of QCS will reflect a strong, corruption-resistant organisational culture and there will be fewer incidents of corruption among QCS officers.*

The Queensland Government has prioritised 'Keep Communities Safe' through [Advancing Queensland's Priorities: Our Future State](#). QCS will be vital to the realisation of this priority. To contribute to community safety effectively, QCS must transform into a forward-thinking, top-tier public safety organisation. Forward-thinking means that we are strategic, innovative and evidence-based. Top-tier means that we are trusted, respected and valued for our expertise as a public safety agency.

The *Anti-Corruption Strategy 2020-2025* will support this priority by providing an overarching framework for a range of initiatives designed to build a mature, corruption-resistant culture consistent with the recommendations of the CCC's Taskforce Flaxton. Additionally, the Strategy will inform agency and business area risk management aligned to the QCS Risk Management Framework. An Anti-Corruption Action Plan 2020-2021 will support the implementation of the Strategy and embed regular reporting.

## The four objectives

The *Anti-Corruption Strategy 2020-2025* coordinates activity across QCS aimed at better preventing, detecting and addressing corruption and corruption risks. The four objectives of improving safety and security, promoting integrity and impartiality, increasing transparency and accountability and embedding performance standards will inform the structure of this Strategy.

This Strategy sets a clear direction for QCS over the next five years to deliver on the principles of *Corrections 2030*, guided by the recommendations of Taskforce Flaxton, to drive improvements in corruption resistance. By ensuring consistency with international best practice, the Strategy links QCS' operations with broader social policy objectives. Implementation of the Strategy will contribute to building awareness and understanding of the organisation's strategic vision among all QCS officers.



## The Anti-Corruption Strategy 2020-2025 in context

In December 2017, QCS became a standalone public safety agency. From May to December 2018, CCC, led by Mr Alan MacSporran QC, conducted a thorough review of corruption and corruption risks in Queensland's prisons. The final report of [Taskforce Flaxton](#) contains a comprehensive assessment of corruption and corruption risks relevant to QCS' operations. The report makes 33 recommendations to address these risks, including a model anti-corruption framework. In July 2019, the Queensland Government published its response, supporting or supporting-in-principle all 33 Taskforce Flaxton recommendations, supported by significant investment.

Since then, QCS has been working to address the risks identified by the CCC during Taskforce Flaxton. The transition of the private prisons to public operation is underway. A range of functions have been centralised as part of the establishment of a new Organisational Capability Division. As part of this centralisation, the Enterprise Strategy Group, Strategic Futures Command, has been created to provide QCS with dedicated capacity to transform QCS' approach to strategy development.

This Strategy builds on work underway by looking forward to our desired end-state as a top-tier public safety organisation. It recognises that there are corruption risks across all aspects of our business, including Community Corrections, Specialist Operations, Organisational Capability and Custodial Operations. To unite our organisation against corruption and corruption risks, the Strategy's objectives are consistent with the five principles of *Corrections 2030*:

**Promote safety:** The Strategy will contribute to a safer environment for all QCS officers across our organisation, and the prisoners and offenders under their supervision, to support a mature, corruption-resistant organisational culture.

**Strengthening partnering and collaboration:** By strengthening our partnerships and collaboration with key stakeholders, including CCC and QPS, QCS will more effectively prevent, identify and respond to corruption and corruption risks.

**Reduce crime:** The Strategy better positions QCS to contribute to crime prevention and community safety by building the capability and culture needed to transition into a top tier, forward-thinking public safety agency with a reputation for integrity, transparency and accountability.

**Empower a professional workforce:** The Strategy will guide the development of policies, tools and training to provide our professional workforce with the skills and knowledge that they need to proactively respond to corruption risks, supported by strong and ethical leadership.

**Drive innovation:** The Strategy draws on best-practice anti-corruption initiatives, including innovative technology, to build an anti-corruption framework consistent with a top tier, forward-thinking public safety agency.



## What is corrupt conduct?

Under the *Crime and Corruption Act 2001*, there are two types of corrupt conduct – Type A and Type B. Both Type A and Type B corrupt conduct must be either a criminal offence or serious enough to warrant dismissal.<sup>1</sup>

### Type A: Corrupt conduct that affects a public officer

'Type A' corrupt conduct involves conduct that affects, or could affect, a public officer (an employee of a public sector agency) where the performance of their functions or the exercise of their powers: is not honest or impartial; knowingly or recklessly breaches public trust; or involves the misuse of agency-related information or material.

#### Examples of Type A corrupt conduct

Common examples include fraud and theft, extortion, unauthorised release of information, obtaining or offering a secret commission and nepotism.

### Type B: Corrupt conduct that affects public confidence in public administration

'Type B' corrupt conduct involves specific types of conduct that impairs, or could impair, public confidence in public administration.

#### Examples of Type B corrupt conduct

Examples may include collusive tendering; fraud relating to an application for a licence, permit or other authority; dishonestly obtaining public funds or State assets; evading a State tax, levy or duty or fraudulently causing a loss of State revenue; or fraudulently obtaining or retaining an appointment.

#### What does it mean to 'impair public confidence'?

Public confidence in public institutions would be impaired when the public begins to question, or ceases to have trust in, the ability of government to deliver services efficiently, accountably and ethically. It may manifest in, for example, extensive and damaging media coverage, calls for the resignation of a senior public servant or minister, or the public choosing private-sector providers rather than State providers. Impairment of confidence is a question of fact and degree, and in general would focus attention on serious or systemic conduct rather than isolated incidents.

See **Appendix 1** for a full definition of corrupt conduct (section 15 of the *Crime and Corruption Act 2001*).

Other examples of corrupt conduct can include, but are not limited to:

- a community or custodial corrections officer assaulting an offender or prisoner (because assault is a criminal offence and a breach of trust)
- a community or custodial corrections officer giving a 'heads up' to officers arriving at work that testing or searches are likely to be conducted that day (because it is a criminal offence and dishonest)
- a purchasing officer of a government department accepting 'kickbacks' in the tendering process (because it is a criminal offence and dishonest)
- a public officer looking up the department's records about a client without a valid work need (because it could result in dismissal and it is a misuse of official information)
- a public officer manipulating a selection panel decision to ensure that a relative gets the job (because it may indirectly adversely affect the performance of the department, lacks impartiality, and may present reasonable grounds to dismiss the officer concerned).



<sup>1</sup> Crime and Corruption Commission (2020) 'What is corrupt conduct?' <https://www.ccc.qld.gov.au/corruption/what-corrupt-conduct>;

## The case for action

Taskforce Flaxton found that the Queensland custodial environment exhibits conditions conducive to corruption<sup>2</sup>. Taskforce Flaxton noted an increase in allegations of corrupt behaviour within Queensland's prisons over a period of three years (2015-2018).<sup>3</sup> In response, Taskforce Flaxton identified a range of strategies to improve the detection, management, and prevention of corruption within Queensland's prisons, focusing on building a mature, corruption-resistant culture.<sup>4</sup> Some of these conditions are shared by prison environments worldwide and include a range of common factors, such as:

- overcrowding
- the complex needs of prisoners
- the closed nature of the environment
- the need for staff–prisoner relationships to deliver dynamic security
- the existence of private prisons.

While many of these risks are particular to the custodial context due to the closed nature of prisons, corruption risks exist across all of QCS' operations, including Community Corrections, Specialist Operations and in corporate support areas. The CCC identified a number of corruption risks specific to QCS' operations, including:

- failure to report corruption
- excessive use of force
- misuse of authority
- introduction of contraband
- misuse of information
- inappropriate relationships.<sup>5</sup>

The CCC found that this situation puts prisoners, offenders and staff at risk of harm, and undermined public confidence in the criminal justice system to ensure community safety. The CCC found that the QCS anti-corruption measures in place in 2018 were insufficient to address these risks.

Staff working in custodial environments and Community Corrections are responsible for supervising and managing some of the most complex people in society. These complex needs, along with the specific environment in which our staff operate, were recognised by the CCC's Taskforce Flaxton as corruption risks. It is important to acknowledge this operational context when designing and implementing the *Anti-Corruption Strategy 2020-2025*. Further, it is important to recognise the critical role that a healthy organisational culture plays in creating a corruption-resistant workforce.

The Taskforce Flaxton Report contains 33 recommendations that provides a roadmap for reforming QCS' existing frameworks. The Queensland Government's response to Taskforce Flaxton, supporting 24 recommendations and supporting-in-principle nine recommendations, provides a clear mandate for QCS to pursue initiatives required to support its implementation. Together with a number of recommendations of the QPSR, it makes a case for action to address the corruption risks within the Queensland corrective services system.

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<sup>2</sup> Queensland Crime and Corruption Commission (2018) *Taskforce Flaxton* <https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf>.

<sup>3</sup> Queensland Crime and Corruption Commission (2018), *Taskforce Flaxton* <https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf>.

<sup>4</sup> Queensland Crime and Corruption Commission (2018), *Taskforce Flaxton* <https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf>.

<sup>5</sup> Queensland Crime and Corruption Commission (2018), *Taskforce Flaxton* <https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf>.



The QPSR highlighted opportunities to reform the corrective services and Community Corrections systems in Queensland at the time to improve community safety as well as outcomes for prisoners and offenders.<sup>6</sup> Of the 91 recommendations, the Queensland Government supported or supported-in-principle 89. The review also made a number of recommendations relevant to addressing the risk of corruption, particularly in relation to training, internal review and investigations, and information technology systems. The Strategy will capture these recommendations as they relate to anti-corruption.

At the heart of an organisation's culture, it is its people who bring to reality the agency's integrity, honesty, accountability and professionalism. The character of an organisation is founded in its people. For this reason, practices and decisions around staff engagements and people management are critical for any cultural change endeavour, which includes instilling corruption prevention practices and an integrity mindset.

QCS highly values its culture of probity, honesty and integrity and views fraudulent and corrupt behaviour as a threat to this culture. Accordingly, QCS treats any reports of suspected fraudulent or corrupt behaviour very seriously. With an annual budget in excess of \$1 billion, the agency makes a vital contribution to the economy and welfare of the Queensland community. In managing procurement and service delivery, we are committed to best practice detection and deterrence of improper conduct.

## The policy context

A range of international, national and state-level policies, frameworks and reviews have influenced the development of this Strategy. By ensuring consistency with this broader policy context, the Strategy links custodial and community corrections operations with broader social policy objectives and international best-practice. Implementation of the Strategy will contribute to building awareness and understanding of the organisation's strategic vision among frontline staff. The below diagram indicates the various policy instruments and external reviews that have shaped this Strategy. Detailed information on each of these elements is included in **Appendix 2**.

International Resources	United Nations Convention Against Corruption	United Nations Minimum Rules for the Treatment of Prisoners	Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (OPCAT)	UNCAC Handbook on Anti-Corruption Measures in Prisons
Australian Resources	Crime and Corruption Commission Fraud and Corruption Best Practice Guide		Victorian Independent Broad-based Anti-Corruption Commission (IBAC): Corruption risks associated with the corrections sector	
QCS	Fraud & Corruption Control Policy (under redevelopment)	Anti-Corruption Strategy 2020-2025	Anti-Corruption Strategy Action Plan 2020-2021	
External Reviews	Crime and Corruption Commission's Operation Impala (2019)	Taskforce Flaxton (2018)	The Queensland Parole System Review (2016)	



<sup>6</sup> Walter Sofronoff QC (2016) – *Queensland Parole System Review*  
<https://parolereview.premiers.qld.gov.au/assets/queensland-parole-system-review-final-report.pdf>.

## Objective 1 – Improve safety and security

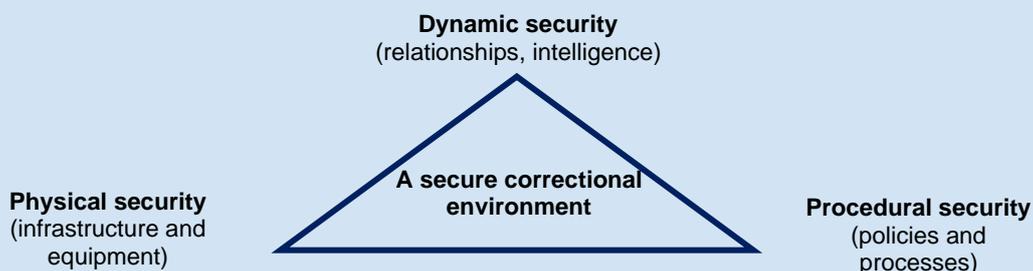
A safe and secure correctional environment, both in the custodial and the community corrections contexts, is the foundation from which a mature, corruption-resistant culture is built. It is critical to recognise the link between a safe and secure correctional environment and the prevention and detection of corruption and corruption risks. Measures to address corruption in both correctional facilities and community corrections need to be integrated into sound management practices designed to ensure the safe, secure and humane custody of prisoners and supervision of offenders.

In particular, imprisonment creates a situation in which prisoners depend upon corrective services agencies for the fulfilment of almost all of their basic needs. By depriving individuals of their liberty, governments assume a heightened duty to ensure that containment is secure, safe and humane. Within the community corrections environment, officers form close professional working relationships with offenders to promote community safety by supporting them to address their risks and needs. All decisions regarding an offender's supervision should be reasonable, informed and transparent. This is particularly important in the context of the introduction of the *Human Rights Act 2019* (Qld) and the ratification of the Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (OPCAT). Practices and procedures must be implemented to prevent abuse and corruption that may be committed by prison staff, public officials and other prisoners.

The effective safety and security of custodial and community corrections environments relies on a combination of dynamic, physical and procedural security measures. This section outlines the key initiatives that QCS will implement in pursuit of the objective of ensuring a safe and secure work environment for our staff, and therefore, the community as a whole.

### The security triangle

Dynamic security is one of the three components that make up the overall security of a correctional environment. The other two axes of the 'security triangle' are physical security (such as the security infrastructure and equipment in correctional centres and Community Corrections offices) and procedural security (the routines, processes and procedures for managing prisoners and offenders). The security and safety of a correctional environment will be at its most effective when all three elements of the security triangle complement each other.



### Physical security

The physical infrastructure of a correctional environment, both in custody and the community, including secure doors, duress systems, fences, movement controls, CCTV and barrier hardening technology (metal detectors, detection dogs) provide physical security.



## Procedural security

Appropriate operational policies and procedures are required to support the other elements of the security triangle. Staff, prisoners and offenders must know and understand the relevant procedures that they must comply with for this to be effective.

## Dynamic security

The success of correctional systems in safeguarding correctional environments and the broader community, and creating an environment conducive to rehabilitation, relies to a significant degree on staff-prisoner/offender relationships. Where those relationships are well managed, professional and transparent, a positive environment can be created. Where this is not the case, safety and security can be compromised.

### Intelligence and human source management

Intelligence is at the core of many of the security related functions undertaken across both custodial and community corrections. Human Source Management contributes to improving safety and security by reducing and preventing offending and corruption through developing and deploying an effective Human Source function. QCS is currently working on an intelligence review, which will support the implementation of the Strategy.

## Key initiatives

### Physical security

#### Increase prison bed capacity to reduce overcrowding

Overcrowding has been identified as the most pressing operational issue confronting QCS' operations, as well as a significant corruption risk.<sup>7</sup> In June 2019, the Queensland Government announced plans to build a new prison at the Southern Queensland Correctional Precinct (SQCP). The new \$618.9 million, 1000-bed facility is planned for completion in 2022-23. It will help to reduce overcrowding across the prison network, promoting staff safety and reducing corruption risks.

SQCP Stage 2 will follow a therapeutic design, with a focus on addressing the mental and physical health and wellbeing needs of prisoners. This design approach will also help to address the complex needs of prisoners, which has been identified by the CCC and other agencies as a unique feature of the custodial environment that makes it susceptible to corruption. QCS has already commenced a range of initiatives to ease pressure on the correctional system. In 2018-19, QCS:

- converted the 302-bed Southern Queensland Correctional Centre into a women's correctional centre, relieving overcrowding within women's correctional centres across the state
- continued the expansion of Capricornia Correctional Centre.

As part of its ongoing capital maintenance program, QCS will continue to review the safety and security of community corrections infrastructure and make changes as required to ensure the safety and wellbeing of both our staff and the offenders under our supervision.

#### Update information technology systems

Evidence provided to Taskforce Flaxton suggests that video surveillance (such as Body Worn Cameras) can be very useful in assessing and investigating corruption and misconduct allegations, providing objective evidence of events. It also noted that video footage from Body Worn Cameras can inform anti-corruption training and development activities for staff.

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<sup>7</sup> Crime and Corruption Commission (2018), *Taskforce Flaxton: an examination of corruption risks and corruption in Queensland prisons* <https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf>, p. 6.

In response to Taskforce Flaxton, QCS has commenced a range of initiatives including:

- exploring options for increasing the number of Body Worn Cameras across the state
- investigating options for in-cell technology
- implementing remediation strategies to reduce the risk that prisoner and offender information can be inappropriately accessed and released.

Further, QCS has commenced trials of contemporary safety devices to support Community Corrections staff, providing safety and security for staff working in the field.

In addition, QCS has also rolled out a range of additional Information Communications Technology (ICT) support to frontline staff in response to the COVID-19 pandemic, to enable remote working, audio-visual visits, collaborative case management and prisoner email. QCS will continue to implement and leverage these initiatives to ensure that our workforce has the ICT they need to perform their duties effectively and safely.

## **Procedural security**

### **Review Officer Safety (Use of Force) policies and practice**

In 2019, QCS commissioned a comprehensive review of Officer Safety (Use of Force) in Queensland's correctional facilities to determine sustainable improvements in safety. The review is examining the existing skill levels of custodial correctional officers with respect to use of force, relevant training regimes and practices of QCS, availability and use of equipment and accoutrements, and use of technology to enhance staff safety. In response to the review's findings:

- Body Worn Cameras and Load Bearing Vests have been rolled out across all QCS correctional centres
- policies and procedures have been updated to reflect contemporary best-practice
- training has been reviewed and a suite of products for both custodial and Community Corrections staff developed.

QCS will continue to implement the findings of the review to develop an evidence-based framework to support appropriate and proportionate staff responses with a focus on de-escalation and dynamic security techniques. For example, a further layer of ensuring officer safety was added with the introduction of the Officer Safety – Local Review Panels and Officer Safety – Corporate Oversight Panel. These panels provide governance over the use of force, enhancing officer safety by identifying learning opportunities and sharing excellent practice in prisoner management. These types of initiatives will contribute to a safer work environment for our staff and the prisoners in our care, providing a strong foundation to improve corruption resistance.

### **Crime scene preservation and evidence management procedure and training**

It is important to maintain the security and integrity of a crime scene and preservation of evidence to ensure the success of any breach action taken under section 118 of the *Corrective Services Act 2006* (the CS Act) or the success of any prosecution for an offence under the CS Act, Queensland Criminal Code, *Drugs Misuse Act 1986* or any other relevant legislation. A state-wide review of crime scene preservation and evidence management in correctional centres will inform the development of a new standalone procedure. This procedure will be supported by appropriate training for relevant staff to enhance procedural security.

### **Develop and implement a drug and alcohol strategy**

Taskforce Flaxton identified the introduction of contraband, including illicit substances and paraphernalia, as a key corruption risk that also presents a significant risk to the safety and good order of Queensland correctional centres.<sup>8</sup> We know that prison entrants have previously engaged in

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<sup>8</sup> Crime and Corruption Commission (2018) *Taskforce Flaxton: An examination of corruption risks and corruption in Queensland's prisons*, <https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf>, p 14.

illicit substance misuse at much higher rates than the general population.<sup>9</sup> Prisoners under the influence of, or withdrawing from, alcohol or other drugs may harm themselves or others. They may engage in acts of aggression or standover tactics related to drug debts, undermining the safety of staff and prisoners. All of these factors present an unacceptable risk to the safety of our workforce and the prisoners and offenders in our care.

Consequently, QCS has developed and published the *Drug and Alcohol Strategy 2020-2025*, which contains a number of initiatives aimed at improving barrier security to reduce the presence of alcohol and other drugs in prisons. The *Drug and Alcohol Strategy 2020-2025* takes a harm minimisation approach to prevent and deter supply, reduce demand and reduce harm associated with drug and alcohol use, promoting community safety and wellbeing. These three objectives are supported by a number of initiatives including:

- a review of staff search processes to address the concerns raised by the CCC about their frequency and timeliness
- passing of amendments to the Corrective Services Act 2006 to provide for searches of a staff member at any time the staff member is at a correctional centre, or before entering the centre
- investigating and implementing a model for electronic mail to eliminate the introduction of contraband via surface mail.

### **Review operational practice directives and guidelines**

Taskforce Flaxton recommended that QCS reviews Custodial Operations Practice Directives (COPD) and local instructions to improve clarity and consistency. In the Community Corrections context, operational practice guidelines exist and should also be reviewed. Consideration will be given to whether guidelines and directives could be developed to apply QCS-wide to ensure consistency and continuity of service delivery and support shared responsibility. To this end, QCS has appointed a Director, Operational Policy and Practice, who is responsible for policy and practice management throughout the agency to promote performance standards and consistency. In preparation of the commencement of the *Human Rights Act 2019*, QCS completed a detailed review and updates to the COPD and local instructions. QCS will continue to review operational policies in both the custodial and Community Corrections context to support reform, including any relevant amendments to the instruments of delegation and limitation made under the Corrective Services Act 2006.

### **Dynamic security**

#### **Improve support for prisoners and offenders, particularly those with complex needs**

Initiatives to address the often complex needs of prisoners and offenders can reduce prisoner numbers by providing them with the supports that they need to live in the community and reduce the incentive to reoffend. QCS is currently implementing a range of initiatives to better support prisoners with complex needs. The \$265 million QPSR reforms will increase support services for prisoners across mental health, alcohol and other drug, and re-entry services. This will include the new end-to-end case management system, designed to provide a holistic approach to prisoner rehabilitation from prison, through release and during community supervision.

To accelerate access to the National Disability Insurance Scheme (NDIS), in 2018-19 and 2019-20, QCS delivered a dedicated service to identify and support prisoners with disability to access the NDIS. During this time, more than 1750 prisoners/offenders who may be eligible for the NDIS were identified, more than 340 prisoners/offenders had their NDIS access met, and more than 240 prisoners/offenders reported having an NDIS plan in place, either through dedicated assistance provided by QCS, or upon admission to prison or a community-based order. QCS continues to deliver disability awareness training as part of entry-level training for all corrective services officers and will implement revised refresher training that responds to the needs of prisoners with cognitive impairment or other forms of disability, in line with recommendation 14 of Taskforce Flaxton. QCS continues to work with government partners such as the Department of Communities, Disability Services and

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<sup>9</sup> Australian Institute of Health and Welfare (2018) *The Health of Australia's Prisoners*



Seniors, and National Disability Insurance Agency, to support prisoners and offenders to access the NDIS and the supports that they need to successfully transition into the community.

### **Introduce a suite of training enhancements**

The safety and security of correctional centres relies on a range of human factors to ensure success.<sup>10</sup> This applies equally to the Community Corrections environment. Positive relationships between staff and prisoners/offenders are crucial. For staff to behave ethically and lawfully, they must receive appropriate training. This training must be delivered both upon entry and throughout their career, to ensure their knowledge and skills remain consistent with contemporary best practice. QCS managers and supervisors must receive ongoing leadership training and development to ensure that they have the necessarily capabilities to effectively lead a corruption-resistant workforce.

In response to Taskforce Flaxton, Operation Impala and the QPSR, QCS has commenced reviews of its training offerings. These reviews will result in the incorporation of training on integrity and ethical practice across all levels, including induction, entry-level and mandatory refresher training. These initiatives include:

- implementation of a centralised training function through the People Capability Command
- a number of updated modules for the Custodial Officer Entry Program
- development of a formal first-year correctional officer graduate program
- revised entry-level training for Community Corrections officers.

### **Enhance corruption detection and response capability**

QCS has zero tolerance for corrupt conduct. Following Taskforce Flaxton, QCS has centralised a range of key functions and expanded its capacity to prevent, detect and respond to corruption risks. A key part of this work was the establishment of the Organisational Capability Division, which, for the first time, brings together QCS' human resources, training and professional standards capability.

The Professional Standards and Governance Command (PSGC) has been formed within the Organisational Capability Division to build, drive and maintain a mature and corruption-resistant culture, that promotes disciplined ethical behaviour and professional practice through deterrence, education and system improvements. Corrupt conduct may be detected through internal PSGC investigations, prisoner and offender complaints and investigations by the QPS. The PSGC is involved in the development and delivery of programs and services to maintain an ethical culture and promote ethical decision making throughout QCS.

It is important that QCS is able to make decisions about the management of the correctional system based on robust information and analysis. This allows QCS to better understand its current position, plan for the future and ensure appropriate allocation of resources and supports. The PSGC's functions are a critical component of this process.

Recent amendments to the CS Act included enhanced investigative powers for QCS inspectors. The CS Act now extends the investigative powers of QCS inspectors to include investigations into alleged misconduct or alleged corrupt conduct of a staff member, as well as incidents. QCS inspectors' powers to require information from a person performing functions under the CS Act have also been extended to these new matters.

QCS will continue to work closely with QPS and CCC to comply with its ethical and legal obligations to educate, identify, investigate and penalise those staff members who participate in corrupt conduct. The public rightly holds QCS officers accountable to the highest standards of conduct. QCS will continue to act swiftly to investigate misconduct and implement proportionate, transparent disciplinary measures and will manage the impact of investigations in the workplace in accordance with the [CCC's Corruption in focus: A guide to dealing with corrupt conduct in the Queensland public sector](#)<sup>11</sup>.



<sup>10</sup> UNODC (2017) *Handbook on Anti-Corruption Measures in Prisons*, Pg. 13.

<sup>11</sup> Crime and Corruption Commission (2020) – *Corruption in focus – A guide to dealing with corrupt conduct in the Queensland public sector*.

## Success measures

The key measures of success to improve safety and security are:

- increased prison bed capacity and reduced overcrowding across Queensland's correctional facilities
- reduced number/proportion of prisoner-on-prisoner, prisoner-on-staff and offender-on-staff assaults and incidents
- increased detection and seizure of contraband at correctional facilities
- increased staff awareness of level of authorisation required for access to and disclosure of confidential information
- reduced number of substantiated prisoner and human rights complaints
- enhanced training and support for all QCS officers.



## Objective 2 – Promote integrity and impartiality

Custodial and community corrections work is complex and demanding. It involves working with some of the most challenging people in our society, many of whom have poor social and educational skills or come from marginalised groups. Corrective services officers carry out this important duty and are, therefore, critical in any corrective services system. The way in which our staff deal with prisoners and offenders, when they refuse to conform to legitimate expectations, can be one of the greatest professional challenges. Headquarters staff provide critical support to our frontline officers, including making procurement decisions and providing advice to government. QCS recognises the importance of our staff to building a mature and corruption resistant culture.

In response to Taskforce Flaxton, QCS has created the PSGC to provide enhanced corruption prevention, detection and response capability. QCS is transitioning to a proactive ethical standards and disciplinary model that identifies risks and implements appropriate mitigation strategies before they coalesce. Initiatives in this section will support the work of PSGC by promoting a culture of integrity and impartiality across all parts of our organisation, including headquarters, Custodial Operations, Community Corrections and Specialist Operations.

Ethical decision making at QCS is exhibited in three ways: in individual roles; in managerial roles; and in organisation frameworks. The PSGC supports QCS to deliver on this approach in the following three ways:

1. Work with **guidance**: through Code of Conduct procedures, directives, sources of advice, departmental commitment, professional socialisation, behaviour activities
2. Support through **management**: supervision, oversight, conditions, management processes
3. Exhibit **control**: through the legal framework, rules, penalties, transparency, sharing ideas and effective accountability and reporting.

### Key initiatives

#### Centralise core business functions

Since Taskforce Flaxton, QCS has commissioned an independent workforce review, and commenced implementation of its recommendations. The Organisational Capability Division has enhanced core capability across human resources, professional standards, finance and contract management, strategy and corporate governance. Financial Services and Strategic Sourcing Command (FSSSC), led by an Assistant Commissioner, has been established to provide QCS with the capacity to deliver complex procurement and contracting in a rigorous, impartial and transparent way. This core capability will enable the delivery of large scale infrastructure projects that represent value for money for government, including the development of SQCP Stage 2. The appointment of a Chief Procurement Officer and strengthening of procurement processes will ensure integrity and impartiality in the procurement of goods and services.

The PSGC, led by an Assistant Commissioner, includes specialists in complaints assessment, investigations, intelligence, discipline, and ethical standards. An effective PSGC promotes an integrity culture, discipline and professional practice across the QCS. It is critical to addressing corruption risks and promotes staff and public confidence in QCS' discipline process. Human Source Management contributes to this objective as it seeks to de-identify and protect sources, while maintaining integrity in the assessment, investigation and response to information received. QCS will continue to build its professional standards capacity through a range of other initiatives in this Strategy, including updated performance management and complaints handling systems.



## Develop a QCS-specific Standard of Practice

The adoption of a Code of Conduct or Code of Ethics is commonly used to guide staff behaviour. It is a crucial aspect of any effective approach to strengthening integrity and professionalism. The findings of Taskforce Flaxton about the critical importance of an agency-specific Code of Conduct reflect international best practice.<sup>12</sup> A specific standard, which is formulated, applied and enforced specifically for corrective services staff is likely to increase its relevance, legitimacy, and effectiveness.

### Initiative in focus: consider yourSELF

The recent 'consider yourSELF' campaign, launched on 22 July 2019, included broadcast messaging from the QCS Executive, screensavers, and posters. The SELF test applies to every QCS officer:

- **Scrutiny** – will my action or decision withstand public scrutiny?
- **Ethical** – is my decision ethical? Compliance with policy, procedures, Standard of Practice, Code of Conduct.
- **Lawful** – Are my actions/decisions lawful?
- **Fair** – Would my decision/action be seen as fair?

A QCS-specific Standard of Practice, to complement the Queensland Public Service Code of Conduct, will provide the following benefits:

- providing staff with clear guidance on expectations around appropriate conduct within the complexities of Queensland correctional environments
- ensuring that QCS officers are aware of their responsibilities and promoting accountability for their own actions
- enabling inspectors and investigators, both internal and external, to apply another level of scrutiny to the conduct of staff as part of their examination process
- providing another mechanism for minimising anti-corrupt practices and ensuring the safe and humane treatment of prisoners and offenders while also providing a level of protection for staff.

PSGC is leading the development of this Standard of Practice, which will be supported by additional training and communications material.

### Identify CCTV high-risk blind spots

Taskforce Flaxton noted that QCS has an extensive CCTV network, primarily for the purpose of movement control<sup>13</sup>. Evidence provided to Taskforce Flaxton suggested many areas within both public and privately operated correctional centres have incomplete CCTV coverage (known as 'blind spots') and cameras that rely on activation by a staff operator. The Queensland Government has committed to reviewing CCTV coverage, and progressively replacing outdated CCTV through planned capital upgrades, providing QCS with an opportunity to improve the identification and prevention of corruption.

### Implement workforce drug and alcohol testing

Staff drug and alcohol testing can be considered a special form of integrity testing. Such tests are relevant in an anti-corruption context because correctional staff with a substance abuse problem are often ready victims of conditioning and manipulation. Alcohol and other drug misuse are a risk to the safety of QCS officers, whether they work in a custodial or community corrections environment, or at QCS headquarters. It also creates a risk that inappropriate relationships may form between staff and prisoners/offenders, which is a key corruption risk. Having systems in place to detect alcohol and other drug misuse among staff will help prevent corruption. In response to Taskforce Flaxton,

<sup>12</sup> UNODC, *Handbook of Anti-Corruption Measures in Prisons*, 55.

<sup>13</sup> Queensland Crime and Corruption Commission (2018) *Taskforce Flaxton*  
<https://www.ccc.qld.gov.au/sites/default/files/Docs/Public-Hearings/Flaxton/Taskforce-Flaxton-An-examination-of-corruption-risks-and-corruption-in-qld-prisons-Report-2018.pdf> (Pg. 39).



amendments to the *Corrective Services Act 2006* provide legislative authority to require staff to submit to an alcohol or other drug test. This will be supported by operational policies and processes to provide a framework for the implementation of staff testing. The Corrective Services Regulation 2017 and operational policies and procedures will be amended to facilitate the new provisions.

### **Review attraction, selection and recruitment practices**

Staff working in the corrections environment have a challenging role and should possess maturity, intelligence, sound judgment and the physical ability to perform the rigorous duties required of them. Recruiting the right people to work in corrective services is the essential starting point not only to prevent corruption, but also to promote a decent and humane corrective services system. Taskforce Flaxton recommended improvements be made to QCS' recruitment and selection processes to support the development of a strong ethical culture, including:

- consistently attracting a high quality pool of candidates
- increased pre-employment screening and vetting
- improving transparency and accountability of recruitment and selection processes.

In response, People Capability Command has been established within the Organisational Capability Division to lead a review of QCS attraction, selection and retention processes. This review has been supported by increased capacity across human resources, employee relations, and culture, safety and wellbeing. It is anticipated that this additional capacity will deliver the following:

- a revised human resources business partnering model of service delivery
- an evidence-based recruitment and selection policy and guideline
- an Aboriginal and Torres Strait Islander recruitment strategy
- a Performance Management Policy and supporting documents
- delivery of in-house best-practice recruitment and selection training.

QCS is committed to empowering our professional workforce as part of an effective anti-corruption framework.

## **Success measures**

The key measures of success of promoting integrity and impartiality are:

- improved public perception of QCS
- strengthened processes to identify and manage corrupt behaviour
- reduced time taken to assess and investigate allegations of corrupt conduct and misconduct
- identification of CCTV high-risk blind spots
- reduced proportion of staff testing positive to alcohol and other drugs
- improved staff satisfaction with attraction, retention and selection processes.



## Objective 3 – Increase transparency and accountability

Public officials working in corrective services must uphold the law, policies and procedures, and deliver services in a professional way. Clear lines of responsibility and accountability for decisions are critical for delivering humane and professional corrective services. As much as possible, information relevant to the operation of QCS should be subject to inspection and public scrutiny. This section outlines current and planned initiatives to increase the transparency of QCS' operations. This will, in turn, increase public confidence in the delivery of corrective services in Queensland.

### Key initiatives

#### Transition private prisons to public operation

The CCC identified that the hybrid private/public prison model in Queensland created challenges in promoting a consistent set of performance standards and organisational culture. In response, the Queensland Government committed \$111.4 million over five years to transition the two private prisons, Arthur Gorrie and Southern Queensland Correctional Centres, to public operation. This is one of the largest criminal justice reforms to occur in Australia for a generation. Arthur Gorrie Correctional Centre transitioned to public operation on 1 July 2020, with Southern Queensland Correctional Centre to follow in 2021. By providing QCS with full operational and day-to-day management control of all prisons and all employees, the transition will strengthen corruption resistance in Queensland correctional facilities and improve overall integrity.

#### Implement a complaints management framework

To improve the transparency of our operations and the accountability of our staff, QCS has developed a Client Complaint Management Policy and supporting processes. A corruption-resistant culture is one in which staff, prisoners and offenders feel safe to report misconduct. All QCS officers have access to the whistle-blower protections contained in the *Public Interest Disclosure Act 2010*. In preparation for the commencement of the *Human Rights Act 2019*, QCS completed a review of internal complaints processes and amended them to support the requirements of the *Human Rights Act 2019*. This work will be supported by the implementation of an electronic complaints management system.

#### Ensure integrity, probity and accountability during procurement

Each year, the Queensland Government spends more than \$14 billion on a wide range of goods and services to support the delivery of frontline services.<sup>14</sup> Procurement is one of the top five most common activity types associated with allegations of misuse of authority.<sup>15</sup> Corruption vulnerabilities have been identified at several stages of the procurement process, from determining procuring method to initial tendering and selection of preferred suppliers. QCS is committed to ensuring its procurement practices and contract management reduce the potential for corruption.

FSSSC, led by an Assistant Commissioner, has been established to provide QCS with the capacity to deliver complex procurement and contracting in a rigorous, impartial, defensible and transparent way. The appointment of a Chief Procurement Officer, strengthening of procurement processes and management of conflicts of interest will continue to ensure greater accountability and compliance with the Queensland Procurement Policy.



<sup>14</sup> [Backing Queensland Jobs – Queensland Government Procurement Strategy 2017.](#)

<sup>15</sup> [Crime and Corruption Commission \(2019\) – Integrity in procurement decision making.](#)

## **Develop a Public Interest Disclosure Policy and Declarable Association Policy**

Transparency and proactive disclosure of information are key elements of combating corruption in any setting, including the correctional environment. While some information, including intelligence, may need to be restricted from public access, other information should be made available proactively, not only to staff, prisoners and offenders, but also to the general public.

The actions of QCS employees, both in an official and private capacity, must not give rise to a reasonable suspicion of bias in relation to QCS activities. The reputation and integrity of QCS is critical to the success of its charter to deliver community safety and crime prevention, and to provide the humane containment, supervision, and rehabilitation of prisoners and offenders. Public sector employees must also act in the public interest. A conflict of interest arises when a personal interest, such as a personal relationship, outside employment, membership of a special interest group, or financial or business interest, interferes with an employee's ability to act in the public interest. This includes engaging in other employment, which is defined as additional paid employment (whether on a full-time, part-time or casual basis). A conflict of interest may be actual, perceived or potential.

QCS will develop a Public Interest Disclosure Policy and a Declarable Association Policy designed to protect the integrity and effectiveness of QCS operations and maintain the confidence of the government and the community in the integrity of QCS employees. The Public Information Disclosure Policy will be developed in accordance with the *Public Interest Disclosure Act 2010*. These policies will be supported by the development and implementation of an electronic system to manage declarations of associations, private interests, and other employment.

## **Review of overtime and rostering practices**

Any reform efforts that aim to enhance the professionalism of corrective services staff and personnel structure should be supported by adequate remuneration. Sufficient compensation allows correctional staff to focus on their work, rather than worrying about providing for their families. The CCC identified a number of risks associated with current overtime practices among correctional facilities staff. In addition, manual timesheet processes represent a corruption risk and should be eliminated.

Access to overtime must be fair, transparent and consistent with operational need. These issues will be addressed through a comprehensive review of existing overtime and rostering practices and the development of a new overtime policy.

This policy will be supported by the Attendance Oversight Management System (ATOM) to strengthen transparency and accountability. The ATOM system provides on-line capability for centre management to interrogate the dashboards and access data sets covering sick leave, overtime, rostering information and other employee related data sets. The ATOM will support the new overtime policy by providing accurate and timely insights, through trend and outlier analysis, pattern matching and exception reporting.

## **Develop a model for staff rotation**

Staff rotation can decrease corruption risk in correctional environments and is practiced in other professions where inappropriate relationships may develop, including law enforcement and health. Carefully planned, periodic rotation of staff in high risk positions can significantly contribute to minimising risks of staff corruption and manipulation. QCS will consider these risks through the scoping and development of an organisation-wide staff rotation policy. This policy will also take into account the need for continuity of service and the importance of staff-prisoner/offender relationships in promoting dynamic security and rehabilitation.



### **Support an independent inspectorate**

QCS will continue to work with its Queensland Government partners to implement an independent inspectorate, consistent with Australia's obligations under the OPCAT. QCS is also working on a model for the public reporting of inspection reviews. QCS will continue to engage with the Department of Justice and Attorney-General in relation to independent inspections by the United Nations Subcommittee on the Prevention of Torture (SPT).

### **Success measures**

The key measures of success to increasing transparency and accountability are:

- increased transparency in complaints reporting
- increased staff awareness of definitions of conflict of interest
- all conflicts of interest are documented and kept in a central repository, including 'nil' responses
- compliance with the Queensland Procurement Policy and internal processes for all procurement activity
- more objective and equitable distribution of overtime
- development of a staff rotation model.



## Objective 4 – Embed performance standards

Sound management practices and preventing corruption are inexorably linked. QCS officers must be equipped and supported to do their job well. Increasing transparency through public reporting and measuring performance is essential to raising standards. Appropriate performance measures will be developed and communicated to all staff. Regular performance monitoring will be conducted both for individuals and the agency as a whole. The following initiatives address the recommendations made by the CCC through Taskforce Flaxton, with a view to improving performance over time.

### Key initiatives

#### Strengthen public reporting

This Strategy will provide QCS with an opportunity to publicly report on its anti-corruption activity. The Strategy sets the overarching framework for QCS' approach to preventing, detecting and addressing corruption risks. It will be supported by the development of 12-month Action Plans, which will articulate the Strategy's objectives at the operational level and provide detail of the activities, targets and measures for each year. This annual reporting will address the recommendations of Taskforce Flaxton by improving transparency and accountability.

#### Develop an Organisational Performance Framework and implement regular reporting

In response to Taskforce Flaxton, QCS has enhanced its operational performance, data analytics and reporting capacity through the establishment of a discrete business unit within the new Organisational Capability Division. The Operational Performance, Data Analytics and Reporting Group (OPDARG) has developed a suite of key performance indicators (KPIs) to measure the effectiveness of custodial and community corrections operations. This will include a KPI to measure the effectiveness of anti-corruption activity across QCS. The OPDARG supported the implementation of regular Operational Performance Reviews (OPR), which commenced in mid-2020.

In addition, QCS will develop a performance management framework to promote performance standards and consistency across the agency. QCS will create greater role function and clarity including span of control, reporting lines, delegations and authorisations, employee performance management in order to drive performance standards. This Strategy will coordinate activity already underway to implement consistent performance standards in a meaningful and transparent way, supported by strong leadership from the QCS Executive.

#### Develop and implement an organisation-wide cultural change program

Employing the right individuals is only the first step in managing corruption risks. At the wider strategic level, it is the primary role of corrective services supervisors, managers and executives to supervise, provide guidance and leadership, and enforce adherence to legal and ethical obligations. Positioning QCS as a top-tier public safety agency with a strong ethical culture will best position us to prevent, detect and address corruption and corruption risks. Work to develop a mature, corruption-resistant culture is already underway, with the transition of the private prisons to public operation and the centralisation of core functions. Further work will continue to provide the necessary leadership training, development, mentoring and support to those who, at all levels, are critical to driving such cultural change. This will ensure that professionalism and ethical behaviour are embedded in the everyday business of QCS.

*Corrections 2030* sets the strategic vision for our organisation over the next 10 years. It establishes our organisation's vision and values, based on the five principles of safety, excellence, empowerment, respect and accountability. The Enterprise Strategy Group has been established in response to Taskforce Flaxton to elaborate this strategic vision through a range of specific strategies, including this Strategy and the *Drug and Alcohol Strategy 2020-2025*.



In addition, People Capability Command is developing a QCS cultural change program which aims to:

- assess current culture and create a shared vision of the ideal culture
- develop and implement initiatives to support cultural change
- monitor and report on the implementation of initiatives and cultural change.

## Success measures

The key measures of success to embedding performance standards are:

- increased consistency of performance reporting across the Queensland correctional system
- implementation of the Anti-Corruption Strategy is publicly reported annually
- operational performance reviews are embedded and support improved performance over time
- increased monitoring and reporting of cultural change initiatives
- increased sense of shared purpose, culture and vision among our staff.



## Next Steps

### The Anti-Corruption Action Plan 2020-2021

Following the endorsement and release of the *Anti-Corruption Strategy 2020-2025*, the Project Executive will commence consultation with key stakeholders on the development of the Anti-Corruption Action Plan 2020-2021.

### Evaluation and review

An Action Plan will be developed on an annual basis to review Strategy implementation progress and ensure that activity continues to meet the overarching policy objectives. The Strategy will be comprehensively and formally evaluated in 2024, to support the development of the Anti-Corruption Strategy 2025-2030.



## Appendix 1 – Corrupt conduct in focus

In Queensland, 'corrupt conduct' is defined by the *Crime and Corruption Act 2001* (CC Act). 'Conduct' includes:

- neglect, failure and inaction;
- conspiracy to engage in conduct; or
- attempt to engage in conduct.

Under the CC Act, there are two different types of corrupt conduct. 'Type A' corrupt conduct involves conduct that affects, or could affect, how officers from a Unit of Public Administration (UPA) perform their functions or powers. UPAs include government departments, the police service, and local governments. 'Type B' corrupt conduct involves conduct that impairs, or could impair, public confidence in public administration.

### Type A corrupt conduct – section 15(1) CC Act

Type A corrupt conduct is conduct by any person that satisfies the three elements as follows:

#### 1. Effect of the conduct

Type A corrupt conduct adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of –

- a UPA; or
- an individual holding an appointment in a UPA.

#### 2. Result of the conduct

Type A corrupt conduct results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned above in a way that –

- is not honest or is not impartial; or
- involves a breach of the trust placed in a person holding an appointment, either **knowingly** or **recklessly**; or
- involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment.

In relation to a breach of trust:

- **knowingly** can be taken to mean that the subject officer knew that their actions were a breach of the trust placed in them; or
- **recklessly** can be taken to mean that, while the subject officer did not necessarily know that their actions were a breach of trust, they were aware that there was a real and apparent risk that the conduct would amount to a breach of the trust and they nevertheless without justification went through with the conduct.

#### 3. Seriousness of the conduct

Type A corrupt conduct would, if proved, be—

- a criminal offence; or
- a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were a holder of an appointment.

Conduct must satisfy all three elements above to be considered Type A corrupt conduct, as in the example below.



Conduct	Elements that make it Type A corrupt conduct
An audit reveals that a public servant cheated on travel allowances by claiming allowances for trips not taken, and claiming expenses that were not incurred.	1. adversely affects the performance of the department through misuse of resources 2. is dishonest 3. is a criminal offence (i.e. fraud).

## Type B corrupt conduct – section 15(2) CC Act

Type B corrupt conduct is conduct by any person that satisfies the three elements described below.

### 1. Effect of the conduct

Type B corrupt conduct impairs, or could impair, public confidence in public administration.

### 2. Type of conduct

Type B corrupt conduct involves, or could involve, one of the following types of conduct:

- collusive tendering;
- fraud relating to an application for a licence, permit or other authority under an Act that has any of the following purposes or objects:
  - protecting people’s health or safety;
  - protecting the environment; or
  - protecting or managing the use of the State’s natural, cultural, mining or energy resources.
- dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets;
- evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue; or
- fraudulently obtaining or retaining an appointment.

### 3. Seriousness of the conduct

Type B corrupt conduct would, if proved, be—

- a criminal offence; or
- a disciplinary breach providing reasonable grounds for terminating the person’s services, if the person is or were a holder of an appointment.

Conduct must satisfy all three elements above to be considered Type B corrupt conduct, as in the example below.

Conduct	Elements that make it Type B corrupt conduct
A government department issues licences. Anyone wishing to obtain a licence from that department must first complete mandatory training and obtain suitable qualifications. The main reason for the licence is to ensure public safety. However, the department has outsourced responsibility for training and qualifying people to a private company. One of the employees of the private company has accepted bribes from an outlaw motorcycle gang to issue qualifications to unqualified persons so that they can obtain licences. The result is that the department is now issuing licences in good faith to unqualified people.	1. impairs or could impair public confidence in public administration 2. fraud relating to a licence application where the purpose of the regulation is public safety 3. is a criminal offence (i.e. fraud).



## Professional misconduct<sup>16</sup>

Professional misconduct is conduct connected with exercising the skill of a professional or engaging in the performance of the specified duties or activities of a position, in both the public and private sectors. In many cases, by virtue of their roles and skills, professionals often have ethical or statutory obligations attached to the discharge of their powers or functions. Professional misconduct can also be Type A or Type B corrupt conduct.

While professional misconduct only rarely amounts to corrupt conduct, it can do so even when there is no criminal offence involved. In such cases, the conduct must involve repeated behaviour (including neglect, failure and inaction) that undermines the trust placed in the person by virtue of their position. Alternatively, the conduct must be a single incident of behaviour indicating a callous or reckless disregard for, or indifference to, the skills required for the proper discharge of the duties of the position.

Consider the following scenario, which illustrates professional misconduct that is also Type A corrupt conduct. The Chief Finance Officer in this scenario has a responsibility to manage the resources of the UPA efficiently using the skills and qualifications appropriate to their position. While the mismanagement of the budget can be seen as serious professional neglect, it is the attempted cover up in order to protect their position — and the subsequent outcome for the UPA — that makes the conduct Type A corrupt conduct.

Professional misconduct	Also corrupt conduct because it...
<p>A Chief Finance Officer responsible for preparing your UPA's budget fails to reconcile funding movements, resulting in a million dollar deficit in the budget. When the issue comes to their attention, they do not report the deficit to the board in a deliberate attempt to cover up their mistake.</p>	<ol style="list-style-type: none"> <li>1. adversely affects the performance of the department through budget deficit</li> <li>2. is dishonest and a breach of trust</li> <li>3. is reasonable grounds for dismissal.</li> </ol>



<sup>16</sup> Crime and Corruption Commission (2020) – *Corruption in focus – A guide to dealing with corrupt conduct in the Queensland public sector*

## Appendix 2 – Policy context

### International responses to corruption and corruption risks

#### United Nations Convention Against Corruption

The [United Nations Convention Against Corruption \(UNCAC\)](#) is the first binding global instrument aimed at combating corruption. It has broad international support, with 187 national signatories as at February 2020. It establishes mechanisms for the prevention and criminalisation of corruption, international cooperation and asset recovery. Australia ratified the UNCAC in December 2005. The three goals of the UNCAC are to:

- promote and strengthen measures to prevent and combat corruption more efficiently and effectively
- promote, facilitate and support international cooperation and technical assistance in the prevention of and fight against corruption, including in asset recovery
- promote integrity, accountability and proper management of public affairs and public property.

This Strategy will align with a number of Australia’s commitments under the UNCAC, including:

- **Article 5:** each party shall develop and implement effective, coordinated anti-corruption policies that reflect the rule of law and deliver on the goals of the UNCAC.
- **Article 7:** each party shall adopt, maintain and strengthen systems for the recruitment and retention of public servants, including education and training programs that enable them to meet the requirements for the proper performance of public functions and enhance awareness of corruption risks.
- **Article 8:** each party shall apply codes or standards of conduct for the correct, honourable and proper performance of public functions.
- **Article 9:** each party shall establish appropriate systems of procurement, based on transparency, competition and objective criteria in decision making, effective in preventing corruption.
- **Article 10:** each party shall enhance transparency in its public administration, including with regard to organisation, functioning and decision-making processes.

#### United Nations Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)

The Nelson Mandela Rules were adopted by the United Nations General Assembly in December 2015. The 122 rules represent the consensus of the United Nations on minimum standards in prison management and the treatment of prisoners. A summary of rules relevant to the implementation of this Strategy is as follows:

- **Rule 1:** All prisoners shall be treated with the respect due to their inherent dignity and value as human beings. No prisoner shall be subjected to, and all prisoners shall be protected from, torture and other cruel, inhuman or degrading treatment or punishment.
- **Rule 2:** These rules shall be applied impartially.
- **Rule 12:** Prisoners should be accommodated in individual cells wherever possible, unless it is necessary to make an exception to this rule due to special circumstances, e.g. temporary overcrowding.
- **Rule 36:** Discipline and order shall be maintained with no more restriction than is necessary to ensure safety and security.
- **Rule 56:** Every prisoner shall have the opportunity each day to make requests or complaints to the prison director.



- **Rule 74:**
  - The prison administration shall provide for the careful selection of every grade of the personnel, since it is on their integrity, humanity, professional capacity and personal suitability for the work that the proper administration of prisons depends.
  - The prison administration shall constantly seek to awaken and maintain in the minds both of the personnel and of the public the conviction that this work is a social service of great importance.
- **Rules 75-76:** All prison staff shall possess an adequate standard of education and training to carry out their duties in a professional and ethical manner, consistent with contemporary best-practice.
- **Rule 77:** All prison staff shall at all times so conduct themselves and perform their duties as to influence the prisoners for good by their example.
- **Rule 79:** Prison executives should be adequately qualified for their task by character, administrative ability, suitable training and experience.

### Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT)

Australia signed the Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) in 2009. In December 2017, Australia ratified the OPCAT, to support international efforts to prevent torture and cruel, inhuman or degrading treatment or punishment. Ratifying OPCAT supports Australia's efforts to implement the OPCAT. The Australian Government is currently working to support a series of visits to monitor safeguards around prisoners' human rights.

Under OPCAT, Australia has agreed to establish a National Preventative Mechanism (NPM) to conduct independent inspections of places of detention, including prisons, against OPCAT standards. QCS is working with the Department of Justice and Attorney-General on the implementation of the NPM. Australia has also agreed to facilitate independent inspections of places of detention by the United Nations Subcommittee on the Prevention of Torture. The Australian Government is currently working to support a series of visits to monitor safeguards around prisoners' human rights.

This Strategy contributes to the implementation of the OPCAT by guiding the development of a mature, corruption-resistant culture at all levels of QCS' operations. Every interaction with a prisoner or an offender is an opportunity to promote positive behaviour change and role model integrity and professionalism. This Strategy coordinates activity across QCS to ensure that those interactions are ethical, transparent and accountable, consistent with human rights.

### UNCAC Handbook on Anti-Corruption Measures in Prisons

In 2017, the United Nations Office on Drugs and Crime released its [Handbook on Anti-Corruption Measures in Prisons](#) to support the implementation of the UNCAC. The Handbook identifies a range of corruption risks specific to the custodial environment, and recommends strategies to address them. It draws on the UNCAC, Nelson Mandela Rules and OPCAT to develop a framework to support nations to prevent and address corruption and corruption risks. This analysis is reflected in the CCC's approach to Taskforce Flaxton.

The Handbook identifies the following unique features of the custodial environment, that make it susceptible to corruption risks:

- **Prisons are closed environments.** With limited and strictly regulated access from external parties, prisons throughout the world tend to be relatively isolated from society, with prisoners easily being forgotten by the general public.



- **Risks and needs within the prison population.** Prisoners often experience multiple forms of social disadvantage, including poor educational attainment, complex health issues (including mental illness) and alcohol and other drug misuse.
- **Prison staff and human resources management policies.** Prison administrations, managers and staff have a unique level of control and power over prisoners and their well-being. This situation creates an increased risk in terms of abuse of power and corruption and requires correspondingly high levels of diligence and oversight.
- **Staff-prisoner relationships and dynamic security.** The success of prison systems in achieving their key objectives, relies on staff-prisoner relationships. Where those relationships are well managed, controlled and constructive, a positive environment can result.
- **Prison infrastructure and capacity.** Overcrowding is an issue facing corrective services agencies worldwide. In 2015, 115 of 198 countries reported prison overcrowding. Corruption risks multiply when prisons are overcrowded and when basic services are not, or not fully, available.

The Handbook identifies two additional ways corruption may manifest itself in the context of corrective services:

- **Bribery, abuse of function and trading in influence.** Many acts of corruption in prisons revolve around the treatment of and conditions for prisoners. Prison officers might misuse a situation of real or supposed influence over a prisoner for financial or other reward.
- **Embezzlement and misappropriation.** Corrective services agencies procure a significant quantity of goods and services to support their operations, while private contractors will compete for such tenders. Such contracts may be attractive to criminal enterprises or individual officials as potential sources of personal gain.

The Handbook provides a comprehensive analysis of a range of anti-corruption measures to address the risks identified above, including:

- **Corruption risk mitigation plans.** Corrective services agencies should publicly affirm their commitment to transparency, integrity and accountability by developing frameworks to prevent, detect and respond to corruption, incorporating public reporting.
- **Anti-corruption units or focal points.** The UNCAC requires nations to establish independent anti-corruption bodies.
- **Corruption risk assessments.** The most useful starting point for the design of risk mitigation plans at the institutional level is conducting a corruption risk assessment. A risk assessment is a process of identifying the specific vulnerabilities or risks that may lead to corruption in a particular setting in order to define further action.
- **Recruitment and vetting.** Staff working in prisons have a very difficult job and should, therefore, possess maturity, intelligence, good judgment and the physical ability to perform the rigorous duties required of them. Recruiting the right people to work in prison is the essential starting point not only to prevent corruption, but also to promote a decent and humane prison system.
- **Remuneration, benefits, incentives and awards programs.** Any prison reform efforts that aim to enhance the professionalism of prison staff and an administration's personnel structure should be supported by adequate remuneration. Sufficient compensation allows prison officers to focus on their work.
- **Codes of conduct.** The adoption of a Code of Conduct or Code of Ethics is commonly used to guide staff behaviour. It is a crucial aspect of any effective approach to strengthening integrity and professionalism. A specific code, which is formulated, applied and enforced specifically for corrective services staff is likely to increase its relevance, legitimacy, and effectiveness.



- **Training, including on integrity and accountability.** Once prison staff have been properly selected and recruited, they need to be given appropriate initial training prior to being deployed. The Nelson Mandela Rules provide a detailed list of the content that induction training for prison staff should encompass. The subjects of integrity and accountability should be addressed in all prison staff training.
- **Conflict of interest regulations and asset declaration systems.** Corrective services agencies should assure that staff are aware of their obligation to report a potential conflict of interest. The applicable Code of Conduct or relevant prison regulation should make clear reference to conflicts of interest.
- **Staff rotation.** Staff rotation is regularly exercised in the management of high-risk prisoners or other sensitive posts and is a highly relevant measure of corruption prevention. Carefully planned, periodic rotation of prison staff in high-risk positions can significantly contribute to minimising the risks of staff corruption and manipulation.
- **Leadership and management.** Employing the right individuals is only the first step in managing corruption risks. At the wider strategic level, it is the primary role of corrective services executives to supervise, provide guidance and enforce adherence to legal and ethical obligations.
- **Prison intelligence.** Collecting indicative information on the prevalence of corruption is an important part of ongoing prison intelligence gathering and monitoring of corruption risks. More broadly, a well-structured prison intelligence system is crucial for supporting dynamic security.
- **Reporting channels.** A necessary element of any sound accountability system is an effective procedure for dealing with reports of alleged misconduct, that ensures the confidentiality of those providing the information, encouraging reporting.
- **Disciplinary and criminal procedures.** Prison administrations must have effective internal disciplinary systems for the investigation of staff misconduct, governed by the principles of fairness and due process. Consistent, effective and timely disciplinary and criminal procedures are part of the foundation of a well-functioning anti-corruption system.
- **Internal and external inspections.** The Nelson Mandela Rules clearly require internal or administrative inspections of prisons to be undertaken on a regular basis. In addition, international standards have consistently highlighted the need for a system of regular inspections independent of the authority responsible for administering prisons.
- **Access for legal representatives and civil society groups.** Informal monitoring is often conducted by prisoner legal representatives and civil society groups responsible for providing services to prisoners.

## Australian resources

### Crime and Corruption Commission's Fraud and Corruption Control Best Practice Guide

The CCC's [Fraud and Corruption Control: Best Practice Guide](#) consists of an integrated framework of 10 key elements for an effective fraud and corruption control program. The Guide presents an integrated approach that includes proactive measures designed to enhance system integrity (prevention measures) and reactive responses (reporting, detecting and investigating activities). The maintenance of high standards of integrity, conduct and fiduciary responsibility is one of the important tasks of any public sector organisation. This is managed through a collection of tools (legislation, policies, procedures, etc.), which together determine how the organisation and its staff are to behave on a daily basis and that help the organisation to build an integrity-based culture that will resist fraud and corruption. This integrity framework consists of:

- legislation
- strategic plans, mission statements, values



- Codes of conduct, policies and procedures
- performance plans
- workplace practices, culture and behaviour, including unwritten ground rules, traditions
- the fraud and corruption control framework.

In order to assist organisations to implement the fraud and corruption control framework, the CCC recommends a best-practice approach through the following 10 components:

- **Coordination mechanisms.** Effective mitigation of fraud and corruption risks can only occur through the implementation of a well thought out fraud and corruption control framework tailored to specific organisational needs. It is important to ensure that the fraud and corruption control framework is complete and that all components work to support each other.
- **Risk management system.** Developing an effective fraud and corruption control program requires a comprehensive understanding of an organisation's risks and vulnerabilities. Identifying an organisation's key fraud and corruption risks is therefore one of the major tasks to be undertaken. Risk assessment establishes an organisation's risk profile and the nature of the operating environment so that cost-effective practices can be established to contain or minimise each risk.
- **Internal controls.** Once an organisation has established its risk profile through a comprehensive risk assessment process, it can establish internal controls to deal with and minimise those risks.
- **Reporting processes.** The reporting of suspected misconduct and maladministration within the Queensland public sector is fundamental to its ongoing integrity and health.
- **Protections for disclosers.** Research consistently shows that reports by employees are one of the most common ways that fraud and corruption are discovered. Employees should feel supported to report misconduct without fear of retribution.
- **External reporting.** Where suspicious activities are found within an organisation, appropriate action must be taken to investigate and bring any wrong-doers to account. Referral to external integrity agencies increases the likelihood that fraud and corruption will be dealt with appropriately.
- **Investigation management processes.** Once suspected fraud or corruption has been identified or reported, a number of processes must follow. The appropriate processes will depend on the nature and seriousness of the alleged conduct.
- **Code of conduct.** A Code of Conduct can help develop the expectations and standards of behaviour within an organisation, consistent with the public sector ethics principles and values. It reflects an organisation's values and philosophy, and provides the framework within which employees perform their duties.
- **Organisational culture change.** Being an organisation that is truly free of fraud and corruption is an ideal worth striving for. An integrated organisational culture change program will ensure a well-informed workforce with a greater capacity to recognise and respond to corruption risks.
- **Client and community awareness program.** To maintain public trust, the community must be confident that organisations and their officers behave ethically. Publicly emphasising that the organisation is committed to probity and will not tolerate fraud and corruption raises morale and productivity.

## Queensland Human Rights Act 2019

Queensland's *Human Rights Act 2019* protects 23 human rights. The Act primarily protects civil and political rights drawn from the International Covenant on Civil and Political Rights. In the QCS context, the Act explicitly protects the following rights:

- recognition of equality before the law
- protection from torture and cruel, inhuman or degrading treatment



- humane treatment when deprived of liberty
- rights in criminal proceedings
- cultural rights for Aboriginal and Torres Strait Islander peoples
- right to education
- right to health services.

The Act requires each arm of government to act compatibly with these human rights. This means that:

- Parliament must consider human rights when proposing and scrutinising new laws
- courts and tribunals, so far as is possible to do so, must interpret legislation in a way that is compatible with human rights
- public entities – such as state government departments, local councils, state schools, the police and non-government organisations and businesses performing a public function must act compatibly with human rights. The Act makes it clear that rights can be limited, but only where it is reasonable and justifiable.

The Strategy contributes to the implementation of the *Human Rights Act 2019* by promoting transparent and accountable decision making, consistent with QCS' legal and ethical obligations.

### Victorian Independent Broad-based Anti-corruption Commission (IBAC): Corruption risks associated with the corrections sector

The IBAC's 2017 report into [Corruption Risks Associated with the Corrections Sector](#) provides an overview of corruption risks and measures to address them in the context of the Victorian corrective services system. Similar to the international resources outlined above, the IBAC report identifies the following key corruption risks in correctional settings:

- introduction of contraband
- inappropriate relationships
- excessive use of force
- inappropriate access to, and disclosure of, confidential information
- corrupt procurement practices.

The IBAC also identified a number of best-practice prevention and detection strategies, including:

- promoting a strong organisational culture and comprehensive training
- proactive management of allegations of misconduct and intelligence
- vetting and revalidation of employees
- implementing declarable associations policies
- implementing procurement controls.

## Related external reviews

### Crime and Corruption Commission's Operation Impala (2019)

The CCC's [Operation Impala](#) examined improper access to and disclosure of confidential information by public sector employees. QCS cooperated fully with the CCC's inquiry, providing a submission and participating in public hearings in late 2019. The Final Report, published in February 2020, makes a number of recommendations relevant to the development of QCS' Anti-Corruption Framework:

#### Recommendation 1 – Access control mechanisms

That agencies:

- ensure all computer databases where confidential information is stored have unique user identifications log-ons
- conduct quarterly user access reviews and monitoring of user access changes to help prevent and minimise unauthorised use of these databases



- ensure additional access control mechanisms are implemented on confidential information of vulnerable people.

### **Recommendation 3 – ICT Information Access policy**

**3.1** That all public sector agencies develop a comprehensive and concise ICT Information Access policy. The policy should refer to the Criminal Code, the relevant public sector agency governing Act and the *Information Privacy Act 2009*. It is critical that language used is standardised to ensure consistency and better understanding. In particular, the policy should include for each of these three Acts:

- the meaning of confidential information
- the meaning of unauthorised use
- the meaning of unauthorised disclosure
- the range of potential sanctions including criminal charges and disciplinary proceedings, such as termination, demotion, and/or the imposition of a post-separation declaration
- de-identified case studies of substantiated allegations relating to the misuse of confidential information and the consequences of those matters for the employee.

### **Recommendation 4 – Confidential information access and privacy training**

**4.1** That agencies ensure that training:

- is developed and provided to all public sector employees prior to gaining access to any database that contains confidential information
- is developed and provided annually to all public sector employees who have access to confidential information
- reflects the respective ICT access and use policy, including references to the Criminal Code, the relevant public sector agency governing Act and the *Information Privacy Act 2009*. The language used in the training material should be consistent and include explanation of items numbered 1 to 5 outlined in Recommendation 3.1
- comprises a combination of online, face-to-face and video modules
- records of the content and participation by employees are kept
- is assessed annually to determine levels of retention and understanding of the content of the respective information privacy policy and supporting training material.

### **Recommendation 5 – Privacy awareness messaging**

That public sector agencies undertake regular information privacy awareness campaigns including but not limited to:

- annual email messaging to all employees by the Commissioner, Director-General or Chief Executive Officer, to communicate the agency's position clearly as regards information privacy, including acceptable and unacceptable conduct
- bi-annual email messaging of same to employees by senior executive officers
- screensavers and posters that stipulate the consequences of misusing a restricted computer database (see items 1 to 5 of Recommendation 3.1), to be updated on a quarterly basis
- log-on warnings displayed before accessing a restricted computer database to remind public sector employees that access is logged and monitored and that consequences of misuse of confidential information may result in criminal charges under section 408E of the Criminal Code and/or disciplinary sanctions
- de-identified case studies—for example, for inclusion in monthly newsletters or for discussion during toolbox talks.



## Recommendation 6 – Dealing with misuse of confidential information

That public sector agencies:

- consider criminal prosecution upon detection of misuse of confidential information by public sector employees, which generally will require the matter be referred to the QPS as a criminal complaint in the first instance prior to a determination being made with respect to the instigation of disciplinary proceedings
- apply and adapt, if necessary, the CCC’s assessment flowchart to ensure consistency in decision making processes with respect to incidences of misuse of confidential information, including the decision to refer to the QPS and the decision to institute disciplinary proceedings. Public sector agencies are to retain contemporaneous records to justify decisions made
- pursue post-separation disciplinary proceedings where appropriate.

## Recommendation 8 – Improved prevention and detection systems

That public sector agencies are to:

- develop and define additional protections to safeguard confidential information that relates to vulnerable including high profile persons. Public sector agencies should develop their own categories of vulnerable persons. Protections should be proportional to ensure that operational efficiency is not compromised and should include: - flags when records of vulnerable or high-profile persons have been accessed; and - targeted quarterly audits of the flags
- conduct quarterly targeted audits of access logs to identify possible misuses of confidential information. Agencies are to develop their own categories for the targeted audits, based on a risk assessment
- develop systems that monitor outbound emails, after hours and remote accesses; as well as the deployment of data analytics to report unusual accesses. That the Queensland Government Chief Information Officer (QGCIO) advises agencies with respect to proposed improved proactive auditing systems.

## Crime and Corruption Commission’s Taskforce Flaxton (2018)

Taskforce Flaxton was the catalyst for the creation of this Strategy, which builds on the blueprint provided by the CCC to articulate a sophisticated and effective anti-corruption framework that responds to QCS’ unique operational context across all areas of our business.

## The Queensland Parole System Review (2016)

The recommendations made within the [Queensland Parole System Review](#) support the development of the *Anti-Corruption Strategy 2020-2025* by creating an environment of effective rehabilitation, reintegration and supervision of prisoners and offenders. Targeting drug use, increasing staff training and enhancing oversight and information technology functions support the recommendations made within the review in the following ways:

### Increased staff training

- **Recommendation 66.** QCS should reformulate its training program to ensure that new probation and parole officers undertake all necessary and appropriate training prior to being allocated a caseload of offenders to supervise.
- **Recommendation 67.** QCS should review and revise the content of the current training program for probation and parole officers and consider doing so in partnership with a university to develop a fit for purpose training program that appropriately instructs trainee officers in managing offenders.
- **Recommendation 72.** QCS should have ongoing professional and practice development training of probation and parole officers.



### Clear lines of oversight

- **Recommendation 89.** QCS should retain a function internal to the department to undertake internal review and investigations as required by the Commissioner, but this must be in addition to and not in derogation of a fully independent inspectorate.

### Improved Information Technology systems

**Recommendation 91.** The information technology systems required for the implementation of other recommendations should be reviewed and the necessary software systems developed or upgraded with appropriate funding.

### Offender Health Services Review (2018)

The [Offender Health Services Review](#) was tabled as part of Taskforce Flaxton. It provides a review of the governance, funding and delivery of health services to prisoners in Queensland, including primary care provided by Hospital and Health Services and specialist care provided by Prison Mental Health.

Key findings include:

- prisoners have complex health needs requiring a coordinated treatment approach
- there is considerable variation in the nature and availability of prisoner health services across the state
- there is a lack of suitable infrastructure to deliver health care services in Queensland correctional facilities.

Queensland Health, in consultation with QCS, is currently developing the Prisoner Health and Wellbeing Strategy 2020-2025 to address the majority of the OHSR recommendations. Initiatives contained in the *Anti-Corruption Strategy 2020-2025* and the *Drug Strategy 2020-2025* will contribute to the implementation of this work.

