



PREVENTION in focus

Personal relationships, professional boundaries: how to manage potential corruption risks



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Public sector employees are obliged to always act in the public interest. In any situation of competing obligations or priorities, the outcome must favour the public interest over any private considerations.

But sometimes, situations don't seem to be that clear-cut, and that's precisely when corruption risks can emerge. If not managed carefully, relationships with family and friends can come into conflict with your obligations as a public sector employee. It's important to recognise when the line has become blurred, or has even been crossed, compromising your integrity, and diminishing public confidence in the operations of government.

What you should know

- Be aware of your obligations as a public sector employee, and know that they must always take precedence as long as you are employed by the public sector. Some obligations, such as the obligation to keep public sector information confidential, continue after you leave the public sector.
- While it's natural to want to help your friends and family, your employer and Queensland taxpayers aren't paying you to do that – they're paying you to act in their interests, not those of your family and friends.
- If you are asked by a friend, family member or associate to assist them, or you become aware that their business dealings could intersect with those of your agency, you must inform your supervisor and declare a conflict of interest.
- Public sector employees must take care that they don't allow a normal personal relationship to become an inappropriate one.

This publication points out the pitfalls and potential corruption risks involved in personal relationships that cross the line, and what can be done to manage them.





Helping a friend or flirting with corruption?

We all understand why doctors are not permitted to operate on their family members – the personal feelings involved in wanting to help a partner or child could cloud their professional judgement when making a decision on how to treat them.

In the same way, public sector employees may lose sight of their official obligations when friends, family and close colleagues ask for their help. It may seem harmless enough – asking you to access information on their behalf, to tell them when business opportunities arise within your agency, to put in a good word with a selection panel – but it can still be a corruption risk if not handled wisely.

Other such requests may appear to be harmless, but carry the same corruption risks. Business associates may cultivate your friendship precisely because of your position, seeing you as a useful source of information or a valuable insider they can use to their advantage.

Relationships with former business colleagues can be particularly problematic, especially when one party moves to the private sector – with a new focus on obtaining a benefit for their business – and no longer has the same requirements for accountability and merit-based decision making as they did in the public sector.

Relationships which should be approached with caution

Some relationships will need to be handled with more caution than others, as they have the potential to develop into corrupt associations. They include:

- a personal friendship that may have developed from a business association with a contractor or consultant
- a family member or friend who supplies goods or services of the type used by your agency
- a relationship with a person who has a criminal history, associates with known criminals, or is suspected of being involved in criminal activity, including social drug use.

This last category is particularly relevant to police officers or anyone working in law enforcement or licensing and regulatory agencies.

Lessons from across the sector

The following case studies from local government, departments and the police service highlight some of the pitfalls and consequences of allowing personal relationships to take precedence over public interest obligations. Failing to declare and manage inappropriate relationships may constitute corrupt conduct which can lead to criminal charges, disciplinary action and/or losing your job.



Case study



Toxic relationships at the Ipswich City Council

The CCC's investigation into the Ipswich City Council resulted in criminal convictions for corruption-related offences for Carl Wulff, the former CEO, his wife Sharon Oxenbridge, and contractors Claude Walker, Wayne Myers and Wayne Innes, among others.

The extract below is taken from an interview with Carl Wulff.

“In terms of somebody giving you tickets to the football or taking you to lunch, fundamentally there's no such thing as a free lunch ... People who might be interested in corrupting you will start off small, maybe just buying you a cup of coffee. But slowly, it's a bit like a cancer — slowly and slowly it eats away at the body of the organisation through you, so a cup of coffee becomes dinner or lunch, then it might become, you know, a day at the races or a day at the football, then it might be a weekend away somewhere and slowly that cancerous approach increases to the point where you then become involved in real corrupt activity which will come back to bite you. Straightaway or at some time in the future, it will be used against you to increase the favours so that you now feel in a position where you can't say no ...”

The extract below is taken from the appeal judgement of Carl Wulff, Sharon Oxenbridge, Claude Walker and Wayne Myers in 2019. It shows how contractors intentionally cultivated relationships within the Council.

Myers was a self-employed business consultant, and the owner and sole director of Dinorden Pty Ltd, which provided corporate business advice to businesses of all sizes. He was previously a registered lobbyist.

Myers had been friends with the previous Mayor of Ipswich, Pisasale, for more than 10 years. Through him he met Wulff shortly after Wulff joined the Council and they gradually began to socialise together.

Myers met Innes, who owned a business called Landfill Logistics (LL) engaged in the business of locating areas that needed landfill and then sourcing the fill from other areas, at a business conference in Thailand in about 2010 or 2011. Innes attached himself to Myers at this conference, asking him if he had any connections with the Council. Innes stated that Myers told him that he had close relationships in the Council and that he could facilitate work with the Council.

Myers gave Innes details of some Council landfill contracts and the amount they were paying for fill. Innes knew he could legitimately supply fill at a much lower rate, but that he needed an “in” with the Council. Through Myers, Innes began to receive work from the Council which was initially one-off jobs or purchase orders.

In about May or June 2011, Myers facilitated a meeting at a cafe between Innes and Wulff, after which they began to meet regularly to discuss business.

At about the same time (May or June 2011), Myers and Innes came to a verbal agreement that Innes would pay Myers approximately 30 per cent of his profit from any works he received from the Council. Innes did this to “grease the wheels” and encourage Myers to maintain his relationship with Wulff and Pisasale.



“
*You soon find out
most people you
think are friends are
friends because
of the position
you hold ...*
”

Carl Wulff,
former CEO
Ipswich City Council



Case studies



Trusted insider undermines agency operations

Over the course of his career, a public sector employee built up a network of contractors and consultants which, over time, evolved into personal friendships. The public sector employee and the contractors/consultants became close enough to use nicknames for each other, get to know one another’s families and go to social functions together.

This led to the public sector employee allegedly releasing confidential information to his friends and helping them obtain work from his department. Although considered a trusted employee, part of the “inner circle” of his business unit, he was further alleged to have used his position and internal networks to ensure the department granted contract and consulting work to his friends.

The public sector employee appears to have been unable to separate his work-based relationships from his personal ones, or to recognise or manage any conflicts of interest. His view of the situation was that, “There’s no conflict. I’ve not been paid by anyone. I’m just getting the job done”. He failed to understand that a conflict of interest does not have to involve a financial transaction to be inappropriate or potentially corrupt.

This matter is currently being reviewed by the CCC.



Police officer turns a blind eye to friends’ criminal activities

A former police constable used to go to his gym for several hours a day, six days a week, and frequented a supplement store. Over time he formed friendships with the people he met there, one of whom became his girlfriend. The officer knew his girlfriend and gym friends were using and supplying dangerous drugs and he himself started to use steroids. However, he decided to adopt an attitude of wilful blindness about their activity, because of his personal relationships with them. He accessed the police database to conduct searches on himself, his friends and associated vehicles and addresses, to see what was being recorded.

The officer failed to approach those relationships with any degree of professional caution. Not only did he commit illegal offences by improperly accessing information, he also used illegal substances himself, failed to report the criminal offences of others and failed to report all but one of his declarable associations.

The officer was charged with computer hacking and failing to perform his duties as a public officer. He pleaded guilty and resigned from the Queensland Police Service before being sentenced to nine months imprisonment, suspended for five years. Allowing his private life and relationships to influence the performance of his official duties cost him his job and career.





Know your boundaries – don't cross the line!

The following list should help you identify any corruption risks that may arise from mixing your role as a public sector employee with your personal relationships.

1. Remember your official duties and obligations

As a public sector employee, your primary responsibility is to act in the best interests of the Queensland community.

2. Identify, declare and manage any conflict of interest, perceived or actual

You are obliged to report all actual, potential and perceived conflicts of interest. Some agencies require you to report and manage any declarable associations.

3. Set clear boundaries in personal relationships

You should be cautious when asked by relatives, friends and business acquaintances for assistance with any action that could involve the business of your agency. Even if they are unaware that they are creating a potential conflict for you, you should make clear that you personally are unable to assist, and declare the approach to your supervisor.

4. Exercise judgement about your social networks

Within your social networks you may meet people who see your position as one that can facilitate benefits for them. Be mindful of your social settings, who you engage with and how much information you share, particularly if you work in finance, contract management or procurement. Be careful of what you reveal about yourself and your job through social media.

5. Ask yourself some questions

- Would these contractors or business associates continue to invest their time (and money) to maintain a relationship with me if I no longer held this job?
- Would my friend, family member or colleague get the same treatment from someone in my agency they didn't know?
- Would I do the same thing for someone I didn't know personally?



Operation Yabber

Our report entitled *Operation Yabber: An investigation into allegations relating to the Gold Coast City Council* highlighted some problematic relationships between council staff and business people, which resulted in the private interests of developers being given greater priority than the interests of the community.

Read the report:

www.ccc.qld.gov.au/operation-yabber

Further information



- Queensland public sector code of conduct: www.forgov.qld.gov.au/about-code-conduct
- *Carl Wulff - The Inside Story* www.ccc.qld.gov.au/carl-wulff-inside-story
- Report from IBAC (Victoria) on [Organised crime group cultivation of public sector employees](#)