Queensland
Police Service

Corruption Prevention Plan
2009 - 2013

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Commissioner's Message

The Queensland Police Service (QPS) Corruption Prevention Plan was first presented to the members of the QPS in 2007. Since then, the Plan has been revised to ensure that it reflects the strategic priorities of the QPS and reflects community expectations for all police employees. It is timely to remember that 2009 marks the 20th anniversary of *'The Commission of Inquiry into Possible Illegal Activities and Associated Police Misconduct'* (The Fitzgerald Inquiry). The Inquiry highlighted the impact of corruption, not only on the QPS as an organisation but on public administration within Queensland and the community as a whole. The hard lessons learnt through this inquiry should never be forgotten and above all community support should never be taken for granted.

As a large organisation with over 14000 members, we recognise that some individuals will fail to meet the high standards expected of them by the community and the QPS. As more and more positions that interface with the community are civilianised new risks around professionalism emerge. The existence of the Ethical Standards Command with a budget of $8.4M per annum supporting an additional eleven Professional Practice Managers throughout the State is an example of the commitment of the Queensland Government in maintaining an ethical and professional organisation. It is important to ensure that strong systems and processes are in place to prevent corruption and unethical behaviour by police and staff members.

Importantly the Corruption Prevention Plan places the onus squarely on the individual: "Integrity is everyone's business". This theme highlights that we must not only be vigilant in monitoring our own behaviour and professional conduct but that of our work colleagues. The Corruption Prevention Plan forms the basis of informed training programs designed to educate members of the QPS in aspects of ethical behaviour, legislative requirements and professional conduct.

I ask you to consider the four foundation pillars of the Corruption Prevention Plan which are:

1. The QPS corporate governance framework for corruption prevention;

2. A strategic framework to ensure that the QPS remains a corruption resistant organisation;

3. Individual commitment: "Integrity is everyone's business"; and

4. Education and Ethical Awareness.

The community expects the highest possible standards from all members of the QPS. These standards can only be maintained through appropriate decision making and ethical behaviour. As Commissioner, I strongly endorse the Corruption Prevention Plan and commend it to you.

"With Honour We Serve"

R Atkinson APM
Commissioner of Police
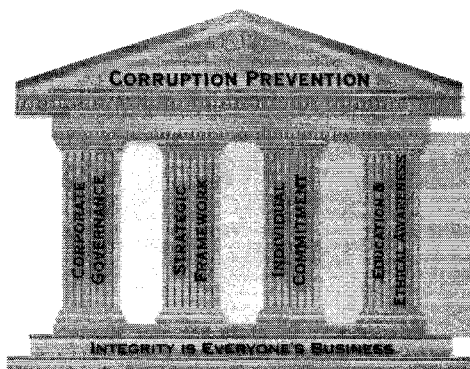
Purpose

The purpose of this plan is to ensure the QPS remains a corruption resistant organisation by establishing a framework that promotes a culture of professionalism and integrity.

Policy

The QPS has an obligation to its members, the community and the government to ensure that its operations are free from corruption.

The QPS takes a 'zero tolerance' stance against corruption and unethical practices.

The responsibility for corruption prevention rests with all QPS employees, including the requirement under *s.7.2 of the Police Service Administration Act (Qld) 1990* to report misconduct and breaches of discipline.

Our Commitment

The QPS is committed to providing a corruption free service to the Queensland community, based on honesty, integrity, fairness, equity, professionalism and accountability.

Regions, commands and divisions are responsible for monitoring and reviewing progress of corruption prevention plans at district, station or work unit level and the reporting process through existing reporting procedures. These include the risk management process and the Operational Performance Review (OPR).

Objectives

- To articulate the QPS corporate governance framework for corruption prevention.
- To ensure the QPS remains a corruption resistant organisation.
- To promote a culture of professionalism and integrity.
- To maintain and foster community confidence in the QPS.
- To reduce the number of substantiated complaints relating to misconduct and corruption.
- To provide the framework for corruption prevention plans within the QPS.

Definitions

Corruption

'Official Corruption' is detailed in *s.87 of the Criminal Code Act 1899 (Qld)*.

'Official Misconduct' is detailed in *s.15 of the Crime & Misconduct Act 2001 (Qld)*.

Although corruption is defined in a variety of ways, all definitions are based upon the misuse of power as a result of position:

- An act done with intent to give some advantage inconsistent with official duty and the rights of others.
  (The Lectric Law Library http://www.lectlaw.com/def/c314.htm)
- Improper and usually unlawful conduct intended to secure a benefit for oneself or another. Its forms include bribery, extortion, and the misuse of inside information. (Encyclopaedia Britannica
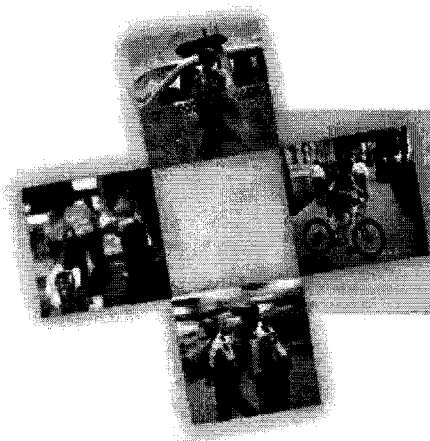
Misconduct

For police officers and recruits, misconduct is defined in *s.1.4 of the Police Service Administration Act (Qld) 1990* as:

(a) is disgraceful, improper or unbecoming an officer; or

(b) shows unfitness to be or continue as an officer; or

(c) does not meet the standard of conduct the community reasonably expects of a police officer.

For staff members, misconduct is defined in *section 187 of the Public Service Act 2008* as:

(a) inappropriate or improper conduct in an official capacity; or

(b) inappropriate or improper conduct in a private capacity that reflects seriously and adversely on the public service.

Breach of Discipline

Section 1.4 of the Police Service Administration Act (Qld) 1990 defines breach of discipline as a breach of this Act, the *Police Powers and Responsibilities Act (Qld) 2000* or a direction of the Commissioner given under this Act, but does not include misconduct.

Grounds for disciplinary action

For police officers and recruits, section 9 of the Police Service (Discipline) Regulation (Qld) 2000.

For staff members, section *section 187 of the Public Service Act (Qld) 2008*.

Who does the plan apply to?

This plan applies to any person engaged by the QPS for any activity, irrespective of whether remuneration is payable to the person or not.

Link to other organisational plans and processes

This plan provides a strategic focus to the QPS corruption prevention process. It builds on existing mechanisms and links to other QPS plans, policies and processes including:

- the QPS Strategic Plan 2009–2013
- the QPS Statement of Affairs
- QPS Human Resource Management Manual
- the Code of Conduct
- the QPS Risk Management Plan

Specifically, the plan is aligned with the Government's Towards Q2 Ambition of Fair – *Safe and Caring Communities*, the QPS Strategic Plan 2009–2013 – *Promote Ethical and Professional Behaviour strategy*, and Directions in Australia and New Zealand Policing 2008–2011 – Direction 4 – *Professionalisation of Policing*.

Reporting corruption and/or misconduct

Maintaining and promoting a positive reporting climate of suspected corruption and misconduct is vital to the integrity of the QPS, therefore all staff must be ever vigilant and act professionally. In addition, Section 7.2 of the *Police Service Administration Act 1990* (PSAA) provides an obligation to report matters of misconduct or breaches of discipline.

The complaint management process is comprehensively covered in chapter 18 of the QPS Human Resource Management Manual.

Internal Witness Support

The QPS will support any internal witness that comes forward. Chapter 18.6 of the Human Resource Management manual outlines the functions and responsibilities of the Internal Witness Support Program which aims to address the needs of internal witnesses by ensuring they receive advice, appropriate support and guidance. *Section 7.3 of the Police Service Administration Act 1990* provides for the offence of victimisation.
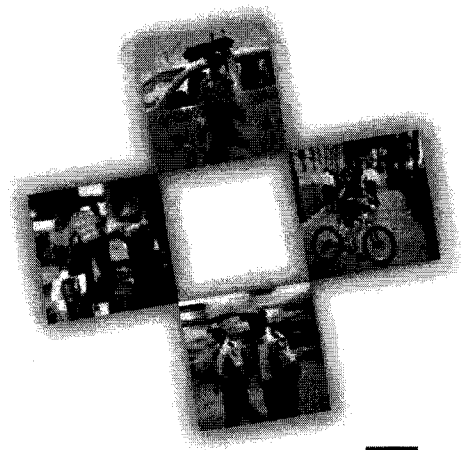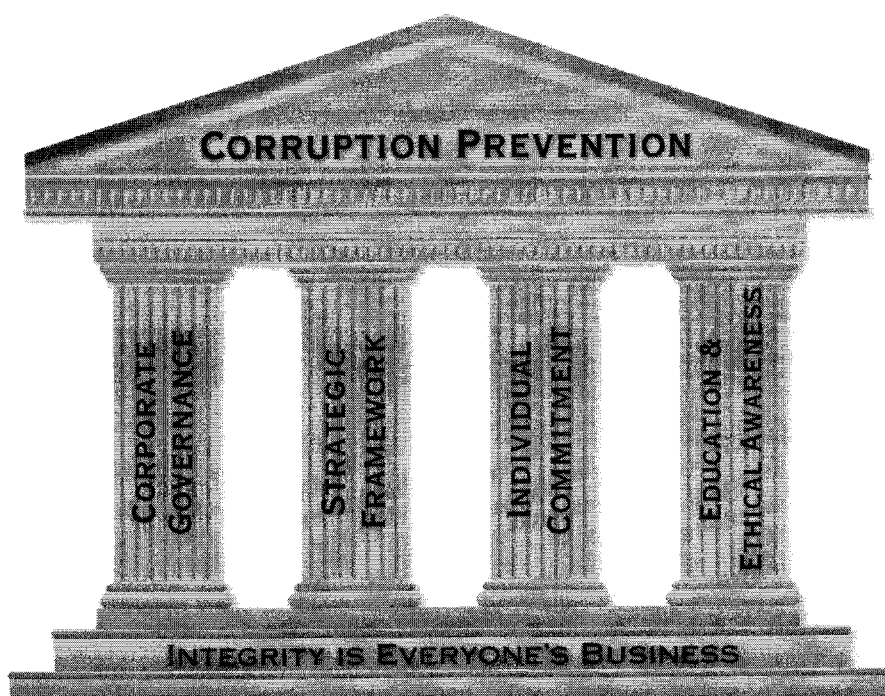
The QPS Corruption Prevention Framework – a strategic approach

The QPS has adopted a strategic approach to corruption prevention, enabling all levels of the service to identify corruption risks within the workplace and develop appropriate strategies and treatments utilising established risk management principles.

The four pillars of the QPS Corruption Prevention Plan are:

1. **The QPS corporate governance framework for corruption prevention**

2. **A strategic framework to ensure the QPS remains a corruption resistant organisation**
   - strengthening the ethical culture
   - targeting of corruption risks
   - the QPS framework for corruption prevention plans at district/station/work unit level

3. **Individual commitment: "*Integrity is everyone's business*"**
   - QPS Statement of Ethics
   - ethical Decision Making Tool 'SELF Test'

4. **Education and Ethical Awareness**

1. The QPS corporate governance framework for corruption prevention

The QPS corporate governance framework is outlined in detail in the QPS Statement of Affairs and our strategic direction is outlined in the QPS Strategic Plan 2009-2013. Some key components, as it relates to this plan are included in Appendix 1.

This plan acknowledges the comprehensive nature of the governance framework; however the QPS is committed to excellence in policing and the principles of continuous improvement. As such, the QPS recognises that complacency can open the door to corrupt activity. Therefore a strategic framework is required to assist in maintaining a corruption resistant organisation and to mitigate against ethical slippage.

2. A strategic framework to ensure that the QPS remains a corruption resistant organisation

The strategies employed to ensure the QPS remains corruptin resistant are:

- strengthening the ethical culture
- targeting of corruption risks
- the QPS framework for corruption prevention plans at district/station level.
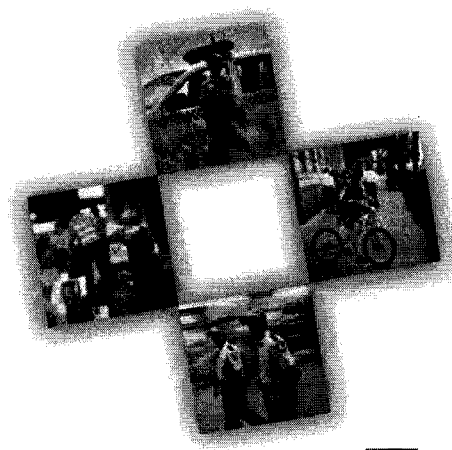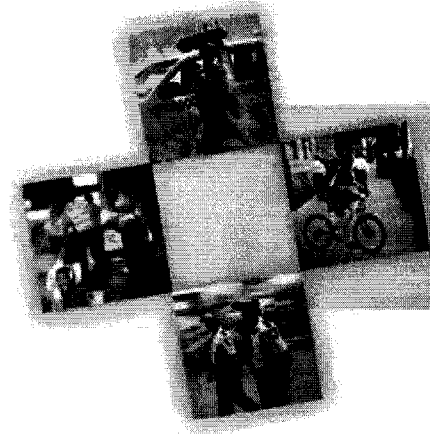
Strategy 1
Strengthening the ethical culture

Key priority areas:

- training and professional development
- professionalism and ethical practice
- public accountability
- effective and appropriate complaint management
- encouraging and supporting good people management practices
- monitoring, auditing, evaluating & reporting.

Actions:

- embrace modern human resource management practices
- provide appropriate and effective training and professional development opportunities
- utilise risk management
- promote professionalism by engendering ethical behaviour in all QPS employees
- demonstrate public accountability by providing appropriate, accurate and timely information to Government and the community.

- regularly review and support corporate governance strategies and structures
- support witnesses who identify corruption or unethical behaviour
- apply internal accountability, monitoring and auditing processes
- ensure a timely, measured and consistent response to corrupt and unethical behaviour
- maintain early warning systems
- provide supportive leadership, effective management and supervision
- maintain partnerships with key stakeholders, for example the Crime and Misconduct Commission (CMC), Australian Federal Police (AFP) and Australian Crime Commission (ACC)
- provide specialist support services, for example maintenance of alcohol & drug units, Senior Human Service Officers, and Chaplains.
- recognise good work and encourage good work practices
- continuous improvement strategies.
  (Refer to Appendix 1)

Performance indicators:

- percentage of time directed towards maintaining professionalism and ethical practices (Source: SWAS)
- hours directed to in-service training (Source: Advance database)
- public perception of police professionalism and image (Source: CSWP)
- rate of and changes in, substantiated complaints (Source: complaints database).

Strategy 2
Targeting of corruption risks

Priority corruption risk areas:

- misuse of police powers/position
    inappropriate access/release of information/excessive use of force
- drug and alcohol abuse
- Human Source Management (HSM)
- property/exhibits
- financial management
- prosecutions
- integrity of the complaints management system
- recruitment of staff
   vetting/probity checks.

Actions:

- apply a robust risk management process to corruption risks
- apply and maintain an efficient and effective complaint management processes
    monitor & report
    quality assurance
    client/stakeholder satisfaction
- maintain early intervention strategies
- maintain robust vetting and probity checks of recruits
- undertake research into corruption prevention strategies
- maintain and expand the QPS *'Alcohol and Drug'* testing program
- maintain and regularly audit the Human Source Register (Human Source Management)
- maintain security over information management processes and data
- maintain internal accountability and auditing of financial management practices
- maintain district review and reporting of failed prosecutions
- maintain integrity of the complaint management system through quality assurance

Performance indicators:

- rate of, and changes in, substantiated complaints (Source: complaints database)
- number of research papers completed
- number of requests for vetting processed per year
- number of members tested under the alcohol & drug program.
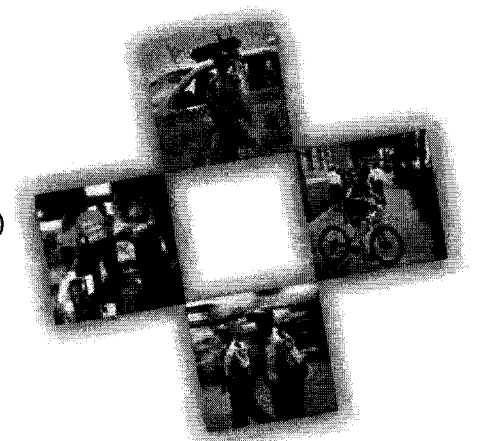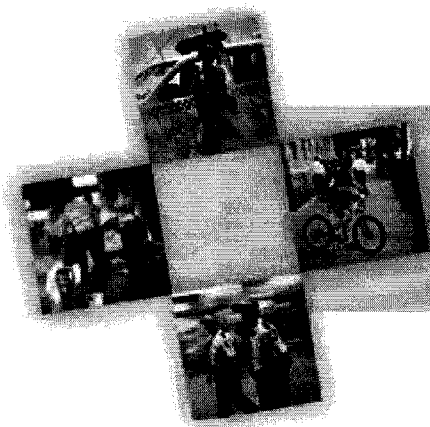
Strategy 3
The QPS framework for corruption prevention plans at district/station/work unit level

The QPS risk management process is based upon AS/NZS 4360:2004 (ISO 31000 is scheduled to replace AS/NZS subsequent to June 2009) and policy as contained in chapter 15 of the Operational Procedures Manual (OPMs).

The QPS has mandated that all business units will include *Corruption Prevention and Professional Standards* as a nominated risk in their risk management plans.

Appendix 2 provides a guide to the risk management framework for corruption prevention. Managers are required to apply the risk assessment process to each risk identified in the guide and only include those risks identified as a reportable risk for their respective workplaces. Likewise, risks applicable to a work unit which are not identified in the guide, should be included in the local risk management plan.

The framework:

- compliance with QPS risk management policy
    - misconduct is a mandated risk to report upon
    - consideration given to the QPS priority corruption risk areas (refer to strategy 2)

- setting and maintaining standards
    - induction/staff awareness
    - individual responsibility for ethical behaviour
    - supervisor/manager responsibility
    - performance management

- early intervention
    - managing and resolving minor complaints early to the satisfaction of all parties and to prevent an escalation
    - identifying complaint trends and take appropriate action

- reporting and investigations
    - ensure all staff are aware of their obligation to report misconduct and the process to report misconduct
    - ensure that all investigations are completed in an appropriate and timely manner
    - ensure compliance with risk management exception reporting timeframes

- continuous improvement
    - review and evaluate existing processes, risks and strategies.

Performance indicators

- number & type of exceptions reported for misconduct
    - actions taken / result.

3. Individual commitment
## Integrity is everyone's business

The QPS Statement of Ethics provides an obligation for police officers to:

- protect life and property
- preserve the peace
- prevent offences
- detect and apprehend offenders and
- help those in need of assistance.

In addition, ALL members, both police officers and staff members shall at all times:

- carry out duties without fear or favour, malice or ill will
- act honestly and with the utmost integrity
- make every effort to respect and uphold the rights of all people in the community regardless of race, social status or religion
- strive for excellence and endeavour to improve knowledge and professionalism
- keep confidential all matters divulged in an official capacity, except as necessary in the course of duties
- practise self-discipline in word and deed both on and off duty
- resist the temptation to participate in any activity which is improper or which can be construed as being improper
- refrain from misusing their position for personal gain
- accept responsibility for their own actions and for acts which they may order
- accept the desirability of these ethics as an integral part of their personal and professional life.

The QPS has developed and implemented the SELF Test to assist QPS members in their decision making processes.
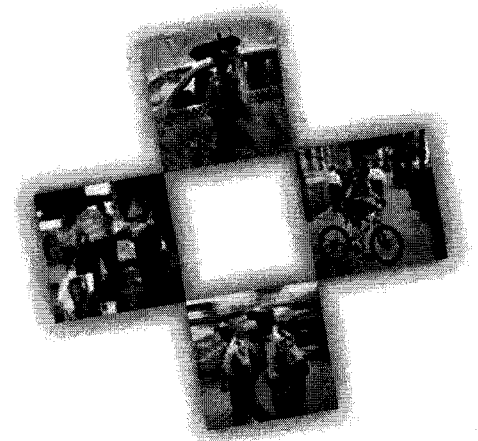
The SELF Test

Every individual in the QPS is responsible for maintaining the highest standard of conduct as outlined in the *Code of Conduct*; employees must apply ethical principles to their work, decision making and in their dealings with each other and the community.

The QPS is committed to working in partnership with the people of Queensland to enhance the safety and security of the community. A strong partnership is built upon the ideals of honesty, fairness and trust. Making informed and fair decisions is one way to contribute towards this goal. Member's decisions and actions reflect on the QPS's reputation and ability to perform the legitimate role of policing. Therefore, to maintain the respect of the community, it is of the utmost importance that all members of the QPS consistently demonstrate ethical conduct and ethical decision making.

Determining if the conduct is right and proper, whether on or off duty, requires examination of:

- the nature of the conduct exhibited
- the context in which the conduct takes place.

A simple application of the SELF Test will assess the appropriateness of your conduct, or the conduct of other members.

Scrutiny. **Would your decision withstand scrutiny by the community or the service?**

Ensure **compliance with your Oath of Service, Code of Conduct and service policy?**

Lawful. **Does your decision comply with all laws, regulations and rules?**

Fair. **Is your decision fair to the community, your family, and colleagues?**

Would Your Decision Pass The Test?

Consider

S

Would your decision withstand **Scrutiny?**
- Community
- Police Service
- Media

E

Will your decision **Ensure compliance?**
- Oath of Service
- Policy
- Code of Conduct

L

Is your decision **Lawful?**
- Laws
- Regulations
- Rules

F

Is your decision **Fair?**
- Community
- Colleagues
- Your family
- Others

before you decide.

An unethical decision will affect us all

4. Education and Ethical Awareness

Strategies:

- incorporate ethical awareness components into all QPS training courses
- identify relevant and contemporary ethical and discipline training for all employees
- adopt education and ethical practise training as a mechanism to enhance leadership and accountability
- ensure that training is available to all members
- deliver practical and competency based education and training in ethical behaviour directed towards supervisory staff.

Key priority areas

- Develop self esteem of all employees in the QPS as an ethical organisation
- Target supervision as a priority emphasis area in regards to training for ethical practise and behaviour
- Education and ethical practise training as a mechanism to enhance leadership and accountability
- Audit and review the integrity component of QPS training programs
- Identify education and training gaps and examine options for filling those gaps
- Increasing ethics awareness throughout the QPS.

Actions:

- maintain modern human resource management practices
- ensure effective training and development opportunities
- develop risk management processes
- enhance professionalism by engendering ethical behaviour for all QPS employees
- promote internal accountability, auditing and monitoring processes
- monitor early warning systems
- respond to unethical and corrupt behaviour in a measured and consistent manner
- promote partnership with key stakeholders
- ensure effective management, supervision and provide supportive leadership.

Performance indicators:

- percentage of time directed towards maintaining professionalism and ethical practices (Source: SWAS)
- hours directed to in-service training (Source: Advance database)
- public perception of police professionalism and image (Source: CSWP)
- rate of and changes in, substantiated complaints (Source: complaints database).
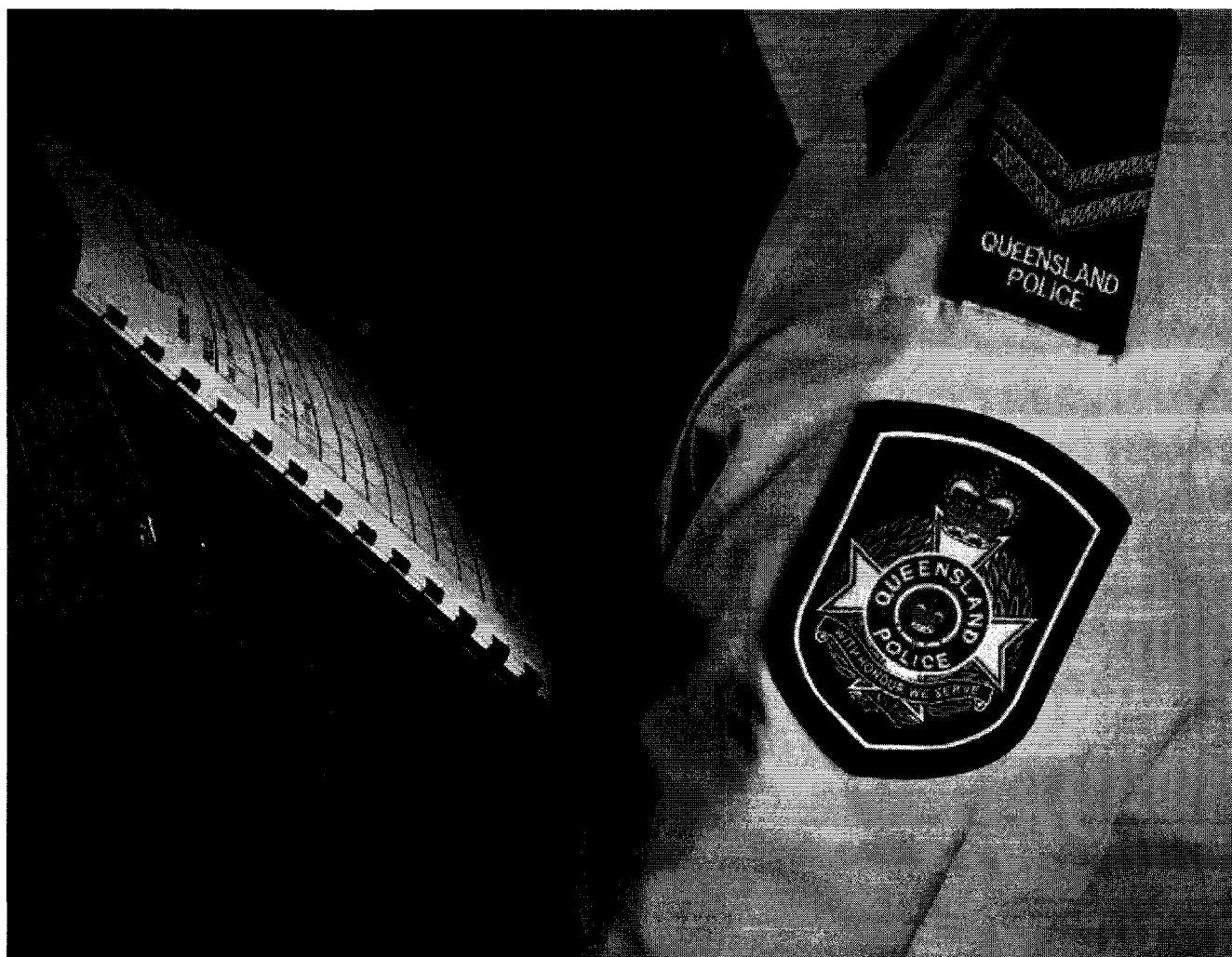
Appendix 1

The QPS corporate governance framework for corruption prevention

The QPS has a comprehensive corporate governance framework. Some key links to corruption prevention are included in:

- QPS Strategic plan
- QPS Statement of Affairs
- QPS structure
  - Regional/district structure
    - Professional Practices Managers (PPMs)
    - Regional/district review committees - Significant Event Review Panel (SERP), failed prosecutions
    - Finance Managers
    - Human Resource Managers
    - Information Resource Managers
  - Ethical Standards Command
    - Internal auditor
    - Inspectorate & Evaluation Branch
    - Ethical Practice Branch
    - Internal Investigations Branch
  - Organisational Performance and Improvement Branch
  - Media and Public Affairs Branch
- Complaint management policy & procedures
- Corruption risk management strategy
  - Early intervention strategies
  - Vetting/probity checks
  - Partnerships with other law enforcement agencies
  - Research
  - Misconduct is a mandated risk within the QPS risk management regime

- Code of conduct
- Internal audit
- Gifts register
- Reward & sanctions
- Merit based promotion system
- Performance and Personal Assessment (PPA)
- Public accountability reporting (e.g. Annual report)
- Risk management and exception reporting
- Internal witness support program
- Human Resource Management Manual
  - Recruitment policy & processes
  - Workplace harassment policy
  - Equal Employment Opportunity
  - Grievance process
- Information Management Manual - security of information
- Financial Management Practices Manual
- Legislation
  - The Criminal Code Act (Qld) 1899 (s.87 Official corruption)
  - Police Service Administration Act (Qld) 1990
  - Crime and Misconduct Act (Qld) 2001
  - Public Sector Ethics Act (Qld) 1994
  - Public Service Act (Qld) 2008

Appendix 2

The QPS framework for corruption prevention plans at district/station/work unit level

This template is taken from the QPS risk management policy as outlined in Chapter 15 of the OPMs. The risks and treatments in this appendix are provided as a guide only. Managers and supervisors are encouraged to discuss risks with their staff, prioritise risks and then develop and apply appropriate treatments. Ongoing monitoring and testing of treatments are required (working papers should be kept during this process).

No	Risk and related issues (Below is by example only)	Level of risk (Refer to risk analysis matrix)	Risk treatments (Identify what will be checked and the testing methodology to be applied) (Below is example only)	Risk Treatment Officer/ Member	Risk monitoring and review process (including planned system check frequencies)	Managers comments
Corruption Prevention and Professional Standards (Mandatory Reporting)						
	QPS Priority corruption risk areas (refer to strategy 2)		Risks should only be included if they are an identified risk in your workplace. (Below is by example only)			
	Increasing complaints Delay in resolving complaints		**Early intervention** • Monitor complaint trends & specific action taken • Training competent investigators • OPR analysis **Complaint management** • Ensure timely/appropriate completion of investigations/case management • Quality assurance **Supervisor responsibility** • Provide supportive & ethical leadership • Take affirmative action			
	Standards slippage		**Performance management/training** • Set standards • Corruption prevention plan training • Staff induction program • Completion of ethics awareness and/or disciplinary training courses (SELF Test, client service charter, statement of ethics, Ch 18 HRMM) • Target all levels in the organisation • Maintaining appropriate compliance auditing, station inspections and risk management processes			
	Fail to report misconduct/corrupt activity		**Individual responsibility** • Mandatory reporting s.7.2 PSAA • Take responsibility for actions • Awareness of the QPS Code of Conduct, complaint management process, client service charter & SELF Test **Supervisor responsibility** • Set / maintain proper standards • Rapport with staff • Training			
	Missing exhibits		**Supervisor responsibility** • Ensure local SOP's are adequate and in line with QPS policy/procedures • Ensure staff are aware of procedures • Take affirmative action **Individual responsibility** • Take responsibility for actions			
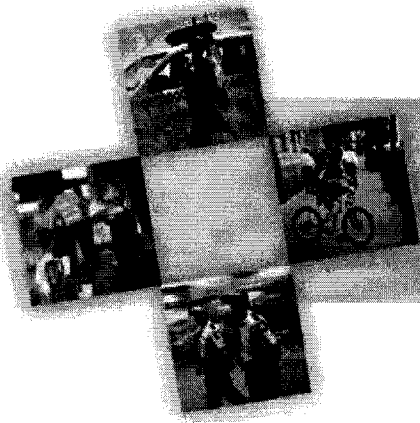
Honesty

Integrity

Fairness

Equity

Professionalism

Accountability

Respect

Empathy

Openness

Judgement

Corruption Prevention Plan 2009-2013 -"Integrity is everyone's business"