
Reducing crime and corruption in Queensland

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Our purpose, as an independent agency, is to combat major crime and reduce corruption for the benefit of Queensland. We maximise the impact of our services through identifying key areas of focus and developing strategies to target these areas.

We reduce crime and corruption in Queensland through the following key strategies:

- advance major crime investigations and help the Queensland Police Service solve major crime
- remove the financial benefit and support for serious criminal offending
- investigate and oversee investigations into serious and systemic public sector corruption and police misconduct
- work with stakeholders to build corruption-resistant public institutions, and
- inform public policy about major crime and corruption by providing independent advice to government.

In 2020–21, we directed our crime fighting efforts to illicit markets of high value or high public impact and helped the Queensland Police Service solve crimes involving loss of life or serious injury, and serious crimes against children and vulnerable people. These crimes have significant immediate and longer-term impacts on victims, their families and their communities, and lasting social and economic consequences.

Our corruption focus was on investigating and preventing serious and systemic corruption relating to elected officials, misuse of confidential information, or the exploitation of public sector resources. These corrupt activities can have far reaching impacts into the community, including by corroding public trust in our government and public institutions.

FOCUS AREA Illicit markets of high value or high public impact

We continue to disrupt high value illicit markets and sophisticated criminal networks operating in Queensland. These networks endanger our community through their serious criminal activities including firearms trafficking, cybercrime, organised fraud, child sexual exploitation, and the distribution of illicit drugs. We remain focused on illicit market activity with the highest value and causing the most devastating impacts to Queenslanders, their families, and our community.

Targeting facilitators of organised crime

Organised crime groups are heavily involved in illicit markets, using sophisticated business models, specialised systems, and professional facilitators to enable their criminal activities and conceal the profits. Professions commonly exploited by these groups include lawyers, accountants, and financial advisers. We are also seeing increasing involvement of mortgage and stockbrokers, real estate agents, company liquidators, information and communication technology specialists and cryptocurrency traders.

In Queensland, we are seeing an increase in the use of professional facilitators, by organised crime networks, to provide critical expertise to enable money laundering, fraud and phoenixing² activities. These facilitators are often portrayed as respected professionals within the community, who offer their expertise on a fee-for-service basis. They are typically recruited by organised crime groups through pre-existing networks which have global reach, requiring national and international law enforcement collaboration and coordination.

In response, we continued to work closely with our law enforcement partners in 2020–21, focusing our efforts on the systems and expertise that enable high value, high impact organised crime to thrive.

Enhancing our cryptocurrency capability

The use of cryptocurrencies has seen exponential growth over the last decade. As cryptocurrencies operate globally, outside regulated financial markets and systems with a high level of anonymity, they can be exploited by criminal groups to make secure payments for illicit goods and services, raise revenue to finance criminal activity, and launder criminal proceeds through complex networks of exchanges, brokers, mixers and online services such as gambling platforms.

In 2020–21, we enhanced our capability to investigate cryptocurrency-enabled crime by:

- training our investigators in cryptocurrency technology
- developing a law enforcement guide on the features of an encrypted communications platform
- reviewing how other agencies investigate and manage criminal exploitation of cryptocurrency, and
- commencing a project to improve our capability to investigate, seize, store and forfeit cryptocurrencies.

In December 2020, as part of a larger restraining order, we facilitated the restraint of a 'Coinjar' account owned by a person suspected to be involved in laundering of money derived from cyber and drug offences.

We will develop this capability further in 2021–22 by:

- identifying best-practices for detecting, seizing, and managing cryptocurrency
- commissioning a training environment to maintain contemporary knowledge of cryptocurrencies, systems and markets, and
- trialling analysis software for identifying and tracking crypto-transactions.

² Phoenixing is defined by the Australian Securities and Investments Commission as activity whereby a new company is created to continue the business of an existing company that has been deliberately liquidated to avoid paying outstanding debts, including taxes, creditors and employee entitlements.

Assessment of money laundering in Queensland

Money laundering is one of the most significant and widespread enablers of organised crime. It allows criminal organisations to conceal and legitimise the financial benefits derived from their criminal activities. Of the combined 20 illicit market related crime investigations and intelligence operations we progressed this year, 12 involved suspected money laundering, including Operations Jackal and Mercury (pages 29 and 30 respectively).

To better understand the current environment and impact of money laundering in Queensland, this year we undertook a money laundering risk assessment project. The project gathered insights into the extent and nature of money laundering affecting Queensland and identified emerging risks and opportunities to strengthen our proceeds confiscation framework, and to ensure the best use of our resources for detecting, disrupting and removing the financial benefit and backing for serious criminal offending in Queensland.

Through this project, we gained critical insights into money laundering in Queensland including:

- key money laundering channels, methods, enablers and sector vulnerabilities
- the effectiveness of current enforcement measures and responses to money laundering, and
- opportunities to improve and strengthen our current approach to detecting and disrupting money laundering activity.

In 2020–21, we will continue to leverage our unique capabilities, including our coercive hearings powers, and our investigative, financial and intelligence specialists, to identify, investigate and prosecute money laundering offences and make Queensland a hostile place to engage in crime for profit.

Investigating crime

In 2020–21, we progressed 14 crime investigations targeting illicit markets and their facilitators. These investigations obtained critical evidence from the examination of 78 witnesses across 79 days of hearings in the same period.

We finalised eight crime investigations into illicit markets during 2020–21, which resulted in the charging of 11 people with 47 offences. Some significant outcomes are summarised below.

Law firm involved in major crime operations

Through Operation Jackal, we investigated allegations that the principal solicitors of a Gold Coast law firm were laundering money for criminal clients and receiving cash payments from these clients, which were not being deposited into the firm's trust account in accordance with relevant legislation. This practice concealed these cash receipts from a number of entities including the Australian Tax Office. Using their criminal connections, the solicitors were also allegedly trafficking steroids, cocaine and methylamphetamine.

We finalised Operation Jackal in April 2021. Three employees of the law firm were charged, including the solicitor, as well as multiple clients and associates of the firm. The charges included money laundering, supply and possession of dangerous drugs, fraud, making false statements and perjury.

From this investigation, we produced 21 intelligence profiles detailing the suspected activities and methodologies of criminals related to the investigation, which we made available to our law enforcement partners through shared intelligence databases.

Legal and financial practitioners laundering money

In 2020–21, we investigated alleged money laundering by a criminal network using the expertise of legal and financial practitioners associated with a Brisbane-based law firm. This investigation, Operation Mercury, investigated information suggesting these professional facilitators provided advice and assistance to conceal assets derived from illicit activities through money laundering and phoenixing activities, and in the process accumulating significant unexplained wealth.

To date, this operation has resulted in 11 persons being charged with 419 offences relating to money laundering, fraudulently falsifying records, possessing tainted property and drug related offences, including charging a solicitor acting as a facilitator with 110 offences.

Drug trafficking network in south-east Queensland

In November 2020, we finalised a joint investigation with the Queensland Police Service into a criminal network trafficking methylamphetamine in south-east Queensland.

Code-named Operation Quebec Resolution, the 20-month long investigation identified the alleged participants and methods of the network and resulted in 43 persons being charged with 185 offences, including possession of dangerous drugs and drug utensils, trafficking dangerous drugs, possession of tainted property, money laundering, attempting to pervert the course of justice, dangerous operation of a vehicle, and weapons related offences.

Intelligence operations and activities

We gather and share with our law enforcement partners intelligence that we have obtained through our investigations and intelligence activities. This enables a collaborative and holistic response to identifying and disrupting criminal networks, their participants, and the systems and expertise that allow them to operate successfully in our community.

In 2020–21, we progressed six intelligence investigations targeting facilitators and participants in illicit market crimes and we finalised three intelligence operations into illicit market activities by examining 15 witnesses over 19 days of hearings.

Encrypted communications specialist enabling organised crime

In 2020–21, Operation Morse enabled us to gain significant insights and intelligence about encrypted communications technology and their use by organised crime networks to evade law enforcement detection. Throughout the operation, we disseminated over 126 intelligence reports to our law enforcement partners, including reports identifying 32 separate networks of organised crime participants. We also identified over 500 encrypted devices, predominantly supplied to persons suspected of trafficking dangerous drugs.

In April 2021, as a result of Operation Morse, an encrypted telecommunications distributor was charged with several offences including money laundering, structuring cash payments to defeat regulatory reporting protocols and attempting to pervert the course of justice.

Former solicitor facilitating money laundering enabling a drug trafficking network

In 2020–21, we assisted the Queensland Police Service to investigate the distribution of illicit drugs, including methylamphetamine, MDMA and cocaine, in Queensland communities. Operation Romeo Amata focused on a criminal network that was importing large quantities of drugs and distributing them to other criminal networks in our community.

Operation Romeo Amata resulted in significant information being collected about the operations of the network, including the involvement of a former solicitor who had allegedly assisted the network by establishing complex money laundering mechanisms and structures.

Drug guide for law enforcement agencies

Historically, we have produced a Queensland-focused drug commodities guide containing information to assist operational police in partner law enforcement agencies with their drug enforcement initiatives and activities.

This year, we jointly developed a guide with the Queensland Police Service. The guide provides an overview of the most used and available illicit drugs in Queensland and their estimated prices, drawing on a range of sources including our own intelligence, and that of the Queensland Police Service, the Australian Criminal Intelligence Commission, and Queensland Health Forensic and Scientific Services.

The *Drug Guide 2021* was shared with our law enforcement partners and external stakeholders in August 2021.

Recovering the proceeds of crime

In 2020–21, we pursued and confiscated cash, property and other assets gained from criminal activity to undermine the profitability of those crimes and prevent crime derived profits from being re-invested to support ongoing and additional criminal activity.

We also targeted high profit, high impact crime for confiscation action and identified and pursued opportunities to strengthen the effectiveness of Queensland’s confiscation schemes.

Measuring the impacts of proceeds of crime actions

In 2019–20, we assessed the feasibility of measuring the impacts our proceeds of crime confiscations have on reducing crime related to illicit drug markets. Four potential measurement approaches were identified, each with its own strengths and limitations, with two approaches selected for further development.

In 2020–21, we commenced a research project to develop the first stage of one of the approaches selected. This first stage is a time series analysis which aims to provide insight into the deterrence effect of proceeds of crime action through tracking offenders’ contacts with the justice system before and after that action. With the assistance of external data custodians such as the Queensland Police Service and the Queensland Corrective Services, we have finalised a dataset that will meet the objectives of the project and expect to complete the data linkage analysis in the early part of 2021–22.

Strengthening the effectiveness of Queensland’s confiscation schemes

We actively identify and pursue opportunities to strengthen Queensland’s confiscation schemes.

In 2020–21, as part of the five-year review of the CCC by the Parliamentary Crime and Corruption Committee (see page 78), we highlighted a number of concerns with the clarity and scope of the offence of money laundering under the *Criminal Proceeds Confiscation Act 2002*. In its report, the Parliamentary Crime and Corruption Committee acknowledged those concerns and recommended the definition be reviewed. In August 2020, we welcomed an amendment to the Criminal Proceeds Confiscation Regulation 2013 which has widened the potential scope for proceeds of crime action if a person has been involved in allegedly possessing, or otherwise dealing with, suspected tainted property. This approach is broadly consistent with most Australian jurisdictions and will be particularly helpful in restraining and forfeiting property seized by police, which is suspected to be tainted property where no other criminal charges have been laid in connection with the property.

About our proceeds of crime function

Under the *Criminal Proceeds Confiscation Act 2002*, we are responsible for administering the civil confiscation scheme and serious drug offender confiscation order scheme. Under these schemes, we initiate actions to confiscate the proceeds of crime based on our investigations and on referrals from the Queensland Police Service and other law enforcement agencies.

The civil confiscation scheme enables the restraint, and subsequent forfeiture, of a person’s assets where there is a reasonable suspicion they have engaged in serious crime related activity. The serious drug offender confiscation order scheme enables the confiscation of assets where a person has been convicted of a specific qualifying drug offence.

We work closely with the Queensland Police Service and the Office of the Director of Public Prosecutions to identify and litigate proceeds of crime matters, as well as the Public Trustee of Queensland, who holds and disposes of restrained property on behalf of the State of Queensland.

Further information is available on our website at www.ccc.qld.gov.au/crime/proceeds-crime.

Removing financial benefits of crime

In 2020–21, we continued our work toward removing the financial benefits of engaging in criminal activities. This work resulted in:

- 88 matters assessed for confiscation action against 101 persons alleged to have been involved in serious crimes
- 42 restraining orders obtained over the assets of 48 persons, with an estimated value of \$20.159 million, and
- 33 forfeiture orders obtained for the assets of 36 persons, with an estimated value of \$8.688 million.

As at 30 June 2021, we had 119 open confiscation matters; comprising 27 finalised matters expected to realise \$10.835 million for the State of Queensland, and 92 active matters of which:

- 30 have potential for \$15.145 million in assets to be restrained, and
- 62 have an estimated \$48.123 million in assets under restraint.

\$2.66 million cash forfeited following a Queensland Police Service cannabis operation

In October 2020, we obtained an order for the forfeiture of \$2.66 million in proceeds of crime to the State of Queensland, arising from a Queensland Police Service operation into alleged cannabis trafficking.

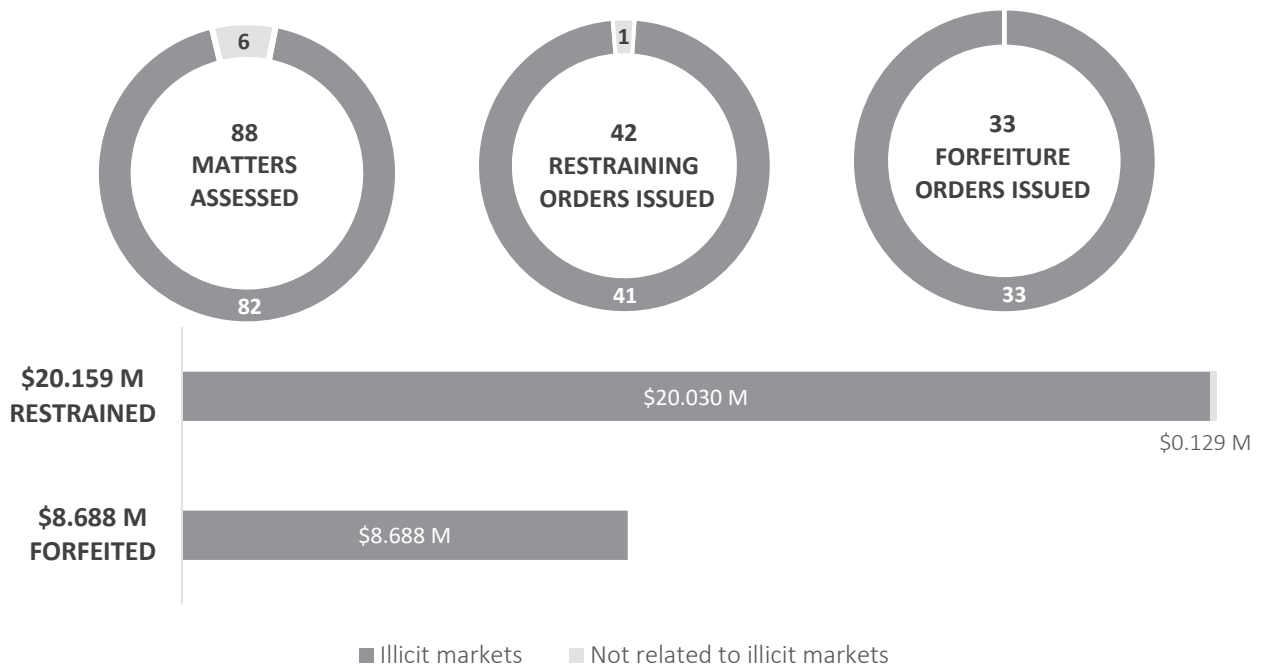
\$1.29 million cash forfeited following a Queensland Police Service drug-trafficking operation

In October 2020, we also obtained an order for the forfeiture of \$1.29 million in cash that was seized in connection with a Queensland Police Service investigation into cannabis and methylamphetamine trafficking.

\$835,000 forfeited by Hells Angels member

In July 2020, we obtained an order resulting in the forfeiture of assets valued at \$835,000, which belonged to a Hells Angel Outlaw Motorcycle Gang member. This matter arose from our investigation, Operation Amulet, and the order was obtained to satisfy the unexplained wealth of the Outlaw Motorcycle Gang member, which was found to be linked to his involvement in trafficking cocaine, methylamphetamine and steroids.

Figure 18: Proceeds of crime matters assessed, restraining and forfeiture orders issued in 2020–21



Action on Ice update

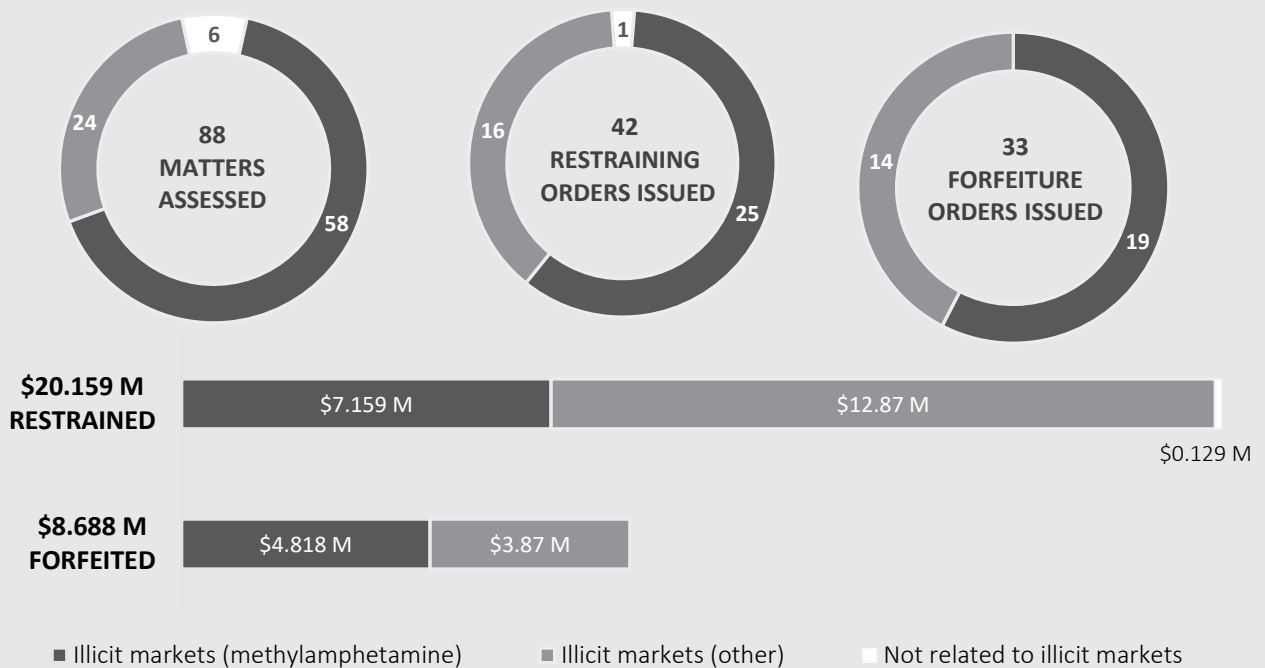
The Queensland Government’s five-year *Action on Ice* plan commenced in 2018 to address the harms caused by ice (methylamphetamine) by breaking the cycle of drug use and building upon existing efforts across government agencies. The key activities address every aspect of the path to addiction, with a focus on reducing supply and demand for methylamphetamine, and minimising harm.

We are committed to the Government’s plan to address and minimise the harmful impact of methylamphetamine upon Queensland communities. We support the Queensland Government’s *Action on Ice* initiatives by prioritising investigations into high threat criminal networks that are trafficking methylamphetamine into Queensland.

In 2020–21, we worked with the Queensland Police Service to progress investigations into methylamphetamine trafficking including Operations Quebec Resolution and Romeo Amata (see page 30).

We also removed the financial benefit from trafficking in methylamphetamine by restraining \$7.159 million worth of assets derived from, or associated with, methylamphetamine related criminal activity, and obtained the court-ordered forfeiture of \$4.818 million worth of assets derived from or associated with methylamphetamine related criminal activity (see Figure 19 for breakdown).

Figure 19: Methylamphetamine related matters as a proportion of total proceeds of crime matters assessed, restraining orders and forfeiture orders issued in 2020–21



FOCUS AREA Crimes involving risk to, or actual loss of, life or serious injury to a person

The unlawful killing of another is the most serious offence in Queensland, attracting a maximum life sentence of imprisonment, which is mandatory in the case of murder. Offences causing death, or serious and permanent injury or disability, cause enormous grief to victims and their families, and are detrimental to the wellbeing and sense of safety of the community. These offences include violent, serial or premeditated, sexual offending.

Offences of this kind are difficult to solve and are often the most complex crimes. They may involve domestic violence or have links to organised crime. Offences may be premeditated or highly planned and involve multiple motivated suspects. Our coercive hearing powers are particularly effective in assisting the Queensland Police Service in meeting these challenges.

Investigating crime

The Queensland Police Service may seek our assistance to solve serious violent crimes and we can respond to these requests in the early stages of a police investigation if the use of our powers would result in a more effective investigation. We also undertake a large body of work in 'cold case' murder investigations where existing lines of enquiry have been exhausted.

During 2020–21, we supported several Queensland Police Service operations involving homicides and other serious violent crimes by commencing 12 new crime investigations and finalising 14 crime investigations. This involved holding 61 days of hearings and examining 49 witnesses. Some investigative outcomes are summarised below.

Stabbing murder in Kingston in 2020

In August 2020, we held a hearing into the alleged stabbing murder of a 47-year-old man at Kingston in March 2020 (Operation Sierra Tulle).

The hearing obtained new information relevant to understanding the motive behind the suspected homicide and whether it was premeditated. We also obtained evidence of the suspect's movements and appearance after the incident, which was relevant to the location and possible disposal of the alleged murder weapon.

Cold case — Suspected murder near Aratula in 2012

In support of Operation Kilo Footwork 3, we held a hearing through September and December 2020 in relation to the disappearance and suspected murder of a woman near Aratula in January 2012.

The hearing obtained evidence from a previously uncooperative witness and identified a new line of enquiry with respect to the alleged disposal of the woman's body. Although the primary suspect is deceased, evidence from the hearing enabled their involvement to be fully investigated and determined.

Cold case — Murder at Logan Reserve in 2012

We held a hearing in November 2020 to examine two witnesses in relation to the alleged murder of a 38-year-old man at Logan Reserve in November 2012 (Operation Kilo Alaska 3).

The hearing obtained an extensive and detailed version of events from one witness, which implicated the second witness in the alleged murder, as well as uncovering crucial evidence about the possible location of the suspected murder weapon.

Stabbing murder of a 17-year-old youth

In support of the Queensland Police Services Operation Romeo Bosky, we held a hearing in September 2020 in relation to the suspected stabbing murder of a 17-year-old youth at Surfers Paradise on 13 December 2019, allegedly committed by a group of five male persons.

Our hearing examined the events surrounding the alleged murder in detail and obtained evidence from a previously uncooperative witness which allowed the Queensland Police Service to finalise their investigation.

Cold case — Suspected murder near Brisbane in 1996

In September 2020, we held a hearing for Operation Mash regarding the disappearance and suspected murder of a man in the Brisbane area in 1996.

The hearing assisted the Queensland Police Service by obtaining evidence from two witnesses regarding admissions made by the suspect. These admissions were consistent and corroborative with evidence provided from additional witnesses and subsequently led to the suspect being charged with murder.

Intelligence operations and activities

In 2020–21, we finalised one intelligence operation relating to the risk to, or actual loss of, life or serious injury to a person, including examining 19 witnesses over 16 days this year. Some of our key outcomes are summarised below.

Shooting by an emerging criminal organisation

In 2020–21, we assisted the Queensland Police Service to investigate a suspected emerging criminal group alleged to be involved in a shooting on 25 March 2019. A particular focus of this operation, Romeo Magenta 2, was to identify the perpetrator of the shooting that resulted in the wounding of a 16-year-old youth. At the time the Queensland Police Service requested our assistance, no persons had been charged in relation to the incident and the firearm had not been recovered.

During this operation we examined 19 witnesses over 16 days. The hearing was successful in gathering information about the identity of the alleged shooter and where the firearm, used in the alleged offence, was obtained and disposed of. We also obtained and disseminated five intelligence reports to our law enforcement partners, containing information about the alleged criminal organisation, its inner workings and alleged criminal activities.

FOCUS AREA Crimes against children and vulnerable victims

We work in cooperation with other agencies to fight the most significant crimes involving physical or sexual abuse of children or other vulnerable victims (such as the elderly or mentally or physically impaired persons), including homicide, grievous bodily harm (whether through violence, maltreatment, or neglect), torture and serious or organised sexual exploitation.

Investigations into crimes involving children and vulnerable victims are a priority for us. Beyond the immediate implications of death and serious physical, cognitive and emotional injury, these crimes have enormous and immediate long-term impacts on victims, their families and communities, and lasting social and economic consequences.

Crimes against children and vulnerable people can be particularly difficult to prevent, detect or solve through conventional methods of enquiry or investigation. Offending often occurs out of sight, and any physical or forensic evidence likely to be compromised or destroyed. Offenders are often known to the victim — someone who cares for them or has authority over them. Witnesses may be unable or unwilling to cooperate with authorities out of fear, or because of their relationship with the offender.

Investigating crime

In 2020–21, we continued to assist the Queensland Police Service in investigating crimes against children and vulnerable victims.

We commenced eight investigations relating to this area of focus. During the same period, we finalised six investigations, some of which commenced prior to this year.

Our contributions in 2020–21 to investigations involving crimes against children and vulnerable victims included obtaining additional information and evidence by holding 15 days of hearings to examine 16 witnesses. Some investigative outcomes are summarised below.

Repeated sexual abuse of a teenage girl

For Operation Sierra Dorcas, in July 2020 we held a hearing in relation to allegations a teenager on the Sunshine Coast was subjected to ongoing rapes and sexual assaults by a man in 2019 and 2020.

Through this hearing, we obtained evidence from two previously uncooperative witnesses and corroborating evidence to assist the Queensland Police Service investigation.

A man was subsequently charged with the offences.

Sexual assault of a child and possession of child exploitation material

For Operation Collier, we held a hearing in November 2020 in relation to suspected sexual offending against a child over several years, and possession of child exploitation material by a 25-year-old man.

At the time of the alleged offences, the suspect was living on a remote rural property in the Queensland with multiple extended family members.

Our hearing obtained computer and social media account access details and passwords which enabled the Queensland Police Service to locate additional evidence of child exploitation material.

The man was charged with accessing and distributing child exploitation material.

Cold case — Suspected murder of a young boy

In October and November 2020, we held a hearing for Operation Sierra Bobcat in relation to the disappearance and suspected murder of a young boy who had lived in a western suburb of Brisbane from 1968 to 1970.

The hearing obtained evidence from a witness who had previously refused to provide a statement to police. This evidence enabled the evidence of other witnesses to be tested, and also resulted in new evidence being found that related to conversations between these witnesses since their statements were originally taken by police. Overall, the hearings strengthened the Queensland Police Service case by ensuring alternative lines of enquiry were properly investigated.

Suspected murder of a two-year-old girl

Operation Romeo Tertiary was an investigation into the suspected homicide of a two-year-old girl by her mother and/or her mother's boyfriend at Chinchilla in 2016. The two suspects were charged on 1 March 2020.

We assisted the Queensland Police Service by examining a witness who provided information in addition to that they had previously provided to police. This new information related to conversations the witness had with the defendants about the disappearance of the child.

No further witnesses were required, and the matter was finalised and closed in early 2020–21.

FOCUS AREA Corruption involving elected officials, misuse of confidential information and exploitation of public sector resources

This year, we continued our important work to investigate allegations of corruption within Queensland's public sector. We uncovered serious and systemic corruption involving trusted public officials and public sector employees who took advantage of their position and used it to gain personal benefits.

In 2020–21, we achieved our service standard target of 85 per cent of corruption investigations finalised within 12 months (see page 22) despite:

- experiencing the impacts of COVID-19 which led to delays in obtaining evidence relevant to investigations, particularly financial records from banks and other financial institutions
- carrying into 2020–21 several complex investigations that exceeded 365 days, and
- continuing our focus on the local government sector (38 per cent of our finalised corruption investigations), which tend to be complex and protracted in nature.

Of the four investigations finalised this year that exceeded 365 days, two (50%) involved the local government sector. When investigations relating to the local government sector are excluded, 89 per cent of investigations finalised this year, were finalised within 12 months. These investigations have resulted in a range of significant outcomes, including criminal charges, disciplinary recommendations, recommendations for law reform and reform to policy and practice.

We adopt a proactive approach to corruption risk prevention, drawing on our investigations to highlight specific prevention lessons for the public sector. We aim to build the integrity and capability of Queensland's public sector agencies to identify and respond to corruption, therefore reducing future impacts of corruption on the Queensland community.

In 2020–21, we undertook a significant project to develop a new Corruption Strategy which included examining best-practice in relation to corruption prevention, and methodologies that might be used to measure impact from our efforts. The project has resulted in the development of a Corruption Strategy (incorporating a Corruption Prevention Strategy) for 2021–25 (see page 52).

This year our strategic focus has been on investigating and preventing three high-risk corruption areas: elected officials, misuse of confidential information and exploitation of public sector resources.

In 2020–21, we received 3,490 complaints of suspected corruption involving 8,563 allegations. This is an increase of five per cent when compared to 2019–20 and continues the pattern of steady increases since 2015–16.

In 2020–21, we assessed 3,681 complaints of corruption. Of these complaints, we commenced 26 investigations and 2,852 were forwarded to an appropriate agency for investigation.

This year we finalised 29 investigations, some having commenced in previous years, resulting in:

- 67 criminal charges against 4 people
- 64 recommendations for disciplinary action involving 33 persons, and
- 180 prevention recommendations.

In 2020–21, we also made an additional 23 prevention recommendations arising from reviews of external investigations.

Investigation Arista: Investigating systemic gender discrimination within historical recruitment practices of the Queensland Police Service

Our agile resourcing model also allows us the flexibility to respond to emerging matters outside our strategic areas of focus. This allows us to address matters of high risk or significant public interest. In some cases, these emerging issues will form the basis of a future area of focus or a focus within our next audit plan.

In November 2019, we were notified by the Queensland Police Service of allegations of discrimination within their recruitment processes between December 2015 and October 2018. Although this was outside our strategic areas of focus, due to the serious and systemic nature of the allegations, we commenced an investigation in January 2020. We interviewed 43 people, examined 10 people in hearings, and considered a range of submissions during our investigation.

During this time, the Queensland Police Service was implementing a well-intended strategy to improve female representation. However, the practices used to achieve the strategy's 50 per cent female recruitment target resulted in systematic discrimination against male applicants. Our investigation identified a pattern of deceptive reporting by staff from the Queensland Police Service Recruiting Section to a range of people, including senior executives, over an extended period of time.

On 12 May 2021, our investigative report was tabled in the Queensland Parliament: *Investigation Arista: A report concerning the investigation into the Queensland Police Service's 50/50 gender equity recruitment strategy*. In our report, we recommended disciplinary action be taken against several people who engaged in a recurring pattern of misleading, deceptive, and false reporting practices during this period.

Although our investigation focused specifically on gender discrimination within recruitment processes, the underlying lessons highlighted in our report have broad application across public and private sector entities.

Aside from the corruption prevention benefits of publishing our investigative findings, our reports serve as a critical mechanism to provide transparency for our decisions and enables our work to be examined by others, an important component to ensure accountability.

The allegations in Investigation Arista fall within the broader corruption category of misuse of authority. Over the past two years, a significant number of our investigations involved allegations of misuse of authority, which has led us to including it as an area of focus for 2021–22.

Elected officials

We recognise the importance of public confidence in elected officials and improving integrity, accountability and transparency in Queensland’s public sector.

People who are elected to represent our community in local or state governments are trusted to act with the highest levels of integrity, putting the interests of the public ahead of their own. They must demonstrate accountability and transparency in decision making and should not be motivated, or perceived to be motivated, by self-interest.

We have focused on improving the integrity, accountability and transparency of Queensland’s local and state governments since 2018–19, as failure to demonstrate these behaviours severely erodes public confidence in the critical work that they do.

Since 2018–19, we have completed a significant body of work in investigating corruption by elected officials and identifying the key corruption risks that lead to this behaviour. We have used these insights to progress legislative reform and target our prevention activities to build the capability and resilience of the public sector.

In 2021–22, we will focus on an emerging corruption area involving the misuse of authority by public sector employees, including those with special legislative powers like elected officials and the Queensland Police Service. This focus will enable us to continue to target the most serious and systemic corrupt conduct impacting our community.

Targeting emerging corruption risks: Lobbying (private and public interests)

At the end of 2019, we conducted a strategic assessment of new and emerging corruption risks which identified key features of the corruption environment in Queensland, highlighted current significant trends and risks, examined factors driving or enabling corrupt conduct, and identified possible future areas of focus.

The increasing trend regarding the movement of people between the public and private sector, and the increasing use of private sector agencies to undertake work for the public sector, has been identified as one of the highest corruption risks in Queensland.

In August 2020, we commenced a project to examine the relationships between private entities and the public sector to determine the extent to which these relationships give rise to corruption risks, including conflicts of interest and misuse of authority.

We profiled public sector agencies and examined whether they presented a corruption risk due to their activities or strategic partnerships with other entities. We also monitored several public data sources including the lobbyists contact register, ministerial diaries, media articles and electoral donations.

We compared this data with our other intelligence holdings. To date, our analysis of lobbying and increasing public-private partnership risks has identified that several key people have strategic associations with both private entities and government agencies, including previous employment and engagement under contracts, and/or strong affiliations with one or both major political parties in Queensland.

Table 1: Elected officials – complaints, allegations and investigations from 2016–17 to 2020–21

	No. of complaints	No. of allegations	No. of investigations commenced ¹
2020–21	124	270	12
2019–20	170	345	10
2018–19	235	444	17
2017–18	212	584	34
2016–17	158	413	31

Note:

1. An investigation can encompass multiple allegations against multiple persons and vary in complexity.

Investigating corruption

Each year, we receive a significant number of complaints of corrupt conduct, with many complaints comprising multiple allegations. As we only investigate serious or systemic corruption, only a small proportion of the complaints we receive result in us commencing an investigation. We assess each allegation on its merits to determine the appropriate action and may refer matters to another agency for investigation, with our oversight if appropriate.

Complaints against elected officials accounted for approximately four per cent of our overall corruption complaints received this year, with the most common allegations we investigated relating to the misuse of authority, misappropriation of public assets, and conflicts of interest. Since we commenced our focus on elected officials in 2018–19, we have finalised 50 investigations which resulted in 20 persons being charged with 44 offences.

In 2020–21, complaints about the local government sector accounted for 90 per cent of complaints we received in this area of focus. These investigations are often complex in nature, resulting in protracted investigations which can impact the overall achievement of our performance measures relating to timeliness.

In 2020–21, we finalised 10 investigations relating to elected officials with significant matters summarised in this section.

Identifying corruption risks associated with conflicts of interests

Between September 2019 and September 2020, we undertook *Investigation Keller* — an investigation into allegations that the then Chief of Staff to the Premier of Queensland had misused his position to obtain \$267,500 in funding from a government investment fund for a company in which he was a shareholder and director.

Our report *Investigation Keller: An investigation into allegations relating to the former Chief of Staff to The Honourable Anastacia Palaszczuk MP, Premier of Queensland and Minister for Trade* was tabled on 23 September 2020 in the Queensland State Parliament.

We did not find evidence that the Chief of Staff had misused his position to obtain the funding for his company, or that the decision to award the funding to his company was the result of any improper influence.

The investigation highlighted how conflicts of interests, if not properly managed, can create public perceptions of impropriety. In our report, we made recommendations relating to the management and documentation of conflicts of interest, training relating to conflicts of interest, and the recording of decisions by the Queensland Investment Corporation and the management of those records. We also recommended amendments to the *Integrity Act 2009* to impose obligations on certain people to disclose advice from the Integrity Commissioner in certain circumstances.

As at 30 June 2021, three of the five recommendations had been accepted and implemented or supported. The remaining two recommendations are under consideration.

Table 2: Elected officials – summary of outcomes 2020–21

Description	Number
Investigations commenced	12
Investigations finalised	10
People charged	2 ¹
Criminal charges laid	4 ²
Reviews commenced	0
Reviews finalised	0
Referred to a unit of public administration to investigate subject to monitoring by the CCC	2
Prevention recommendations made	26

Notes:

1. Includes one person who is not a member of a unit of public administration.
2. Includes one charge against a person who is not a member of a unit of public administration.

Uncovering corrupt conduct enabled by recordkeeping and governance failures

We commenced Investigation Rebind in December 2017 to examine allegations of corrupt conduct within the Palm Island Aboriginal Shire Council. We gathered intelligence from over 400 sources, interviewed over 130 witnesses, executed 180 warrants/notices and examined many gigabytes of electronic data including thousands of financial transactions.

Our investigation identified systemic issues regarding the recording of information and governance processes within this council which we believe created an environment where corrupt conduct could emerge and flourish.

We finalised this investigation in October 2020 and charged five people with a total of 92 separate criminal offences.

Preventing corruption

Our targeted prevention activities aim to identify corruption risks and build public sector resilience, through engagement activities designed to increase awareness of corruption risks and build response capabilities.

In 2020–21, we made 29 recommendations for local government reform. We also undertook prevention activities to address, understand, and develop more appropriate responses to lobbying risks. Our key prevention activities are summarised below.

Our future initiatives will include communicating with public sector employees about the importance of being alert to suspected corruption and reporting it in a timely fashion.

Gathering the insights of public sector employees to inform strategy development

We believe that the employees of Queensland's public sector agencies hold valuable information about their agencies' corruption risks and insights into ways to prevent corruption. This year we gathered these insights as part of our broader engagement project which aims to better understand perceptions and corruption risks within the Queensland public sector.

In May 2020, we distributed an 'Integrity Survey' to employees of our local governments to gauge their perceptions of corruption and attitudes towards reporting matters within their council. Across the three weeks the survey was open, we had 8,655 local government employees across 77 councils in Queensland respond to at least one question (24 per cent response rate) and 6,515 respond to two or more (18 per cent response rate). Overall, we were satisfied with the response rate.

On 20 November 2020, we published the survey results in a factsheet: *Perceptions of corruption and integrity in local government*. We also presented the findings to our stakeholders, including to local government Chief Executive Officers at a Local Government Managers Association forum.

We used the outcomes of the survey to inform strategies for preventing and disrupting corruption in local government and to identify opportunities to build their corruption resilience.

In May 2021, we commenced the next phase of our engagement with employees in the public sector, focused on Queensland Government departments. We distributed the Integrity Survey to 200,000 public service employees from 19 government departments to gather insights about the prevalence of corruption and corruption risks in their department, their attitudes towards reporting corruption, and their levels of awareness about corruption prevention, organisational change and reporting obligations.

Next year, we will use insights from the survey to better understand perceptions and corruption risks within the Queensland public sector. Key findings from the survey will be shared with departments in the future and used to inform our ongoing prevention activities.

Co-hosting the Integrity Summit to facilitate a joint response to improper lobbying practices

In March 2021, we co-hosted the inaugural Integrity Summit 2021 along with the Queensland Integrity Commissioner and the Independent Commissioner against Corruption, South Australia.

This summit focused on the influence of lobbyists on the Queensland public sector and included an examination of current legislative regimes across Australia.

At this summit, we hosted representatives from integrity agencies across Australia to discuss lobbying practices, hear from integrity practitioners responsible for overseeing or administering relevant legislation, and consider regulation and registration of lobbyists in what a 'best-practice standard' could look like.

In July 2021, we issued a [joint media release](#), together with the Queensland Integrity Commissioner and the Independent Commissioner against Corruption, South Australia, to voice concerns about lobbying in the public sector.

Conducting a Corruption Prevention Forum for the public sector and local government

In May 2021, we hosted a [Corruption Prevention Forum](#) for liaison officers, employees of ethical standards units, internal investigators and anyone with responsibility, within an agency for reporting corrupt conduct or managing corrupt conduct investigations. Our officers presented on a variety of topics including:

- how to use our [Corruption Allegations Data Dashboard](#)
- how to identify suspected corrupt conduct and when to report it to the CCC
- when and how public sector agencies should engage the services of an external investigator
- what an agency's responsibilities are when it comes to proving procedural fairness during an investigation, and
- a recent corruption investigation.

We received positive feedback from attendees, and we will run another forum next year.

Responding to risks associated with State Government elections

In the lead up to the 2020 State Government Election, we reviewed significant donations that had been made to candidates and political parties. To remind the candidates of their obligations, our Chairperson wrote an [open letter to all candidates](#), urging them to put integrity first and emphasising that serious corruption risks can arise for both elected officials and candidates during the period just before an election.

After the election, our Chairperson [wrote to Ministers, Assistant Ministers and Directors-General](#) inviting them to partner with us in making Queensland resistant to corruption and to remind them of the corruption risks they may face as senior decision-makers and of the community's expectations of them.

The election also gave rise to Machinery of Government changes and associated corruption risks. In response, in February 2021, we published a Prevention in Focus advisory, [Organisational change and economic recovery: Managing the risks](#), to alert heads of public sector agencies, senior managers and members of audit and risk committees of these potential corruption risks and to provide advice about ways to mitigate these risks.

Promoting governance, accountability and transparency during public sector appointments

In late 2019–20, we finalised an investigation into allegations that the then Deputy Premier interfered in a recruitment process being undertaken by the Department of Education. Our report was tabled on 2 July 2020 in the Queensland Parliament — *An investigation into allegations relating to the appointment of a school principal*.

The allegations were unsubstantiated; however, our report sets out how some of those involved in the process to select a principal for a new school failed in promoting best-practice human resource management. Our report exposes how:

- one senior public servant's over-responsiveness to a politician resulted in decision-making being infected by perceived political influence, and
- how that politician allowed herself to be involved in departmental decision-making processes.

Our report details a lack of transparency and a willingness to manufacture information to support a decision after the event, involving others in the deception, and prevailing upon others to destroy a record relating to the deception.

We provided a confidential report to the Chief Executive of the Public Service Commission for the purpose of determining whether disciplinary action should be taken against any individuals identified.

In May 2021, the Chief Executive of the Public Service Commission advised that it is his intention to publish a report in due course about how the Public Service Commission has responded to our report.

Auditing local government procurement processes

From January to March 2021, we undertook an audit in relation to local government procurement to:

- assess how appropriately councils have dealt with allegations of corrupt conduct
- assess whether councils' strategies to prevent fraud and corruption in procurement are adequate, and
- examine whether councils' procurement practices are transparent and accountable.

We identified 15 areas for improvement for relevant councils, including four relating to how they deal with complaints and 11 relating to their systems for managing procurement risks.

We communicated the key findings from this audit in relation to corruption risks and how to avoid them to assist agencies to build capability, through:

- an information sheet about the importance of probity to manage risks during procurement processes — *Probity as a means of managing corruption risks in procurement*
- a checklist — *Probity plan checklist for procurement*, and
- a webinar — *Local government procurement audit findings*.

Corrupt conduct and professional engineering

This year, we received allegations that employees of a local council were engaging professional engineering services that were not registered with the Board of Professional Engineers or under supervision from a registered engineer, conduct which may amount to corrupt conduct.

In response, we liaised with the Board of Professional Engineers and wrote to all local government Chief Executive Officers about the obligation to ensure engineer works complied with the *Professional Engineers Act 2002*. As a result of this engagement, we were invited to speak at the Institute of Public Works Engineering Australasia (IPWEA) Queensland to explain how and when the definition of corrupt conduct could apply to engineers who are employed by a public sector agency. At the IPWEA's request, we also developed a [factsheet](#), based on the presentation, that was published in the December issue of their professional journal and is available on our website.

Misuse of confidential information

Employees of Queensland’s public sector agencies have access to a large amount of sensitive information in the course of their duties. They are trusted to ensure this information is kept secure and is not accessed by, or disclosed to, anyone who does not have a legitimate and lawful reason.

Misuse of confidential information occurs when a public sector employee accesses or discloses this information without a lawful reason, often to benefit themselves or another person. Offences of this type include unintentionally disclosing official information, falsifying information or records, illegally acquiring or retaining information and inadequately safeguarding information.

While there had been a steady increase in the overall allegations of this type over the last four financial years, in 2020–21 allegations decreased by 21 per cent when compared to 2019–20 (see Table 3). The decrease was seen across most public sector areas (including local government), with the exception of allegations against Queensland Police Service officers which remained steady in 2020–21.

Misuse of confidential information by police officers is particularly concerning due to the personal nature of the information held about members of the community.

We have focused on corruption involving the misuse of confidential information since 2017–18. Over this time, we have achieved significant outcomes including finalising 44 investigations and charging 14 persons with 124 offences.

In 2019–20, following [Operation Impala](#), we made 18 recommendations to public sector agencies aimed at improving their capability when assessing allegations of misuse of confidential information. Despite the progress in implementing these recommendations (see page 49), improper access and disclosure of confidential information remains a worrying trend and will continue to be a focus area in 2021–22.

Next year, in conjunction with the Queensland Police Service and public sector agencies, we will focus on ‘raising the bar’ for disciplinary outcomes and generally reserving criminal charges for the most serious matters.

We are assisting public service agencies to establish and document parameters for penalties that meet community expectations, protect the community, properly reflect the seriousness of the conduct, and maintain public confidence in the relevant agency.

Table 3: Misuse of confidential information — complaints, allegations and investigations from 2016–17 to 2020–21

	No. of complaints	No. of allegations	No. of investigations commenced ¹
2020–21	757	1179	8
2019–20	923	1495	6
2018–19	603	1060	9
2017–18	492	762	15
2016–17	459	710	21

Notes:

1. An investigation can encompass multiple allegations against multiple persons and vary in complexity.

Investigating corruption

In 2020–21, we received 757 complaints relating to the misuse of confidential information, with the most common allegation relating to access and unauthorised disclosure of information.

Complaints regarding the misuse of confidential information account for 22 per cent of the corruption complaints received this year. Of these complaints, 32 per cent related to officers of the Queensland Police Service.

In 2020–21, we received 1,179 allegations relating to the misuse of confidential information, representing 14 per cent of corrupt conduct allegations received, with 396 (34 per cent) of those allegations relating to Queensland Police Service officers.

In 2020–21, we finalised eight investigations relating to the misuse of confidential information, including the following matter.

Misuse of information within the Queensland Police Service

This year, we completed two investigations into alleged misuse of information within the Queensland Police Service. These investigations resulted in five disciplinary recommendations involving two officers. A prevention recommendation was also made in relation to the *Police Powers and Responsibilities Act 2000* and the definition of protected information.

Table 4: Misuse of confidential information — summary of outcomes 2020–21

Description	Number
Investigations commenced	8
Investigations finalised	8
People charged	0
Criminal charges laid	0
Reviews commenced	90
Reviews finalised	87
Referred to a unit of public administration as a disciplinary matter	2 ¹
Referred to a unit of public administration to investigate subject to monitoring by the CCC	63
Prevention recommendations made	11

Note:

1. Includes two persons referred on five disciplinary recommendations.

Preventing corruption

This year, we focused on preventing the misuse of confidential information through targeted prevention activities that aim to identify and respond to corruption risks. These activities aim to build the capability of our public sector agencies, including the Queensland Police Service, to respond effectively to the corruption risks, therefore building their resistance to this type of corruption.

Improving the identification and management of suspected misuse of information — Recommendations from Operation Impala

We launched Operation Impala to examine improper access and dissemination of information within the public sector. We held a public hearing and used case studies to identify opportunities for reform. In February 2020, *Operation Impala — A report on misuse of confidential information in the Queensland public sector*, was tabled in the Queensland Parliament and included 18 recommendations designed to ensure that confidential information is less vulnerable to inappropriate access by employees of public sector agencies.

Since this time, we have continued to engage in prevention initiatives to help public sector agencies identify and manage matters involving suspected misuse of confidential information.

In June 2020 and February 2021, we wrote to those agencies who provided evidence during Operation Impala, requesting an update on their progress implementing recommendations made in our report. All agencies reported having either commenced or finalised implementation of the relevant recommendations.

Audit examining how health professionals record gifts and benefits

Deliberately failing to disclose, or undervaluing gifts and benefits to avoid reporting them, is fraud. This type of behaviour also reduces the community trust and damages the integrity of the sector.

In 2020–21, we commenced an audit examining how health professionals are recording and valuing gifts and benefits from pharmaceutical companies, and how hospital and health services are managing the associated risks. This audit will be completed in early 2021–22.

Audits into public sector agencies' management of complaints regarding corrupt conduct

On 9 November 2018, the *Crime and Corruption and Other Legislation Amendment Act 2018* was passed, amending the *Crime and Corruption Act 2001*.

One key amendment introduced section 40A, which requires public sector agencies to prepare and keep complete and accurate records of any decision not to notify the CCC of a complaint about alleged corrupt conduct.

In September 2020, we undertook an audit examining the policies and processes of seven public sector agencies to assess their capacity to:

- effectively capture complete and accurate records of their assessment decisions of complaints about corrupt conduct coming to their attention, and
- correctly form conclusions that the allegations did not reasonably raise a suspicion of corrupt conduct for the complaints to be notified to us.

We published a [summary audit report](#) on our website. The report outlines our key results and recommendations and includes a short [Guide to recordkeeping requirements for section 40A](#), including a suggested template for [Corrupt Conduct Assessments](#).

Following from this, in June 2021, we completed an audit evaluating how effectively:

- agencies are assessing complaints about corrupt conduct
- agencies are notifying us of such conduct in a timely manner, and
- the Queensland Police Service is assessing complaints that are interwoven with court matters.

We will publish a summary audit report about assessments of corrupt conduct in 2021–22.

Exploitation of public sector resources

Public sector employees, under *the Public Sector Ethics Act 1994*, must ensure their decisions are in the public interest. A fundamental aspect of this is ensuring they use official resources appropriately as the exploitation of these resources impacts the delivery of critical goods and services, which may mean they may no longer be able to be funded by the agency.

Exploitation of public sector resources can include deliberate acts of stealing, fraud, and misappropriation, but also includes misusing or poorly managing resources. The resources most at risk include public funds, vehicles, equipment and technology, facilities and materials, allowances and other entitlements, and work time.

Public sector employees are required to use and manage public resources effectively, efficiently and economically. Failing to do so is a breach of public trust and may result in disciplinary action or prosecution.

We have focused on the exploitation of public sector resources since 2019–20. Over these two years, we have finalised 25 investigations and charged 12 persons with 151 offences.

The number of allegations received in 2020–21 decreased by eight per cent when compared to 2019–20. This followed a decrease in 2019–20 compared to 2018–19. While there is no single explanation for the decrease in allegations of exploitation of public sector resources, we are optimistic about the influence of our focus of resources in this area.

As this is a relatively new focus area, we will be continuing this focus area in 2021–22.

Investigating corruption

This year, we received 370 complaints relating to the exploitation of public resources, accounting for approximately 11 per cent of corruption complaints we received. The most common allegations we investigated related to fraudulent use of official funds and fraud related to travel allowances and overtime.

In 2020–21, we commenced three investigations, finalised seven investigations and charged four persons with 67 offences. Some significant matters are summarised below.

Uncovering corruption using corporate credit cards

In our discussion regarding corruption involving elected officials, we summarised Investigation Rebind which was a significant investigation into the activities of the Palm Island Aboriginal Shire Council (see page 42). This investigation resulted in the charging five persons with 92 offences, including fraud, secret commissions, stealing as a servant, misconduct in public office and failing to correct a register of interests. We made seven prevention recommendations, with the majority relating to policies and procedures surrounding appropriate use of corporate credit cards.

This year, we also investigated allegations that a school principal employed by the Department of Education had misused his corporate credit card and dishonestly obtained money. In September 2020, we charged the principal with 34 counts of fraud and one count of misconduct in relation to public office.

Exposing fraudulent access to leave entitlements

During our investigation into the fraudulent use of a credit card by this school principal, we also investigated allegations that this principal, and a school teacher, had fraudulently accessed leave entitlements. We charged them both with 14 fraud offences in October 2021.

All of these matters remain before the courts.

Table 5: Exploitation of public sector resources — complaints, allegations and investigations from 2016–17 to 2020–21

	No. of complaints	No. of allegations	No. of investigations commenced
2020–21	370	620	3
2019–20	437	675	5
2018–19	452	816	15
2017–18	390	647	12
2016–17	338	470	13

Preventing corruption

We undertake targeted prevention activities to identify and respond to corruption risks, including those identified through corruption investigations. Through our prevention activities, we aim to build corruption resistant public institutions through increasing awareness and building capability to respond to corruption risks.

This year, we focused on undertaking prevention activities to address the corruption risks relating to exploitation of public resources identified in previous years.

Audit focusing on reducing timesheet and leave fraud

Last year we undertook an audit of public sector agencies timesheet and leave processes, identifying several areas for improvement to manage associated corruption risks. In July 2020, we published our summary audit report, *Managing corruption risks associated with timesheet and leave fraud*, which included case studies and a prevention guide to assist public sector agencies in combating timesheet and leave fraud, with examples of strategies to address corruption risks.

In September 2020, we published the Prevention in Focus publication, *Timesheet and leave fraud — How managers can prevent and detect corrupt conduct relating to timesheets*, to educate public sector managers on their obligations to approve and monitor employees' timesheets and other allowances.

Monitoring the implementation of recommendations to reduce research fraud

Last year, we also undertook an audit into research fraud within government funded universities in Queensland. Our summary audit report, *Reducing the risk of research fraud*, contains our findings and recommendations for reducing corruption risks in this area.

This year, we conducted a follow-up audit with three of these universities to review their progress in implementing the audit recommendations. We found that the universities have been implementing the recommendations in a timely way to enhance their research governance frameworks and control processes, in turn reducing the risk of research fraud.

Table 6: Exploitation of public sector resources – summary of outcomes 2020–21

Description	Number
Investigations commenced	3
Investigations finalised	7
People charged	4 ²
Criminal charges laid	67 ³
Reviews commenced	36
Reviews finalised	36
Referred to a unit of public administration as a disciplinary matter	2 ⁴
Referred to a unit of public administration to investigate subject to monitoring by the CCC	35
Prevention recommendations made	118

Notes:

1. Some of the matters above are also captured and reported under Table 2: Elected officials – summary of outcomes 2020–21.
2. Includes one charge against a person who is not a member of a unit of public sector administration.
3. Includes one person who is not a member of a unit of public sector administration.
4. Includes 15 persons referred on 23 disciplinary recommendations.

FOCUS AREA Stakeholder engagement

Stakeholder engagement is a critical capability for our agency to effectively investigate and prevent crime and corruption. We are progressively enhancing our stakeholder engagement activities to ensure our priority stakeholders — complainants, law enforcement agencies, public sector agencies and Queenslanders — are informed, educated and empowered to act. Through knowledge-sharing and collaboration, we can enhance the impact of our work for the benefit of our community.

Evolving our Stakeholder Engagement Strategy

Through effective stakeholder engagement, we can build strong relationships with our key stakeholders and achieve:

- improved understanding of the interests and concerns of our key stakeholder groups and ways our stakeholders communicate with us
- enhanced awareness of our role, functions, and processes by our stakeholders
- early identification of issues, and ability to tailor solutions to stakeholder concerns
- greater transparency about our work and opportunities for external opinions to be heard, and
- improved access to knowledge, expertise, and perspectives of others including people in the local communities.

Our 2021–23 strategy facilitates our continued transition toward stakeholder-centric engagement and embeds a consistent approach to the planning and delivery of our stakeholder engagement activities across the agency.

Engaging with key crime stakeholders

Crime Stakeholder Engagement Strategy

On 1 July 2020, we implemented our new Crime Stakeholder Engagement Strategy, designed to support and sustain meaningful engagement with our key internal and external stakeholders and ensure stakeholder engagement is integrated into our decision-making processes. Our strategy includes requirements for management plans, and the evaluation of engagement outcomes to ensure our level and approach to engagement with key stakeholders is appropriate and achieving value, and that insights from key stakeholder interactions can inform future business and operational decision-making. In June 2021, we commenced a project to deliver a digital solution to meet the requirements of the strategy, facilitate a more efficient implementation and allow us to more readily access and use the insights gathered from our engagement activities. This project is due to be delivered in the first half of 2021–22.

Prioritisation model for crime matters

We use our Matter Prioritisation Model (MPM) to assess and review our investigations, as well as our crime related projects and initiatives. The MPM allows us to assess whether an opportunity is appropriate and to prioritise our work having regard to specific criteria, based on public interest, importance and value to our stakeholders, and our agency having regard to our strategic objectives, areas of focus, and business strategies and commitments. The MPM also ensures we have a consistent and transparent process for our crime related case and project selection and ongoing review and is supported by a sound public interest and human rights considerations.

The MPM is updated as required to ensure it captures our current plans and other key stakeholder interests such as Queensland Government priorities, Queensland Police Service strategic and operational plans, Queensland Family and Child Commission strategic plans, and other Queensland and National priorities and strategies for responding to serious and organised crime.

Engaging with law enforcement agencies

We liaise and cooperate with partner law enforcement agencies to optimise the use of resources, coordinate activities and avoid duplication of effort. This involves Queensland's commitments to national frameworks, agreements, and strategies. Our close engagement with the Queensland Police Service, our partner agencies and other key stakeholders, is important to fully realising opportunities to pool resources, collaborate, and remain informed and responsive to strategic priorities and risks relevant to our work.

The Queensland Police Service's priorities for serious and organised crime have particular significance for our major crime work. This alignment ensures that our major crime work complements and supports broader strategic objectives for reducing the incidence and impact of crime on the Queensland community. We also engage closely with the Queensland Police Service and partner Commonwealth law enforcement agencies to remain informed and responsive to emerging major crime threats and issues and to maximise the value of collaborative opportunities.

In 2020–21, senior Commission officers participated in and contributed to the following key interagency forums:

- Queensland Joint Management Group — The Queensland Joint Management Group is a committee of senior executive members of the Australian Federal Police, the Australian Criminal Intelligence Commission, Australian Taxation Office, Australian Department of Home Affairs, Australian Transaction Reports and Analysis Centre, Australian Border Force, Queensland Police Service and the Crime and Corruption Commission who meet bi-monthly and at various other times, as required. The Queensland Joint Management Group facilitates information sharing, collaboration, capability development and coordination of strategies and responses to serious and organised crime within Queensland. The Senior Executive Officer (Crime) represents our agency on the Queensland Joint Management Group.
- Queensland Operations Coordination Group — The Queensland Operations Coordination Group is a committee of senior officers of the Queensland Joint Management Group agencies who meet at least monthly. The Queensland Operations Coordination Group facilitates information sharing, operational coordination and de-confliction, and assessment of opportunities for inter-agency collaboration on responses to serious and organised crime within Queensland. The Queensland Operations Coordination Group reports on operational progress and outcomes and takes direction from the Queensland Joint Management Group. The Executive Director Crime Operations, and the Director Proceeds of Crime represent our agency on the Queensland Operations Coordination Group.
- Queensland Joint Analysts Group — The Queensland Joint Analysts Group is a committee of senior officers of the Queensland Joint Management Group agencies who meet at least monthly. The Queensland Joint Analysts Group considers assessments undertaken by the Queensland Joint Analysts Group working group for consideration of action by the Queensland Operations Coordination Group. The Queensland Joint Analysts Group working group is a standing capability of the Queensland Joint Analysts Group member agencies which identifies opportunities and priorities for targeting serious and organised crime in and affecting Queensland. The Manager Crime Strategy represents our agency on the Queensland Joint Analysts Group and our agency provides ongoing intelligence analyst support to the Queensland Joint Analysts Group working group.
- Queensland Police Service Operations Coordination Group and Specialist Resources Committee — These committees are comprised of command and regional crime coordinators and other relevant Queensland Police Services members who meet at least three-weekly to share information, review, coordinate and approve operational activities and responses, and prioritise specialist resources for dealing with serious and organised crime within Queensland. The Director Crime Operations and the Executive Director Crime Operations represent our agency on the Operations Coordination Group and Specialist Resources Committee, respectively.

Engaging with key corruption stakeholders

Corruption Strategy

We remain committed to working with our stakeholders to build corruption resistance public institutions. This year, we developed a new Corruption Strategy and a new Corruption Prevention Strategy focusing on our stakeholder engagement for 2021–25 and beyond.

These strategies included establishing a coordinated approach to delivering our corruption prevention activities and maximising their impact by collaborating with our stakeholders to deliver prevention activities. The Corruption Prevention Strategy is also intended to identify measures of impact for those activities and identify a methodology to become more proactive in response to emerging corruption risks.

In the first phase of this project, we undertook a literature review to identify best practice in relation to prevention and ways of measuring impact from prevention activities.

In the second phase, we focused on engaging with our stakeholders to gain insights into how we can most effectively use our resources to minimise corruption risks in Queensland. We disseminated a discussion paper and invited our stakeholders to provide a submission. We received 55 written responses and used our discussion paper to facilitate 85 consultations with representatives across public sector agencies, seeking their input to those strategies as understanding the challenges from their perspective is essential to our corruption prevention efforts.

The feedback from stakeholders drove the development of the themes which are imbedded in the Corruption Strategy and shaped the Corruption Prevention Strategy for 2021–25.

Engaging with the Queensland Police Service

The Joint Assessment and Moderation Committee (JAMC) includes representatives from our agency and the Queensland Police Service Ethical Standards Command (ESC). The JAMC aims to improve the timeliness and consistency of the Queensland Police Services' processes for triaging and monitoring serious complaints against its own officers. This year, the JAMC assessed 75 matters.

The JAMC evaluates how each complaint is initially assessed and then agrees to a plan of action. This process gives both us, and the Queensland Police Service, an assurance that complaints are being appropriately assessed and clearly establishes the responsibilities of each agency.

The JAMC draws on our allegations data and research to evaluate levels of risk. The analysis of allegations data assists the JAMC to assess whether an officer's complaints history is significant compared to that of their peers. We continue to conduct research to better understand the importance of an officer's allegations history in assessing matters at the JAMC.

The Investigation Consultation Process (ICP) is the second tier of the JAMC process. Since its commencement in 2017, the ICP has enabled inter-agency collaboration on contemporary investigative methodologies in matters that are the subject to our statutory monitoring function. As part of the ICP, the progress of matters and our expectations regarding investigations and/or criminal, disciplinary, and managerial processes are tabled. In addition, either agency can raise issues that are contentious or that impact on their resources, so that an effective resolution may be achieved. The ICP does not meet on every matter; a meeting is held when there is a stakeholder necessity or public interest in gaining a joint commitment to processes that will meet stakeholder expectations. During 2020–21, 10 meetings were held in relation to 21 matters.

Building awareness of corruption risks

Organisational culture has a significant influence on how corruption risks are managed and tolerated within an agency. We undertake targeted prevention activities to assist public sector agencies to develop ethical cultures by building their awareness and capability in responding to corruption risks.

In 2020–21, we published five corruption prevention advisories to assist public sector agencies to identify and manage corruption risks:

- [*Timesheet and leave fraud — How managers can prevent and detect corrupt conduct relating to timesheets*](#) (September 2020)
- [*Perceptions of corruption and integrity in local government*](#) (research report — November 2020)
- [*Template for section 48A policy*](#) (December 2020)
- [*Corrupt conduct and professional engineering services*](#) (fact sheet — December 2020)
- [*Organisational change and economic recovery — Managing the risks*](#) (February 2021).

Corruption Audit Plan 2019–21

Our program of audits aims to help build the integrity of the Queensland public sector and reduce the risk of corruption. Our [2019–21 Corruption Audit Plan](#) consists of six audits into the following areas of high corruption risk:

- research fraud (page 49)
- local government procurement (page 44)
- timesheets and leave (page 49)
- section 40A recordkeeping requirements (page 47)
- assessments of corrupt conduct (page 47), and
- gifts and benefits (page 47).

Although responsibility for implementation of agreed audit recommendations rests with the Chief Executive Officers of relevant agencies, we actively follow up with agencies to measure the extent to which our recommendations have been implemented.

Our Corruption Audit Plan and summary audit reports are published on our [website](#).

Corruption Allegations Data Dashboard

In December 2016, we released the [Corruption Allegations Data Dashboard](#) on our website to provide the public and public sector agencies with access to our allegations data, including at-a-glance knowledge about trends and patterns in corruption allegations. By providing insights about corruption allegations we have received, we hope to improve awareness of corruption trends to assist public sector agencies in identifying and preventing corruption.

Key findings (as at 30 June 2021) include:

- Allegations relating to misuse of confidential information increased between 2016–17 to 2019–20, before decreasing in 2020–21.
- Allegations of corrupt conduct have remained stable over the last six financial years.
- Allegations involving public service departments have shown an increasing trend over the last six financial years.
- Allegations about local governments rose in 2017–18 and remained high until dropping sharply in 2020–21.
- Allegations involving the Queensland Police Service have shown a declining trend between 2017–18 and 2019–20, before increasing in 2020–21.

International Anti-Corruption Day

We supported International Anti-Corruption Day on 9 December 2020. In line with the United Nations 2020 message, ‘United against corruption’, we progressed several important anti-corruption initiatives including targeted prevention activities aimed at elected officials before and after the Queensland State Government election (see page 43).

International Access to Information Day 2020

On 28 September 2020, we supported International Access to Information Day, led by the Office of the Information Commissioner to highlight the importance of providing accurate and relevant information to the community. The 2020 theme of ‘Building trust through transparency’ reminds the public sector of the importance of providing access to government information and government services to assist Queenslanders.

International Fraud Awareness Week

We supported International Fraud Awareness Week 2020 (15 to 21 November) by sharing two short video presentations to raise awareness of the important roles that procurement and internal audit play in detecting and preventing fraud and corruption. The first video, presented by our Chief Executive Officer, outlined the significant impacts of fraud and how senior executives can protect their agency by empowering procurement and internal audit units to make recommendations to correct any internal weaknesses they identify. The second video, presented by one of our officers, was aimed at employees to remind them about the role of procurement and internal audit in fraud prevention and detection, quoting several cases in which these units played a critical role. Both videos are available on our YouTube channel.

Privacy Awareness Week

In May 2021, we supported Privacy Awareness Week, which is an initiative of the Office of the Information Commissioner. This year’s theme, ‘Make privacy a priority’ aligned with our current focus on misuse of confidential information (see page 45). In support of this important message, our Chairperson gave a keynote presentation at the launch of Privacy Awareness Week, titled *‘I trusted you with my private information’ — Government powers and practices to prevent misuse of personal information*.

The presentation reflected on lessons from the implementation of our recommendations from [Operation Impala](#) (see page 47), and why building a ‘privacy-aware’ culture is fundamental to public trust in government.