Crime and Corruption Commission
QUEENSLAND

Investigation Sphynx

An investigation into allegations of corrupt conduct surrounding the QPS's decision to enter into the Stones Corner lease

November 2026



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Crime and Corruption Commission
QUEENSLAND

4 November 2026

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Member for Ferny Grove
Chairperson, Parliamentary Crime and Corruption Committee
Parliament House
George Street
BRISBANE QLD 4000

The Honourable Pat Weir MP
Speaker of the Legislative Assembly
Parliament House
George Street
BRISBANE QLD 4000

The Honourable Deb Frecklington MP
Attorney-General and Minister for Justice and Minister for Integrity
1 William Street
BRISBANE QLD 4000

Dear Mr Furner, Mr Speaker and Attorney-General,

In accordance with section 69(1)(b) of the *Crime and Corruption Act 2001*, the Crime and Corruption Commission hereby furnishes to you its report on *Investigation Sphynx – An investigation into alleged corrupt conduct surrounding the QPS's decision to enter into the Stones Corner lease.*

Yours sincerely

Bruce Barbour
Chairperson

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Executive summary

1. This report examines the critical decision-making behind the Queensland Police Service's (QPS) decision to enter into a long-term lease of a major commercial property at Stones Corner, Brisbane, based on a need for suitable accommodation. The QPS committed to approximately $116 million in lease costs over 15 years to premises that were later found unfit for purpose and ultimately not occupied.

2. The investigation identified no dishonesty, improper relationship or personal benefit on the part of any person. The significance of the matter lies in the governance and control weaknesses that allowed a commitment of this size to be made and to become binding.

3. An agreement to lease was entered into without the appropriate level of governance or the specialist expertise required for government property leasing. It proceeded before securing the necessary government funding. The approval submission did not refer to the whole-of-life cost, funding source, and concerns raised during consultation as to suitability. The approving committee did not adequately scrutinise the proposal. Due diligence was undertaken and legal advice sought only after the commitment, and the QPS did not use available opportunities to reconsider before becoming bound.

4. Multiple controls that could have prevented this outcome failed at the same time. Although the QPS had appropriate controls, their failure resulted from a breakdown in organisational culture. Controls were assumed to be operating, concerns were not communicated to decision-makers, and responsibilities were unclear. In the public sector, such weaknesses increase the risk of corruption.

5. A list of the key persons involved in the decision to enter the lease and a timeline of key events are set out at Annexures 1 and 3.

6. Following these events, the QPS implemented a broad program of organisational reform. The CCC has made nine (9) recommendations directly to the QPS to support their broader reforms and address integrity weaknesses and corruption risks identified through this investigation. The issues identified are not unique to the QPS, and the recommendations apply more broadly to the public sector and government, offering lessons for any agency managing major public transactions. This report also makes two recommendations to the Queensland Government to manage the broader risks associated with property transactions.

7. The CCC has separately reported to the Commissioner of Police on this matter under division 5 of the *Crime and Corruption Act 2001* (CC Act).[1]

[1] CC Act, section 48B(3)(b).

Introduction

Overview of investigation

8. Investigation Sphynx was a corruption investigation conducted by the CCC into the circumstances and decisions giving rise to the QPS's commitment to lease the premises at 433 Logan Road, Stones Corner, Brisbane.

9. Investigation Sphynx was a complex and protracted investigation. It initially was informed by a report prepared by KordaMentha at the request of then Commissioner of Police, the late Mr Stephan Gollschewski AO APM (former Commissioner Gollschewski), and over 3000 related/supporting documents. In addition, the investigation issued several Notices to Produce to the QPS and other entities to gather evidence, resulting in the collection and review of a very great number of documents. In addition to reviewing this material, the investigation involved:

    a) Interviewing 47 witnesses, including representatives from four government departments

    b) The collection and review of over 3200 documents and other electronic records

    c) Liaison with government departments including the Queensland Treasury and the Queensland Audit Office

    d) Requisitioning a report from the Queensland Government Accommodation Office (QGAO) of the review of the QPS lease procurement process, and

    e) Eight (8) hearing days with the examination of 11 witnesses.

Caution regarding adverse inferences and scope

10. Persons are referred to only to the extent necessary to explain the systemic issues the report addresses and the key decisions taken. All persons referred to cooperated with the investigation. Despite the criticism of the lease transaction in this report, no adverse inference should be drawn about any individual involved in the transaction, including the property's lessors or agents, who cooperated with and assisted the investigation.

Overview

11. This report concerns a decision by the QPS to enter into a long-term lease of a major commercial premises at Stones Corner as part of a strategy to consolidate its accommodation in Brisbane. The decision was taken against a background of operational need: several QPS premises were ageing and raised legitimate health, safety and building-condition concerns, and there was a real imperative to secure suitable accommodation.

12. In pursuit of that objective, the QPS entered into a conditional agreement to lease the property and, one month later, allowed that agreement to become unconditional, binding itself to a 15-year lease. It could have been avoided without penalty. The commitment is substantial: it obliges the QPS to spend in the order of $116 million over 15 years, including rent of approximately $500,000 each month. The issue is compounded because the premises have not since been occupied by the QPS.

13. The commitment was made before the QPS had secured the government funding on which it depended, and before the due diligence and advice that would ordinarily inform a decision of this kind had been completed. The property was later assessed as not fit for the purpose for which it had been leased. The rent was assessed as materially above, and the incentive materially below, prevailing market levels. The QPS did not comply with its own leasing policies. The financial cost was not originally disclosed in the QPS's financial statements. The government declined to provide the funding sought. The QPS continues to pay rent for a premises it does not use.

14. Specific information about the matter initially came to the attention of the CCC in October 2024. The investigation was formally commenced after a complaint was received on 8 November 2024 from former Commissioner Gollschewski, notifying the CCC of broad concerns regarding the lease of the site. Those concerns related to the procurement process for the lease, the lack of due diligence undertaken before the QPS became bound, and the lease's unfavourable terms.

15. The significance of the matter lies in the governance and control failures by which an organisation such as the QPS came to commit public funds of this magnitude to an unsuitable asset. Those failures, and the lessons to be drawn from them, are the subject of this report.



Systemic weaknesses in governance and control

A cumulative failure of controls

16. This section reviews the governance and control weaknesses identified during the investigation. These are presented in the order they emerged in relation to the lease: the authority for the commitment, the process and expertise that should have managed it, the funding it required, the information and scrutiny that should have assessed the proposal, and the checks that should have allowed the QPS to reconsider the decision. The final section addresses the organisational culture underlying these issues.

17. Individually, several of these weaknesses may not have led to this outcome. However, each represented a control that could have prevented the transaction before the QPS was bound. Their combined failure is significant. At every stage, opportunities to halt the transaction were missed.

Authority to commit public funds

18. The decision to lease the Stones Corner property was strategic, aiming to consolidate some of the QPS's accommodation into a single major site and committing significant public funds over 15 years. Such a commitment requires clear authority, which is a fundamental aspect of sound governance. Delegated expenditure authorities and the reservation of major decisions to an organisation's board or senior executive body ensure that significant commitments are made by accountable individuals, aligned with strategy and budget, and properly documented.

19. The QPS established several key governance committees composed of senior executive police officers from across the organisation. The then Demand and Capability Committee (DCC) was comprised mainly of Deputy Commissioners and was responsible for managing and prioritising resources to ensure fiscal sustainability, as well as directing and endorsing strategies related to capability planning. The DCC could endorse project expenditure and recommend approval to the Commissioner of Police. The members of the DCC were drawn from various areas of the QPS.[2]

20. The abovementioned integrity controls are to ensure public funds are committed transparently, by accountable individuals, and on a record that can be reviewed. When such controls are absent, the risk of corruption increases, as weaknesses of this kind allow misconduct to go undetected.

21. These controls were not followed in this case. The QPS board of management did not formally decide on the transaction. While a general accommodation strategy had been discussed previously, the specific commitment to the Stones Corner premises was not. The decision to pursue the asset was not recorded or attributed to an authorised individual. The expenditure was approved outside the established delegated authorities. As a result, a significant commitment was initiated without proper documentation or approval from the appropriate authority and was never presented to the body responsible for such decisions.

22. Delegated authorities and reserved decisions protect public funds only when they are understood and followed. Strategic commitments or those exceeding financial thresholds must be made at the appropriate governance level, with decisions and their reasons properly recorded. Those with expenditure authority must know their limits and act within them.

[2] See Annexure 1.

Following established process and using available expertise

23. Complex, high-value commercial transactions are precisely the type of decisions that require an organisation's established processes and specialist expertise. In Queensland, the Queensland Government Accommodation Office (QGAO) manages office accommodation leasing for government agencies. By handling leases centrally, the QGAO has the opportunity to leverage the government's combined market power and knowledge. It also employs staff whose role and functions carry expertise in this area. Typically, all significant government dealings with building owners go through the QGAO.

24. The QPS had its own internal leasing process, which involved developing a proposal and seeking the QGAO's expertise. These arrangements help protect a public agency from overpaying or agreeing to terms that favour the other party. Independent processes and expert advice ensure that decisions to spend public money are based on merit and not on the views of those proposing the transaction.

25. Neither process was used. The QPS did not follow its internal leasing process, and the QGAO was not involved. The choice not to involve the QGAO appears to have been made by junior staff who believed it would be too expensive and too slow, and because of confusion about the classification and definition of 'operational workplaces'. This important decision was left to people who should not have had the authority or responsibility to make it.

26. A police Superintendent, without significant commercial property transaction experience and whose main job was to assess whether the property met the QPS's needs, ultimately led the negotiations for the long-term lease. The Superintendent believed their role was to engage with the OCC; that the OCC was responsible for engaging QGAO; and that their role was to prepare a 'business case' for the transaction for approval by their Assistant Commissioner. In practice, the Superintendent discussed rent and incentives with an experienced counterparty, but without the necessary expertise or oversight. The QPS did not use the government's collective bargaining power. Instead of working through the QGAO and comparing options, the QPS negotiated directly with the counterparty, who then prepared the agreement. Annexures 1 and 3 to this report list the key persons involved in those events and a timeline of the key events that led to the QPS ultimately entering into the agreement. There was no competitive process or independent check to determine whether the terms were appropriate, reasonable, and represented value for money.

27. As a result, the QPS agreed to terms it was not well equipped to negotiate and could not show that the deal was good value for public money. For deals of this size and complexity, using established processes and expert advice should be required, and decisions left only to senior, authorised staff. Deciding if a property meets operational needs should be separate from negotiating its commercial terms. Leasing should go through the body set up to use the government's market power. When a body such as the QGAO exists, its involvement should be standard practice.

Securing funding before commitment

28. A unit of public administration (UPA)[3] should confirm funding, whether external or from its own resources, before making any commitment. Confirming available funds and obtaining any required government or Cabinet approval ensures that public expenditure is properly authorised. This process also protects the UPA: without secured funding, it can withdraw from the transaction and maintain its negotiating position.

[3] Units of public administration are defined in section 20 of the CC Act and include public service departments, the Queensland Police Service, local governments, statutory authorities and state and local government elected officials.

29. This process was not followed. A consultant to the QPS, engaged to undertake a significant review of assets and propose a detailed strategy for future accommodation needs, advised that government funding was required, that the QPS's budget was insufficient, and that funding assurance should be secured before proceeding.

30. The consultant recommended preparing a funding submission for government approval. However, the QPS committed to the transaction before taking these steps. The responsible Minister was only fully informed after the QPS entered the conditional agreement, and the government ultimately declined the requested funding.

31. As a result, the QPS committed to expenditure beyond its budget, without government approval, for which funding ultimately was denied. By committing before securing funding, it lost both the option to withdraw and its negotiating leverage. The lesson is clear: if a commitment cannot be met from the UPA's own budget, the funding source must be identified and secured, and all necessary government or Cabinet approvals obtained, before any binding action is taken. The responsible Minister should be actively briefed and involved before the UPA is exposed.

The information on which decisions were made

32. A decision to commit public funds is only as sound as the information supporting it. In this case, the then Police Commissioner (the Commissioner) approved the expenditure based on the DCC's recommendation. The DCC's role was to review the proposal, ensure it was affordable, sustainable, and aligned with QPS priorities, and, if appropriate, endorse it. As a gatekeeper, the DCC assured the Commissioner that the proposal had been properly examined, while relying on the submission as a complete and accurate account of the proposal.

33. The submission used to approve this expenditure lacked essential information. It did not include the whole-of-life cost, the funding source, or the status of due diligence, all of which are necessary for an informed and fiscally responsible decision. Whilst those absences ought to have been identified, the submission nonetheless set the scene. It enabled, or contributed to, poor senior-level decision-making. The submission also referred to considerations said to favour the proposed lease transaction, including a requirement for operational need, concerns regarding the condition, suitability and future capacity of existing QPS facilities, and potential savings associated with maintenance and holding costs of those facilities. Those considerations formed part of the material presented to, and considered by, the DCC and ultimately the Commissioner.

34. However, neither the DCC nor the Commissioner could fulfil their responsibilities without a submission that disclosed the full cost, funding source, and relevant opinions regarding the lease transaction under consideration, even if the transaction was intended to address legitimate concerns about existing QPS facilities and operational needs. The submission formed the basis of the decision, and the author's certification of its completeness and accuracy was essential for both the DCC and the Commissioner.

35. A process in which a submission can present an incomplete or one-sided account is, for that reason, a corruption risk. The information control is the principal defence against public money being committed when it should not be, because those who must decide can test only the information put before them, and cannot weigh what a submission leaves out. Where a submission can omit known concerns, suggest support that was not given, and reach the decision-makers without being provided to those best placed to correct it, the risk is twofold: that a poor decision will be made, and that a commitment can pass the checks that exist to prevent it.



36. The submission's account of consultation was also incomplete in a critical way. It claimed that the Brisbane Region (which was the proponent of the transaction) had been in *'constant communication'* with the Organisational Capability Command (OCC) of the QPS responsible for leasing matters and also had contacted the director of the Finance Services division about funding. These were the two most important internal stakeholders. However, the submission did not document the substance of these communications or the concerns raised by these stakeholders.

37. Both stakeholders had concerns directly relevant to the decision: Finance Services questioned the availability of funding, and OCC raised issues with the transaction terms. These concerns were not disclosed in the submission, nor were Finance Services and the OCC included among those who received the submission before the expenditure was approved. The submission was advanced urgently (without that urgency being obvious) and provided to the DCC without input from Finance Services and the OCC, who were best positioned to identify omissions. As a result, the submission referenced consultation with stakeholders whose concerns it failed to record and who had no opportunity to provide input.

38. As a result, the decision to commit significant public funds was made on incomplete information that did not disclose the concerns of the stakeholders consulted. The DCC endorsed the submission, and the Commissioner approved the expenditure based on that endorsement. However, the amount the Commissioner approved exceeded her authorised financial delegation. The Commissioner submitted that she approved the expenditure under the mistaken belief that it was within her authorised financial delegation.

39. Both the DCC as gatekeeper and the Commissioner as approver depended on the completeness of the submission, which was lacking. Additional information was not sought by the DCC or the Commissioner.

Scrutiny of major commitments

40. A major commitment of public funds is submitted to, in this case, the DCC for approval to ensure independent evaluation. For commitments of this magnitude, this integral step is designed to identify any deficiencies before referral to the decision-maker for approval which operates as the final safeguard before public funds are allocated. Committees such as the DCC are established as important checks to ensure that proposals are examined from multiple perspectives and that no single account remains unchallenged. A scrutiny process that defers to the submission or interprets the absence of recorded concerns as assurance offers only the illusion of a safeguard.

41. A check that can be satisfied without genuine examination constitutes an integrity risk, as it confers the appearance of oversight on decisions that have not been properly evaluated. This risk is heightened because other stakeholders depend on the committee's endorsement. The Commissioner, for example, should be able to regard the DCC's endorsement as confirmation that the commitment has undergone thorough scrutiny. Consequently, nominal scrutiny fails to identify flawed proposals and also leads those who rely on the endorsements to believe that adequate evaluation has occurred.

42. The DCC was responsible for conducting thorough scrutiny before the commitment was advanced for approval. However, it did not fulfil this function as intended. The submission was endorsed without the level of deliberation warranted by the scale of the commitment. The DCC relied on the apparent assurances within the submission and interpreted the absence of recorded concerns as support. Critical questions that independent scrutiny should have addressed (such as the ultimate cost of the commitment, its funding sources, the perspectives of those consulted and the authority of the Commissioner to approve the expense) were not raised. Had these inquiries been made, significant concerns regarding the transaction would have emerged.



43. The DCC operated based on a submission that was incomplete. The inadequacy of the submission and the lack of scrutiny represent two aspects of a single failure: the first deprived the decision-making process of essential information, while the second allowed this deficiency to go undetected. In addressing these failures, this report discusses deficiencies in both submission and scrutiny collectively, without attributing the outcome to any individual, given the varying roles, knowledge, and opportunities to intervene.

44. Individuals responsible for approving commitments of public funds (especially commitments of this scale) have an obligation, independent of any submission received, to rigorously evaluate the proposals presented to them. This includes inquiring about the cost and funding of the commitment, treating any silence or ambiguity in the submission as a prompt for further investigation, and allocating sufficient time for the level of scrutiny appropriate to the decision's scale.

Testing the decision before binding

45. Due diligence, independent advice, and the ability to withdraw are essential safeguards between considering a transaction and being bound by it. Their purpose is to ensure a party fully understands its commitments and can decline if necessary. Conditional agreements exist to provide time to verify a transaction and, if adverse findings arise, to withdraw. These safeguards are effective only if acted upon before a binding commitment is made. Committing public funds before proper verification and missing the chance to reconsider removes the final protection against unintended consequences and eliminates the ability to halt an irreversible commitment.

46. None of these safeguards were applied in time. Due diligence on the property began only after the conditional agreement was signed and was not completed until after the QPS was already committed. The completed due diligence revealed the property would require millions of dollars in additional expenditure and was unsuitable for the QPS's needs. Legal advice was sought late, and the QPS allowed the agreement to proceed despite knowing the risks. No extension was requested, and although the QPS could have withdrawn, it chose not to.

47. At no stage did the QPS appear to consider purchasing the property instead of leasing it, even though the total lease cost far exceeded the purchase price. A basic value-for-money assessment, comparing available options, was not conducted.

48. The QPS committed itself before understanding the full implications and did not act to withdraw when it still had the opportunity to do so. Due diligence and advice, which should have informed the decision, only confirmed after the fact that the commitment was unwise. The key lesson is that due diligence, independent advice, and evaluation of alternatives must occur before making a binding commitment. The conditional period is meant to test a transaction and, if necessary, withdraw. A conditional period should not be treated as a mere formality. The ability to decline must be maintained until the UPA is confident that the commitment is sound.



Escalation, supervision, documentation and disclosure

49. Four key governance measures fall for consideration: escalation of concerns, supervision, documentation, and disclosure. Escalation ensures concerns reach decision-makers. Supervision aligns responsibility with appropriate experience and expertise. Documentation allows significant decisions to be reviewed and learned from. Disclosure enables the public to see a UPA's commitments on their behalf. Individually, these controls may seem routine. Together, these measures allow an organisation to identify problems, respond to them, and account for its decisions.

50. The controls safeguard organisational integrity. When concerns are not escalated, decisions are undocumented, or staff act beyond their expertise without support, the organisation cannot reliably detect errors or wrongdoing. Weakness in these controls creates conditions for costly mistakes and increases the risk that misconduct will go unnoticed. In short, failure of these controls is a corruption risk.

51. In this case, each control was weak. Concerns remained within the QPS which did not reach decision-makers. Relatively junior or inexperienced staff handled significant parts of the transaction without adequate supervision. Critical decisions were undocumented, leaving the QPS unable to identify who decided to pursue the property, the reasons, or how terms were set. The commitment was also not initially disclosed in the QPS's financial statements.

52. When escalation, supervision, documentation, and disclosure fail, an organisation loses its ability to hold itself accountable. It cannot demonstrate that expert concerns were considered, identify who initiated key actions or explain the rationale, nor disclose commitments made on the public's behalf. This collective failure removes safeguards against poor decisions and the record needed to review them later.

53. These controls require consistent attention. A UPA must have escalation channels to ensure concerns reach decision-makers and a duty to record and address them. Supervision should match the risk and value of staff activities. Significant decisions and their reasons must be documented as they occur, and material commitments must be accurately disclosed. Without these measures, no one can reconstruct how a decision was made or why.



The common thread: organisational culture

54. The weaknesses described in this report were not isolated incidents. The simultaneous failure of multiple controls, each of which may, if acted upon, have prevented the transaction, cannot be attributed to chance. Instead, these failures reflect the prevailing organisational culture and its practices, which determined how and whether controls were applied.

55. Several features of that culture recur across the matter. No one tested the proposal: those involved took comfort in the fact that it had reached them, or that a senior person had signed it, and treated the absence of recorded concern as assurance. A common refrain was that there was a simple assumption by senior decision makers that others had 'done their job'. Responsibility was diffused: at each point where the transaction might have been questioned, those involved relied on someone else to have done the questioning, so that a decision of great consequence became, in effect, no one's to make or to stop.

56. A strong preference within one part of the QPS influenced an organisation-wide decision, while governance functions failed to provide necessary oversight. Once approved, the commitment gained momentum, making the lease appear inevitable and eliminating opportunities for reconsideration. Significant decisions were made and communicated informally, leaving the QPS unable to fully reconstruct how it became bound.

57. None of this involved dishonesty. However, a culture such as this creates the conditions in which the risk of corruption is highest. When controls are assumed, concerns are not communicated, decisions are undocumented, and preferences override checks, corrupt conduct can occur and remain undetected. The risk is inherent in these conditions, regardless of whether it is realised in a specific case.



Recommendations

58. This was a very costly transaction for the Queensland Government. It shows how an organisation with adequate controls on paper can still fail if those controls are not applied and if the culture that should apply them is lacking. The safeguard against repetition, in the QPS or any other public sector agency, is a culture that takes its existing policies seriously.

Program of organisational reform

59. Since June 2026, the CCC has been engaging with senior officers of the QPS to discuss the corruption risks identified during the investigation and opportunities to strengthen governance practices, promote a proactive risk culture, and build their resistance to corruption.

60. The CCC has made nine (9) recommendations directly to the QPS to address weaknesses and close the loopholes which allowed the conduct to occur. These recommendations are set out in Annexure 4 and focused on:

- Improving internal governance and oversight practices with respect to leasing and accommodation processes
- Strengthening the governance, assurance and decision-making practices of internal committees so that documented governance processes are followed in practice
- Ensuring clear expectations among committee members, including endorsement and recordkeeping practices
- Developing capability and awareness of financial delegations, governance and leadership, and
- Investing in ongoing improvements to organisational culture and risk management.

61. At the same time, the QPS has been delivering a broader program of organisational reform. This has included:

- Implementing a new governance structure which includes dedicated committees and subcommittees, and establishing clearer decision-making pathways for strategic, financial, workforce, ICT and asset matters
- Strengthening frameworks to support enhanced governance practices and define responsibilities, committee structures, and assurance processes
- Delivering targeted capability uplift for officers and employees with financial management delegations, including partnering with Queensland Treasury Corporation to support maturing the service's financial dexterity, and
- Investing in organisational leadership and culture through targeted governance and audit professional development for executive level staff and a program of work focused on ethical leadership, decision-making and accountability.

62. The CCC acknowledges the work already completed by the QPS as well as its ongoing efforts to strengthen governance, assurance, and decision-making capability service-wide.



Lessons for all public sector agencies

63. The recommendations made to the QPS have broader application to the public sector and government, offering lessons for any agency managing major public transactions.

64. The CCC recommends that all public sector and public service entities:

- Ensure decision-makers fully understand their roles, responsibilities and financial delegations and receive regular training, support and guidance to make informed and fiscally aware decisions
- Have clear policies and procedures in place with respect to leasing and accommodation, and appropriate internal controls, governance and due diligence processes to verify decisions and confirm financial funding
- Engage relevant internal and external subject matter experts when making major or high-value decisions, keeping records of this consultation or, where applicable, the reasons for not consulting
- Have processes in place to ensure complete and accurate information is provided to decision-makers, and assurance measures to review and authenticate decisions about major or high-value commitments before finalisation, including that supporting records of decisions and reasons have been made, and
- Ensure employees understand the scope of their roles and the authority they have, know where to seek guidance and support, and operate in a culture which encourages and rewards integrity and accountability.

The broader reforms required

65. Multiple safeguards that should have prevented this outcome for the QPS failed; and the agencies established to support decision-making about complex, high-value commercial transactions were not engaged.

66. The decision to deviate from established public sector policies and practices, and not seek specialist advice, undermined the guardrails that exist to manage risks associated with property transactions.

67. To address the broader risks this presents to the public sector, it is recommended that the Queensland Government:

- Review its whole-of-government accommodation policy to determine if additional advice or direction is required to ensure appropriate public sector representation in office accommodation matters, including clearer guidance on what constitutes an 'operational workplace' and how to apply this definition, and
- Review its Leasing Approval Policy to ensure it reflects broader policy changes and contemporary practices, and documents that intersect with the whole-of-government accommodation policy, including responsibilities for applicable agencies.



Annexure 1 – Key persons referred to in timeline of key events

All persons from herein will be referred to by their abbreviated title and name.

Name	Position at relevant time	Abbreviated title and name
Campbell, Jayne	Senior Leasing Officer (AO6), Capital Asset and Facilities Management Group (CAFMG), OCC	Ms Campbell
Carroll, Katarina	QPS Commissioner	Commissioner Carroll
Chelepy, Shane	Deputy Commissioner, Emergency and Disaster Management (DCC member)	DC Chelepy
Connors, Brian	Assistant Commissioner, Brisbane Region	AC Connors
Gollschewski, Stephan	Deputy Commissioner, Special Coordinator, Police and Emergency Services Reform	Commissioner Gollschewski[4]
Guteridge, Kevin	Acting Deputy Commissioner, Regional Operations (DCC Member)	A/DC Guteridge
Harsley, Cameron	Assistant Commissioner, Brisbane Region and Deputy Commissioner Regional Services (DCC member)	DC Harsley
Jacobsen, Linda	Director, OCC	Dir Jacobsen
Linford, Tracy	Deputy Commissioner, Crime, Counter Terrorism and Specialist Operations (Chairperson DCC)	DC Linford
McCarthy, Sinead	Deputy Chief Executive, Strategy and Corporate Services (DCC member)	DCE McCarthy
Tayler, Simon[5]	Inspector, Brisbane Region	Supt Tayler
Vanderbyl, Matthew	Assistant Commissioner, OCC (DCC standing attendee)	AC Vanderbyl
Viles, Nick	Executive Director/Finance Chief Financial Officer, QPS (DCC standing attendee)	CFO Viles

[4] Appointed Commissioner of Police on 22 April 2024.
[5] Simon Taylor became a substantive Inspector on 17 February 2020 before being appointed a substantiative Superintendent on 17 November 2023.

Annexure 2 – Definitions for timeline of key events

Abbreviation	Definition
BR	Brisbane Region
CAFMG	Capital Asset and Facilities Management Group
CBRC	Cabinet Budget Review Committee
C&W	Cushman & Wakefield
COTL	Conditional Offer to Lease
DCC	Demand and Capability Committee
EBN	Executive Briefing Note
MBN	Ministerial Briefing Note
NRF	Norton Rose Fullbright Solicitors
OCC	Organisational Capability Command
QPUE	Queensland Police Union of Employees
Standing Attendees	Standing attendees of the DCC including AC of OCC, CFO, Chief Information Officer, ED of Human Resources and ED of Policy and Performance
Stones Corner Site	433 Logan Road, Stones Corner



Annexure 3 – Timeline of key events

Date	Event
2022	**DC Harsley** delegates **Supt Tayler** to review the capital assets of BR.
25 January 2023	MBN provided to advise the Minister of capital asset concerns and "*intention to create a detailed short, medium and long-term capital asset strategy.*"
April 2023	Egis Oceania Pty Ltd engaged to undertake the *"Brisbane Region Accommodation Planning Study".*
9 May 2023	**Supt Tayler** emails **Ms Campbell** stating the BR was seeking an appropriate site to lease for the consolidation of four stations and other District functions.
9–10 May 2023	**Supt Tayler** contacts a real estate agent seeking a suitable property to lease. The agent emails **Supt Tayler** a list of five properties, including Stones Corner, which was off market.
31 May 2023	The real estate agent emails **Supt Tayler** further details about Stones Corner.
2 June 2023	**Supt Tayler** visits the Stones Corner site with a QPUE representative. **Supt Tayler** later advises OCC of its *"enormous potential for the Region…"*.
7 June 2023	**DC Harsley** visits site following which he is recorded by **Dir Jacobsen** as having advised **AC Vanderbyl** of its suitability to the Region. **Dir Jacobsen** reported also that **AC Vanderbyl** asked CAFMG to "*initiate action for a lease offer*" and "*a submission will be prepared for funding after the offer has been received and is acceptable*".
27 June 2023	**Supt Tayler** and **Ms Campbell** meet with lessors and their representatives.
6 July 2023	**Ms Campbell** emails the lessor and requests a COTL.
7 August 2023	Egis Report sent to **Supt Tayler** and **DC Harsley**. The report recommends "*Brisbane Region develop a Cabinet Budget and Review Committee (CBRC) submission…for the development of five new multi capability police facilities (MCPFs)*".
10 August 2023	MBN Update 1, generated by BR, emailed to Minister as 'urgent'. MBN advises the QPS have received a COTL for Stones Corner and are in negotiations with the lessors. The MBN recommends the Minister "*supports in principle the funding arrangements from the QPS operating budget with an additional CBRC capital funding submission for the remaining recommendations…*". The MBN was returned from the Minister's office to **AC Vanderbyl** on the same day, requesting "*more advice*".
14–31 August 2023	**Ms Campbell** and **Supt Tayler** negotiate the proposed lease terms with the lessors' agents.
22 August 2023	**AC Vanderbyl** forwards email from Minister's Officer to **AC Connors**.

Date	Event
28 August 2023	**AC Vanderbyl** emails **AC Connors** the unsigned COTL, and states: "*Sqm includes common areas which is unacceptable, the price point and lease conditions are totally unacceptable at present and do not represent good value as they currently stand*". Further down the email thread, **Dir Jacobsen** had written, "*…this offer is not considered favourable at present and further negotiations are required to ensure value for money etc*". The email from **AC Vanderbyl** was sent only to **AC Connors**, and not to **Supt Tayler**. **Supt Tayler** was not in **AC Vanderbyl**'s line of command.
31 August 2023	The lessor emails **Supt Tayler** a "*revised and final COTL*".
31 August 2023	**Supt Tayler** emails the DCC submission to **AC Connors** and **Ms Campbell**. **Ms Campbell** then sends the submission to an OCC staffer. The concerns of **AC Vanderbyl** were not included in the DCC submission.
1 September 2023	The OCC staffer sends the DCC submission to **Dir Jacobsen**. The DCC submission is not forwarded to **AC Vanderbyl**.
4 September 2023	The DCC submission, verified by **AC Connors**, is sent to **A/DC Guteridge** who endorses the submission.
6 September 2023	**DC Harsley**'s support officer emails the DCC submission to **CFO Viles** stating she was following up some urgent information on behalf of **DC Harsley**. **DC Harsley**'s support officer asked **CFO Viles** to call her regarding the DCC submission.
6 September 2023	**CFO Viles** responds to **DC Harsley**'s support officer's email with suggested updates to wording in the DCC submission regarding funding. In summary, **CFO Viles** said: • $4M could come from COI DFV funding but requires consultation and approval • there was an opportunity to de-invest some BR assets as a full or partial offset to the lease expenditure • a Net Present Value (NPV) calculation may need to be performed due to the length of the lease • the DCC could consider $4M funding via emerging priorities allocation, but said this would only be able to be considered as a *"one-off allocation for the current year, not a recurring allocation".*
7 September 2023	**DC Harsley**'s support officer forwards the advice to **Supt Tayler** "*Tayls- For your information and addition to the submission*". **Supt Tayler** forwards the email to the QPS's Operations unit. The DCC submission is ultimately not updated with **CFO Viles**' information. **Supt Tayler** thought **CFO Viles**' information would be added to the DCC submission because **CFO Viles** provided the information to **DC Harsley**'s office after **DC Harsley**'s support officer had requested it.
7 September 2023	**Supt Tayler** meets with the lessor and their real estate agent. **Ms Campbell** is not invited to the meeting.



Date	Event
8–11 September 2023	**DC Harsley**'s support officer requests that the DCC Submission be heard out of session. The DCC Submission was emailed to all DCC members for consideration but was not emailed to standing attendees (such as **AC Vanderbyl** and **CFO Viles**). The DCC members unanimously endorse the submission (without reference to **AC Vanderbyl** or **CFO Viles**).
11 September 2023	A resolution is forwarded to **Commissioner Carroll** for approval. The 'Referral to the Commissioner of Police for final decision' document signed by **DC Linford** states, in part: **"***This matter is unable to wait until the next DCC meeting (on 26 September 2023) to allow for return Brisbane Region and allow for the lease to be signed*". **Commissioner Carroll** signs the following resolution**:** *The Commissioner: APPROVES recurrent expenditure ($5.8M per annum indexed at a flat 4% over a 15-year lease) to lease office accommodation for the creation of a Vulnerable Persons Hub and consolidation of Dutton Park, Annerley, Coorparoo and South Bank Police Stations* The above occurs between approximately 1.15 pm and 1.43 pm.
11 September 2023	**Supt Tayler** emails **Ms Campbell** and asks for the COTL to be 'executed'.
12 September 2023	An Operations officer emails **Ms Campbell, Dir Jacobsen**, an OCC staffer and **Supt Tayler** asking what time the COTL will be sent to the lessors as it was expected the previous day, and the lessors need it prior to 10:30 am due to a meeting with their bank.
12 September 2023	COTL is signed by **Dir Jacobsen** and **Ms Campbell** sends the COTL to the lessor's agent, **Supt Tayler** and an Operations officer. **Ms Campbell** states they will instruct solicitors to draft lease documents and CAFMG will commence "*our further due diligence investigations*".
12 September 2023	**Ms Campbell** emails COTL to QPS legal representatives, NRF and notes she will commence due diligence that day.
12 September 2023	**AC Vanderbyl** sends email to **CFO Viles** informing him about the approval of the DCC submission and advising OCC cannot fund the lease.
12 September 2023	**AC Vanderbyl** emails **DCE McCarthy** and states OCC has not finalised negotiations and it does not represent good value. Also advises he has asked **CFO Viles** to identify a funding source.
12 September 2023	**CFO Viles** responds to **AC Vanderbyl** and states "*it looks like the draft Sub without FIN-approved comment was progressed*". Advises he received a copy of the draft last week and was asked to find a one-off initial $4M funding source and "*beyond that we'll need to look at our options*".
12 September 2023	A QPS finance staffer emails an OCC staffer and advises "*ED Finance [CFO Viles] has confirmed funding is available for these lease costs as per the D&CC submission. The exact funding source is still to be identified…*". The email is forwarded to **Dir Jacobsen** and **Ms Campbell**.

Date	Event
12 September 2023	Final COTL sent to lessors again after it was identified QPS had signed the wrong version. COTL has a condition it would not become binding until "*Departmental Approval*" was obtained, and if the lessors were not notified of Departmental Approval within 30 days, the agreement would end.
12 September 2023	A Ministerial Liaison Officer emails the DC Regional Operations (**A/DC Guteridge**), requesting an MBN update, noting the Minister has become aware of DCC decision, and requests details of the funding stream, anticipated use of existing police facilities post transition to the new hub and whether funding will be sought via CBRC. The Minister also requested a meeting with **Commissioner Carroll** and the AC of BR (**AC Connors**) on 18 September 2023.
13 September 2023	**Ms Campbell** emails QPS solicitors NRF requesting the lease documents be drafted.
21 September 2023	MBN Update 2 sent to Minister's office, advising the Commissioner approved the expenditure to lease Stones Corner and OCC provided a signed COTL to the owners to secure a long-term lease. The recommendations were the same as MBN Update 1 (10 August 2023).
26 September 2023	Email from QPS Ministerial Services Unit to an Operations officer advising MBN Update 2 returned unendorsed, and updated version requested.
3 October 2023	**Ms Campbell** emails **Supt Tayler** and an Operations officer advising, "*We will engage Cushman Wakefield later today to commence the due diligence investigation works and provide a report*".
4 October 2023	**Ms Campbell** provides updated meeting notes to multiple internal staff members that includes, "*Cushman and Wakefield to be engaged. 2-3 weeks required to complete works and provide report*".
10 October 2023	NRF provide legal advice to **Ms Campbell**. **Ms Campbell** forwards the advice to **Dir Jacobsen** who provides approval to send an NRF letter to the lessor.
11 October 2023	**Ms Campbell** emails NRF letter to **Supt Tayler** and an Operations officer, who queries the wording as she needs to update the MBN and brief the AC.
11 October 2023	NRF emails the lessors' legal representatives providing Departmental Approval and noting "*Until the documents are agreed and executed, Queensland Police Service reserves its position and will not be bound*".
12 October 2023	**AC Connors** phones **AC Vanderbyl** (on speaker with **Dir Jacobsen** present) and (allegedly) says the union would walk out of Dutton Park, Annerley and Coorparoo if the COTL was not revised and signed immediately, and the Minister and union members had expressed their disappointment in OCC to get it signed urgently. Other than the statements of **AC Connors**, there was no evidence identified during the investigation which showed the Minister had expressed any 'disappointment' or a desire for QPS to have the COTL signed 'urgently'.



Date	Event
12 October 2023	Email from Performance Inspector, BR containing Minister's request for urgent update to MBN Update 2 (refer to email sent to BR on 26 September 2023). Email stated, "*Our office would appreciate this request being brought to the attention of the AC OCC and an urgent update of the briefing note be completed by cob today as today is the COTL end date*".
12 October 2023	**AC Vanderbyl** emails **AC Connors**, **Dir Jacobsen** and **DCE McCarthy** and states he spoke with the union and they have no intention to walk out of police stations, the Minister is comfortable with the due diligence and legal process, the lessors had not objected to the clause [at that time] and OCC will update the relevant MBN. **AC Vanderbyl** also stated, "*it is important no regional member talk to the building owner during this final negotiation period*" (9:48am).
12 October 2023	**AC Connors** responds to **AC Vanderbyl** and states several points are not correct. **AC Connors** affirms all contact with the owners will be through legal channels with OCC managing on behalf of the QPS and asks **AC Vanderbyl** to "*note the expectation of government members when they were briefed on the proposal was that they wished for operations to be occurring from that site by May 2024*".
12 October 2023	Lessors' solicitor emails NRF. Lessors take exception to the conditions placed on the COTL.
12 October 2023	NRF advise **Ms Campbell** of the response from the lessors' solicitor and asks for QPS to advise them of their response, considering the risks previously outlined (12:06pm). **Ms Campbell** forwards the email to **Dir Jacobsen**, **AC Vanderbyl** and an OCC staffer.
12 October 2023	Following consultation with OCC members, **Dir Jacobsen** notified NRF of Departmental Approval for the COTL. The due diligence report from C&W was not completed prior to signing the COTL.
12 October 2023	NRF emails the lessors' legal representative to advise of Departmental Approval stating *"…the only reservation of rights is in relation to the negotiation of the lease documents which is also expressly contemplated in the COTL"* (3:58pm).
12 October 2023	**Dir Jacobsen** emails **Ms Campbell** and an OCC staffer advising, "*Andrea and I discussed this advice with the AC this afternoon, who noted the risk that the pre-lease assessment may recommend works that the landlord does not agree, during the lease negotiation. The AC accepted this risk and agreed to the approach detailed below and asked that NRF provide confirmation by 5pm that the revised advice has been accepted*".
13 October 2023	Lessors' solicitor confirms the COTL is unconditional and binds both parties.



Date	Event
Post COTL becoming unconditional	
27 October 2023	Due diligence report provided by Cushman & Wakefield identifying $6.5M in potential repairs and upgrades over the term of the lease.
20 November 2023	QPS Ministerial Service Unit seek dot points for the Department of Premier and Cabinet about *Courier Mail* article.
23 November 2023	OCC made aware that an Operations officer is meeting with the lessors every fortnight. **AC Vanderbyl** again advises BR that "*only OCC is to be communicating with the owner.*"
16 March 2024	OCC conducts a re-write of CBRC submission originally authored by BR.
18 March 2024	**AC Vanderbyl** advises **DCE McCarthy** of concerns around lease via CBRC submission "*Urgent: CBRCiC Stones Corner.*"
7 May 2024	OCC (allegedly) challenged by **DCE McCarthy** on views about Stones Corner and OCC engages "Primary Advisory" to review the COTL.
23 May 2024	Lessors' solicitor emails NRF in response to lease negotiations and reiterates the COTL remains binding on all parties. The letter states the rent commencement date remains 12 July 2024.
8 July 2024	CBRC submission outcome received.
2 August 2024	Final Primary Advisory Report received. According to the Report, "*the lease terms in the COTL may be in the order of 35-45% above market rental rates, and the incentive in the order of 70% below the market level. That is, the terms in the COTL are highly favourable to the Lessor relative to market commercial terms*".
7 August 2024	QPS receives a letter of demand from the lessors.
16–21 August 2024	EBN '*Expenditure approval to secure a new lease at 433 Logan Rd, Stones Corner*' was submitted to **Commissioner Gollschewski**. Estimates show a cost of approximately $116M for a 15-year term and a total cost of approximately $240M if the eight-year option is taken up by QPS. The EBN to approve expenditure was signed by then **Commissioner Gollschewski** on 21 August 2024 noting "*under the previous officer holder the QPS was bound to this lease transaction*".



Annexure 4 – Recommendations made to the QPS

The CCC has made the following recommendations directly to the QPS:

Recommendation 1

- Conduct reviews or audits of leasing processes to examine compliance with proper policies, procedures and delegation frameworks.
- Deliver updated training following process change to ensure relevant employees are informed.
- Communicate the updated leasing process and QPS strategic leasing plan to all impacted employees to ensure awareness and compliance, including how the policy interacts with other mechanisms such as financial delegations, procurement and contract management, ministerial approval and Cabinet Budget Review Committee (CBRC) process.

Recommendation 2

- Undertake a comprehensive review of the Property and Planning team, to ensure its resourcing profile supports the full functions of the QPS.
- Consider whether reviews of other areas of the QPS that were transitioned from the Public Safety Business Agency are required to ensure their resourcing profile supports service delivery and delegations are at an appropriate level.

Recommendation 3

- Update its Corporate Governance Manual to ensure it includes a definition for what matters may require urgent consideration. The QPS should maintain records of urgent considerations and consider conducting annual reviews or audits of these matters to determine if they appropriately met the relevant definition.

Recommendation 4

- Deliver education and awareness sessions for applicable staff appointed to new committees, including processes involved for a submission (including when Ministerial or CBRC approval is required), and expectations of the committee when making a submission.

Recommendation 5

- Ensure all employees with financial delegations complete financial delegation training when appointed (substantive or acting) to a role with financial delegations, with regular ongoing refresher training.

Recommendation 6

- Review other governance and management training courses available for staff to aid their development into senior roles, such as those provided by the Queensland Ombudsman, the Public Sector Commission and the Queensland Treasury Corporation.
- Require all ELT members (substantive and acting) to complete the Company Directors Course and other governance and management training.
- Consider providing regular refresher training to all senior staff on governance.



Recommendation 7

- The QPS's updated committee submission form template should be reviewed to include formal sign off, endorsement (by the responsible person or position submitting the paper) and comments by each committee member (including subject matter experts), and a requirement to attach proof of consultation with subject matter experts (as relevant).

Recommendation 8

- Include a regular review mechanism (at least annually) into the Corporate Governance Manual for each committee to ensure it remains fit for purpose and undertake internal audits of each committee's activities to inform such reviews.

Recommendation 9

- Develop and implement an action plan to address systemic organisational culture issues.



Annexure 5 – The CCC's corruption functions and public reporting

The CCC's corruption functions

68. The CCC's corruption functions are provided for in the CC Act.[6] The CCC has, among its corruption functions, responsibility for raising standards of integrity and conduct in units of public administration (UPA) and ensuring that complaints involving suspected corruption are dealt with appropriately.

69. One of the CCC's primary responsibilities is to investigate matters that may involve corrupt conduct by, or involving, a person holding an appointment[7] within a UPA in Queensland. The CCC has primary responsibility for dealing with complaints about corrupt conduct.[8]

70. Importantly, the CCC's corruption functions extend to corrupt conduct and to conduct liable to allow, encourage or cause corrupt conduct.[9] They are as concerned with prevention as much as they are with detection, investigation and potential prosecutions. The corruption functions are directed to a main purpose of the CC Act: to continuously improve the integrity of, and to reduce the incidence of corruption in, the public sector,[10] including by helping UPAs to deal effectively and appropriately with corruption by increasing their capacity to do so.[11]

71. The CCC performs its corruption functions in several ways. These include taking responsibility for conducting and completing investigations, as well as offering advice and recommendations to a UPA on handling corruption complaints. Additionally, the CCC fulfils its functions by sharing information with the public, such as reports on specific investigations.[12] This promotes transparency, reassures the public that corruption allegations are being properly addressed, and helps enhance the integrity of the public sector.[13]

The CCC's power to publicly report

72. The CCC may report in the performance of its functions[14] and may report on a corruption matter.[15] The CC Act recognises that the CCC performs its corruption functions, in part, by providing information to the public by reporting,[16] including in relation to particular investigations, to provide transparency about how it performs those functions,[17] and to continuously improve the integrity of, and reduce the incidence of corruption in, the public sector.[18] The CCC does not report publicly on every matter it investigates. Whether to do so requires it to weigh the considerations set out in the CC Act and to act consistently with its overriding obligation to act independently, impartially and fairly, having regard to the purposes of the Act and the importance of protecting the public interest.[19]

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6 CC Act, Part 3, Division 1 (particularly sections 33, 34 and 35).
7 CC Act, section 21.
8 CC Act, section 45(1).
9 CC Act, section 33(2)(a).
10 CC Act, section 4(1)(a).
11 CC Act, section 5(3)(b).
12 CC Act, section 35(1)(k).
13 CC Act, section 35(1)(m).
14 CC Act, section 64(1).
15 CC Act, section 64A.
16 CC Act, section 35(1)(k).
17 CC Act, section 35(1)(m)(i).
18 CC Act, section 35(1)(m)(iii).
19 CC Act, section 57.

Why issue a public report?

73. The CCC has reported publicly on this matter due to the systemic and serious failures identified, the significant public funds involved, and its value as a lesson for the public sector. The investigation identified no dishonesty, improper relationships, or personal benefit by any individual. Instead, it highlights governance and control failures by individuals and relevant senior committees that led the QPS to commit substantial public funds to a long-term obligation that has not achieved its intended purpose. Such weaknesses, wherever they arise, are costly and can also allow, encourage, or cause corrupt conduct, posing a corruption risk relevant to all UPAs.

74. The safeguards that should have prevented this outcome are not unique to the QPS. These are standard controls relied upon by all public sector agencies, making this matter instructive for the broader public sector.

75. Public reports are not prepared about every CCC corruption investigation. There are several competing factors in the CC Act[20] that the CCC must consider when deciding whether to issue a public report. Having regard to the considerations in section 64A(2), and to the purposes for which the power to report exists in the CC Act, the CCC decided to report publicly on the investigation.

76. This report is directed to the following objectives:

    a) to promote accountability and transparency in the management and expenditure of public funds

    b) to identify, for the benefit of all UPAs, the governance and control failures by which a major financial commitment came to be made, and the improvements that would reduce the risk of the same thing happening elsewhere

    c) to reinforce the standards expected of UPAs, and of those who lead them, in the expenditure of public funds, and

    d) to provide public assurance that matters of this kind are appropriately investigated.

77. Aligned with these objectives, this report takes a preventive and forward-looking approach. It analyses failures as indicators of weaknesses in governance control, offering lessons to improve the management of major financial commitments in the public sector.

78. The CCC's decision to publish this report, and the form it takes, reflect a consideration of each of the matters the CCC is required to take into account under section 64A(2) of the CC Act, including the need for accountability and transparency, the public benefit of a report, the seriousness of the matter, and the interests of any person who may be identifiable from it.

[20] CC Act section 64A(2).

Annexure 6 – Limitations on findings, recommendations and statements

Limitations on findings, recommendations and statements

79. Section 48B of the CC Act limits what the CCC may include in a report. The CCC must not make any finding or statement that a person has or has not engaged in, is or is not engaging in, or is about to engage in, corruption; any finding, recommendation or statement that a person should be prosecuted for a criminal offence or be the subject of disciplinary action, or that prosecution proceedings or disciplinary action should be considered in relation to a person; or any finding or statement that there is evidence, or insufficient evidence, supporting the start of a proceeding against a person (s. 48B(1)). This report is written within those limits.



Annexure 7 – Procedural fairness

Procedural fairness

80. Section 69B of the CC Act provides that, where the CCC proposes to make an adverse comment about a person in a report, it must, before the report is published, give the person a copy of the report or an excerpt containing the adverse comment and an opportunity to make a submission about the proposed comment and about the substance of the evidence the CCC considers justifies it. The CCC must fairly state any submission the person makes in the report.

81. Although this report is directed to systemic issues, some individuals are named or otherwise identifiable, and comments or inferences within the report might be regarded as adverse to them. To ensure fairness, and consistently with section 69B of the CC Act, the CCC gave those persons a copy of the draft report, and the substance of the evidence relied on, and invited them to make submissions within the period allowed by the CC Act, namely not earlier than 30 days.

82. Submissions were received from five (5) of the 14 relevant identifiable parties or their legal representatives. Careful consideration was given to each of the submissions received. The draft report was amended, where appropriate, to address the concerns raised in those submissions.

83. A copy of the draft report was also provided to the Acting Commissioner of the QPS inviting the QPS to provide their feedback on the accuracy of the report and any updates on QPS processes and procedures that have been implemented to address the concerns raised herein. Details of the QPS's organisational reforms in this area are discussed in the Recommendations section of this report.



Annexure 8 – Human rights compatibility statement

84. In deciding to prepare and publish a public report, the CCC is required by the H*uman Rights Act 2019* (HR Act) to act and make decisions in a way that is compatible with human rights. When making decisions, it is required to consider human rights relevant to the decision.[21]

85. The decision to prepare and publish a public report engage the right to privacy and reputation[22] of any person who is identified or may be identifiable from the report. Any interference with the right to privacy and reputation is lawful, being authorised by sections 64 and 64A of the CC Act and is not arbitrary: the report focuses primarily on systemic issues and makes no finding about the conduct or culpability of any person. To the extent the decision limits that right, the CCC considers the limitation reasonable and demonstrably justifiable,[23] having regard to the importance of the purposes the report serves, the measures taken to ensure fairness (including, the procedural fairness afforded, and the limits imposed by section 48B of the CC Act), and the public interest in accountability for the stewardship of public funds.

86. The CCC also has considered the right to a fair hearing[24] and the rights in criminal proceedings.[25] No criminal proceeding is in contemplation, and thereby section 32 is not engaged. As to a right to a fair hearing, this report does not limit it: the report, makes no finding about the conduct or culpability of any person, and does not determine, prejudge or pre-empt any question of individual liability, which is not a question for the CCC and is not addressed in this report.

87. The CCC considers that the decision to publish this report is compatible with human rights.

21 HR Act, section 58(1)(b).
22 HR Act, section 25.
23 HR Act, section 13.
24 HR Act, section 31.
25 HR Act, section 32.

Crime and Corruption Commission

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