



Crime and Corruption Commission

QUEENSLAND

Investigation Workshop

An investigation into allegations of disclosure of confidential information at the office of the Integrity Commissioner

July 2022



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4 July 2022

The Honourable Curtis Pitt MP
Speaker of the Legislative Assembly
Parliament House
George Street
BRISBANE QLD 4000

Dear Mr Speaker,

In accordance with section 69(1)(b) of the *Crime and Corruption Act 2001* (the Act), the Crime and Corruption Commission hereby furnishes to you its report *Investigation Workshop – An investigation into allegations of disclosure of confidential information at the office of the Integrity Commissioner*.

As the Legislative Assembly is not sitting this week I understand you will deliver the report to the Clerk for authorisation and publishing pursuant to section 69(5) of the Act.

The Commission has adopted the report.

Yours sincerely

A handwritten signature in black ink that reads "Bruce Barbour".

Bruce Barbour
Chairperson

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Why issue a public report?

1. Investigation Workshop has explored allegations of improper disclosure of information from the Integrity Commissioner's office, and related matters.
2. These allegations have attracted a substantial amount of public attention, media coverage, and, regrettably, misinformation.
3. This is in addition to the broader public focus on matters involving the Integrity Commissioner's office, including the statutory review of that office and its functions, and the relationship between that role and the Public Service Commission.
4. The investigation explored three matters arising from the complaint:
 - i. Whether there was any improper disclosure of information by an officer working in the Integrity Commissioner's office
 - ii. The circumstances surrounding the 'raid' on the Integrity Commissioner's office and the 'seizure' of laptops from that office
 - iii. The information security arrangements in relation to the confidential information held by the Integrity Commissioner.
5. In relation to those three matters, the investigation concluded that:
 - i. There was no evidence of improper disclosure.
 - ii. The circumstances in which the laptops were retrieved from the Integrity Commissioner's office were entirely ordinary, and the descriptions of 'raid' and 'seizure' do not reflect the reality of what occurred. Further, the circumstances in which one laptop was 'wiped' are wholly unremarkable.
 - iii. The information security arrangements in relation to information held by the Integrity Commissioner have been in place since the office's inception. While there may be occasion to reconsider those arrangements as part of the broader review of the structural arrangements for the Integrity Commissioner, there was no evidence to suggest that these arrangements had led to any improper access of confidential Integrity Commissioner information.
6. In light of the above conclusions, the CCC considered a public report was appropriate so as to provide an accurate picture of what the evidence suggests actually occurred.
7. A failure to correct the confusion and misinformation around these events may continue to erode public confidence.
8. Further, in light of the current review of the Integrity Commissioner's functions, this matter highlights some of the practical and structural difficulties which arise from the current arrangements.

Procedural fairness process

9. Under the *Crime and Corruption Act 2001* (the CC Act), the CCC must act independently, impartially and fairly having regard to the purposes of the CC Act and the importance of protecting the public interest.¹

¹ *Crime and Corruption Act 2001*, s. 57.



10. The CCC must also act in accordance with the *Human Rights Act 2019* (the HR Act) and must not act or make a decision in a way that is not compatible with human rights or, in making a decision, fail to give proper consideration to a human right relevant to the decision.²
11. The CCC acknowledges the publication of this report is likely to engage human rights in relation to freedom of expression,³ and privacy and reputation.⁴ Having regard to the clear statutory basis and reasons for the publication of this report, together with the measures adopted to ensure fairness with respect to the content of the report,⁵ the CCC considers the decision to publish the report is compatible with human rights in that it limits human rights only to the extent that is reasonable and demonstrably justifiable in accordance with section 13 of the HR Act.⁶
12. Accordingly, for the purpose of procedural fairness, the CCC gave the draft report (or relevant parts of it) to people and organisations referred to in it (whether those people or organisations were specifically identified or not) where those references may be viewed as adverse, and invited them to make submissions prior to the CCC determining the final form of the report. Respondents could provide confidential or non-confidential submissions. The CCC indicated to respondents that non-confidential submissions may be annexed to the final report, while confidential submissions would be noted as received but not attached to the final report. Three confidential submissions were received by the CCC. The CCC did not receive any non-confidential submissions.

² *Human Rights Act 2019*, s. 58.

³ *Human Rights Act 2019*, s. 21.

⁴ *Human Rights Act 2019*, s. 25.

⁵ Including revealing the identity of relevant persons only when it is necessary to understand and/or give context to the report; and the procedural fairness process.

⁶ *Human Rights Act 2019*, s. 8(b).



Background

13. The Integrity Commissioner is an independent statutory office holder whose responsibilities include⁷:
 - i. Providing confidential advice on ethics and integrity issues to particular classes of persons within the public sector.
 - ii. Providing confidential advice on ethics and integrity issues to members of the Legislative Assembly.
 - iii. Maintaining the lobbyists register, including responsibility for registering lobbyists.
 - iv. Raising public awareness of ethics and integrity matters by contributing to public discussion of these issues relevant to the Integrity Commissioner's functions.
14. By virtue of those functions, the Integrity Commissioner is privy to a significant amount of confidential information which is personal to those who seek advice. The Integrity Commissioner is responsible for ensuring the confidentiality of that information.
15. The administrative and staffing arrangements for the Integrity Commissioner are provided through the Public Service Commission (PSC), as the Integrity Commissioner has no statutory provision for an 'office of the Integrity Commissioner'. As such, the PSC is responsible for the conduct, supervision, training and performance of staff working in the Integrity Commissioner's office.⁸
16. Information Technology support for the Integrity Commissioner's office is provided through the Department of the Premier and Cabinet (DPC). The Integrity Commissioner's office's records and information are stored on DPC systems.
17. By March 2021, the arrangements with the PSC had become a point of contention for the Integrity Commissioner, who considered that those arrangements impaired the integrity of her office, and therefore her ability to fully carry out her functions.
18. A particular point of friction – which became central to this investigation – was the circumstances in which a Director, seconded to the Integrity Commissioner's office⁹, was returned to the PSC, and the circumstances in which two laptops were removed from the Integrity Commissioner's office on about 12 March 2021.

Review of the Integrity Commissioner's functions

19. The mandated five-yearly review of the Integrity Commissioner's functions conducted by Mr Kevin Yearbury PSM reported on 30 September 2021 to the Economics and Governance Committee (EGC). That report made a number of recommendations, both in relation to the regulation of lobbying in Queensland, and also the administrative and governance arrangements for the Integrity Commissioner.

⁷ Section 7 *Integrity Act 2009*

⁸ For the purposes of this report, the Integrity Commissioner and those staff employed by the PSC who provided services to the Integrity Commissioner are collectively referred to as 'the Integrity Commissioner's office' – although that is not a discrete legal entity.

⁹ This included a complaint made in December 2020 against the Integrity Commissioner that she had misused a corporate credit card, and against the Integrity Commissioner and a Director, also seconded from the PSC to the Integrity Commissioner's office. That matter remains under investigation by the PSC, and as such, is dealt with only to the extent necessary to provide context for this report.



20. The EGC conducted an inquiry in relation to that strategic review. The CCC made a written submission and gave oral evidence to that inquiry. While those submissions focused on regulation of lobbying in Queensland, the CCC did support the recommendations directed to establishing independent administrative and governance arrangements for the Integrity Commissioner.
21. On 3 June 2021 the EGC provided its report in relation to that review.



Summary and extent of investigation

22. During 2020 and 2021, the CCC received a number of complaints in relation to the Integrity Commissioner's office. Those matters were considered and dealt with by the CCC in the usual course.
23. In July 2021, while the CCC were making inquiries in relation to an unrelated matter, the Integrity Commissioner raised concerns that a PSC employee (an Executive Officer) who had been employed in her office may have released confidential Integrity Commissioner documents.
24. The Integrity Commissioner believed she had identified instances in which the Executive Officer had 'blind copied' emails to her own individual Integrity Commissioner email account, and also to a PSC email account.
25. On 19 August 2021, the CCC determined to investigate the allegation that the Executive Officer had misused her position to disclose confidential information of the Integrity Commissioner.
26. The investigation also considered the circumstances in which the Executive Officer's and Director's laptops were removed from the Integrity Commissioner's office, and the information security arrangements for managing the Integrity Commissioner's information.
27. The initial investigation was completed on 27 April 2022, with further clarifying information being provided until 27 May 2022. The CCC interviewed a number of witnesses and forensically examined the Executive Officer's laptop, and the 'backup' made of it. Notices to discover were also issued to various entities to obtain further information relevant to the investigation.
28. The following is a summary of the key issues explored by the investigation, as well as what the investigation revealed.

Allegation of unauthorised disclosure of confidential information

Background

29. The Executive Officer had been employed in the Integrity Commissioner's office in mid-2018. One of the Executive Officer's initial duties had been to ensure that a backlog of email records were properly processed and stored in the system, due to some historical record-keeping issues not relevant to this investigation.
30. The Executive Officer's responsibilities included general office administration, including reception duties and maintaining diaries. They also included processing and ensuring appropriate storage of emails passing through the Integrity Commissioner's various email mailboxes, and also updating the lobbyists register and storage of declaration of interest forms.
31. The staffing levels within the Integrity Commissioner's office would vary from time to time, depending on a variety of factors including workload. The PSC retained ultimate responsibility in relation to staffing of the Integrity Commissioner's office.
32. By mid- to late 2020 there were two staff within the Integrity Commissioner's office responsible for maintaining that office's administration and record-keeping. The Executive Officer was struggling to meet her record-keeping obligations.



33. The Executive Officer later raised a complaint of bullying in relation to how she felt she was treated at this time.¹⁰
34. On 12 October 2020 the Integrity Commissioner identified a missing Declaration of Interests form. Further instances of forms not being properly processed and saved were subsequently identified and this was raised with the Executive Officer. During a handover of work, the Executive Officer also provided another staff member with a number of records, which were emails which were to be, but had not yet been, properly processed and saved.
35. The Executive Officer left the Integrity Commissioner's office on 6 November 2020.

Identification of copied emails

36. The Integrity Commissioner commenced a review of the restored office@Integrity.qld.gov.au mailbox in July 2021.¹¹
37. That review (undertaken without forensic computing assistance) identified a number of emails which had been copied, or blind copied, to the Executive Officer's individual Integrity Commissioner email account. Some other emails appeared to have been blind copied to an individual PSC email address which had been created for the Executive Officer (as were created for all other Integrity Commissioner staff) for administrative purposes due to the system requirements.
38. This caused the Integrity Commissioner concern that information may have been improperly released by the Executive Officer.
39. As set out above, the CCC assessed the complaint and determined to investigate.

Conclusion

40. The Executive Officer denied improperly disclosing confidential Integrity Commissioner information.
41. Having investigated this issue, the CCC found no evidence that the Executive Officer had disclosed confidential information by email.
42. There was no basis for suspecting that information had been improperly disclosed by any other means, and the investigation did not find any evidence to suggest it.

Evidence

43. The CCC conducted a review of the relevant emails.
44. That review identified a large number of emails in which the Executive Officer copied or blind copied emails from Integrity Commissioner functional mailboxes (that is, those centralised mailboxes to which multiple staff had access) to her individual Integrity Commissioner mailbox.
45. The review did not identify any instances of those emails being on-sent, either to a personal email account, or to any inappropriate entity.
46. The forensic process by which the review was undertaken suggested that the appearance of emails as having been sent to the Executive Officer's PSC email address arose because of the

¹⁰ As noted above, that matter remains under investigation, and is only raised for necessary context.

¹¹ The reasons for the delay in undertaking this review are not relevant for the purposes of this report, but no criticism should be inferred from that delay.



manner in which the emails were restored for, and reviewed by, the Integrity Commissioner.¹² It appears that no emails were, in fact, copied to the PSC email address which, in any event, was inaccessible and merely routed back to the relevant Integrity Commissioner email address.

47. While the Executive Officer stated that she did not recall blind copying emails, she accepted that she did use the mechanism of copying emails to her individual integrity account, as a means of managing workflow:

I don't recall bcc to [[Name]@integrity], I would regularly cc my own email for, out of convenience and, simply to make sure that I have com-, that the email has gone out correctly as soon as I see it come in as a copy I know that yes it has successfully gone to the sender. Also I would like to keep it in my inbox as a bit of a 'to do' list if I knew I needed to chase that sender up about that email or something – I needed to file the email, something like that, I would keep it in flagged that I knew I needed to do something with it.

48. When the Executive Officer was preparing to leave in late 2020, she undertook a handover with her colleague, the Office Administrator. The Executive Officer provided various files in relation to ongoing work, including an electronic file titled 'lobbying to save'. This file contained a series of unactioned email files that required saving to the records management system that the Executive Officer had saved to her desktop. These files had not yet been 'actioned' despite having been so marked in the relevant functional mailbox.
49. This handover, which revealed the volume of uncompleted work, is consistent with the explanation the Executive Officer provided to investigators, that due to the amount of work coming in, she was struggling to keep up with the workload, and was copying emails to herself as a means of managing that work at a later time.

Alleged 'seizure' and 'wiping' of the laptop during a 'raid'

Background

50. As noted above, the Executive Officer commenced leave from the Integrity Commissioner's office on 6 November 2020 and did not return. The laptop which had been issued to her remained in the Integrity Commissioner's office from that time until it was collected on 12 March 2021.
51. The laptop was used from time to time by the Integrity Commissioner as a 'spare' laptop during this period (using her own login, but on that device).
52. After her departure, the Executive Officer made a complaint of bullying against the Integrity Commissioner¹³ and a Director within the Integrity Commissioner's office.
53. As the bullying complaint against the Director was within the jurisdiction of the CCC it was referred to the PSC for investigation subject to monitoring by the CCC. That investigation is ongoing.
54. On 4 March 2021 the Director was temporarily reassigned to a position outside the Integrity Commissioner's office.

¹² Again we note here that the review by the Integrity Commissioner occurred without forensic technical assistance.

¹³ This complaint was determined to be outside of the jurisdiction of the CCC as for a complaint against the Integrity Commissioner to be investigated by the CCC it must be sufficient to amount to a criminal offence.



55. On 10 March 2021, a new Director (Director 2) from PSC was assigned to support and work with the Integrity Commissioner, including to commence a recruitment process to engage suitably qualified support staff.
56. On 11 March 2021 a request was lodged through the internal staffing system to make relevant arrangements for a new starter to commence at the Integrity Commissioner's office on 18 March 2021.
57. Attempts had been made to arrange for the Director to attend the Integrity Commissioner's office on 12 March 2021 to collect their personal belongings. The Integrity Commissioner (along with the Office Administrator) stayed away from the office on that day to avoid contact, in light of the ongoing investigation. There are differing recollections as to who suggested this arrangement, but it is clear that this was by agreement, rather than by direction.
58. Ultimately the Director did not attend the office on that day.

Attendance at the Integrity Commissioner's office and retrieval of the devices

59. On 12 March 2021, the Desktop Support Engineer (a contractor employed by an external company to provide IT support services for DPC) attended the Integrity Commissioner's office.
60. While the evidence is unclear as to who made the request, it is clear that a request was made by officers of the PSC to DPC IT to collect the Director's laptop from the Integrity Commissioner's office.
61. The Desktop Support Engineer appears to have collected the two laptops from the Integrity Commissioner's office at the same time, albeit for different purposes.
62. It is sufficiently clear that they collected the Director's laptop from the Integrity Commissioner's office to secure it for the purpose of the ongoing investigation concerning the Director. The Executive Officer's laptop was collected by the Desktop Support Engineer at the same time so it could be reallocated to the new starter.
63. The two laptops were taken back to DPC IT. The Director's laptop was marked to be set aside.
64. The Executive Officer's laptop was effectively immediately backed up and then re-purposed for the new starter. The CCC was advised that while devices would ordinarily be held for 7 days before being re-purposed (in case any information was required to be retrieved), this timeframe was sometimes shortened where there was a particular demand for devices.
65. In the present case, the laptop was not held for 7 days before re-purposing due to a combination of demand, and the fact that the device had been sitting in the Integrity Commissioner's office for four months prior.
66. On the following Monday (15 March 2021) Director 2 advised the Integrity Commissioner and the Office Administrator that DPC IT had collected the two laptops for the purpose of reallocation (this was not entirely correct).
67. The Integrity Commissioner made a filenote regarding this issue in the following terms:

... I said it was not to happen as [Director] might return quickly and issues raised in relation to [Executive Officer] also included work that had been taken from active work email accounts and saved to her personal desktop by [Executive Officer] inc. 99 emails from lobbyists with stat decs. Said unclear what else may be saved to her desktop or elsewhere. Said laptops not to be touched as may form part of any legal action should events escalate.



68. As a consequence, the Office Administrator made urgent contact with DPC IT requesting that the two laptops not be wiped as there was data on the devices that was not to be altered. Director 2 also made inquiries of DPC IT on the status of the two laptops.
69. By 10.28am the Office Administrator had received advice from DPC IT, which they provided to the Integrity Commissioner by email:
- [Director] device – not touched at all and has been labelled as do not touch for a couple of week (sic)*
- [Executive Officer] device – has been wiped however any user data eg. One drive can be retrieved by them*
70. Separately on 15 March 2021, PSC requested that the Director’s laptop be transferred from DPC IT to the PSC office for safekeeping. The Desktop Support Engineer delivered both the Director’s and the Executive Officer’s laptops (despite the Executive Officer’s laptop already having been re-purposed).

‘Wiping’ of Integrity Commissioner information

71. In addition to the concern that confidential information belonging to the Integrity Commissioner may have been improperly disclosed, the reallocation of the device raised a further issue – whether other Integrity Commissioner information may have been lost as a result of the reimaging.
72. The Desktop Support Engineer explained to investigators the process by which a device is reimaged for a new starter. The backup which is prepared contained the data in the user’s Office 365 environment (Emails) and the user’s OneDrive folder. In addition, email, OneDrive and desktop files are backed up periodically. Files in other locations (such as a user’s ‘download’ or ‘picture’ folders) are not routinely backed up.
73. It is noted that the Executive Officer had saved a number of files to her desktop, which were handed over to the Office Administrator. It appears that she used a combination of her desktop and her rudimentary email system to manage her workload.
74. There is no evidence to suggest other records were stored in other locations, such that they risked being lost by the device being reimaged.
75. Further, it is noted that the handover process represented an effort by the Executive Officer to ensure that, despite her not being able to properly record necessary information prior to her departure, this work could still be undertaken and appropriate records could be maintained.
76. CCC investigators took possession of the Executive Officer’s laptop on 27 August 2021 to identify whether any data relevant to the Executive Officer was recoverable. It was not. On 8 September 2021 investigators sought, and later obtained, the export of the relevant mailboxes, and the backup of the reimaged device. Nothing was found to suggest relevant data was lost.
77. While it is not possible to say definitively that no records of the Integrity Commissioner were lost by reason of the reimaging of the device, the above circumstances suggest that it was quite unlikely.

Conclusion

78. Two laptops were collected on 12 March 2021. The Executive Officer’s laptop was collected for a different purpose to the Director’s laptop.



79. The Executive Officer's laptop had been in the Integrity Commissioner's office for four months prior to it being retrieved and reimaged. It had been used during that time by the Integrity Commissioner.
80. The Executive Officer's laptop was reimaged so that it could be reallocated to a new staffer.
81. While the reimaging gave rise to a risk that relevant records may have been lost, the backup processes employed meant that this risk was relatively small. Further, nothing has occurred since to suggest that risk materialised.
82. In light of the above, the commentary which has suggested that laptops were 'seized' and 'wiped' as a result of a 'raid' on the Integrity Commissioner's offices is, in the CCC's view, a mischaracterisation of what occurred.



Protection of information held by the Integrity Commissioner

83. On 15 February 2022, the Member for Kawana wrote to the CCC in relation to media reports arising from this matter. This letter was largely reproduced in news articles over the following days.
84. The Member for Kawana raised a number of concerns, but relevant for present purposes are:
- i. I am deeply concerned by these reports that the Public Service Commission took a laptop from the Office of the Integrity Commissioner (sic) and deleted its contents*
 - ii. I am not confident that my private details, or that of my colleagues who have sought similar advice has (sic) not been compromised*
 - iii. [Concerns about] the possible compromise of private details relating to Members of Parliament*
85. The Member for Kawana's concerns were expressly framed by reference to concerns about the PSC having access to information held by the Integrity Commissioner.
86. The administrative and governance arrangements for the Integrity Commissioner have been in place for the duration of that office's existence. In recent times, and particularly through the current review, close consideration has been given as to the ongoing suitability of these arrangements. The Yearbury review recommended changes to these arrangements.
87. As noted above, the IT services for the Integrity Commissioner are provided through the Department of the Premier and Cabinet (DPC) – not through the PSC. That includes arrangements for security and access.
88. The CCC investigated whether any persons other than DPC IT may have had access to Integrity Commissioner information relevant to this investigation.

Information from DPC about Integrity Commissioner information security

89. The DPC have an information security framework of policies and legislative requirements designed to protect and manage the security and risks to Integrity Commissioner information. One such measure is to perform a backup of information contained on a device when an employee leaves the Integrity Commissioner's office.
90. The investigation established that Integrity Commissioner information is stored separately to other DPC information.
91. 'User' and 'administrator control' permissions are applied to grant access to those locations which store Integrity Commissioner information.
92. Inquiries identified that those persons within government agencies that have permissions to access Integrity Commissioner information are strictly limited to Integrity Commissioner Office staff, and DPC IT staff and contractors. It did not identify any concerns as to the appropriateness of any persons with permission to access Integrity Commissioner information.
93. An audit was undertaken to identify whether any unauthorised person had accessed relevant Integrity Commissioner information for the period 31 December 2021 to 24 March 2022. The audit did not identify any person accessing Integrity Commissioner information who should not have had access to it.



94. While the audit did not identify any improper access to Integrity Commissioner information held by DPC, the investigation revealed some structural matters that may bear consideration going forwards.
95. A more comprehensive audit of access arrangements was unable to be conducted because of the period for which DPC retains security and access information.
96. The relevant information security standard recommends that logs of this kind should be retained for 18 months. At present, DPC retains this information for between 30 and 90 days. These are the retention periods which come as standard with purchase of the Microsoft products used by DPC.
97. It is true that longer retention periods would likely come at a cost, as the information needs to be stored. However, we note that DPC has responsibility for a range of sensitive and confidential information, which requires different access permissions, and different strategies for management.
98. We also note that it is the Integrity Commissioner herself who ultimately has responsibility for ensuring the security of the information held by her office. While the present arrangements are facilitated through an administrative agreement with DPC IT, it is not apparent that any meaningful consideration has been given to the adequacy or appropriateness of the current IT arrangements.

Conclusion

99. Ultimately this investigation did not reveal any particular concerns about the security of information held by the Integrity Commissioner. While it did identify potential vulnerabilities in how information security is managed, those were latent and longstanding vulnerabilities which were drawn to the surface by this matter, rather than exploited by it.

Recommendations arising from this investigation

100. The CCC recommends that, in any plan for extending retention periods for this information, DPC may wish to consider prioritising those areas where the information is the most sensitive, and where unauthorised access poses the greatest risk. That is critical for the purposes of being able to meaningfully investigate such potential breaches.
101. The arrangements which are in place for the security of the Integrity Commissioner's information were in existence prior to the appointment of the current Integrity Commissioner. They appear to have been part of the longstanding suite of administrative and governance arrangements and the CCC recommends that consideration ought to be given to their ongoing suitability.
102. Finally, this investigation highlights the difficulties which arise by reason of the current administrative and governance arrangements related to the Integrity Commissioner's office. While we understand that the Government is currently considering these matters, the CCC reiterates its support for the changes proposed to these arrangements in Professor Yearbury's review.





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