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Our Reference: AD-21-0372 - 22/068120  
Contact Officer: Jen O'Farrell



**SENSITIVE**

6 May 2022

Mr Jon Krause MP  
Chair  
Parliamentary Crime and Corruption Committee  
Parliament House  
George Street  
BRISBANE QLD 4000

Via email: pccc@parliament.qld.gov.au

Dear Mr Krause,

**RE: Response to questions taken on notice at the public Parliamentary  
Crime and Corruption meeting on 3 May 2022**

During the course of the public meeting between the Crime and Corruption Commission (CCC) and the Parliamentary Crime and Corruption Committee (the Committee) on 3 May 2022, the CCC undertook to provide further information on the following matters.



**Request number 1 - The Member for Kawana requested detail on the costs to the CCC of a particular litigation matter.**

**External Counsel costs of litigation**

In May 2021 the CCC briefed senior counsel – Peter Dunning QC and junior counsel – Matthew Wilkinson to represent it in relation to the judicial review brought by the applicant on 24 May 2021.

The total expenditure on external legal fees from May 2021 to 5 May 2022 including advice, preparation of written submissions and appearance at the substantive hearing and any subsequent hearings is as follows:

Senior Counsel - \$32,130.76

Junior Counsel - \$42,006.25

Total: \$74,137.01

#### **Internal cost of litigation**

Staff involved in the litigation file have ranged from SO(3), PO6, PO5 to an AO3.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

\$1468.50 has also been expended on transcript of the court appearances and proceedings.

**Request number 2 - The Member for Scenic Rim requested data as to whether there has been, in the last 12-24 months, an increase in nepotism allegations particularly family member appointments to roles in public service or agencies otherwise under CCC oversight**

Please find **attached** the relevant data report as well as the summary report on a survey conducted in 2021 by the CCC of public sector employees and their perceptions of corruption and integrity. This survey was referred to by the CEO at the meeting. The survey results are available on the CCC website at the following link [Survey Results](#).

#### **Submission to the Fitzgerald/Wilson Commission of Inquiry**

We have written to the Commission of Inquiry seeking their advice on providing our submission to the Committee. Once we have received a response, we will revert.

#### **Complaints from Work Health and Safety Officers**

The Member for Kawana raised concerns regarding the delay in the CCC receiving a final report on a monitored investigation. We are undertaking further enquiries concerning this delay and will write to the Committee during the week commencing 9 May 2022.

If the Committee has any further questions concerning this information, please contact the Chief Executive Officer.

Yours sincerely

A handwritten signature in black ink, appearing to read "B. Barbour". The signature is written in a cursive, slightly stylized font.

**Bruce Barbour**  
Acting Chairperson

# Nepotism allegations

Response to Parliamentary Crime and Corruption  
Committee (PCCC) Question on Notice

5 May 2022



## Corruption allegations data

The Crime and Corruption Commission (CCC) releases the Corruption Allegations Data Dashboard (CADD) on our website to provide the public and public sector agencies with access to our allegations data, including at-a-glance knowledge about trends and patterns in corruption allegations. Providing insights about corruption allegations improves awareness of corruption trends to assist public sector agencies in identifying and preventing corruption. The CADD has been updated every six months since December 2015.

The CCC builds stakeholders' awareness of the CADD by:

- publishing a media release when the CADD is refreshed
- alerting the email list of CCC Liaison Officers across Queensland units of public administration (UPAs)
- referring routinely to the CADD in Corruption prevention presentations with external audiences.

From 1 July 2020 to 31 March 2022, the CCC's CADD webpage has been viewed 7,265 times.

## How the CCC classifies nepotism

The framework the CCC uses to categorise the complaints that we receive does not use the term "nepotism". Our framework — called the *Corruption Allegations Data Framework* (CADF) — classifies nepotism or favouritism as *Misuse authority to benefit other(s)*. For consistency, we use the term *Misuse authority to benefit others* — rather than nepotism — throughout this report.

Since July 2020, allegations about misusing authority to benefit others has varied minimally. It comprises between 6 and 9 per cent of allegations that the CCC receives in any year (see Figures 1 and 2).

Exploring these allegations by sector over time, allegations about misusing one's authority to benefit others are:

- highest about members of Parliament (as a proportion of all allegations received about people in that sector), and
- lowest about members of the Queensland Police Service (as a proportion of all allegations received about people in that sector) (see Figure 3).

## Recent allegations of *Misuse authority to benefit others*

The CCC received 1,141 allegations that relate to *Misuse authority to benefit others* from 1 July 2020 to 31 March 2022. These 1,141 allegations related to 701 complaints. The number of allegations received per month in this period relating to *Misuse authority to benefit others* is shown in Figure 4.

Exploring these allegations by sector in the same period, 47.4% of the subjects of these allegations were from public service departments, and 23.1% of the subjects of these allegations were from local governments (see Figure 5).



The majority of these allegations related to either:

- *Human Resource Management* (52.9% of allegations,  $n = 604$ ), which is most commonly about *Recruitment and Selection* activities ( $n = 441$ ), or
- *Management of Public Assets and Resources* (22.5% of allegations,  $n = 257$ ), which is most commonly about *Procurement* activities ( $n = 174$ ) (see Figure 6).

Exploring by sector reveals that allegations about misusing one's authority to benefit others was most commonly related to:

- *Human Resource Management* activities, when the subject of the allegation was from a public service department, or other public sector entity
- *Management of Public Assets and Resources and Human Resource Management* activities, when the subject of the allegation was from local government
- *Law Enforcement or Criminal Justice* activities, when the subject of the allegation was from the Queensland Police Service
- *Human Resource Management*, when the subject of the allegation was from Parliament.

### About the alleged beneficiary

We conducted a word search to learn about who the alleged beneficiary was of these 1,141 allegations of misusing one's authority to benefit others. Where the relationship was specified in the allegation comment (in the CCC case management system,  $n = 640$ ), the two most common relationships were: *Friend* (195 instances), and *Husband, Wife, or "In a Relationship"* (94 instances).

### About links to organised crime

We conducted a word search to learn about how misusing one's authority to benefit others may be related to organised crime. Of the 640 allegations for which the relationship was specified, 17 suggested a possible connection with organised criminal activity. These 17 allegations relate to subject officers:

- Failing to take action against alleged offenders, or helping them to evade detection for an offence
- Giving information to alleged offenders
- Helping alleged offenders to obtain a job
- Otherwise associating with, or taking steps to protect, alleged offenders.

### About the CCC's assessment decision

Of the 1,141 allegations received from 1 July 2020 to 31 March 2022 about misusing one's authority to benefit others, we examined the CCC's assessment decision (see Table 1), and where known, the outcome of the allegation.

Notably, in that period, the CCC commenced investigations into 73 of these allegations, undertook 177 Public Interest Reviews, and 70 Merit and Compliance Reviews. The two most common assessment decisions, however, were to refer the allegation to the relevant UPA to deal with it (38.1% of these allegations), or that the allegation had insufficient evidence, so no further action was taken (31.4% of these allegations).



**Table 1: Assessment decision for Misuse authority to benefit others (1 July 2020 to 31 March 2022).**

Assessment decision	Per cent	Number
Allegation Arising from an Investigation	2.1	24
CCC Investigation	6.4	73
Merit and Compliance Review	6.1	70
No Further Action	31.4	358
Public Interest Review	15.5	177
Refer No Further Advice	38.1	435
Under Assessment	0.4	4
<b>Total</b>	<b>100.0</b>	<b>1,141</b>

Where the allegation outcome is known ( $n = 495$  allegations), 17 were substantiated, 105 were not substantiated, and for two, there was no decision about, but management action was taken in response to the allegation (see Table 2). The remainder had the outcome of “no further action”. Importantly, 358 of these allegations were assessed as “no further action” in the assessment stage (see Table 1). This means that only 13 allegations were not initially assessed as “no further action”, but resulted in that final outcome (totalling 371 by the time the final outcome was known). This occurs when the investigation is discontinued on practical grounds (e.g. that the investigator decided during the investigation that no determination could be made on the allegation).

**Table 2: Final outcome for Misuse authority to benefit others (1 July 2020 to 31 March 2022).**

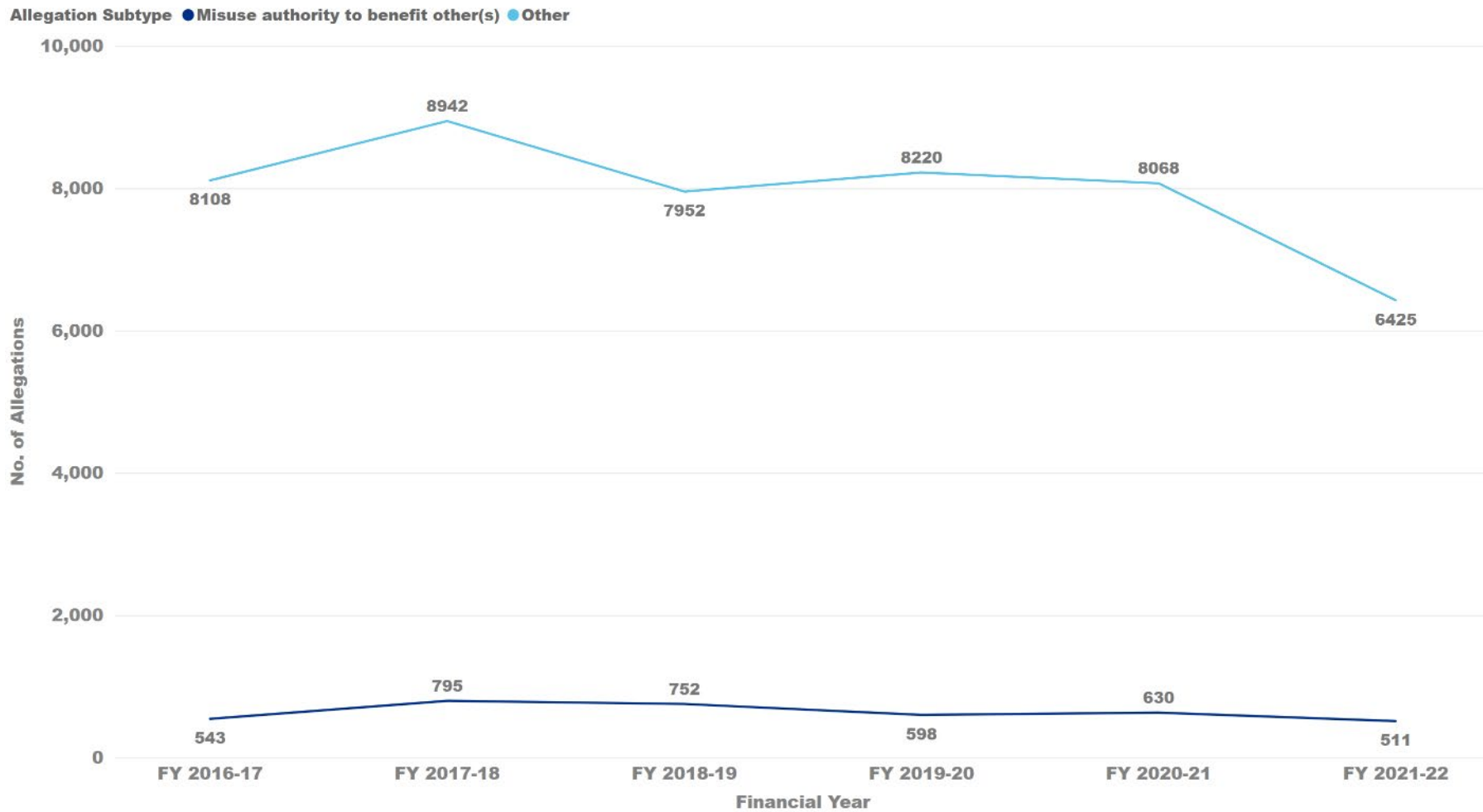
Final outcome	Per cent	Number
Substantiated	1.5	17
Not substantiated	9.2	105
Management action only	0.2	2
No further action	32.5	371
Outcome unknown	56.6	646
<b>Total</b>	<b>100.0</b>	<b>1,141</b>

Where the outcome is unknown ( $n = 646$  allegations), the outcome is unknown because the allegation is still considered “open” ( $n = 142$ ), or because the CCC referred the allegation to the relevant UPA to deal with it ( $n = 504$ ), and the CCC does not require a response from the UPA.



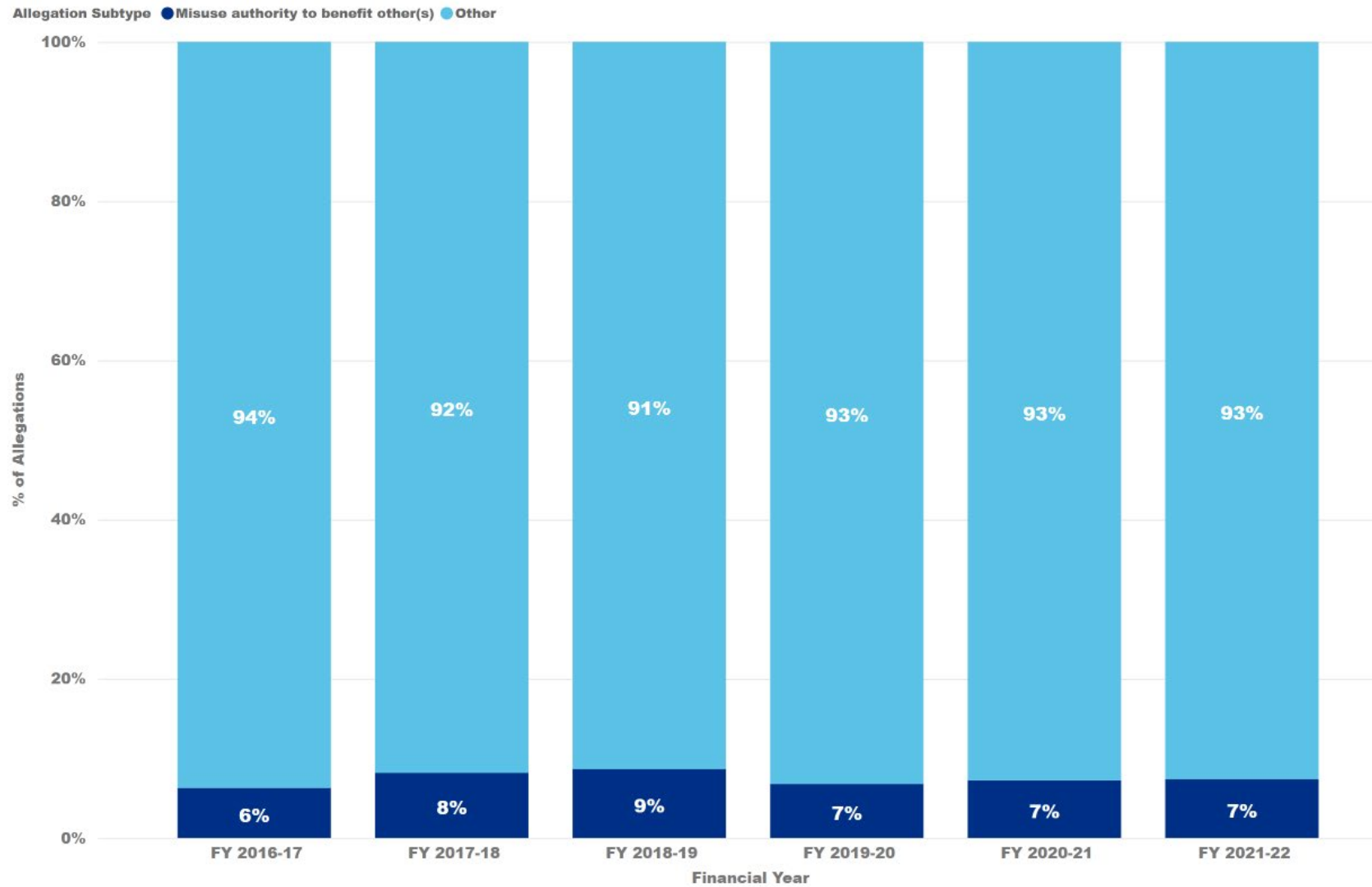


**Figure 1: Number of allegations classified as Misuse of authority to benefit others (1 July 2016 – 31 March 2022<sup>1</sup>).**



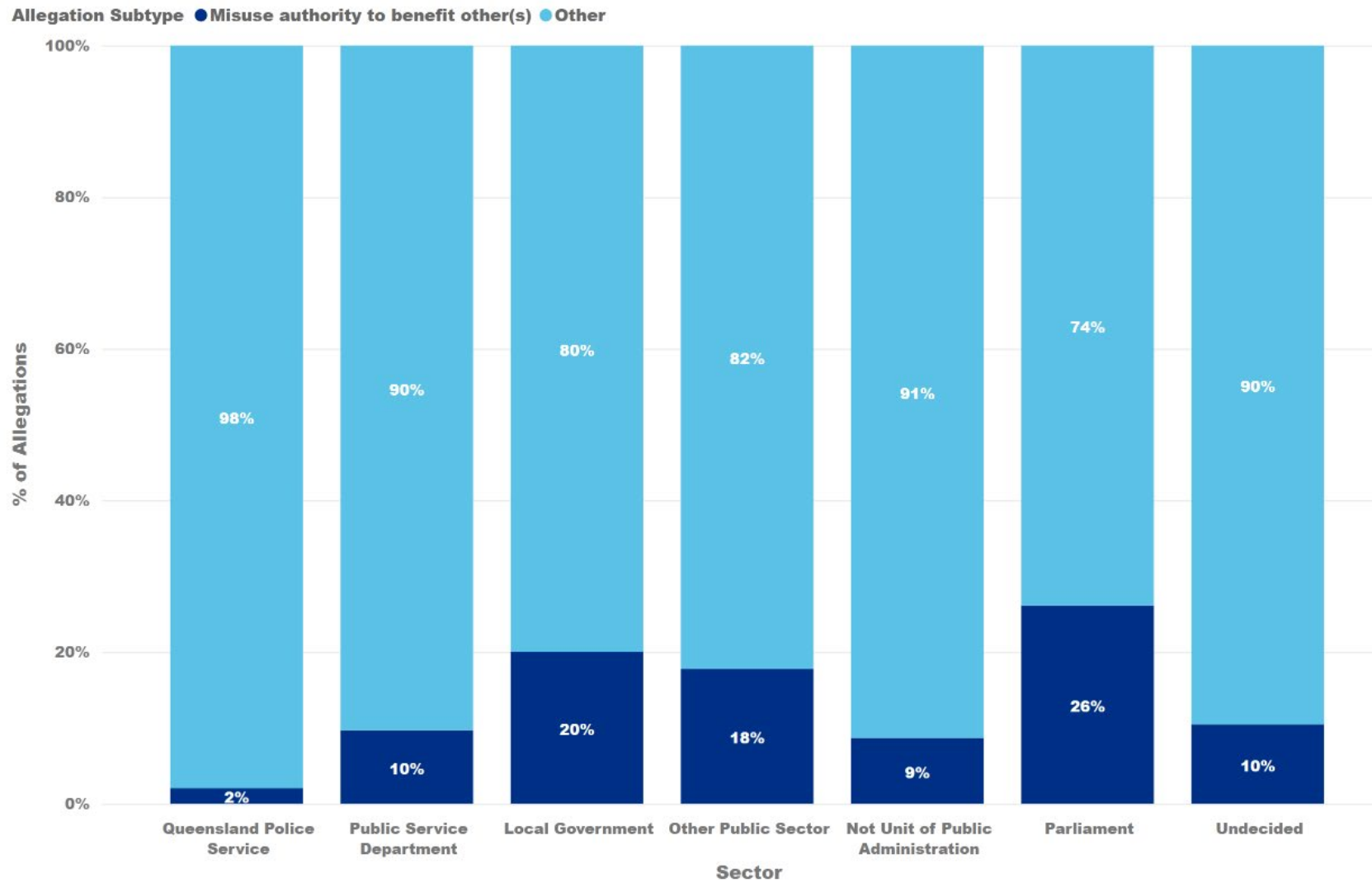
<sup>1</sup> **Note:** The FY 2021-22 figures contain 9 months of data (up to 31 March 2022). All other FYs contain 12 months of data. The decline in FY 2021-22 reflects this.

**Figure 2: Percentage of allegations classified as Misuse authority to benefit others (1 July 2016 – 31 March 2022<sup>2</sup>).**



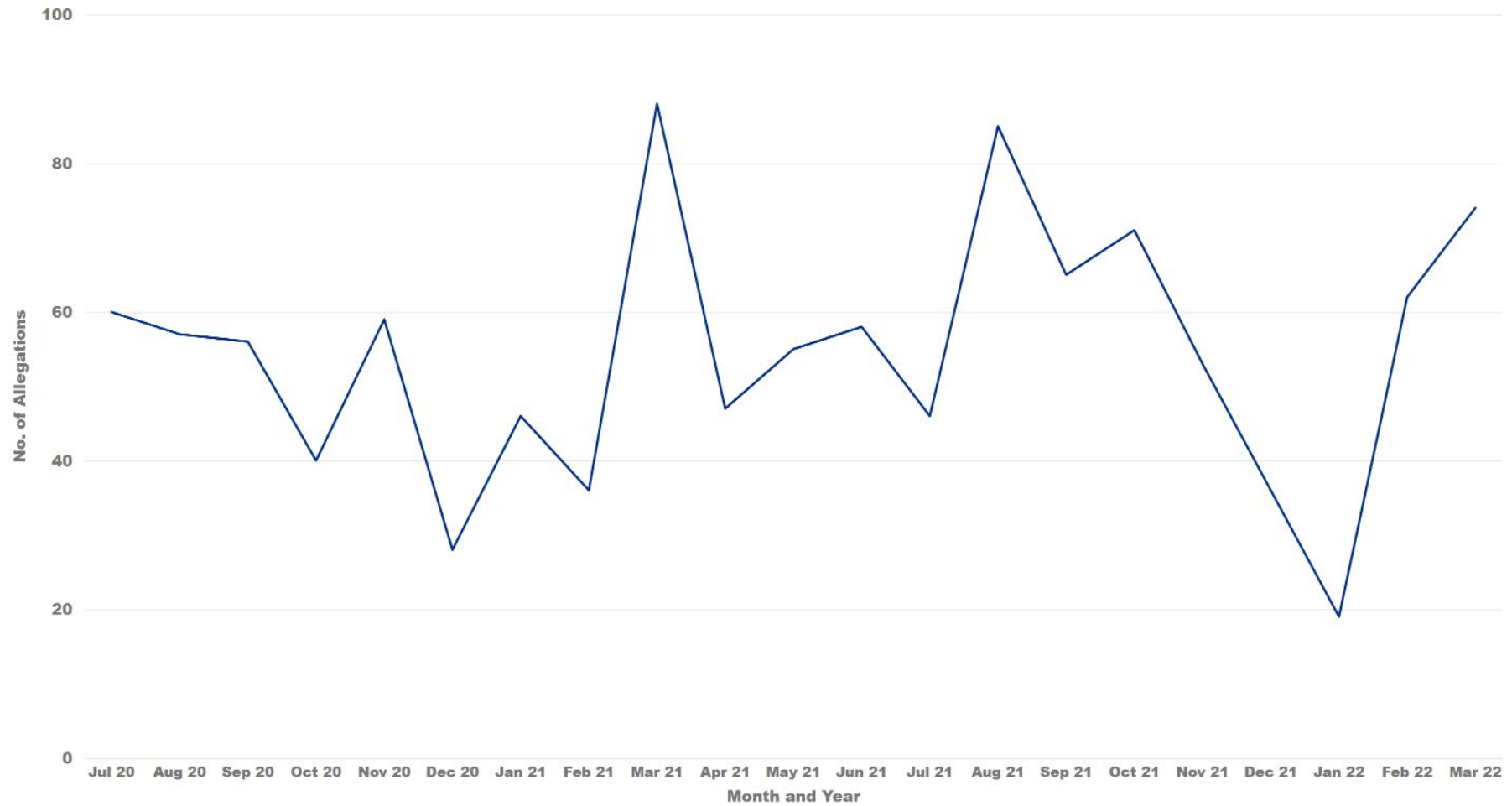
<sup>2</sup> **Note:** The FY 2021-22 figures contain 9 months of data (up to 31 March 2022). All other FYs contain 12 months of data.

**Figure 3: Percentage of allegations classified as Misuse authority to benefit others by sector (1 July 2016 – 31 March 2022<sup>3</sup>).**

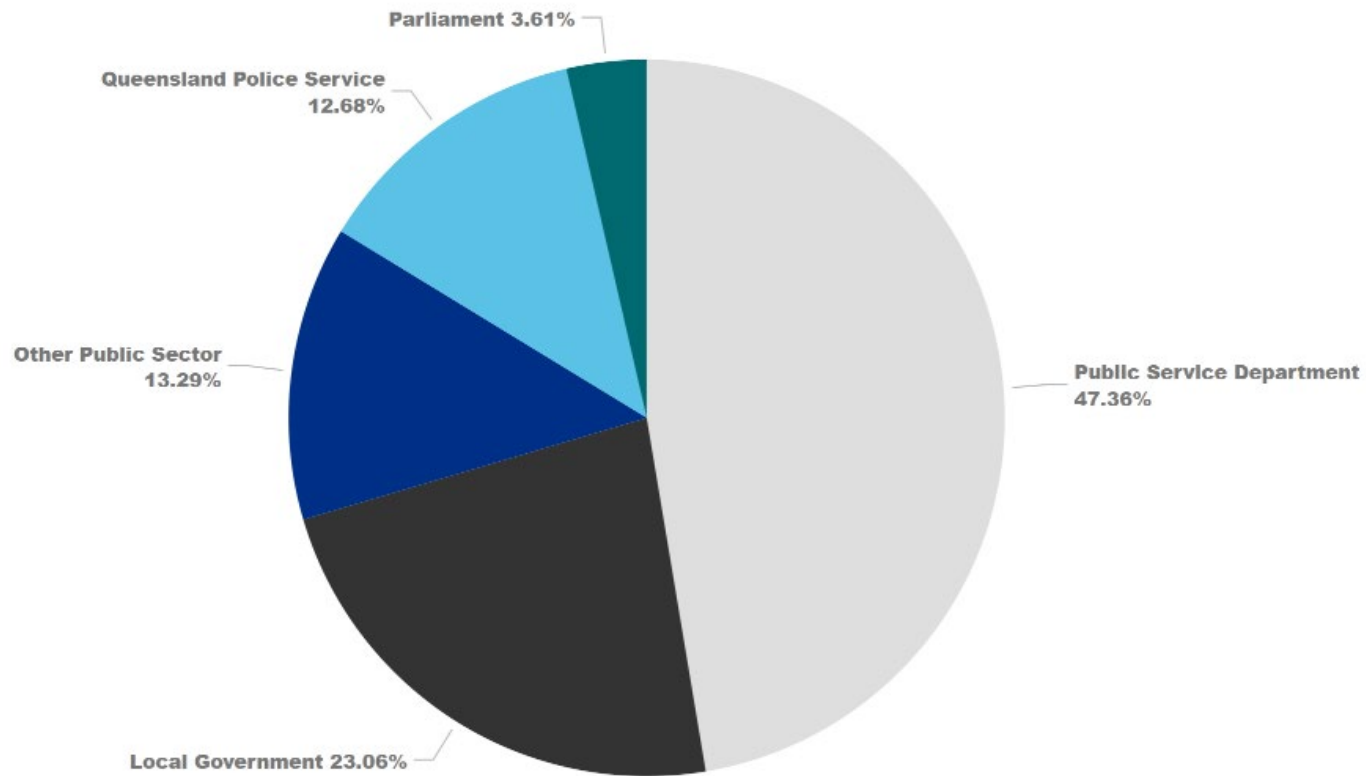


<sup>3</sup> **Note:** The FY 2021-22 figures contain 9 months of data (up to 31 March 2022). All other FYs contain 12 months of data.

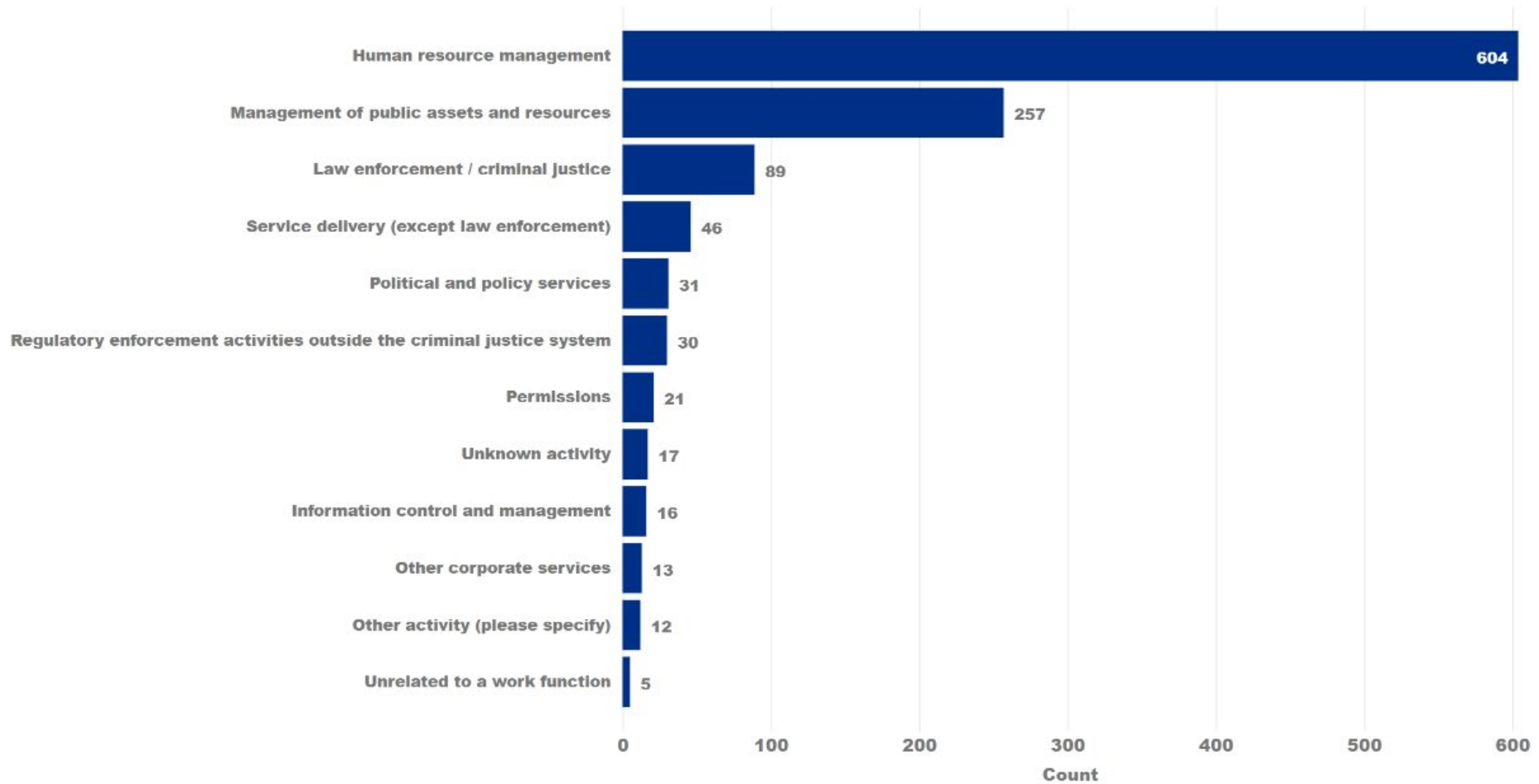
**Figure 4: Number of allegations of Misuse authority to benefit others, by month (1 July 2020 – 31 March 2022).**



***Figure 5: Percentage of allegations of Misuse authority to benefit others, by sector (1 July 2020 – 31 March 2022).***



**Figure 6: Number of allegations of Misuse authority to benefit others, by activity type (1 July 2020 – 31 March 2022).**





Crime and Corruption  
Commission

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QUEENSLAND

# PERCEPTIONS OF CORRUPTION AND INTEGRITY IN QUEENSLAND STATE GOVERNMENT DEPARTMENTS

## Findings from a survey of public service department employees

The Crime and Corruption Commission (CCC) surveyed employees of Queensland's 19 public service departments (including 16 Hospital and Health Services) to better understand their perceptions of corruption risks and attitudes towards reporting and preventing corruption.

The survey was the next phase of the CCC's broader engagement project which aims to better understand corruption risks within the state's public sector. The survey asked the employees about their views on:

- the prevalence and perceptions of corruption in the public sector, their departments, and their work units
- attitudes towards reporting corruption
- corruption prevention and education in their departments
- their interaction with the CCC and preferences for receiving corruption prevention information.

The findings from this survey will inform the CCC's ongoing corruption prevention work and will assist public service departments to develop anti-corruption strategies tailored to the needs of their employees. A similar survey was administered to local government employees in 2020.<sup>1</sup>

## WHAT WE DID



**Administered** an anonymous online survey to more than 200 000 state government employees within 19 public service departments<sup>2</sup>



**Engaged** with public service departments to promote the survey



**Analysed** responses from more than 14 400 employees



**Shared** detailed survey findings and insights with public service departments

## ABOUT THE SURVEY<sup>3,4</sup>

The online survey was open for a six-week period between May and June 2021.<sup>5</sup> Responses were received from employees within all 19 participating departments. Response rates for departments ranged between 2 and 25 per cent.<sup>6</sup>

Overall, about one in ten state government department employees accessed the survey and approximately seven per cent answered questions in the survey.



**21 447**  
viewed the survey



**14 452**  
answered questions in the survey



**67%**  
Frontline (and frontline support) employees represented 67 per cent of respondents (n = 9304)<sup>7</sup>



**28%**  
Employees in corporate roles made up 28% of respondents (n = 3980)<sup>8</sup>

<sup>1</sup> The results from this survey were shared with local governments and a summary of key findings can be found on the [CCC's website](#).

<sup>2</sup> This included all public service departments except the Queensland Police Service (QPS). The QPS (which is typically also considered a public service department) was not included in this survey due to the unique and distinct nature of their workforce, differing allegation types and corruption risks.

<sup>3</sup> A note on data analysis: All percentages presented in this paper are based on valid responses. That is, any respondents who chose not to answer a question were excluded from any analysis that included that survey item. Therefore, there are some variations in the number of valid responses for different questions.

<sup>4</sup> Percentages may not total 100 per cent throughout due to rounding or respondents being able to select multiple responses for questions.

<sup>5</sup> The survey was reviewed by the CCC's Human Research Ethics Advisory Panel to ensure it met the highest ethical standards.

<sup>6</sup> Response rates have been calculated using the Queensland Public Service Commission's (PSC) March 2021 workforce profile.

<sup>7</sup> Occupation type was categorised using the PSC's workforce profile definition.

<sup>8</sup> Five per cent of respondents (n = 695) did not identify their occupation type.





## WHAT WE FOUND



### PREVALENCE AND PERCEPTIONS OF CORRUPTION

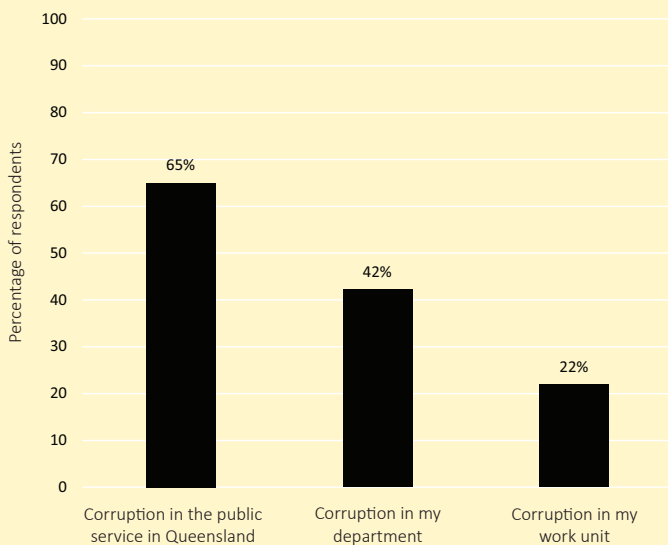
*Respondents were asked for their views on the prevalence of corruption within the public service, their department and their work unit, and whether the level of corruption has changed over time.*

#### Prevalence of corruption

- Two-thirds of respondents (65 per cent, n = 8678) agreed<sup>9</sup> that corruption happens in the public service in Queensland.
- Less than half indicated that corruption happens in their department (42 per cent, n = 5576) and about one in five reported that corruption happens in their work unit (22 per cent, n = 2897).

The CCC noted a similar trend in the results from the [local government survey in 2020](#). That is, a higher proportion of respondents perceived that corruption occurred in Queensland, but perceptions of corruption in their own local government were much lower.

**Figure 1: Perceived prevalence of corruption**

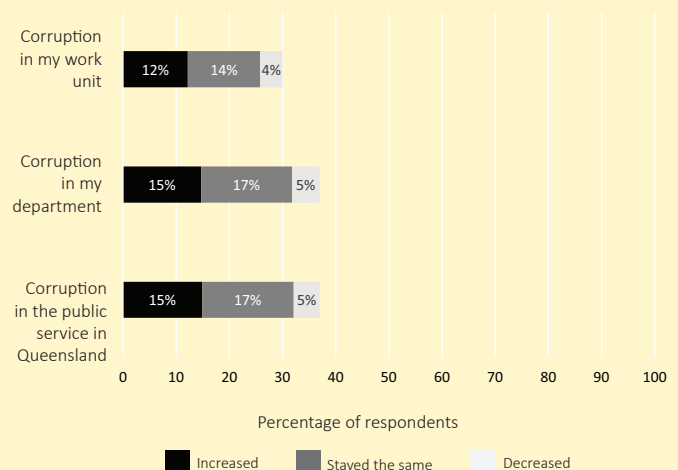


**50%** of respondents (n = 6479) were **not aware of any corruption in their work unit**, more than one-quarter (27 per cent, n = 3438) were not aware of any corruption in their department and 11 per cent (n = 1381) were not aware of any corruption in the public service in Queensland.

#### Level of corruption

- Respondents reported that the level of corruption in the public service (17 per cent, n = 2216) has stayed the same over the last three years. Only a small proportion of respondents indicated they thought the level of corruption in the public service has decreased. Other respondents said they were either not aware of corruption occurring or did not know what changes had occurred. Perceptions about changes in the level of corruption were similar with respect to respondents' departments and work units.

**Figure 2: Perceived change in level of corruption over the last three years**



COVID-19 and departments' responses to it do not appear to have impacted corruption risks within public service departments. More than one-quarter (26 per cent, n = 3390) of respondents indicated corruption risks have stayed the same during the pandemic. Almost one in five reported corruption risks have increased (18 per cent, n = 2370), three per cent thought COVID-19 has decreased corruption risks in their department (n = 395), and 52 per cent (n = 6699) were unsure what impact COVID has had on corruption risks in their department.

<sup>9</sup> This includes respondents who indicated they "agreed" or "strongly agreed".

## CORRUPTION RISK AREAS



*Public service department employees were asked if they have ever witnessed or suspected a range of behaviours and the extent to which they think the behaviour is corrupt.<sup>10</sup>*

- Overall, most respondents had not suspected or witnessed any of the behaviours listed in the survey. Among those who had, **recruitment, timesheet fraud and the theft of resources were the most common behaviours** identified.
- There was a high level of agreement<sup>11</sup> that the behaviours listed in the survey were corrupt, especially behaviours relating to timesheet fraud, recruitment processes, accepting property in exchange for awarding a contract, theft of resources and misusing confidential information to benefit themselves.



*Respondents were also asked to indicate whether they thought particular activities presented a corruption risk within their department.*

- Bullying and harassment** (including sexual harassment) was the behaviour most frequently identified as being a corruption risk<sup>12</sup> (78 per cent, n = 8413), followed by **absent or inadequate internal systems** (69 per cent, n = 7525), **recruitment of personnel** (including vetting) (69 per cent, n = 7511) and **absent or unclear policies and procedures** (69 per cent, n = 7456).



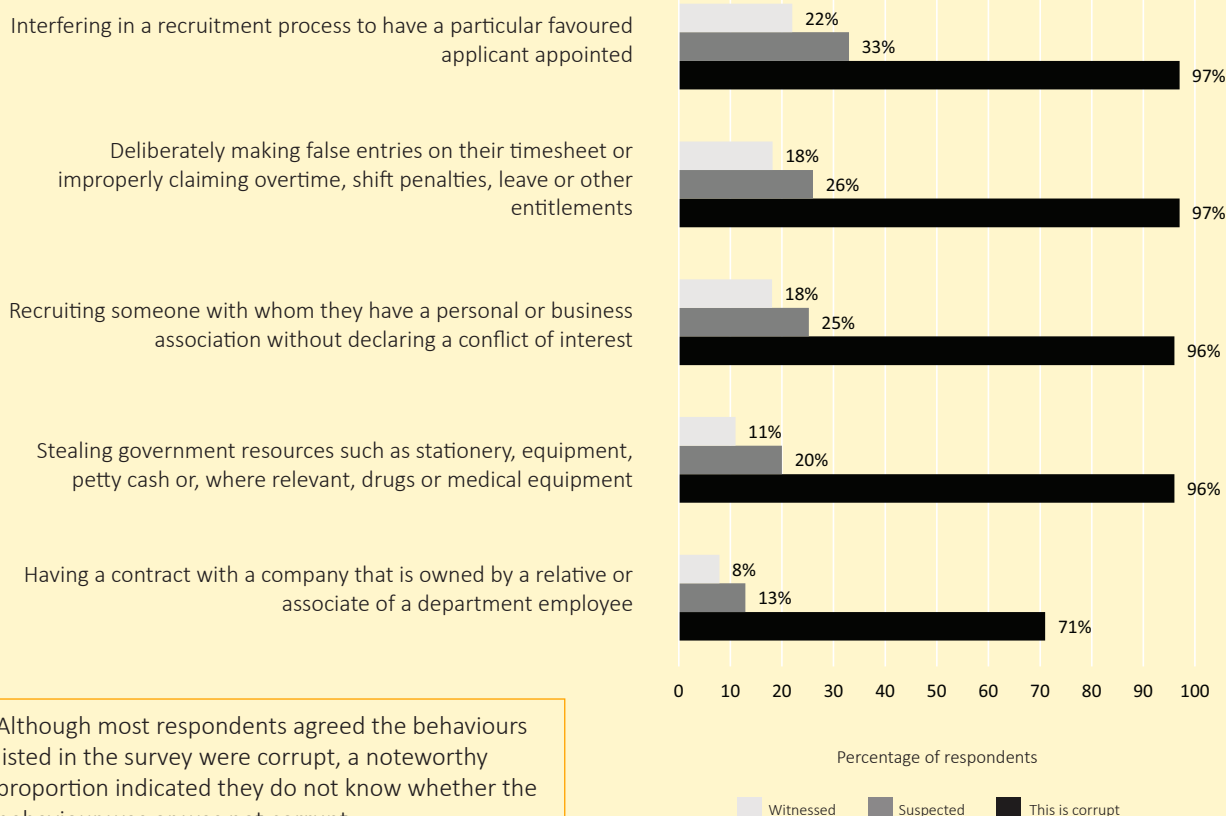
**54%** Identified procurement as a vulnerable area (n = 5809)



**51%** Reported corruption risks associated with lobbying (n = 5533)

### Figure 3: Prevalence and perceptions: Top five behaviours

Respondents were asked whether they suspected or had witnessed a public service department employee engage in the following behaviours.



Although most respondents agreed the behaviours listed in the survey were corrupt, a noteworthy proportion indicated they do not know whether the behaviour was or was not corrupt.

10 The scenarios listed in the survey included behaviours associated with recruitment, the awarding of contracts, influence of the private sector, the use of corporate credit cards and the expenditure of public funds.

11 This includes "this is definitely corrupt" and "this is probably corrupt" response categories.

12 Percentages are based on those respondents who indicated the behaviour was "definitely a risk" or "probably a risk".

# REPORTING CORRUPTION



## ATTITUDES TOWARDS REPORTING CORRUPTION

*Survey responses suggest there is a high level of awareness<sup>13</sup> among public service department employees about the policies, procedures and frameworks associated with their roles (73 per cent, n = 7596) and their obligations to report corruption (70 per cent, n = 7340), and a high level of willingness to report corruption.<sup>14</sup>*

- Although a large proportion of respondents indicated they would report corruption, less than half agreed that their **workplace actively encourages the reporting of corruption** (48 per cent, n = 5081) or communicates to employees how to report corruption (47 per cent, n = 5017).
- There was a strong preference among those who indicated they would report corruption to disclose to their supervisor or manager (73 per cent, n = 7834), and a high level of agreement that their direct supervisor would be supportive of them if they reported corruption (65 per cent, n = 6926).
- Overall, however, slightly more respondents identified a preference to report corruption to someone external to their organisation (38 per cent, n = 4056) as opposed to someone internal to their organisation (28 per cent, n = 2958).



**77%** would report corruption if they witnessed it (n = 8198)



**85%** would report corruption because it is the right thing to do (n = 9107)



Just under half of respondents reported they were either not informed or felt only somewhat informed about ways to report corruption (46 per cent, n = 4822).

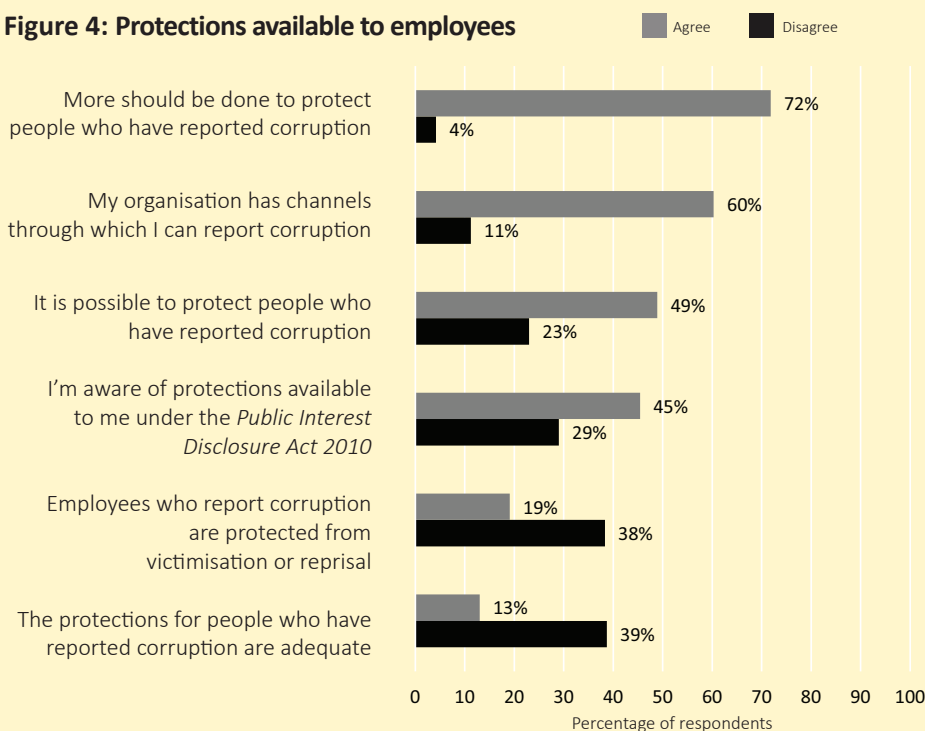


## PERCEIVED BARRIERS TO REPORTING CORRUPTION

*Respondents were asked their views about reporting corruption and the protections available for people who report wrongdoing.* Several barriers to reporting corruption were identified by respondents.

49 per cent are not confident they would be protected from reprisal or victimisation (n = 5202). Other concerns include **losing their job** (30 per cent, n = 3162) or **experiencing other personal repercussions** (47 per cent, n = 5006) or **that meaningful action would not be taken** (34 per cent, n = 3599).

**Figure 4: Protections available to employees**



The most common reasons identified for not reporting corruption included concerns it **could affect their career** (84 per cent, n = 390), belief that **senior management would not do anything about it** (77 per cent, n = 355) and concerns that making a report **could impact their relationships with others** (61 per cent, n = 281). A small proportion of respondents indicated they would not report corruption because **they do not know how to** (18 per cent, n = 85). A large proportion of respondents agreed that **more should be done to protect people** who have reported corruption (72 per cent, n = 7477).

<sup>13</sup> Percentages are based on respondents who indicated they are "very informed" or "informed".

<sup>14</sup> Percentages are based on respondents who indicated they "agree" or "strongly agree".

<sup>15</sup> In this figure "agree" includes "agree" and "strongly agree"; "disagree" includes "disagree" and "strongly disagree".

# ORGANISATIONAL CULTURE AND CORRUPTION PREVENTION



**70%** Agreed the culture at their workplace encourages people to act with honesty and integrity (n = 7407)



**86%** Support corruption prevention activities in their workplaces (n = 9055)

- Although responses suggested positive levels of organisational culture:
  - » 24 per cent (n = 2540) **do not think that managers in their workplace model ethical behaviour**
  - » less than half agreed (49 per cent, n = 5114) that **the culture at their workplace encourages people to report corruption**
  - » 46 per cent agreed their department has **strong corruption prevention policies** in place (n = 4844).
- Respondents generally agreed that **behaving with honesty and integrity is important to them** (99 per cent, n = 12 975), and is important in their work unit (82 per cent, n = 10 784). However, fewer agreed it is important in their department (76 per cent, n = 10 053).
- There is a **high level of personal responsibility** among public service department employees for identifying corruption risks and preventing corruption.



**73%** think preventing corruption is their responsibility (n = 7655).

- One-third of respondents (33 per cent, n = 3508) **have sought advice or looked for information about preventing or reporting corruption** in the last three years.



Department intranet sites (49 per cent, n = 1708) are a common source of information for public service department employees seeking information about preventing or reporting corruption followed by supervisors/managers (35 per cent, n = 1211).



## PREFERENCES FOR RECEIVING CCC INFORMATION

*Public service department employees were asked about their preferences for receiving education and prevention information from the CCC:*



**37%** Email  
(n = 3870) and



**27%** E-Newsletters  
(n = 2825) are the preferred methods of communication from the CCC.

## WHERE TO FROM HERE?

The results from this survey have been shared with public service departments. Each participating agency has been provided with detailed information about responses received from their employees to help them better understand the corruption risks in their department and to tailor solutions relevant to their department.

The survey will inform ongoing discussions between the CCC and the public sector about opportunities to build corruption resistance and improve agencies' capacities to prevent, detect and deal with allegations of corrupt conduct and other wrongdoing.

## OPPORTUNITIES FOR PUBLIC SERVICE DEPARTMENTS



The findings from this survey provide important insights into how public service department employees perceive corruption risks, their willingness to report suspected wrongdoing, the barriers associated with reporting, and where opportunities exist to enhance corruption prevention.



On the one hand it is encouraging that the findings from this survey suggest that public service department employees have a sound understanding of the corruption risks impacting them, are willing to report suspected wrongdoing, and support prevention activities in their workplace. However, these findings suggest that more should be done to ensure they are informed about reporting suspected wrongdoing and are confident that senior managers will support them when they do so.



Recruitment, timesheet fraud and the theft of resources were identified by public service department employees as the most prevalent types of corrupt behaviours in the public sector. Although there is a corresponding high level of awareness about these behaviours, these findings should serve as a reminder to public service departments to consider the adequacy of their existing internal controls and ensure there is sufficient focus on detecting and preventing these corruption risks.



While there appears to be widespread awareness among public service employees about corrupt behaviours, the survey suggests there is a cohort who are unsure about certain behaviours — including some of the more overt behaviours, such as the release of confidential information without approval. These findings highlight the need for ongoing education and awareness raising among public service department employees about the behaviours and activities that could amount to corrupt conduct.



There is a high level of willingness among public service department employees to report suspected wrongdoing. However, as expressed in previous surveys of this nature, public service department employees have concerns about the possible repercussions associated with reporting. Several also identified that their workplace does not actively encourage employees to report suspected wrongdoing or communicate how to do so. One of the most important ways to tackle corruption in the public sector is to encourage people who suspect or witness it to speak up. Public service departments should ensure they foster an environment that encourages and supports the reporting of suspected wrongdoing.



Internal resources and supervisors are a common source of information for public service department employees who are looking for ways to report or prevent corruption. Departments should ensure their corruption prevention resources are accessible, informative, and up to date. Further, considering the important role that supervisors and managers play in not only detecting and reporting corruption themselves, but also supporting their staff to do so, it is vital they are equipped to provide accurate advice and guidance to their employees.

### Further information and resources: [www.ccc.qld.gov.au](http://www.ccc.qld.gov.au)



[CCC Corruption Allegations Data Dashboard](#)



[\*Prevention in focus: Conflicts of interest and disclosing confidential information — grounds for dismissal\*](#)

[\*Prevention in focus: Timesheet and leave fraud — How managers can prevent and detect corrupt conduct relating to timesheets.\*](#)

[\*Prevention in focus: When does bullying reach the threshold for corrupt conduct?\*](#)

[\*Prevention in focus: Conflicts of interest — are you managing yours appropriately?\*](#)

[\*Prevention in focus: Risks in recruitment — are you adequately vetting your staff?\*](#)

[\*Improper access to public sector databases: What you should know\*](#)

[\*Corruption prevention advisory: Use of official resources\*](#)

[\*Corruption prevention advisory: Lobbying\*](#)

[\*Corruption prevention advisory: Procurement and contract management\*](#)



The CCC's website and [YouTube channel](#) contain a range of corruption related video resources.