

Review of the Crime and Corruption Commission's activities

Submission No: 12
Submitted by: Crime and Corruption Commission
Publication:
Attachments:
Submitter Comments:

OFFICIAL

GPO Box 3123
Brisbane QLD 4001

Level 2
North Tower Green Square
515 St Pauls Terrace
Fortitude Valley QLD 4006

Tel.: **07 3360 6060**
Toll-free: 1800 051 611
(in Queensland outside
Brisbane)

Fax: 07 3360 6333

mailbox@ccc.qld.gov.au
www.ccc.qld.gov.au

ABN 32 164 714 360



**Crime and Corruption
Commission**

QUEENSLAND

Your Reference: A1471285
Our Reference: AD-25-0304 | 25/204711
Contact Officer: Jen O'Farrell

1 October 2025

Secretary
Parliamentary Crime and Corruption Committee
Parliament House
George Street
BRISBANE QLD 4000

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

Dear Committee Secretary,

RE: Five-year review of the Crime and Corruption Commission's activities

We refer to the letter dated 16 June 2025 from the Honourable Mark Furner MP advising that the Parliamentary Crime and Corruption Committee (PCCC) had commenced its five-year review of the activities of the Crime and Corruption Commission (CCC) and inviting the CCC to make a submission.

We enclose our submission and advise that it may be published without redaction.

Please contact the Chief Executive Officer on [REDACTED] if you have any questions concerning the submission.

Yours sincerely,

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

Bruce Barbour
Chairperson



Crime and Corruption Commission

QUEENSLAND



Five-year review of the Crime and Corruption Commission's activities

1 October 2025

Contents

Chapter 1: Corporate Governance and organisation structure2

Chapter 2: Major Crime function9

Chapter 3: Corruption function.....18

Chapter 4: Memorandum of Understanding (MOU), between the Crime and Corruption
Commission (CCC) and the Director of Public Prosecutions (DPP)43

Chapter 5: Corruption Reporting Powers.....44

Chapter 6: Police Discipline and misconduct matters.....50

Chapter 7: Civil confiscation function58

Chapter 8: Research and Intelligence61

Chapter 9: Witness Protection63

Chapter 10: Renewal and Continuous improvement.....64

Chapter 11: Telecommunications Interception Powers73

Chapter 12: Oversight arrangements.....75

Chapter 1: Corporate Governance and organisation structure

Overview

1. The Crime and Corruption Commission's (**CCC's**) organisational and governance structure is largely unchanged since the previous five-year review. The CCC's corporate governance arrangements are informed by three principles:
 - We are independent
 - We need to be subject to strong checks and balances
 - We need to operate to best practice standards.
2. The CCC requires strong internal governance and robust external oversight to appropriately fulfil its important role in Queensland. Both systems ensure the CCC achieves its objectives and maintains public confidence in its work and outcomes.
3. The CCC's high-level governance has not changed substantially since the last review, however some changes have been made within the Corruption Division following recommendations made by external reviews.
4. Since 2019, the high-level structure and operations of the organisation have been largely consistent, while subject to continuous improvement to ensure that our practices and processes are robust, accountable and fit for purpose. Changes to mid-level structures within the Corruption Division have been implemented following recommendations made by external reviews.

The Commission

5. The Commission is comprised of the Chairperson, a part-time Commissioner who is the Deputy Chairperson, and three part-time Ordinary Commissioners.

Chairperson

6. The Chairperson is irrevocably delegated most of the Commission's powers that are not irrevocably delegated to the CEO.¹ The Chairperson is expressly not subject to the direction of the Commission.²

Chief Executive Officer

7. The CEO is responsible for the administration of the CCC, ensuring its efficient and effective operation. The CEO is delegated a range of functions and powers through the *Crime and Corruption Act 2001*³ (**CC Act**) including financial accountability functions and public record powers. The CEO is responsible for reporting to the Commission on all matters relating to the administration of the CCC.

¹ Section 269 *Crime and Corruption Act 2001*. The Commission retains powers under sections 234, 251(1), 251(2) and 259 *Crime and Corruption Act 2001*.

² Section 252(3) *Crime and Corruption Act 2001*.

³ Sections 253, 269 *Crime and Corruption Act 2001*.

Governance committees

8. Good governance enables good decision-making in support of the CCC's objectives and long-term vision. It provides a framework that establishes the principles, behaviours and processes to guide our work and drive continuous improvement.
9. Good governance also provides boundaries for decision-makers. It helps reduce exposure to risk while providing assurance to our stakeholders that the agency is managing its resources in a responsible and transparent way. At its simplest, good governance promotes public confidence in our work and the decisions we make.
10. Our approach to governance is guided by the value we place on our people and the broader Queensland community. As an independent statutory body, we are accountable for how we perform (the delivery of outcomes) and the way we perform (compliance with laws and policy).
11. A range of committees are established to support good governance within the organisation.

Executive Leadership Team

12. The operating model places operational governance responsibility with the Executive Leadership Team (**ELT**) in the first instance. The ELT's day-to-day oversight of operations is, in turn, overseen by the Commission in the performance of its statutory function.
13. Additional governance committees are established to meet specific goals and requirements in support of the ELT.

Audit and Risk Management Committee

14. The Audit and Risk Management Committee provides independent advice to assist the CCC in monitoring and developing systems to improve accountability and strengthen risk management.

Organisational Safety and Wellbeing Committee

15. The Organisational Safety and Wellbeing Committee enables staff participation in the safety and wellbeing program including to actively promote wellbeing initiatives in the CCC.

Budget Management Committee

16. The Budget Management Committee is a sub-committee of the ELT. It acts as a review body over the financial and budget processes of the CCC.

Operational Committees***Business Continuity Committee***

17. The Business Continuity Committee is a group of senior Commission officers responsible for the Business Continuity Management System of the CCC. The CEO is the Chair of the Committee and has the responsibility for the implementation, activation and monitoring of the Business Continuity Plan.

Witness Protection Advisory Committee

18. The Witness Protection Advisory Committee provides advice to the Chairperson and guidance to the Witness Protection Unit regarding the operation of the witness protection program.

Police Resource Committee

19. The Police Resource Committee is established to manage the deployment of police officers seconded to the CCC. The Committee acts as a review and advisory body to the CEO and the General Manager, Operations Support, who are jointly responsible for the efficient deployment of seconded police officers in the CCC.⁴

Crime Pre-Assessment Committee

20. The role of the Crime Pre-Assessment Committee is to assess information, formal applications and proposals for crime investigations and crime projects for referral, or potential referral, to the ELT for endorsement or referral to the Crime Reference Committee for decision.

Corruption Prevention Group

21. The Corruption Prevention Group's primary objective is to bring together diverse views to inform corruption prevention, policy and engagement activities.

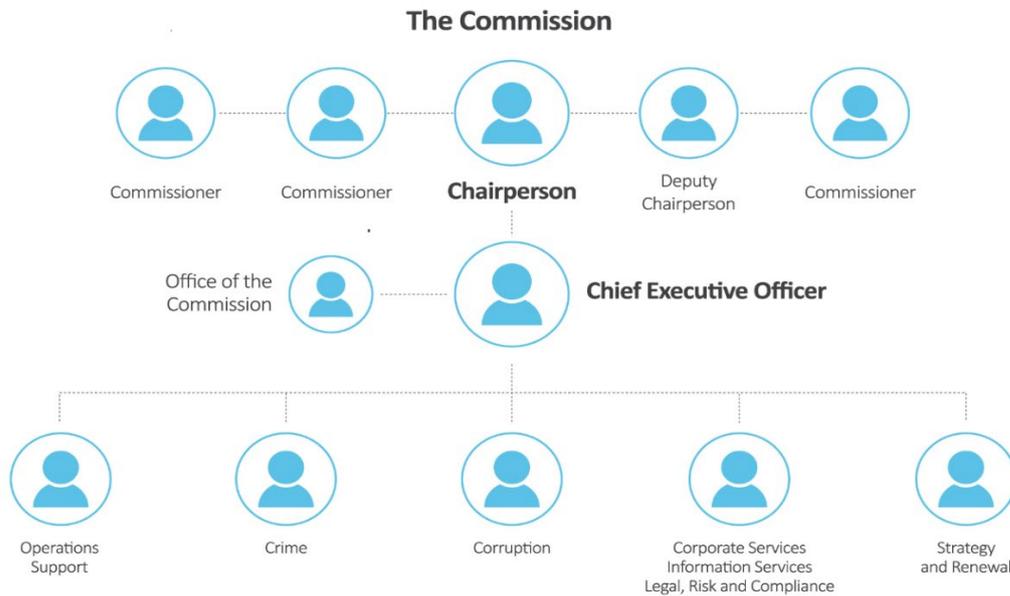
Corruption Investigations Governance Committee

22. The Corruption Investigations Governance Committee is comprised of a group of senior officers whose role is to provide oversight of the progress and direction of corruption investigations through the feasibility, delivery and post-delivery stages of corruption investigations.

⁴ Section 255 *Crime and Corruption Act 2001*.

Organisational structure

23. Since 2022, the CCC has adopted an organisational structure based on our service lines as set out below.



Crime Division

24. The Crime Division, led by the Senior Executive Officer (Crime), is responsible for undertaking day-to-day delivery of crime-related activities, operations and projects.
25. Further detail of the structure is provided in Chapter 2.

Corruption Division

26. The Corruption Division, led by the Senior Executive Officer (Corruption), deals with corruption that affects the state's public sector by:
- Receiving and assessing complaints
 - Investigating serious and systemic corruption
 - Monitoring how agencies deal with the matters we refer to them, or working with them to carry out joint investigations, and
 - Providing guidance on corruption risks and prevention strategies, including through our audits.
27. Further detail of the structure is provided for in Chapter 3.

Operations Support Division

28. The Operations Support Division, led by a General Manager, delivers Queensland's witness protection program and provides specialist operational capabilities in support of combating major crime and reducing corruption.

Strategy and Renewal Division

29. The Strategy and Renewal Division, led by a General Manager, is responsible for driving innovation, generating and turning insights into action, and implementing transformational change as part of the renewal of the CCC. The Division was established

in 2022 from elements of the former Strategy, Insight and Innovation Division, to reflect the importance of the Renewal Program.

Corporate Services Division

30. The Corporate Services Division, led by an Executive Director, enables and supports the CCC's operational functions by providing business support and advisory services.

Information Services Division

31. The Information Services Division, led by an Executive Director, provides essential information and technology management to support the operations of the CCC.

Legal, Risk and Compliance Division

32. The Legal, Risk and Compliance Division, led by an Executive Director, provides independent legal advice, corporate governance, management of litigation and research services.

Office of the Commission

33. The Office of the Commission supports the Chairperson, CEO and Commission in meeting their strategic and governance responsibilities.
34. The Internal Audit function also sits within the Office of the Commission.

CCC planning framework

35. The annual strategic planning process enables the CCC to review its strategic objectives and identify the future strategies and outputs to meet those organisational requirements over the next 12 months.
36. Long term planning considerations must occur in relation to emerging trends, priorities and risks. Within the CCC, strategic planning is an iterative process that informs the overarching CCC Strategic Plan that in turn informs the internal Enabling Strategies and Divisional Business Plans.

CCC strategic plan

37. In alignment with the Queensland Government's Agency Planning Requirements, the CCC must develop and implement a Strategic Plan covering a period of four years.
38. The Strategic Plan must be reviewed annually, with a comprehensive review occurring at least every four years.
39. The purpose of the review process is to identify any 'shifts' that may be required based on changes to the internal and external operating environment including emerging mega trends.
40. The CCC Strategic Plan is published on our website and contains statements on the following:
 - Our Vision
 - Purpose statement
 - Function of CCC
 - Objectives
 - Strategies

- Service Delivery Statement Performance Metrics
- Strategic Risks and Opportunities
- CCC Values
- Human Rights Statement
- Commitment to First Nations Peoples.

Functional strategies

Corruption Strategy 2023-2027

41. The Corruption Strategy aims to transform the way we deliver our services to ensure maximum impact and increase integrity in the public sector. We do this by:
- Building contemporary services and investing in our people to enable them to perform at their best;
 - Using our data and insights to reduce corruption;
 - Partnering to enhance the value of our data and insights;
 - Designing and delivering accessible corruption service and products.

Crime Strategy FY 2025 (Position Statement)

42. This position statement explains how the CCC fulfills our role and responsibilities as Queensland's crime commission including how:
- Our powers and functions give us the authority and capability to combat crime;
 - Our approach encompasses our areas of focus and priority action area;
 - Our Matter Prioritisation Model ensures that our case and project selection is consistent and transparent, and is supported by a sound public interest rationale;
 - Our Stakeholder Engagement Strategy ensures that we capture stakeholder issues and concerns, and pool resources and capabilities to support and achieve outcomes together.

Enabling strategies

43. In alignment with the comprehensive review of the CCC Strategic Plan conducted in 2023, our enabling strategies (Workforce, Data and Analytics and Digital) were also reviewed and revised.
44. These enabling strategies focus on the areas that we need to invest in, and guide significant elements of our continuous improvement program.

Workforce Strategy 2023-2027

45. The Workforce Strategy and subsequent annual plan for delivery serves as a guide for the allocation of resources to deliver on strategic objectives outlined in the CCC Strategic Plan.
46. It recognises the critical role that a skilled, motivated, and agile workforce plays in achieving organisational goals, and provides a clear and actionable strategy to ensure the CCC is equipped to meet the challenges and opportunities ahead of it.

Data and Analytics Strategy 2023-2027

47. The Data and Analytics Strategy recognises data and digital capabilities as a strategic opportunity and includes strategies to build and use data to inform effective decision making, and to innovate, digitalise and automate service delivery to maximise operational efficiency and effectiveness.
48. Through the strategy the CCC is focussing on:
 - Creating high-value datasets by curating, integrating and centralising data to create datasets that support the CCC's strategic priorities; and
 - Embedding and empowering capability by improving data literacy, embedding data-driven decision making and using innovative analytics to deliver value to the CCC, stakeholders and partners.

Digital Strategy 2023-2027

49. The Digital Strategy seeks to mature our digital capability and deliver simpler, smarter, people-centric digital services.
50. It sets out a road map to enhance the CCC's understanding of the technology landscape, adoption of new and emerging technologies, prioritisation and delivery of new initiatives, and understanding of how emerging digital technologies present opportunities for crime and corruption.
51. It aims to take a holistic view of the applications portfolio, improve the digital literacy of the workforce, streamline and enhance our digital products, ensure the CCC is catering for changing user expectations, and promote a digital-first approach.

Chapter 2: Major Crime function

52. The CCC investigates and shapes effective responses to serious and organised crime affecting the Queensland community. We also work with and share criminal intelligence with the Queensland Police Service (**QPS**) and other partner agencies and confiscate criminal profits.⁵
53. The CC Act sets out the CCC’s primary functions, powers, and governance structure for its crime functions and jurisdiction.
54. The CCC does not have a standing jurisdiction for its crime functions, and is limited to investigating matters referred to it under referrals or authorities provided by the Crime Reference Committee (**CRC**), established under Part 2 of Chapter 6 of the CC Act. Section 275 sets out its functions.
55. The CRC may refer a particular incident of major crime (a specific referral) to the CCC for investigation, or a CRC referral may be general in nature, allowing for investigations to be approved by the Chairperson or the Senior Executive Officer (Crime), provided they meet the terms and conditions of the general referral.⁶
56. Membership of the CRC is set out in the graphic below and is also detailed in section 278 of the CC Act.



57. Major crime is defined in the CC Act as meaning: criminal activity involving an indictable offence, punishable on conviction by a term of imprisonment of not less than 14 years (serious crime); criminal paedophilia; organised crime; or terrorism; and activities preparatory to that activity, or undertaken to avoid detection or prosecution for it.⁷

⁵ The CCC’s civil confiscation function is dealt with in more detail under Chapter 3 of this submission.

⁶ Part 2, Chapter 2 *Crime and Corruption Act 2001*.

⁷ As defined in Schedule 2 Dictionary, *Crime and Corruption Act 2001*. Further detail on the CRC is provided in Chapter 12 of this submission.

58. General referrals currently approved by the CRC are:
- **Organised Crime** — involving serious drug and weapons offences, money laundering, and serious offences under Parts 3 to 6 of the *Criminal Code* against the administration of justice, prostitution, persons or property, respectively, occurring since 1 January 1990;
 - **Serious Crime (Homicide)** — involving homicide offences occurring since 1 January 1952;
 - **Serious Crime (Vulnerable Victims)** — involving offences of homicide and violence, occurring since 1 January 1970, against a person who is vulnerable by reason of being under 16 yrs or over 70 years of age, or because of physical disability or mental impairment;
 - **Criminal Paedophilia** — serious sexual offences, against children, occurring since 1 January 1960, or in relation to child exploitation material, occurring since 1 January 2013, where committed in Queensland, or in any jurisdiction if the offender or child ordinarily resides in Queensland; and
 - **Terrorism** — offences involving a terrorist act that occurred since 1 January 2010.
59. The CRC may also authorise the CCC to undertake specific intelligence operations⁸ into the suspected criminal activity of criminal organisations or their participants, or immediate response investigations,⁹ where the activities of a criminal organisation involve or could involve an incident that threatens public safety.
60. The terms ‘criminal organisation’ and ‘criminal organisation participant’ are defined in the *Penalties and Sentences Act 1992*.¹⁰
61. When conducting investigations referred or authorised by the CRC, the CCC may also gather evidence for the prosecution of offences, or the recovery of proceeds of crime, or property liable to forfeiture, or a person’s unexplained wealth under the *Criminal Proceeds Confiscation Act 2002 (CPCA)*.¹¹
62. The CCC’s research,¹² prevention¹³ and general intelligence functions¹⁴ may also be engaged more broadly to support the CCC’s role in reducing the incidence of major crime.
63. For example:
- a) The CCC collects, maintains and analyses intelligence and information about serious and organised crime to support our crime investigations and shares this with our partner enforcement agencies such as the QPS and other state policing agencies, the Australian Federal Police (**AFP**), the Australian Criminal Intelligence Commission (**ACIC**), Australian Home Affairs (**HA**) including Border Force (**ABF**),

⁸ Sections 55A, 55B, 55C *Crime and Corruption Act 2001*.

⁹ Section 55D *Crime and Corruption Act 2001*.

¹⁰ See section 161N *Penalties and Sentences Act 1992*.

¹¹ Section 66 *Crime and Corruption Act 2001*.

¹² Section 52 *Crime and Corruption Act 2001*.

¹³ Sections 23, 24 *Crime and Corruption Act 2001*.

¹⁴ Sections 53, 54, 55 *Crime and Corruption Act 2001*.

the Australian Taxation Office (**ATO**) and the Australian Transaction Reporting and Analysis Centre (**AUSTRAC**).

- b) The CCC may also undertake research and intelligence activities, whether alone or in collaboration with other agencies and enforcement partners, on matters concerning the administration of criminal justice in Queensland, or to promote understanding and develop strategic insights for effective prevention and responses to serious and organised crime affecting the Queensland community.

Exercise of the CCC's crime jurisdiction - *approach and structure*

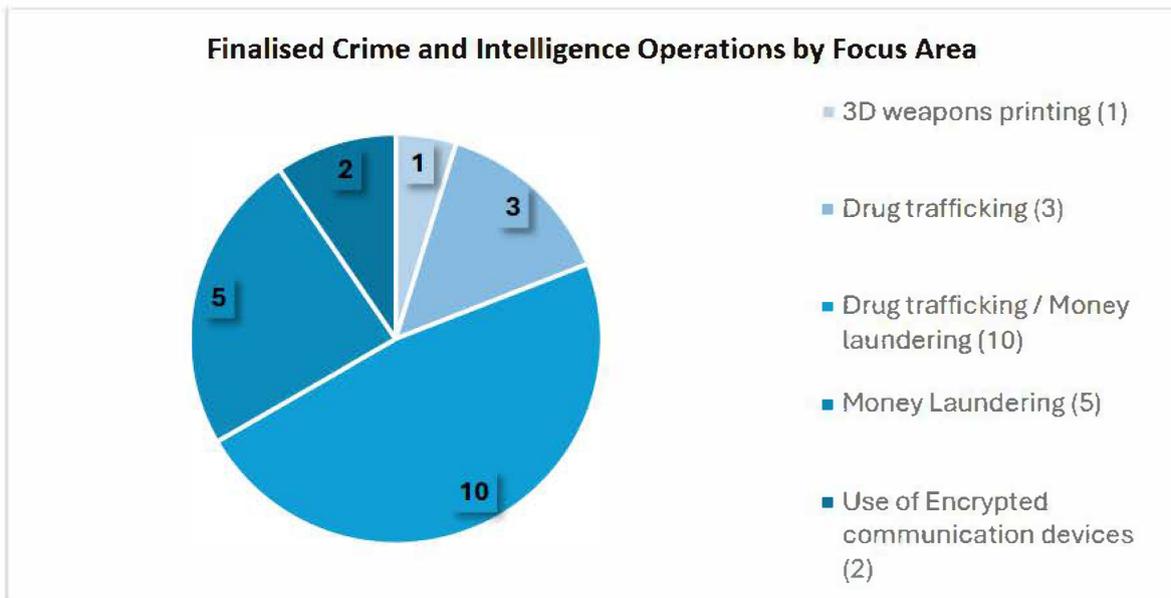
64. While the CCC has a broad capacity to engage its crime functions and powers, our approach is to focus on the specific capabilities we have been given as an organisation, work in cooperation with the QPS and other enforcement partners to optimise the use of resources, coordinate activities and avoid duplication. These are important principles for our engagement.
65. The Senior Executive Officer (Crime) is responsible to the Chairperson for the proper performance of the CCC's crime functions. Work in this area calls on the skills of multiple disciplines to achieve our legislated objectives. This includes lawyers, seconded QPS police officers, intelligence analysts, forensic computer experts, forensic accountants, surveillance and technical specialists, researchers and data analysts.
66. The CCC's Crime Division is responsible for four key service lines that deliver the CCC's crime related functions, and its structure is closely aligned to those services. These are:
- **Crime Operations** - multi-disciplinary teams undertake major crime and intelligence operations referred to it by the CRC.
 - **Proceeds of Crime** - financial investigation teams assess and develop potential civil confiscation opportunities, undertake asset focused financial investigations, and take appropriate action to restrain, forfeit and recover criminally acquired assets under the non-conviction based and serious drug offender confiscation schemes under the CPCA.
 - **Crime Hearings and Legal** - lawyers provide legal advice and advocacy to support the CCC's crime and intelligence operations, and related work, including the conduct of hearings. The unit's lawyers work with our own, QPS, or other law enforcement investigators to assess whether a CCC hearing may advance or help solve serious crimes, provide strategic or tactical intelligence about suspected criminal activity, or help prevent or investigate incidents that may threaten public safety.
 - **Crime Strategy** - intelligence and business analysts engage with stakeholders and partner agencies, provide strategic intelligence assessments and other reports to inform and improve our operational effectiveness, our responses and to identify crime prevention opportunities.

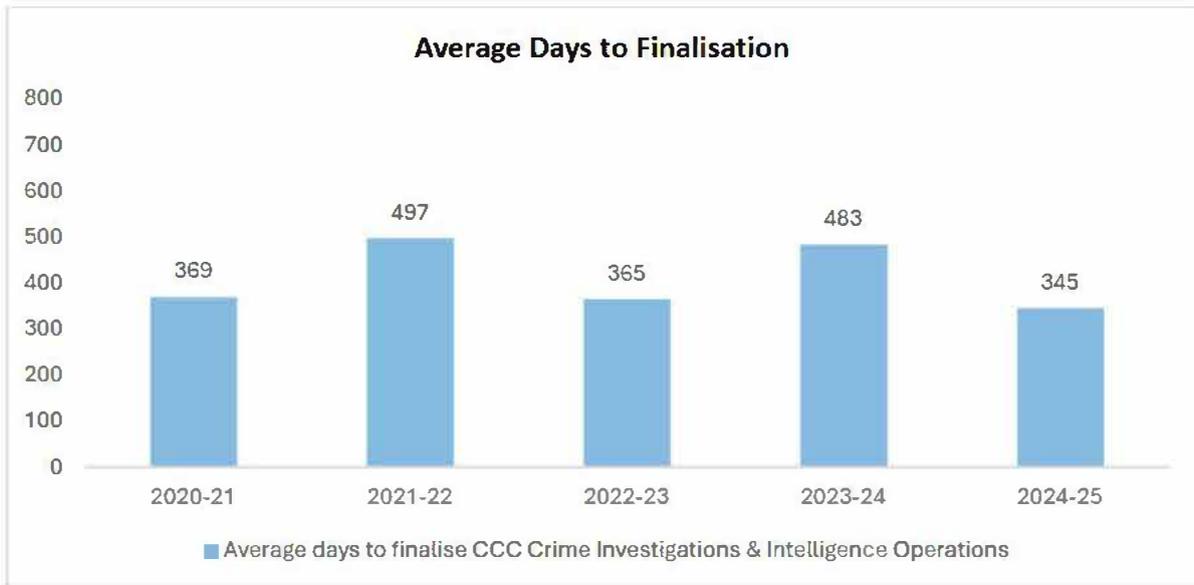
Priorities and focus areas

67. The priorities for our crime functions are informed by and support the Queensland Government’s priorities, commitments and targets.
68. This includes Queensland’s commitments to national strategies for fighting serious and organised crime, associated frameworks and agreements.
69. The QPS priorities for preventing, disrupting and responding to serious and organised crime also have particular significance for setting our major crime priorities.
70. We recognise **three priority focus areas** within our operating environment that are aligned with our functions, including our system of CRC general referrals:
 - Illicit markets;
 - Crimes involving loss of life or serious injury; and
 - Crimes against children and vulnerable people.
71. The CCC’s Crime Matter Prioritisation Model ensures the principles for our engagement, our priorities and focus areas translate into our assessment and review processes to ensure case and project selection is consistent and transparent, considers stakeholder value and is supported by a sound public interest rationale.
72. Our decision-making at all levels is also supported by a Stakeholder Engagement Strategy that ensures we understand and capture stakeholder issues and concerns, manage strategic risk, pool resources, share capabilities, and solve problems and achieve outcomes we could not otherwise achieve alone.

5-year performance data

73. This part of our submission deals with key performance data over the review period.



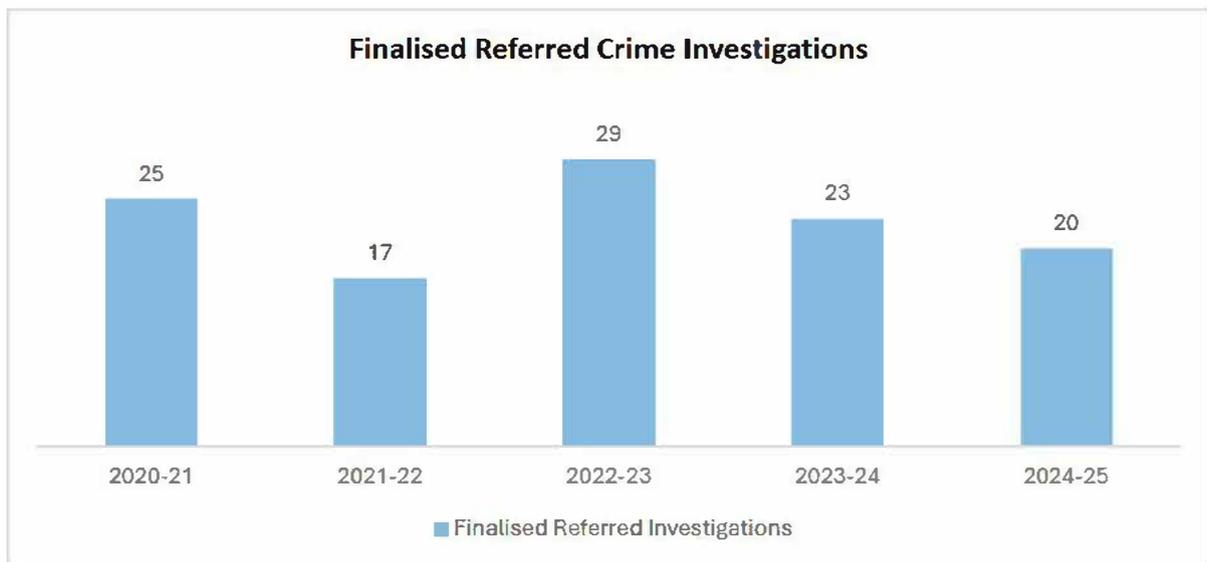


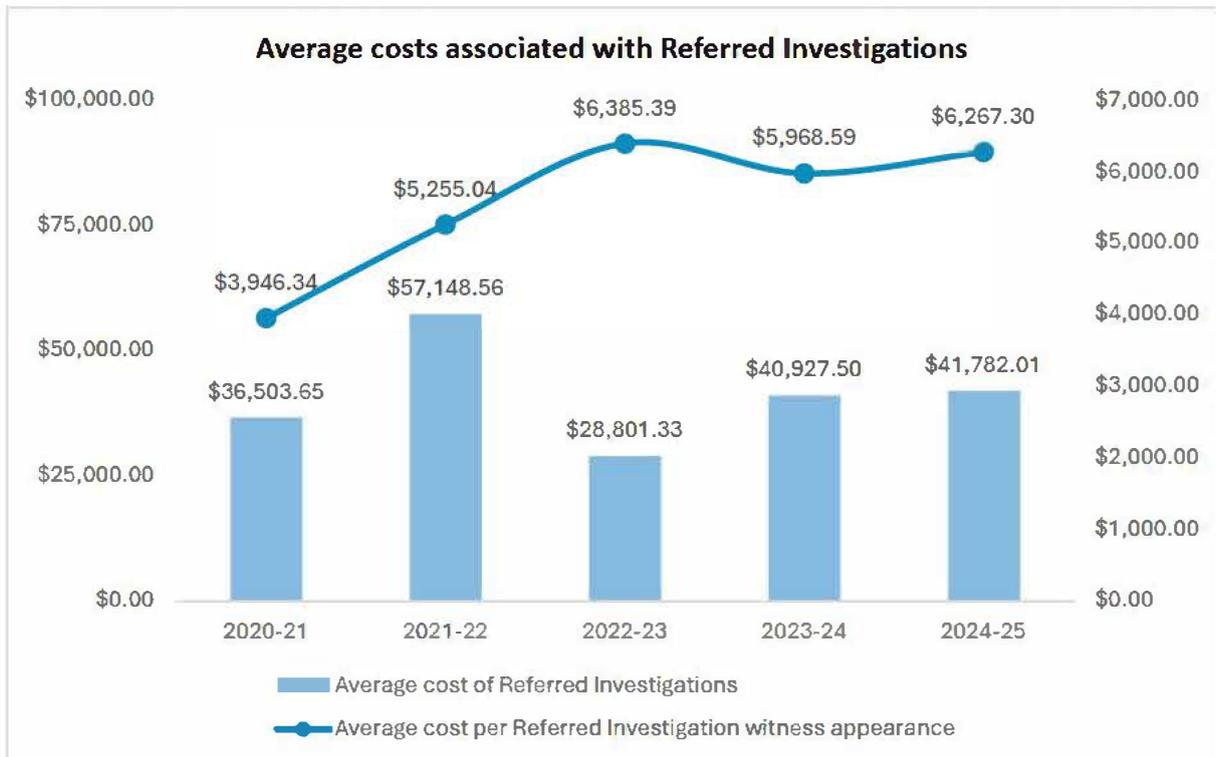
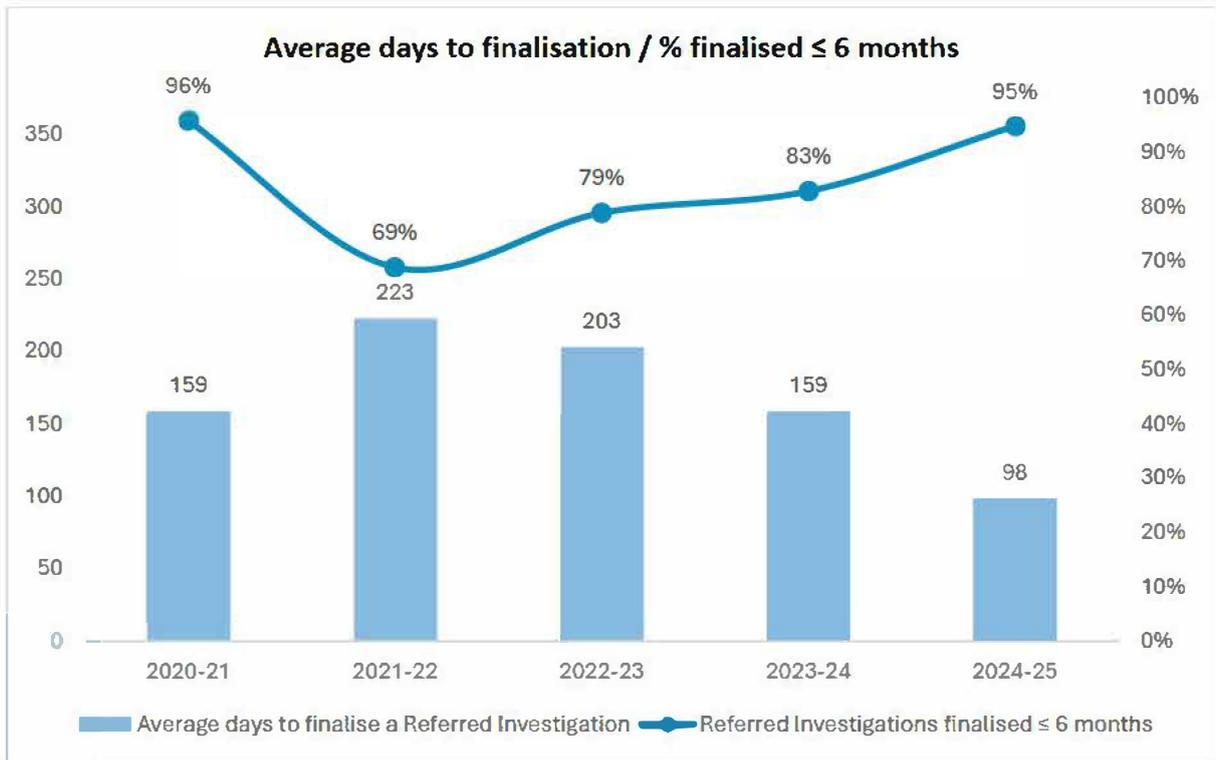
Year	CCC crime prosecution success rate	ODPP Prosecution success rate in superior courts
2024-25	100%	15
2023-24	100%	54%
2022-23	77%	48.8%
2021-22	78%	54.7%
2020-21	93%	53.6%

¹⁵ As at the date of this submission this data was not publicly available via the DPP's website.

Intelligence disclosures and requests for information relating to crime investigations

Nature of disclosure	CCC Crime Investigations	Intelligence Operations	Referred Investigations	Strategic & Other	Proceeds Matter	Total
2020-21	28	5	108	71	18	230
2021-22	20	23	46	40	20	149
2022-23	28	40	75	64	8	215
2023-24	24	28	86	47	14	199
2024-25	18	42	81	65	16	222
Total	118	138	396	287	6	1015

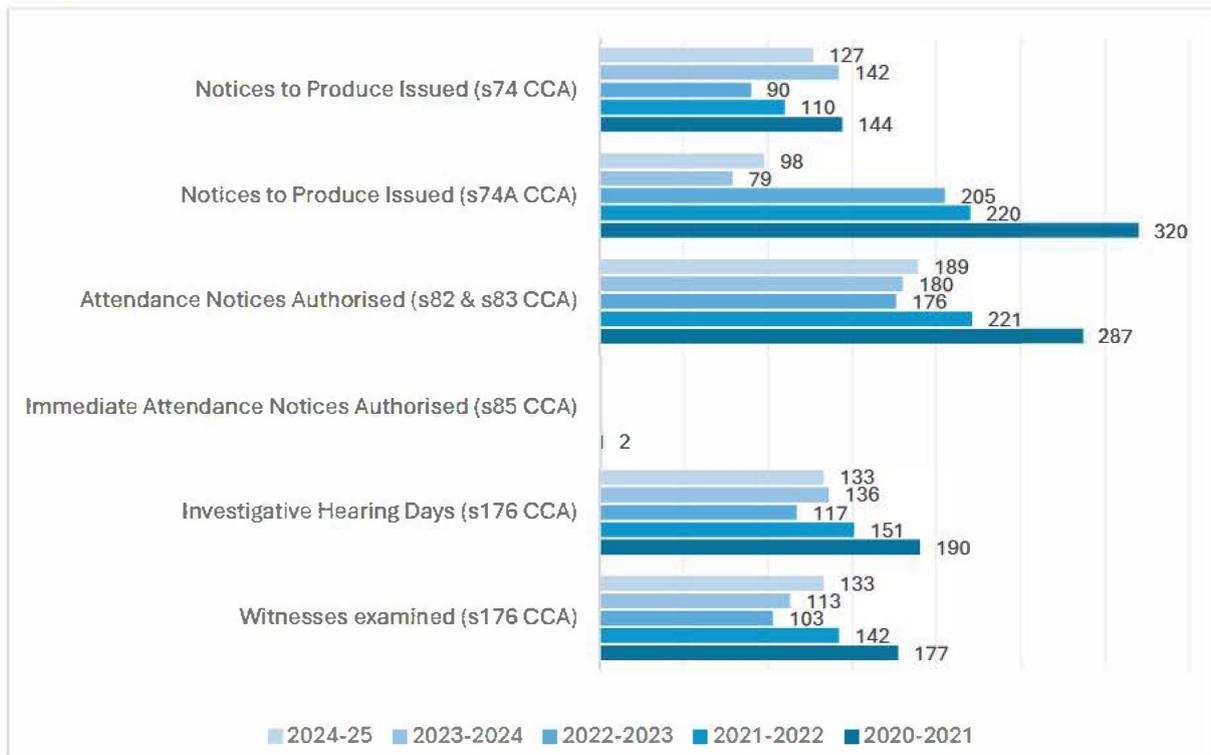




Investigative powers

- 74. Investigative powers that may be engaged by a Commission officer (including seconded QPS officers) in support of the CCC’s crime functions are found in the CC Act or the *Police Powers and Responsibilities Act 2000 (PPRA)*.¹⁶
- 75. Generally, for its major crime related functions (including intelligence operations) the CC Act is the source of overt powers such as Notices to Produce, Search Warrants and Hearings, and the PPRA is the source of the CCC’s covert powers such as Surveillance Device Warrants and Controlled Operations.
- 76. Powers under the PPRA are available to CCC seconded police in their capacity as QPS officers, provided the offence threshold for their exercise and other conditions are met.
- 77. Data on the use of powers for the CCC’s crime related functions under Queensland legislation¹⁷ during the review period, follows.¹⁸

Notices and hearings

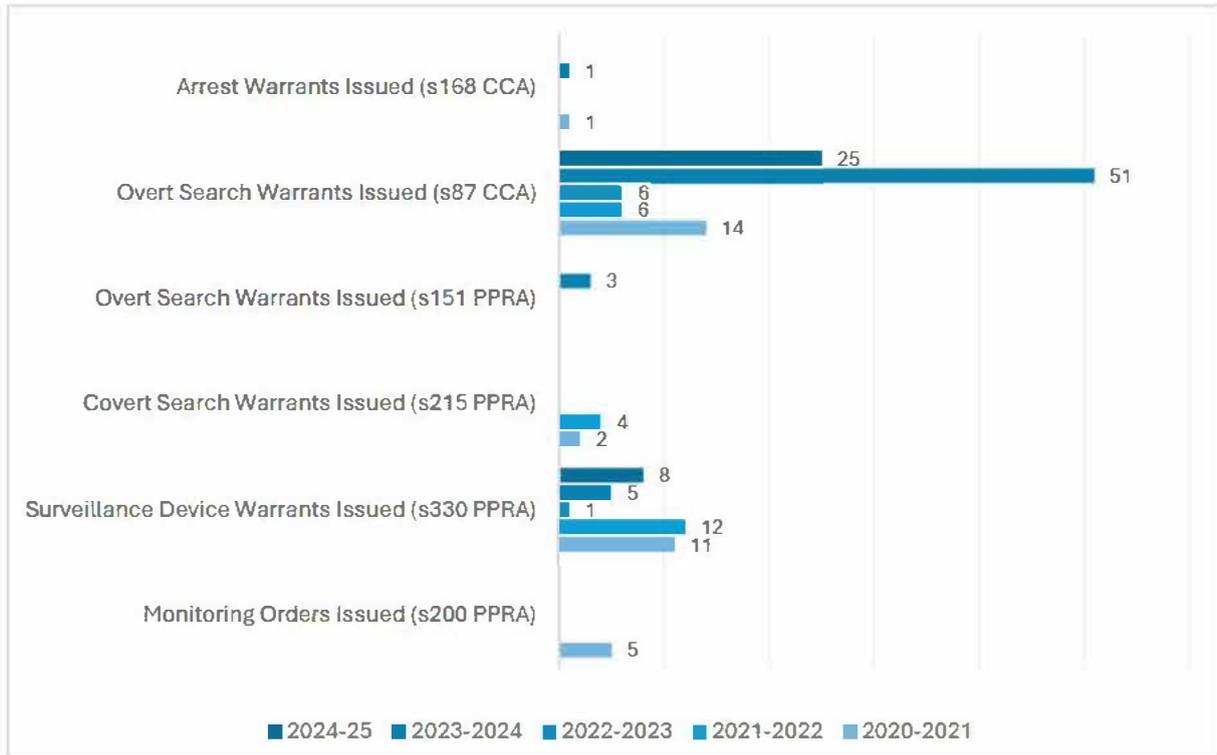


¹⁶ Except for access to telecommunication information and data which is found under the *Telecommunications (Interception and Access) Act 1979* (Cth).

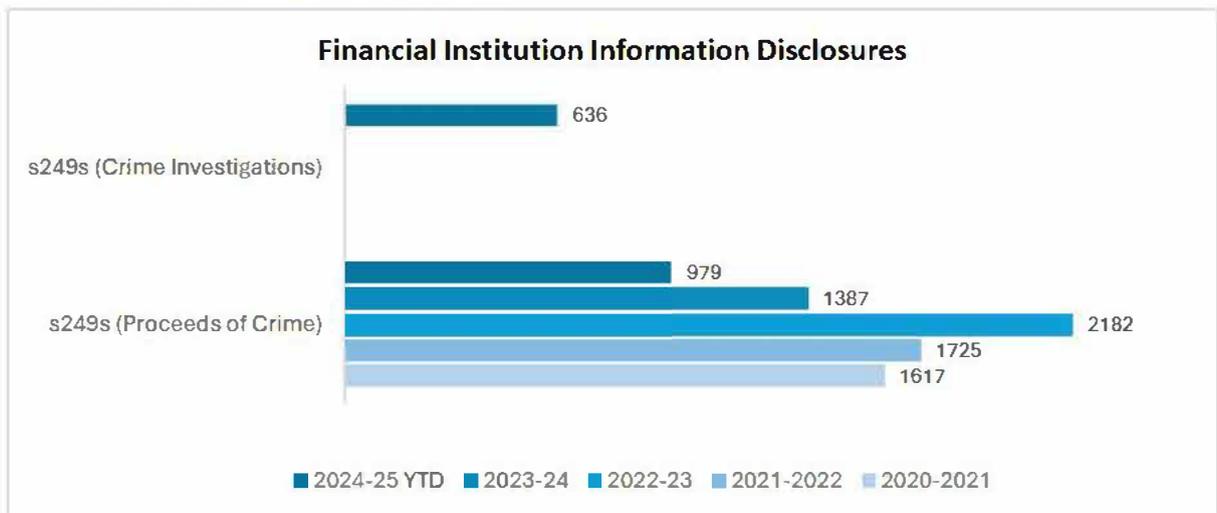
¹⁷ The data excludes powers exercised under Commonwealth legislation such as the *Telecommunications (Interception and Access) Act 1979*.

¹⁸ The legislative references in the table are to the *Crime and Corruption Act 2001* provisions which operated until 30 August 2025. Significant changes to chapters 3 and 4 of the *Crime and Corruption Act* provisions relating to Notices and Hearings commenced on 31 August 2025.

Warrants



Financial Institution Information Disclosures¹⁹



¹⁹ Data capture shows disclosures made under CPCA section 249. Data capture for Crime investigations is only available for the financial year ending 2025.

Chapter 3: Corruption function

78. As Queensland's anti-corruption commission, the CCC's role is to continuously improve the integrity of, and reduce the incidence of corruption in, the public sector.
79. We do this by investigating the more serious cases of corrupt conduct and helping units of public administration²⁰ (**UPA**) deal effectively and appropriately with corruption by increasing their ability to do so.
80. Our work utilises the skills of multiple disciplines to achieve our objectives. Our teams include lawyers, police, investigators, intelligence analysts, researchers, prevention and engagement specialists, assessment officers and forensic accountants.
81. Our work in investigating serious cases of corrupt conduct and raising the standards of integrity and conduct in UPAs as well as the public sector's capacity to deal with corruption makes an important contribution to enhancing the confidence, trust and accountability in Queensland's public institutions through:
 - a) Investigating serious and systemic corruption;
 - b) Gathering and sharing intelligence and research;
 - c) Building corruption prevention capability; and
 - d) Working co-operatively with units of public administration.

Corruption function

82. The CC Act provides that the CCC may perform its corruption function by:
 - a) Assessing each complaint or notification about corruption (**referral**) and then determining the appropriate response which may include:
 - i) taking no further action, or
 - ii) referring those matters most appropriately dealt with by the relevant UPA, or
 - iii) monitoring the way in which a UPA deals with matters referred to it, or
 - iv) investigating, either by itself or in cooperation with a UPA, those referrals alleging more serious or systemic corrupt conduct.
 - b) Assessing the appropriateness of systems and procedures adopted by a UPA for dealing with referrals about corruption.
 - c) Providing advice and recommendations to a UPA to help them deal with and prevent corruption.
83. The CCC also has a function to prevent corruption and some of the ways we do this are by:
 - a) Analysing the intelligence we receive and gather, along with the results of our investigations and investigations undertaken by UPAs.
 - b) Analysing systems used within UPAs to prevent corruption.
 - c) Ensuring that prevention identification is built into the objectives of all investigations.

²⁰ 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 elected officials.

- d) Providing advice, training and resources to support UPAs prevention efforts; and
 - e) Reporting on ways to prevent corruption.
84. We engage our investigation, research, prevention, and intelligence functions to support these activities.

Corruption principles

85. One of the CCC's corruption functions under the CC Act is to ensure that referrals about or information or matters involving corruption are dealt with in an appropriate way, having regard to the following four principles set out in section 34 of the CC Act:
- a) **Cooperation** — the CCC and UPAs should work cooperatively to deal with corruption;
 - b) **Capacity building** — the CCC has a lead role in building the capacity of UPAs to deal with cases of corruption effectively and appropriately;
 - c) **Devolution** — subject to the other principles, action to deal with corruption in a UPA should generally happen within the UPA;
 - d) **Public interest** — the CCC has an overriding responsibility to promote public confidence in the way UPAs deal with corruption.
86. These principles recognise that the CCC does not have sole responsibility for preventing and dealing with corruption, and that reducing or dealing with corruption and improving the integrity of the public sector in Queensland must be a core function of all public sector agencies.
87. We support public sector agencies to build their corruption resistance through sharing strategic intelligence, contemporary research, and prevention advice about corruption risks, delivering targeted education and capacity-building activities, and by informing public policy to reduce corruption risks and strengthen integrity.

Powers

88. The CCC has certain investigation powers not available to the QPS or any other Queensland agency.
89. This includes a hearings power which enables us to compel witnesses to attend and give evidence about serious corruption.
90. The CC Act provides the CCC with various administrative powers to investigate corrupt conduct and gather evidence that could lead to charging a person with a criminal offence. This includes powers to:
- a) Enter and search premises, inspect documents, make copies of, or seize and remove, items of interest to a corruption investigation, and the ability to require a person holding an appointment in a UPA to help the CCC exercise these powers;²¹

²¹ Refer to section 73 CC Act.

- b) Compel a person, regardless of whether that person holds an appointment in a UPA, to provide a written or oral statement or documents or other things relevant to a corruption investigation or specific intelligence operation (corruption).²²
91. Queensland police officers seconded to the CCC may lay a charge arising from a corruption investigation, generally only after receiving the written recommendation of the Director of Public Prosecutions that the person should be prosecuted and if so, for which offences.²³
92. Separate legislation enables us to gather evidence to perform our functions, such as accessing and intercepting telecommunications data, surveillance, and other covert activities.
93. The special nature of these capabilities requires us to balance the tension between those areas where the public interest is vulnerable, and those where there is public benefit and value in the CCC exercising its jurisdiction and powers.
94. This is an important reason these capabilities are vested in an independent agency such as the CCC.

Exercise of the CCC's corruption jurisdiction – *approach and structure*

95. The CCC's corruption jurisdiction is broad and diverse and includes more than 300 UPAs, including state government departments, the QPS, local governments, government-owned corporations, universities, prisons, courts, tribunals and elected officials.
96. The CCC investigates only the most serious or systemic corruption referrals itself and refers all other referrals to relevant public sector agencies to deal with, in line with the devolution principle.
97. When the CCC refers a matter to a UPA to deal with, we may monitor how an agency deals with it, subject to the level of seriousness of the matter. This may take the form of:
- a) **Referred, awaiting outcome advice (AOA).** The CCC will apply this level of monitoring to referrals that do not require active monitoring, but where outcome advice is required to allow the CCC to understand how a matter was dealt with, the outcome of any investigation, and as part of understanding the broader corruption risk landscape.
 - b) **Monitoring.** In some circumstances, the CCC may consider that a matter involving serious and/or systemic corruption should be dealt with by another agency in the first instance, but due to the nature of the matter, the CCC should closely monitor how the matter is dealt with by the agency through regular reporting to the CCC.
 - c) **Auditing.** The CCC may audit the systems and practices in place within a UPA or multiple UPAs for dealing with corrupt conduct.
98. To enable the performance of the CCCs' corruption function, the Corruption Division provides services via the following business units.

²² Refer to section 75 CC Act.

²³ Refer to sections 49A – 49F CC Act.

Intake and Assessment

99. This unit assesses referrals about or involving corruption made or notified to the CCC. The unit applies assessment and prioritisation models to support the CCC's response to corruption referrals.
100. The unit is comprised of four teams:
- a) **Intake:** The intake team receive new matters via phone, email, letters, and an online lodgement form, and are responsible for processing all incoming correspondence onto the referrals management system. New matters are referred to the Executive Director, or their delegate, for triaging using the Corrupt Conduct Assessment Model (**CCAM**). The intake team is also primarily responsible for managing the CCC referrals phone line and speaking with members of the public who lodge their referral by telephone.
 - b) **Significant and Strategic Assessment Team (SSAT):** The SSAT conducts preliminary assessment and intelligence enquiries on matters triaged as meeting the CCAM and applies the Corruption Referral Prioritisation Model (**CRPM**). The CRPM is used to guide an assessment recommendation for consideration by the relevant delegate regarding whether to investigate, monitor, or refer the matter to the agency for resolution (subject to outcome advice).
 - c) **Primary Assessment Team (PAT):** This team assesses and refers matters that do not meet the CCAM criteria. They also prepare and provide outcome advice to complainants. Assessment officers undertake complaint service reviews, respond to further correspondence on current and finalised matters, and provide advice to people making referrals whose matters have been assessed as falling outside the jurisdiction of the CCC.
 - d) **Business Support:** This team provides administrative assistance across the intake and assessment services, ensuring communication of assessment outcomes and managing workflows.

Corruption Investigations

101. The unit is comprised of multi-disciplinary investigation teams that conduct investigations into serious and/or systemic corruption either on their own or in collaboration with public sector agencies.
102. This may involve a feasibility (or preliminary) investigation or more protracted methods and investment of resources over the delivery stage of an investigation. The approved investigation scope and purpose informs and identifies what is, and what is not, involved in undertaking the investigation, and any relevant constraints or assumptions.
103. During a corruption investigation, the CCC may use the powers available to it to gather evidence to enable the prosecution of offences, this may include accessing or intercepting telecommunications data, serving notices to discover, holding coercive hearings, or executing search warrants.
104. Prevention or procedural recommendations can be made during any stage of an investigation to assist a UPA to build their corruption resistance through strengthening

their corruption control systems and practices. These recommendations are developed in consultation with Corruption Prevention and Engagement.

105. The unit is also responsible for overseeing investigations into police-related deaths (both deaths in custody and deaths in police operations). Police-related deaths are generally investigated by the QPS' Ethical Standards Command (**ESC**), with the CCC monitoring the integrity of these investigations on behalf of the Coroner to ensure they are conducted honestly and impartially, are compliant with law and withstand public scrutiny.
106. To facilitate these activities, the CCC provides an on-call 24-hour oversight service and regularly attends the scenes of these critical or fatal incidents to provide direct oversight of these investigations.

Corruption Legal

107. This unit provides independent legal advice and services across the portfolio of our corruption work. The types of legal services provided by this unit include:
 - a) Providing advice on the CCC's jurisdiction and the appropriate use of the CCC's statutory powers.
 - b) Drafting, settling and/or making applications for the exercise of the CCC's investigative and compulsory powers.
 - c) Providing advice on the QPS disciplinary process, including whether to review QPS sanctions, offer alternate sanctions or finalise matters.
 - d) Providing advice regarding criminal and disciplinary charges for referral to prosecuting bodies or Queensland Civil and Administrative Tribunal (**QCAT**) in its original jurisdiction.
 - e) Acting as Counsel Assisting and/or instructing Counsel Assisting at public and private CCC hearings.

Corruption Prevention and Engagement

108. This unit is responsible for providing insights into emerging corruption risks and threats, monitoring the way UPAs deal with and investigate referrals about corruption, and helping Queensland UPAs prevent corruption through the delivery of prevention information and engagement initiatives. The unit is comprised of three teams:
 - a) The **Strategic Insights and Prevention** team strengthens system-wide integrity by examining public sector practices, systems, and culture to proactively identify corruption vulnerabilities, developing and sharing strategic intelligence and research on corruption risks, and providing timely advice to our stakeholders on how to prevent corruption and build corruption resistance.
 - b) The **Engagement and Partnerships** team supports our stakeholders to proactively prevent, detect and respond to corruption by delivering customer-oriented, collaborative solutions informed by our data and insights. The team works with other Corruption Division business units to oversee and deliver consistent and best-fit communication and engagement with our stakeholders.
 - c) The Monitoring and **Review** team oversee matters devolved to agencies to investigate that are of a more serious or systemic nature. This team also reviews significant events notified to the CCC in line with the administrative arrangement

between the CCC and QPS to identify incidents that raise a reasonable suspicion of police misconduct or corrupt conduct. The team plays a critical role in engaging and supporting agencies to build investigative capability and capacity to deal with corruption referrals, and in supporting agencies to identify corruption prevention opportunities through their investigations.

5-year performance data

109. This part provides key performance data for the review period, including where relevant, benchmarking data, information on strategies implemented to improve performance as well as identification of areas where continual focus is required to deliver improved performance.

Corrupt Conduct assessment function

110. In December 2021, Report No. 108, 57th Parliament, Parliamentary Crime and Corruption Committee was published.

111. Recommendation 4 of the report was as follows:

“The committee recommends that the Crime and Corruption Commission engage in reform of culture (including seeking external advice) to assist in creating a best practice organisational culture that aligns with the purpose, functions and goals of the Crime and Corruption Commission under the Crime and Corruption Act 2001, and to enhance public confidence in the organisation”.

112. An external advisor was engaged by the Crime and Corruption Commission in June 2022, to commence the review into organisational culture and performance, focusing on corrupt conduct complaints, as defined in the Public Report to the Parliamentary Crime and Corruption Committee - 1 July to 31 December 2021 (below).

“We recognise that achieving alignment between purpose and organisation culture requires ongoing focus. To continue this program of reform and to be responsive to the PCCCs recommendation we advise that we will, after completing the appropriate procurement process, be undertaking an external review of our current practices in relation to assessment of corrupt conduct complaints.

The complaint lodgement and assessment process represent the front door to the CCC for the majority of people who may have contact with us and how we perform this function and deal with these stakeholders represents an important part of the cultural system of the CCC. This project will involve examining how we strike the right balance between our prevention and investigative responses, to ensure we are identifying, and referring for investigation, the most critical matters.

This will also involve examining the way we deal with complainants, to ensure we are providing services that are valued by the people we provide services to.”²⁴

²⁴ Public Report to the Parliamentary Crime and Corruption Committee - 1 July to 31 December 2021.

- 113. The external review of the Intake and Assessment function provided the CCC with a clear future scope for our continuous improvement of the function.
- 114. It also identified the following opportunities for improvement and since that time, the CCC has been steadily implementing each of them.

Opportunity 1 – Corruption Strategy:

- 115. The Corruption Strategy 2023-2027 was published on 7 July 2023 and defines where we will focus our efforts over the next four years, and how we intend to achieve our vision and ambition for the future. Through implementing the strategy, we aim to transform our services by using our data and insights and working together with our stakeholders to strengthen integrity and reduce corruption.
- 116. The strategy was co-designed with our stakeholders who were invited to contribute to, and shape, the future of the CCC’s corruption function. It reflects the feedback we received and is helping position the CCC to be more responsive and adaptive to our changing environment.
- 117. The strategy has two objectives supported by eight initiatives.²⁵

Queenslanders have confidence in the work we do		Objective 1
What success looks like	<ul style="list-style-type: none"> a) Data and insights inform every decision we make b) Serious and systemic corruption is our focus c) Supports shared responsibility for dealing with referrals d) Working together with our partners 	
How we will achieve it	<ul style="list-style-type: none"> e) Enhance the way we collect, use and share our data and insights f) Engage with the public sector about our redesigned services g) Improve our stakeholder engagement and communication practices to support greater collaboration and sharing of information 	
Successful transformation		Objective 2
What success looks like	<ul style="list-style-type: none"> a) Collaborative data and insights initiatives b) Flexible operating models enable us to adapt and respond c) Leveraging technology to improve our efficiency and effectiveness d) Enabling people to perform at their best 	
How we will achieve it	<ul style="list-style-type: none"> e) Strengthen our data and insights by optimising our data holdings and increasing our investment in analytics capability f) Review, redesign and implement improvements to our services and workforce management practices to ensure they continue to be contemporary and efficient g) Develop and implement new systems to support our functions and improve workforce management 	

²⁵ Available on the CCC website at <https://www.ccc.qld.gov.au/publications/ccc-corruption-strategy-2023-27>

Opportunity 2 – New tool for prioritising corruption referrals

118. There are two main steps in the assessment of a corruption matter:

- i) **Triage** which is undertaken by the officer responsible for receiving the matter (the Triage Officer or their delegate), categorising and allocating the matter in accordance with the Corrupt Conduct Assessment Model (**CCAM**).
- ii) An **assessment** resulting in an assessment decision. The assessment decision is made by a delegated officer, or in the case of serious corruption where the matter is recommended for CCC investigation or for monitoring by the CCC, the decision is made by the Executive Leadership Team.

119. The CCAM helps determine the seriousness of a matter that falls within the jurisdiction of the CCC, and its alignment with a strategic corruption priority.

Seriousness	<p>Nature: Matters that have the potential to adversely impact the public interest or confidence in the police integrity system. These typically include behaviours that, if proven, would be a serious offence, such as official corruption, fraud, bribery or abuse of office.</p> <p>Actors: Matters that involve individuals of significance, either as a subject officer or related party or people in positions of power or who have the ability to influence, such as a Director-General, Chief Executive Officer or elected official.</p> <p>Corruption principles: Matters where devolution may be inconsistent with the principles of cooperation, public interest, and other risk mitigation factors.</p>
Strategic priorities	<p>Corruption priorities: Matters that align with a CCC corruption priority.</p>

Matters meeting the CCAM

120. Matters that meet these criteria are referred to the Significant and Strategic Assessment Team (**SSAT**) within Intake and Assessment to review and, where appropriate, the SSAT will conduct preliminary enquiries to better understand the alleged conduct, identify evidence that supports the conduct has or has not occurred, and make an assessment recommendation to the relevant delegate.

Corruption Referral Prioritisation Model (CRPM)

121. The CRPM is used to assess the priority of matters triaged as meeting the CCAM. The CRPM helps ensure that decisions about responses to corruption referrals categorised as being of significant risk or a strategic priority, are made in an objective, consistent and transparent way.

122. The CRPM applies to a referral within the CCC’s jurisdiction which has been triaged under the CCAM as meeting the criteria of a significant risk or strategic priority, and that raises a reasonable suspicion of ‘corrupt conduct’ for the purposes of section 15 of the CC Act.²⁶

123. The CRPM is applied to the referral holistically and considers the referral across a series of dimensions to ensure there is a strong rationale or business case for the CCC’s continuing involvement in the matter, and for the level of priority it is given.

²⁶The CRPM is only applied to matters meeting the criteria of the CCAM.

124. The CRPM helps the relevant delegate make an informed assessment decision. It does not preclude an alternative recommendation being made to the relevant delegate based on the circumstances of the matter.
125. The CRPM also helps inform the CCC's ongoing involvement in a matter, and is reapplied during a preliminary investigation to inform the CCC's continuing involvement in a matter.

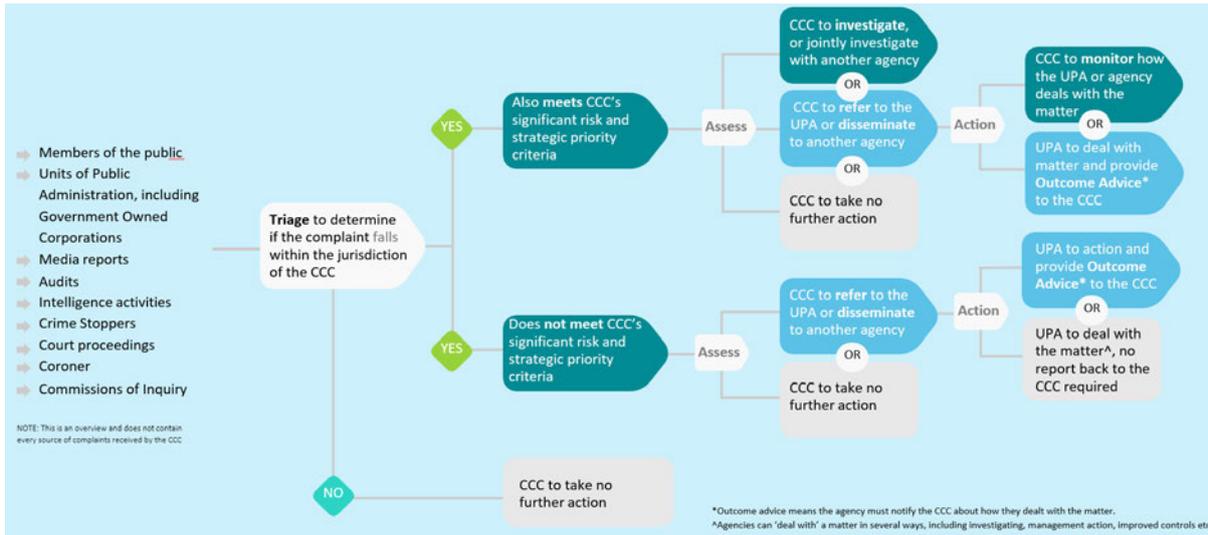
The CRPM criteria

126. Our current approach to prioritising our response to referrals is informed by consideration of:
- a) The likelihood of the complaint involving a criminal offence and the extent to which the CCC's powers are required to gather evidence.
 - b) The public interest.
 - c) The seriousness of a matter and its consequences.
 - d) The extent to which the conduct is systemic; and
 - e) The capacity and capability of UPA.
127. In making an assessment decision for the CCC to investigate, the ELT considers the above CRPM criteria.

Matters not meeting the CCAM

128. Matters which do not meet the criteria for CCAM are referred to the Primary Assessment Team (**PAT**) for assessment and recommendation of appropriate action based on the nature of the referral and the information available at the time of the assessment.
129. These matters are typically finalised by (1) referral to the relevant UPA to deal with in accordance with the devolution principle under the CC Act, or (2) are finalised as requiring no further action, for example, when the information available does not support the allegations raised, or where the referral has been sufficiently dealt with previously or determined as being not within the jurisdiction of the CCC.
130. A matter may be re-categorised if further assessment of the matter suggests it may meet the criteria of the CCAM.²⁷
131. Although matters triaged as not meeting the criteria of serious and strategic priority typically do not progress to investigation or oversight by the CCC, they provide valuable intelligence about corruption risks and issues impacting the public sector, and help inform our prevention and engagement activities.
132. Below is a graphic representation of the Triage and Assessment process.

²⁷ Similarly, a matter triaged as meeting the CCAM may be re-categorised if further assessment of the matter suggests it does not meet the criteria for the CCAM.



Opportunity 3 - Redesign processes and ways of working to improve efficiency and customer centricity

133. As part of the review, an online survey of UPAs was completed with feedback being extremely positive. However, there were several other data points gathered as part of the review, which indicated that, at that time, the function may have been overly internally focused and that there is a need to ensure improved customer service, objectivity and empathy toward those lodging referrals. We have taken significant action to improve how we deal and engage with complainants and witnesses by reviewing our approach to dealing with the psychological welfare of witnesses, and developing a trauma-informed approach to delivering our services.

Opportunity 4 - Redesign core assessment processes to achieve optimal use of resources

134. The workload within the unit has been redistributed to appropriately reflect seniority and reduce the number of roles completing the same or similar tasks. This means that the more senior and experienced commission officers deal with the more complex issues with the aim of improving the timeliness and quality of decisions.

Opportunity 5 - Introduce more quality assurance activities and improve training of assessment officers

135. Work instructions have been developed which detail the process of conducting quality assurance for assessment matters which are determined by the Primary Assessment Team. The work instructions require a sample of 10 written complaint assessments to be reviewed each week and 3 phone intake referrals to be reviewed for quality assurance.

136. Two other methods by which the quality of decision-making is reviewed and improved are - (1) Complaint Service Reviews and (2) Reviews completed in response to complaints lodged with the PCCC.

Complaint Service Reviews

137. If a person is unhappy with our assessment decision, they may submit a written request for a review within 14 days of when they were notified of the decision.

- 138. For any other assessment decision, a single review is conducted by a CCC staff member who is of equal level, or senior to the officer who made the original decision and was not involved in making the original decision.
- 139. The review focuses on how we *assessed* the complaint, not the outcome of an investigation conducted by the CCC or another agency.
- 140. The table below provides data on the number of Complaint Service Reviews finalised during the five-year period.

Complaint Service Reviews finalised					
Year	Total Received	Original decision confirmed	%	Original Decision Re-assessed	%
2024-25	92	66	72%	26	28%
2023-24	41	33	80%	8	20%
2022-23	8	7	87.5%	1	12.5%
2021-22	53	43	81%	10	19%
2020-21	73	57	78%	16	22%
Total	267	206	77%	61	23%

Complaints concerning Assessment Decisions lodged with the PCCC

- 141. The table below provides data on the number of complaints channeled through the PCCC during the five-year period.

Year	Total number of complaints finalised	# of complaints where the CCC identified improvements to internal systems/processes	# of complaints with no improvements identified
2024-25	12	6	6
2023-24	14	6	8
2022-23	5	1	4
2021-22	20	9	11
2020-21	20	10 ²⁸	10
Total	71	32	39

²⁸ The PCCC suggested areas of improvement in three (3) of the ten (10) complaints rather than the CCC.

142. The data indicates that only a very small number of complaints are made concerning the CCCs assessment decisions.
143. We value receiving requests for service reviews for various reasons including:
- a) The direct insights they can provide into areas we can improve our assessment decision making.
 - b) They can help build trust by demonstrating our commitment to be reflective and responsive to feedback.
 - c) They can inform updates to our training program, operational procedures and customer service standards; and
 - d) They can promote new ideas for service improvement.

Opportunity 6 - Define performance measures that provide a broader view of performance across the Intake and Assessment function

144. The Intake and Assessment Unit collects a range of performance data to assist in delivering quality performance, but also to assist in improving that performance over time and in fiscally constrained circumstances.
145. Apart from performance data on different categories of referrals assessed (as detailed in the tables below), the Intake and Assessment Unit also monitors individual assessment officer performance against weekly assessment targets. This information is provided via a weekly dashboard.

Demand overview

146. Providing an overview of the workload (demand) which enters the CCC is important context in understanding the Intake and Assessment processes and how we can continue to work on improving them.
147. There are a range of factors which can influence corruption demand. Some of these are summarised below:
- a) Reporting Culture
 - i) Organisational trust within units of public administration (**UPA**) driving willingness to report.
 - ii) Societal expectations on conduct influencing likelihood to report/lower perceived threshold for reporting.
 - iii) Negative whistleblower/corruption reporter/witness/victim experience publicised, reducing willingness to report.
 - iv) Media coverage of conduct issues in public or other sectors driving awareness and possibly lower perceived threshold for reporting.
 - b) Socio-economic
 - i) Economic conditions increasing financial performance pressures for some UPAs.
 - ii) Economic conditions increasing pressure on third parties to win contacts/achieve favourable contract terms/grants/funding.
 - iii) Economic hardship driving incidence of financially motivated corruption.
 - iv) Increasing monetary value of data.

c) Controls

- i) Tight labour market influencing strength and coverage of recruitment controls.
- ii) UPA prevention competency and capacity.
- iii) Active awareness campaign/prevention activities within the UPA.
- iv) Quality of leadership and management within a UPA.
- v) Perceived likelihood of corrupt conduct being detected/perception of internal controls/internal moral standards.
- vi) UPAs development of artificial intelligence-driven controls/autonomous detection.
- vii) Change in government procurement strategy.

148. Demand in the Intake and Assessment function has been growing each year over the last five years (an increase of 55%). There has been a sizeable increase in the previous two financial years (an increase of 40%) which has occurred at the same time as the CCC has been trying to improve its assessment function. This has not been ideal with our own expectations concerning timeliness not being achieved.
149. The benchmarking data below demonstrates that the CCC’s assessment timeliness generally exceeds that of comparable agencies.
150. We will continue to review our processes to identify further modifications we can make to our processes and to communicate more timely decisions. However, it is likely there will be a time, especially if complaint numbers continue to increase, when we exhaust our ability to improve timeliness without an injection of additional resources.

Referrals – QLD CCC						
Year	Total Received	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	5,422	5,567	55%	71%	78%	88%
2023-24	5,025	5,139	43%	64%	78%	90%
2022-23	3,931	3,691	62%	77%	84%	92%
2021-22	3,889	3,944	90%	98%	99%	100%
2020-21	3,490	3,684	92%	98%	99%	100%

151. The table below demonstrates the increased level of demand as well as the increased level of performance during the review period.

Referrals – QLD CCC				
Year	Total Received	% change since 2020-21	Total Assessed	% change since 2020-21
2024-25	5,422	▲ 55%	5,567	▲ 51%
2023-24	5,025	▲ 44%	5,139	▲ 39%
2022-23	3,931	▲ 13%	3,691	▲ 0.2%
2021-22	3,889	▲ 11%	3,944	▲ 7%
2020-21	3,490		3,684	

152. The table below provides data on the origin of referrals during the review period. Referrals identified as section 36 are those received from someone other than a public official who is required, under section 38, or in accordance with section 40 of the CC Act to notify the CCC if the public official reasonably suspects a complaint, information or matter involves, or may involve, corrupt conduct.

153. We note that the 2024-25 financial year was the first year in which referrals from a person other than a public official represented most referrals received by the CCC.

Referrals received						
Year	Total #.	Section 36	Proportion %	Sections 38 or 40	Proportion %	Other
2024-25	5422	2963	55%	2452	45%	7
2023-24	5025	2347	47%	2670	53%	8
2022-23	3931	1418	36%	2509	64%	4
2021-22	3889	1456	37%	2427	63%	6
2020-21	3490	1209	35%	2270	65%	11
Total	21757	9393	43%	12328	57%	N/A

154. As mentioned above, it is useful to compare our performance against similar commissions in Australia, that is, those commissions that receive and assess referrals from the public sector, including the police service and local government. In this respect the two agencies against which the CCC can generally benchmark are the Independent Broad-based Anti-corruption Commission in Victoria (**IBAC**) and the Western Australian Corruption and Crime Commission (**WA CCC**).

Police Referrals – Benchmarked against IBAC ²⁹					
Year	Total Received	Total Assessed	Assessed within 45 days – police	Target	Qld Comparison
2024-25 ³⁰	2,513	1,602	60%	60%	▲
2023-24	1,942	1,966	48%	60%	▲
2022-23	2,162	2,084	48%	85%	▲
2021-22	1,965	1,786	52%	90%	▲
2020-21	1,710	1,705	49%	90%	▲

Public Sector (exc Police) Referrals – Benchmarked against IBAC ³¹					
Year	Total Received	Total Assessed	Assessed within 45 days – public sector	Target	Qld Comparison
2024-25 ³²	1,590	1,260	66%	60%	▼
2023-24	1,213	1,329	58%	60%	▲
2022-23	1,396	1,417	55%	85%	▲
2021-22	1,763	1,628	38%	85%	▲
2020-21	1,122	1,134	46%	85%	▲

²⁹ Independent Broad-based Anti-corruption Commission Victoria.

³⁰ Figures were sourced from IBAC but remain subject to audit confirmation due by 31 October 2025.

³¹ Independent Broad-based Anti-corruption Commission Victoria.

³² Figures were sourced from IBAC but remain subject to audit confirmation due by 31 October 2025.

Referrals – Benchmarked against WA CCC					
Year	Total Received	Total Assessed ³³	Assessed within 28 days	Target	Qld Comparison
2024-25	2,980	Not reported	52%	80%	▲
2023-24	3,197	Not reported	56%	80%	▼
2022-23	3,367	Not reported	53%	80%	▲
2021-22	2,825	Not reported	46%	80%	▲
2020-21	2,972	Not reported	81%	80%	▲

Queensland Police Service Corrupt Conduct Referrals and Assessments

155. The following table provides referrals received and assessed data for the Queensland Police Service over the review period.

Year	Total Received	% change since 2020-21	Total Assessed	% change since 2020-21
2024-25	2,923	▲ 87%	3,020	▲ 84%
2023-24	2,817	▲ 80%	3,004	▲ 83%
2022-23	2,347	▲ 50%	2,189	▲ 33%
2021-22	1,980	▲ 27%	2,049	▲ 25%
2020-21	1,562		1,643	

³³ The WA CCC does not report the total number of referrals assessed in their annual reports.

156. The following table identifies the performance data for the assessment of all referrals about the Queensland Police Service.

Referrals – Queensland Police Service (TOTAL)					
Year	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	3,020	62%	79%	84%	89%
2023-24	3,004	39%	60%	78%	92%
2022-23	2,189	62.3%	76.9%	83.7%	92.2%
2021-22	2,049	95%	99%	99.5%	99.8%
2020-21	1,643	96%	99.5%	99.6%	99.8%

157. The following table identifies the performance data for the assessment of referrals about the Queensland Police Service triaged to the Significant and Strategic Assessment Team.

Referrals – Queensland Police Service (SSAT)					
Year	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	221	29%	41%	54%	79%
2023-24	179	17%	35%	52%	77%

158. The following table identifies the performance data for the assessment of referrals about the Queensland Police Service triaged to the Primary Assessment Team. These are matters which do not fit the CCAM criteria of Seriousness and Strategic Priority.

Referrals – Queensland Police Service (PAT)					
Year	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	2,799	65%	83%	87%	90%
2023-24	2,825	41%	62%	79%	93%

**Queensland Public Sector including Local Government (excl. Queensland Police Service)
Corrupt Conduct Referral Assessments**

159. The following table identifies the referrals received and assessed data for the Queensland Public Sector (excluding the Queensland Police Service) over the review period.

Referrals – Public Sector (excl. Queensland Police Service)				
Year	Total Received	% change since 2020-21	Total Assessed	% change since 2020-21
2024-25	2,499	▲ 30%	2,548	▲ 25%
2023-24	2,208	▲ 15%	2,135	▲ 5%
2022-23	1,584	▼ 18%	1,497	▼ 27%
2021-22	1,909	▼ 1%	1,893	▼ 7%
2020-21	1,928		2,038	

160. The following table identifies the performance data for the assessment of all referrals about this cohort.

Referrals – Public Sector (excl. Queensland Police Service)					
Year	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	2,548	49%	61%	70%	86%
2023-24	2,135	51%	69%	79%	87%
2022-23	1,497	64.5%	76%	84.5%	91.47%
2021-22	1,893	92.8%	98%	98.8%	99.7%
2020-21	2,038	92.3%	98.4%	99.2%	99.7%

161. The following table identifies the performance data for the assessment of referrals about this cohort triaged to the Significant and Strategic Assessment Team.

Referrals – Public Sector (excl. Queensland Police Service) (SSAT)					
Year	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	410	15%	26%	39%	66%
2023-24	457	18%	32%	46%	68%

162. The following table identifies the performance data for the assessment of referrals about this cohort triaged to the Primary Assessment Team. These are matters which do not fit the CCAM criteria of Seriousness and Strategic Priority.

Referrals – Public Sector (excl. Queensland Police Service) (PAT)					
Year	Total Assessed	Assessed within 30 days	Assessed within 45 days	Assessed within 60 days	Assessed within 90 days
2024-25	2138	56%	68%	76%	90%
2023-24	1678	59%	78%	87%	92%

163. We also collect data on calls received per business day and the average call duration to try to manage the balance between taking referrals and information over the telephone (which then must be entered into the system) against the inefficiency of that approach, and the time it takes away from assessment officers reviewing material for the purpose of preparing or making assessment decisions. The table below provides this data for the last two financial years.

Year	Total No. of calls received	Calls from Prisoners ³⁴	Average Call duration - minutes	Calls from non-Prisoners	Average Call duration - minutes
2024-25	4,139	1,323	7.07	2,816	13.27
2023-24	4,360	1,208	6.95	3,152	12.83

³⁴ Prisoners can only lodge corrupt conduct referrals by telephone call to the CCC or by written correspondence. They are unable to lodge a complaint via email or via the web-based complaint form. Prisoner calls are restricted to 10 minutes by the relevant correctional facility.

Opportunity 7 - Evaluate the opportunity to replace or enhance the COMPASS system used by the Intake and Assessment unit

164. To date our focus has been on implementing a case management system for our crime and corruption investigators. This project is in its final stages of procurement. However, in the 2025-26 financial year a new project has been funded (\$175,000 allocated) to document business requirements and current workflows in preparation for market sounding and a future procurement to replace the current COMPASS system.

Corruption Investigations

165. The primary functions, duties and responsibilities of the Corruption Investigations unit are to investigate serious and systemic corruption alleged to have been committed by, or involving, persons holding an appointment within UPA’s.

5-year performance data

166. The table below provides various performance data on corruption investigations during the review period.

Year	# of Investigations commenced/ finalised	% of investigations finalised within 12 months/ clearance rate ³⁵	People charged /Criminal Charges	Recommendations for discipline against number of persons	# of prevention recommendations made
2024-25	34c/41f	51%/ 121%*	1p/1c	1r/1p	33
2023-24	43c/46f	87%/ 107%*	1p/9c	2r/1p	47
2022-23	51c/39f	79%	1p/2c	7r/3p	35
2021-22	26c/21f	81%	8p/73c	19r/12p	67
2020-21	26c/29f	86%	4p/67c	64r/33p	180

³⁵ This was a new measure introduced in 2023-24. The timely finalisation of investigations concerning the most serious or systemic corruption is an indicator of the CCC’s responsiveness to its legislative obligations, its Charter of Service, and community expectations. This measure counts the number of key matter types (Complaint, Matter and Information) endorsed as requiring CCC investigation (including cooperative investigation) that are commenced and finalised in the reporting period (“finalised investigations”) and/or finalised in the reporting period.

167. The table below provides data on the number of witnesses examined at private hearings for the purpose of corruption investigations.

Year	Hearing Days	Witnesses examined
2024-25	10 days	12 witnesses
2023-24	12 days	13 witnesses
2022-23	9 days	14 witnesses
2021-22	9 days	6 witnesses
2020-21	43 days	51 witnesses

168. The table below provides data on success rate of corruption prosecutions compared with the success rate of the Office of the Director of Public Prosecutions in superior courts.

Year	CCC corruption prosecution success rate	ODPP Prosecution Success Rate in superior courts
2024-25	67%	³⁶
2023-24	86%	54%
2022-23	64%	48.8%
2021-22	60%	54.7%
2020-21	40%	53.6%

³⁶ As at the date of this submission this data was not publicly available via the DPP's website.

Corruption Prevention and Engagement

169. The Corruption Prevention and Engagement unit's key priorities are outlined in the Corruption Strategy 2023–2027 and include:
- a) Developing and implementing a Data and Insight Plan to guide how the CCC collects, analyses and uses corruption-related data and shares insights;
 - b) Implementing and embedding a new operating model across the Corruption Division to focus services on serious and systemic corruption;
 - c) Implementing improved stakeholder engagement and communication practices to support greater collaboration and sharing of information with the public sector;
 - d) Increasing stakeholder awareness of corruption prevention material, including CCC products such as the *Corruption in Focus* guide and the Corruption Allegations Data Dashboard;
 - e) Implementing a new complaint monitoring model to support better oversight and management of public sector referrals; and
 - f) Maturing and expanding the scale of monitoring through leveraging the CCC's data and analytics capability.
170. Since its creation following the Commission of Inquiry into the CCC in 2022, the Corruption Prevention and Engagement team have completed a significant body of work to develop and implement the corruption strategy, including but not limited to:

Internal Systems

171. Undertaking the preliminary stages of the development of a serious and systemic corruption referrals outcomes data initiative designed to analyse serious and systemic corruption referrals outcomes data from the public sector, improve understanding of corruption risk, and inform the CCC's operational service delivery.
172. Developing, evaluating, implementing and embedding a new operating model across the Corruption division to focus service delivery on serious and systemic corruption.
173. Trialing an approach to thematic monitoring to expand the CCC's monitoring footprint and inform the understanding of corruption risk and the development of targeted prevention strategies across the Queensland public sector.

Local Government Sector

174. Continued development of a new Local Government Sector Engagement and Communication Plan to guide how the CCC engages with this sector over the coming financial years.
175. Consultation with the Office of the Independent Assessor (**OIA**) about the Local Government Stakeholder Engagement and Communication Plan given that the OIA is a key delivery partner for the CCC with this sector.
176. Attendance at Councillor workshop with the OIA and the Department of Local Government, Water and Volunteers (**DLGWV**) to educate elected officials about good conduct and integrity.
177. Commenced a strategic assessment of corruption risks associated with the local government sector, with a view to developing a contemporary understanding of trends

and themes relating to referrals received about this sector, and better understanding risks for different types of councils depending on their location and aligned to different roles and employee cohorts (such as elected officials, senior executives and other council staff).

178. The findings from this assessment will help inform the Local Government Stakeholder Engagement and Communication Plan currently in development and support co-design of prevention activities.

Engagement activities

179. Continued development of a new Liaison Officer Engagement and Communication Plan identifying a roadmap on how the CCC can engage with this stakeholder group over the coming financial years.
180. Prepared and launched a variety of engagement activities including the Corruption in Focus newsletter, Corruption in Focus online forums and presentations to various stakeholder groups, including:
- a) The Community of Practice for Ethical Behaviour (**CoPEB**) about the various activities outlined above, with a particular focus on what it means for CCC Liaison Officers and integrity professionals working in the public service;
 - b) The interjurisdictional Corruption Prevention Practitioner's Forum about the corruption priorities and the definition of serious and systemic corruption.
181. Continued development of the Queensland Police Service stakeholder engagement and communication plan, including preliminary engagement with the QPS to inform its development.

Communication activities

182. Development of a new Digital Communication Plan which identifies how, when and why the CCC should use its digital channels to communicate with key stakeholders, including use of the CCC website over the coming financial years.
183. Continued implementation of the Corruption Communication program including:
- a) Working collaboratively with the Office of the Information Commissioner (**OIC**) regarding the Privacy Awareness Week campaign materials and issued for publication by the CCC, articles in the Corruption in Focus newsletter, the CCC website, LinkedIn posts and internal messaging;
 - b) Developing a rolling content plan that includes fortnightly posting to LinkedIn and regular updates to the CCC website;
 - c) Commencing a detailed review of the Corruption in Focus Guide including developing resources and products to complement the detailed Guide, a dedicated web page; and
 - d) Working collaboratively with Queensland State Archives to finalise updates to a number of joint prevention advisories.

Strategic insights activities

184. Preparation and provision of insights summaries to key stakeholders examining trends in referrals received by the CCC to provide awareness of current and emerging corruption trends and position the CCC to respond accordingly.
185. Preparation of monthly summaries of open-source publications relating to the corruption landscape, including analysis of media and an examination of interstate and international products, to provide insight into current and potential future trends impacting Queensland's corruption landscape and better position the CCC to detect, prevent and respond to corruption.
186. Commenced development of a strategic intelligence assessment examining corruption risks associated with recruitment and selection practices, specifically focussing on corruption risks in recruitment involving senior executives and above, to support the development of prevention and engagement activities and materials aligned to this corruption priority.
187. Commenced collating business requirements to support the development of an integrated internal corruption insights dashboard that provides automated and up-to-date data that can be used to measure and report on the CCC's performance and enable timely insights of referrals and allegations by sector, period, behaviour and the outcome of the complaint.

Prevention and policy

188. Prevention and policy activities have included:
 - a) Preparing, updating and delivering content for presentations delivered to Units of Public Administration on the corruption risk landscape, risks relevant to their agency and functions, and opportunities for the board to manage and mitigate these risks.
 - b) Reviewing relevant Bills introduced into Queensland Parliament to identify legislative change impacting the CCC's corruption work and opportunities to proactively identify and manage corruption risks.
 - c) Preparing a submission to inform the Office of the Queensland Integrity Commissioner's review of the Queensland Registered Lobbyists Code of Conduct and other lobbying matters.
 - d) Reviewing and providing feedback on draft Mandatory Standards and supporting Guidelines produced by Queensland State Archives.
 - e) Establishing a Corruption Knowledge Hub to enable and promote information sharing across the Corruption Division. The Hub is progressively being rolled out across the Division from early June 2025, with the view to enabling CCC-wide access by the end of 2025.
 - f) Development of a corruption risk catalogue to support knowledge sharing and improve understanding of the nature, extent and prevalence of corruption, listing risk areas, and mapping risks to existing prevention resources. It will be used to conduct a gap analysis to identify opportunities for enhancements to our suite of prevention products and resources.

- g) Continuing to provide prevention support to current corruption investigations as well as monitoring matters, including analysing these investigations for systemic corruption risks and supporting the development of prevention recommendations and responses.

Audit and assurance

189. Audit and assurance activities have included:

- a) Continuing to liaise with the Queensland Building and Construction Commission to support their review into licensing processes, and to identify opportunities to strengthen their control environment.
- b) Developing a new audit and assurance framework, with a specific focus on examining complaint management practices relating to CCC corruption priority areas and prioritised sectors.

Chapter 4: Memorandum of Understanding (MOU), between the Crime and Corruption Commission (CCC) and the Director of Public Prosecutions (DPP)

Effectiveness and utility

190. Following the publication of the report of the Commission of Inquiry relating to the Crime and Corruption Commission on 9 August 2022, and in accordance with the *Crime and Corruption and Other Legislation Amendment Bill 2024*, the CCC developed and implemented a Memorandum of Understanding governing the provision of legal advice to the CCC by the DPP regarding the availability, suitability and prospects of charges arising from corruption investigations.
191. The MOU was executed by all parties on 1 August 2023.
192. Importantly, in addition to the statutory requirements, the MOU reflects the negotiated position of the CCC and the DPP, namely that timely advice will be provided, specifically that advice will be provided to the CCC within a period of 10 weeks from referral by the CCC.
193. During the period August 2023 to 30 September 2025, the CCC submitted a total of 16 briefs of evidence (**BOE**) to the DPP for legal advice. Less than half were returned within the agreed timeframe.
194. In a recent meeting discussing concerns relating to the operation of the MOU, the DPP agreed to greater cooperation and improved timeliness in reviewing matters referred by the CCC.

Chapter 5: Corruption Reporting Powers

195. On 30 April 2025, the Queensland Parliament passed the *Crime and Corruption (Restoring Reporting Powers) and Other Legislation Amendment Act 2024 (Reporting Powers Act)*.
196. The Reporting Powers Act, which commenced on 19 May 2025, made a range of legislative amendments to the CC Act for the purpose of empowering the CCC to publicly report and make public statements about corruption matters. Reporting and making public statements are now expressly included as ways in which the CCC may perform its corruption functions under sections 34 and 35 of the CC Act.
197. The amendments were primarily intended to address the High Court’s findings in the matter of *Carne v Crime and Corruption Commission*.³⁷ In particular, the Reporting Powers Act inserted new sections 64A and 65A into the CC Act to ensure the CCC has broad, discretionary powers to publicly report and make public statements about corruption matters under section 64 of the CC Act.
198. The Reporting Powers Act also introduced an expanded procedural fairness process and a range of new safeguards under sections 48B, 64A, 65A and 69A-69D to accompany the new public reporting regime. These safeguards operate to guide the CCC in making decisions about reporting and to protect individuals who may be affected by publication decisions.
199. The CCC’s policy is to be as transparent in the performance of its functions as it can be, considering its obligation to at all times act independently, impartially and fairly, having regard to the purposes of the CC Act and the importance of protecting the public interest.
200. Public confidence in public administration is promoted by transparently accounting for how the CCC has performed its functions, and explaining what its investigations have uncovered.
201. However, the need for transparency must always be balanced with compliance with the law, and protection of individual rights, including privacy and reputation, and the right to a fair trial.
202. In deciding whether and what to publish, the CCC will seek to balance these considerations.
203. As a general rule the CCC will not:
 - a) Confirm or deny whether it has received, is assessing, has assessed, or is investigating a matter;
 - b) Confirm or deny the existence of any crime or corruption investigation; and
 - c) Comment on matters before a court or tribunal.
204. The Reporting Powers Act also validated all previous reports and public statements made and published by the CCC (or its predecessors) as lawful and valid. Consequently, the CCC was able to reinstate public access to its previous reports and statements on its website.

³⁷ [2023] HCA 28.

Statutory criteria

205. As noted above, publishing reports and statements in relation to corruption matters requires consideration of specific statutory criteria. Those criteria are almost identical between public reports and public statements. The following is a brief explanation of how those criteria may be interpreted and applied by the CCC.

Sections 64A and 65A

The need for accountability and transparency in the public sector

206. This factor generally weighs in favour of publication. Public reporting provides an opportunity to set out what an investigation has discovered, as well as to provide public assurance that matters have been appropriately and thoroughly investigated.
207. Where conduct has fallen below expected standards, a public report may provide accountability by setting out what occurred, by reference to those standards and expectations. Accountability may also involve setting out where checks, balances and safeguards operated effectively, and where persons engaged in appropriate conduct.
208. Transparency means being open about what has occurred. In the context of the CCC's activities, this can be both in relation to the events under investigation, but also in accounting for the investigation itself.

Whether the report or statement will be for the public benefit

209. In considering whether to make a report or statement, it is critical we understand the purpose of the intended publication from a public benefit perspective.
210. It is not uncommon for matters notified to the CCC to attract public attention and media coverage. It is important to remember that merely because something is interesting to the public, that is not the same as something being in the public interest. At the same time, a matter which attracts public attention may, particularly if important information is incorrect, undermine public confidence in the public sector if not addressed.
211. Publication may occur proactively (such as release of a public report at the conclusion of an investigation) or reactively (such as a statement made in response to a media inquiry). But in any case, consideration will be given to the intended public benefit in making the publication.

Whether the commission has finalised its assessment of the corruption matter, and any action taken in relation to the corruption matter

212. The CCC will generally not consider issuing a public report before the conclusion of an investigation.
213. The CCC will generally not consider making a public statement before a complaint assessment decision is finalised.
214. However, there may be circumstances in which it is necessary to make a public statement while a matter remains under assessment. These may include, for example, where such a statement is necessary to correct public misinformation, or to respond to matters which may bear on the integrity of the assessment or an investigation.

The seriousness of the corruption matter

215. As a rule, the more serious the matter, the higher the public interest in reporting on it.

216. Matters which are being investigated directly by the CCC have already been considered to involve serious or systemic conduct. However, this presumption may be displaced by the circumstances of a particular matter, and what the investigation has revealed.
217. Consideration will be given to the prevalence of the matter, and whether the type of conduct under investigation, or issues uncovered have already been the subject of public reporting. An example of this may be where the matter was previously the subject of investigation as part of a Commission of Inquiry process.
218. Generally, matters which have not been investigated will not be the subject of public reporting or statements, but there may be occasions where a matter may be sufficiently serious as to justify departure from this general position. For example, a high-profile complaint may have been assessed as 'out of jurisdiction', and it is considered in the public interest to explain the reasons why it cannot be investigated by the CCC.

Whether the report or statement may prejudice a proceeding or investigation

219. A report or statement will not be made by the CCC where the CCC considers it may prejudice a proceeding or an ongoing investigation.
220. A statement, at the conclusion of an investigation, advising that a person has been charged, will not ordinarily be regarded as prejudicial to that person's criminal proceeding.
221. In considering whether to report publicly or make a statement, the CCC will have regard to:
- Whether any curial or administrative proceedings are on foot, or are reasonably foreseeable.
 - The extent to which any proposed publication involves exposing factual matters which may be in issue in those proceedings.
 - Whether any proposed publication is likely to damage a person's standing or reputation in the community, which may impact on their ability to receive a fair trial.
 - The extent to which a report or statement may include reference to information or evidence which may be inadmissible in judicial proceedings against the person.
 - Whether any proceedings will involve consideration by a jury, as this requires a particularly high degree of caution to avoid prejudice.

Whether the statement is the most appropriate and suitable means of releasing information about the corruption matter to the public [applies to statements only]

222. In deciding whether a statement is the most appropriate and suitable means of releasing information about the corruption matter, the CCC may consider the form of the proposed communication. For example, this may involve a media release, but could also involve a post to social media, publication of information on the CCC's website, or a press conference or similar direct engagement with the media.
223. In considering the form of release of the information, the CCC may consider the potential to manage the information and its use.

If a person's identity is readily apparent, or can be reasonably ascertained, from the report or statement

224. Where identification of an individual can be avoided without detracting from the purpose of a report, the CCC will not identify them. However, in some instances it will be necessary to identify a person to effectively detail the investigation.
225. Identification most obviously arises where a person is referred to in a publication by name. However, it may also arise in other circumstances, such as:
- Where a person is referred to by their role (particularly where only one individual holds an identifiable role at a given time, such as the Commissioner of Police).
 - Where a combination of information may mean the person is identifiable – either to the public, or to a cohort of persons who may have some association with the person.
226. The considerations which arise where a person may be identified in a report apply to each person who may be identified (including in a situation where a report concerns multiple persons).
227. It may be important to identify a particular person in a report having regard to the senior position they hold in the public service and the seriousness of the conduct involved. However, identifying this person may mean that other persons who were also the subject of the investigation will be identified, even though their conduct may not meet the same standard of seriousness.
228. In such cases, the CCC must weigh all relevant considerations – including balancing any competing considerations – to determine whether and how to appropriately report.
229. Where a person can be identified, the following factors must be balanced:
- a) **Whether the standing and status of the person warrants greater public scrutiny**
 - i) As a rule, the more senior the person, the greater the public interest in publication. This may include:
 - Elected officials
 - Statutory office holders
 - Senior officers of public sector entities
 - ii) The decision to publish may have application where there is otherwise limited opportunity for the person's conduct to be scrutinised. For example, disciplinary action (in a conventional sense) cannot be taken against elected officials. The mechanism for accountability is through the ballot box on election day. That may be a factor weighing in favour of publication. Equally, some senior statutory appointments may not be susceptible to discipline, or may be able to frustrate a discipline process through resignation of office.
 - iii) Equally, persons of more senior status or standing may also have a higher profile and reputation. In such circumstances, the public interest may weigh in favour of publication where publication may dispel a suspicion or allegation of wrongdoing.

- b) **Whether the report or statement may unreasonably damage the person's safety, health or wellbeing**
- i) The CCC acknowledges that public reporting on a matter may have an adverse impact on a person's safety, health or wellbeing.
 - ii) In making the initial decision as to whether to prepare a public statement or report, the CCC must have regard to the health and wellbeing of persons who may be affected by the publication.
 - iii) An individual affected by a publication may make representations to the CCC regarding the impact of a potential publication on their health, safety or wellbeing. This may arise at any point prior to preparation of a publication, during preparation of a publication, during any procedural fairness process, or following procedural fairness but prior to publication.
 - iv) In considering whether the publication may unreasonably damage the person's safety, health or wellbeing the CCC may consider any medical or other information provided by the affected person. The CCC may also request submissions, medical or other further information from a person to consider the potential impact of a publication.
- c) **The seriousness of the person's conduct**
- i) The CCC considers the more serious the conduct of a person, the greater the likelihood that the public interest will weigh in favour of publication.
 - ii) Where the conduct involves multiple persons, and different levels of seriousness and culpability, this will be assessed by the CCC both individually and collectively. For example, an individual may engage in conduct which is relatively low-level. But the low-level conduct may be an instance of systemic conduct which involves more serious examples or may facilitate more serious corrupt conduct.
- d) **Whether the person consents to being identified**
- i) A person may consent to being identified in a publication. This may be implicit or explicit consent. Where practicable, the CCC will seek explicit consent.
- e) **Whether the report or statement may unreasonably interfere with the person's privacy or reputation**
- i) Whether an interference with a person's privacy or reputation is reasonable will depend on the circumstances of a matter. In part, this is assessed by a combination of the above factors. Consideration will also be given to:
 - The extent to which a person is discussed in a report (recognising that some references will be only incidental);
 - Whether it is their own conduct which is under consideration;
 - The number of persons whose conduct is at issue;
 - The extent to which a person is identifiable (recognising that the more particular the identification, the greater the interference with a person's privacy);

- Whether the publication is likely to adversely impact a person's reputation either individually, or as a member of a group.

Human Rights Act considerations

230. In addition to the above considerations, the CCC must fulfil its obligations under the *Human Rights Act 2019*. To the extent that a publication may impair a person's human rights, this should only be to the extent that is reasonably and demonstrably justifiable in the circumstances.
231. As at the date of making this Review submission, the CCC has not yet exercised the new powers to report or make public statements.

Chapter 6: Police Discipline and misconduct matters

CCC's role in oversight of QPS and police discipline

232. The CC Act provides the legislative framework which sets out the CCC's role in oversight of the Queensland Police Service, and in particular its oversight of corruption referrals and disciplinary proceedings.
233. The starting point is the CCC's jurisdiction in respect of police activities. It is broader than the CCC's jurisdiction in respect of other public sector entities.
234. The CCC also has more direct involvement in police discipline matters, having specific review powers for police discipline matters, beyond those available in respect of public sector discipline.

Corrupt Conduct

235. The CCC has primary responsibility for dealing with referrals, information or matters involving corrupt conduct, and monitoring how the Commissioner of Police deals with corrupt conduct.³⁸

Police Misconduct

236. 'Police misconduct' is not 'corrupt conduct' for the purposes of the CC Act but is included within the definition of 'corruption' because it forms part of the Commission's corruption functions, including the Commission's responsibility to oversee how 'police misconduct' is dealt with by the Commissioner of Police.
237. Police misconduct involves conduct, other than corrupt conduct, of a police officer that
- a) is disgraceful, improper or unbecoming of a police officer, or
 - b) shows unfitness to be or continue as a police officer, or
 - c) does not meet the standard of conduct the community reasonably expects of a police officer.
238. Pursuant to section 41 of the CC Act, the Commissioner of Police has primary responsibility for dealing with referrals about, or information, or matters the Commissioner of Police reasonably suspects involves police misconduct.
239. The Commissioner of Police also has a responsibility to deal with a complaint about, or information or matter involving, corrupt conduct referred to the Commissioner of Police by the CCC.
240. The CCC may review or audit the way the Commissioner of Police has dealt with police misconduct, in relation to either a particular matter or a class of matter through its statutory monitoring function,³⁹ or assume responsibility for and complete an investigation by the Commissioner of Police into police misconduct.

Police discipline

241. The Commissioner of Police is primarily responsible for dealing with disciplinary matters related to the conduct of QPS officers (and staff). That includes acting in relation to matters of both police misconduct and corrupt conduct.

³⁸ Section 45 *Crime and Corruption Act 2001*.

³⁹ Section 42(2) *Crime and Corruption Act 2001*.

- 242. That is consistent with the ‘devolution principle’ set out in s34(c) of the CC Act, which provides that action to prevent and deal with corruption in a unit of public administration should generally happen within the unit.
- 243. This principle recognises that a unit of public administration is often best placed to consider what is needed for the maintenance of internal discipline.⁴⁰ It recognises that a unit of public administration dealing with misconduct itself also builds confidence that it will take appropriate action when such conduct is identified. And it reflects the practical reality that internal disciplinary processes are generally more efficient in resolving disciplinary matters.
- 244. The CCC exercises its oversight role in respect of police discipline matters by applying to the Queensland Civil and Administrative Tribunal (QCAT) to review a decision by the QPS in relation to how it dealt with a complaint,⁴¹ or applying directly to QCAT for a finding that an officer has engaged in corrupt conduct.⁴²
- 245. The Court of Appeal in *Aldrich v Ross* recognised the value of bringing an external perspective to bear on police discipline decisions.

Data on police discipline matters

- 246. There has been a fluctuation in police discipline matters over the reporting period. Some of those fluctuations correlate with other events, discussed below.
- 247. The below table sets out the disciplinary figures for the past five years, where a matter was considered by a prescribed officer.

Year	Decision on disciplinary action	Disciplinary declaration against former officer	Decision not to commence proceeding against former officer	Decision not to commence proceeding against current officer
2024-25	84	14	11	5
2023-24	60	7	5	5
2022-23	19	9	12	2
2021-22	42	4	7	2
2020-21	72	5	2	0

- 248. There was a significant number of disciplinary matters in the 2021 financial year, followed by a decrease in the subsequent two years, and then a gradual increase in the 2024 and 2025 financial years.
- 249. The decline in the 2022 and 2023 financial years is consistent with a decline in referrals received in the period prior, which might be explained by decrease in engagement with the public due to the COVID-19 pandemic. The increase in recent years is consistent with the increase in police referrals generally during this period.
- 250. The decline in the 2023 financial year may also be related to litigation which occurred during that period regarding the lawfulness of the process by which matters were referred for disciplinary action (further details below). This impacted significantly on

⁴⁰ *Aldrich v Ross* [2000] QCA 501 per Thomas JA at [43].

⁴¹ Ch 5, Pt 3 *Crime and Corruption Act 2001*.

⁴² Ss 50 & 219F *Crime and Corruption Act 2001*.

how matters were dealt with during this time. This is likely to have impacted disciplinary matters in 2023/24, which were dependent on retrospective legislative amendment.

251. The CCC’s oversight of police discipline matters have been relatively constant throughout the reporting period.

Year	Review applications brought/joined
2024-25	3
2023-24	6
2022-23	4
2021-22	7

- 252. As seen in the above figures the CCC brings relatively few disciplinary review applications compared to the total number of disciplinary decisions taken by QPS.
- 253. Recent decision making by the CCC has been guided by the decision in Willmott v Carless [2024] QCA 115 delivered on 14 June 2024.
- 254. This decision was a joint referral of a question of law by all parties to the Court of Appeal which confirmed that QCAT’s review power under s 219Q(1) of the CC Act is predicated on there being first shown legal, factual or discretionary error in the decision below. The decision constrains the scope of potential reviews lodged by any party.
- 255. While in the vast majority of matters the CCC does not have a significant disagreement with the outcome that it applies to review a decision, that does not necessarily equate to agreement with the outcome in the remainder of matters.
- 256. In many cases the CCC will have a different view from the QPS as to what the correct sanction should be. In other matters it may agree with the outcome, but have a different view of the reasoning which underpins it. In such cases the CCC may communicate these views to the QPS by correspondence, rather than by seeking to review a decision.
- 257. In so doing, the CCC seeks to build the capacity of the QPS in dealing with disciplinary matters by improving decision making, and providing an independent perspective, in matters where litigation would not be warranted.
- 258. As a rule, the CCC will only commence a review application in circumstances where there is a substantial disagreement with the sanction imposed. In most cases, this will be where the CCC considers that a sanction of demotion, probation or dismissal is warranted. This reflects the fact that the CCC needs to focus its resources on the more serious cases of corruption.
- 259. It also reflects the reality that litigating matters through QCAT is an extremely protracted process, and that there is little benefit in doing so where it is likely that any sanction which may be imposed will have expired by the time review proceedings are concluded.
- 260. Despite a relatively constant number of disciplinary review applications in QCAT, the number of proceedings before the tribunal has gradually increased from year-to-year. This is essentially due to a decrease in clearance rates of matters in QCAT.

QCAT Matters

2020-21	2021-22	2022-23	2023-24	2024-25
18	19	19	21	14

Current issues in police oversight and discipline

261. The role of the CCC in providing oversight of the Queensland Police Service, in particular the police discipline and misconduct matters, is largely unchanged since the previous review, noting that the police discipline system underwent significant reforms in 2019.
262. While these reforms were intended to streamline the police discipline, the efficacy of the reforms has arguably not been realised, with additional ambiguity, litigation and emergent issues causing significant delays in the completion of disciplinary proceedings.
263. Three areas demonstrating issues within the current police discipline framework are:
- a) The operation of limitation periods which restrict the timeframe in which discipline proceedings can be commenced;
 - b) Restrictions arising from the mechanism for referral of disciplinary matters to a 'prescribed officer';
 - c) Issues with disciplinary matters being reviewed or commenced in the QCAT.
264. The Police Commissioner has identified the need for further reform of the police discipline system. The CCC agrees that the system needs further reform, and support the QPS's focus. We look forward to engaging with the QPS and working to ensure the police oversight and discipline system works effectively and as intended.

Intent of the 2019 reforms

265. The 2019 reforms were directed at addressing concerns about:
- a) A general lack of public and officer confidence in the police discipline system.
 - b) Unnecessarily lengthy timeframes for investigations.
 - c) Sanctions which were outdated and primarily punitive in nature.
 - d) Discipline proceedings which were overly adversarial and legalistic.
 - e) A perceived lack of consistency in decision-making.
 - f) Divergence of views between the CCC and QPS which led to a substantial number of reviews of QPS disciplinary decisions.
266. As a result, the 2019 amendments:
- a) Introduced timeframes for investigating referrals including limitation periods for commencing disciplinary action.
 - b) Amended the sanctions which could be imposed by way of discipline.
 - c) Formalised the role and range of management strategies available through the discipline process.
 - d) Introduced an abbreviated discipline process where the QPS, subject officer and CCC could reach an agreed position on the appropriate sanction; and
 - e) Created a central disciplinary unit responsible for conducting disciplinary proceedings.
267. While there have been positive features of these reforms, there are also some technical deficiencies which have been identified since their introduction. Chief among these are the statutory provisions governing referral of matters to a prescribed officer, and statutory limitation periods for commencing disciplinary proceedings.

Prescribed officers

268. Sections 7.10 and 7.11 of the *Police Service Administration Act 1990* (Qld) (**PSAA**) set out the process by which a matter may be referred for disciplinary action against a police officer. These provisions were considered by the Court of Appeal in *Assistant Commissioner Maurice Carless & Anor v Johnson; State of Queensland (Queensland Police Service) v Cousins*.⁴³ There, the Queensland Court of Appeal held that the way the QPS had been referring matters for disciplinary decision-making had been invalid since the introduction of those provisions. Retrospective legislation was introduced to validate those disciplinary decisions, and the process has since been corrected within QPS. However, the referral provisions remain the same.
269. Under the current provisions, a matter is referred for disciplinary action by the Commissioner of Police. The Court of Appeal's decision made clear that the legislation requires that referral be to a specific individual police officer (rather than referral to a class, or rank, of officer to make the decision).
270. As Callaghan J noted in *William Johnson v Assistant Commissioner Maurice Carless & Anor*,⁴⁴ the limitation which arises from these provisions may be to the officer's advantage. That is because the referral of a matter to a prescribed officer also defines the range of sanctions which may be imposed for the conduct. Because the range of available sanctions is limited by the rank of the prescribed officer, referral effectively determines the 'upper limit' of the sanction which may be imposed. Should a prescribed officer feel that they are unable to impose a sanction which appropriately reflects the gravity of the conduct, there is no mechanism to refer the matter back for it to be re-allocated to a more senior prescribed officer.
271. There have been several instances in which the prescribed officer has noted in their decision that they considered that a more severe sanction was warranted than they were able to impose. In such circumstances, the CCC may review such a disciplinary decision, but this is an inefficient way to deal with this issue.
272. In one matter, an officer at the rank of Senior Sergeant was found to have engaged in unacceptable workplace behaviours over a period of several years. This included sexually harassing and derogatory comments about women in the workplace. The prescribed officer noted in his disciplinary decision that had dismissal been open to him, he would have considered it.
273. In another matter the subject officer (a Senior Constable) engaged in various instances of academic misconduct, falsifying work examples and submitting them for the purpose of obtaining a detective's qualification. The prescribed officer in that matter considered the conduct at the high end of seriousness of academic misconduct and noted that he would have considered a sanction of demotion and transfer to a non-operational position if it had been open to him.

⁴³ [2023] QCA 29.

⁴⁴ [2022] QSC 146 at [8].

Limitation periods

274. Time limits for when disciplinary proceedings must be commenced against an officer were also introduced in 2019.⁴⁵ A discipline proceeding must be commenced within 12 months from the date the conduct occurred, or 6 months from the date the complaint is made to the CCC or QPS (**LED period**).
275. These provisions were intended to improve the timeliness of disciplinary investigations and decision-making. However, in practice there have been numerous instances where these timeframes have operated to frustrate disciplinary proceedings.
276. It is in larger, or more complex investigations that the limitation period poses difficulties. There are also extremely limited circumstances in which the limitation period is paused. This may create a perverse incentive for subject officers to delay their responses to investigations in the hope of 'running out the clock'. Some examples of the frustration of disciplinary proceedings by the limitation period can be seen below.
- a) An officer was investigated in relation to serious allegations related to seeking to procure child exploitation material. That allegation was unsubstantiated. However, the investigation identified an allegation of unprofessional conduct, involving the officer's interactions with young females. As a result of the expiry of the LED period, discipline was unavailable, and the matter had to be resolved by local managerial resolution.
 - b) An officer had multiple allegations related to unacceptable workplace behaviours. The length of the investigation, and confusion/disagreement about when the allegations were 'recorded', meant that disciplinary proceedings were only undertaken in relation to the single matter which fell within the limitation period. That matter was not substantiated.
 - c) Disciplinary proceedings were taken against an officer for failure to comply with conditions of a professional development strategy. Proceedings were taken within the limitation period. However, the prescribed officer recused himself from the matter before it was resolved. As this occurred outside the limitation period, new proceedings could not be commenced. This highlights the difficulties with both the prescribed officer referral provisions, and the operation of limitation periods.
277. We note that notwithstanding the frustration of disciplinary proceedings caused by the expiry of time, it is technically open for either the CCC or QPS to bring an application in relation to 'corrupt conduct' in QCAT. This was deliberately introduced in the 2019 disciplinary reforms, as a means of ensuring that action could still be taken in relation to the most serious conduct, even where the limitation period may otherwise prevent it. There are several factors which mean that, in most instances, taking corrupt conduct proceedings in QCAT is not feasible. Difficulties in proceeding in QCAT are addressed below.

⁴⁵ See section 7.12 *Police Service Administration Act 1990*.

QCAT

278. A further matter of significant impact on oversight of police discipline matters is the difficulty in litigating matters in QCAT. This was noted in the CCC's submission to the previous 5-yearly review. Unfortunately, since then the problem has worsened.
279. QCAT has a substantial role to play in police discipline. The CCC or subject officers may bring applications to review police discipline decisions. Equally, the CCC or the Commissioner of Police may bring a 'corrupt conduct' proceeding in QCAT.⁴⁶
280. QCAT remains beset by delays. In occupational regulation matters, the primary focus of which is protection of the public, this tends to frustrate the process. QCAT's 2023-2024 Annual Report noted an 11 per cent decrease in clearance rates for occupational regulation matters.⁴⁷ This reflects a trend where clearance rates have declined year-on-year.⁴⁸
281. Beyond resourcing constraints (a factor identified in QCAT's annual reports as contributing to delays), there are several other issues which have compounded delays in police discipline matters in QCAT.
- a) The COVID-19 pandemic severely impacted proceedings in QCAT. In part, this is understood to be due to QCAT's reliance on a paper-based filing system. However, it also compounded an existing backlog of matters for hearing, as those matters were de-listed, and had to be re-prioritised against new matters which were filed in the meantime.
 - b) A question of law was referred to the Court of Appeal which related to the way QCAT exercised its review function in relation to police discipline matters.⁴⁹ While this matter was under consideration (a period of several years), police discipline matters effectively halted.
 - c) Finally, the decision of *Cousins & Johnson* (referred to above), led to a delay in discipline matters before QCAT, as matters were kept in abeyance given uncertainty as to the lawfulness of the underlying disciplinary process and decisions.
282. Corrupt conduct proceedings suffer the same issues in respect of delay. Corrupt conduct proceedings in QCAT are run effectively as 'full trials', which carry significant resourcing requirements and cost. While that may be appropriate having regard to the seriousness of the matters involved, and the gravity of the potential consequences, it highlights that such proceedings are not a ready substitute for disciplinary proceedings conducted by the employer.
283. Delay in proceedings may also have the perverse effect of reducing the sanction (or the effect of the sanction) which may otherwise be appropriate, including for serious

⁴⁶ It is noted that this also applies to other public sector employees. The CCC, or the head of a unit of public administration, may apply to QCAT for a finding that a person has engaged in corrupt conduct (s50 CC Act).

⁴⁷ *Queensland Civil and Administrative Tribunal Annual Report 2023-2024* at p42.

⁴⁸ See QCAT Annual Report 2022-23 at p22 (7% decrease), 2021-22 at p14 (17% decrease).

⁴⁹ *Willmott v Carless* [2024] QCA 115 – it is worth noting that the initial QPS decision in that matter was made on 20 November 2020 (regarding substantiation) and 1 March 2021 (regarding sanction). On 29 March 2021, the subject officer applied to review that decision. On 15 March 2023 QCAT referred the question of law to the Court of Appeal, and the matter was heard in November 2023, with judgment being delivered in June 2024.

conduct. It is not uncommon for matters in QCAT to deal with officers who have long since completed the sanction imposed by the time a review decision (or appeal from that decision) is made.⁵⁰

284. The potential for delay in resolution of matters in QCAT, and with them the reduction in efficacy of a sanction, is a matter which the CCC must consider in deciding whether to review a decision. It reduces the efficacy of the disciplinary process, and the CCC's role in overseeing police discipline, if there is no sensible expectation of a resolution to disciplinary matters for several years after the conduct occurs. This is the reality of any matter which is reviewed in QCAT.
285. These factors in combination – delay, expense, and uncertainty – provide perverse incentives which reduce the overall effectiveness of the disciplinary system. It focuses action on only the most egregious matters (where either the conduct is so serious, and other options are unavailable, as to warrant corrupt conduct proceedings, or where the QPS decision appears so egregiously wrong and out of line with expectations as to justify applying to review it). The unfortunate consequence is that it increases the range of matters which may not meet expectations, but where prosecuting a corrupt conduct proceeding, or reviewing a QPS decision cannot be justified.
286. There are many significant issues in the police discipline system – beyond those matters specifically highlighted here.
287. The CCC supports the QPS's stated intention to review how discipline is administered in the QPS. Such a review should look at statutory features, as well as consider whether QCAT is the best forum to determine these matters.

⁵⁰ See, for example, the matter of *Crime and Corruption Commission v McCarthy & Anor; PSB v McCarthy* [2020] QCAT 529; [2022] QCATA 106; [2025] QCATA 33. There, the conduct in question occurred between 2016 and September 2017. A disciplinary decision was made in August 2018. A review was filed at the time. The review hearing took place in April 2019. The review decision was delivered in November 2020. That decision was appealed. The appeal was heard in November 2021. The appeal decision was delivered in July 2022, with submissions to follow within 21 days of that decision in relation to the question of a non-publication order. The decision in relation to the non-publication order was delivered over two years later, in February 2025.

Chapter 7: Civil confiscation function

288. The CCC is responsible for the non-conviction based and serious drug offender civil confiscation schemes under Chapters 2 and 2A of the *Criminal Proceeds Confiscation Act 2002 (CPCA)*.
289. The non-conviction-based scheme under Chapter 2 of the CPCA allows the restraint of a person's property if there is a reasonable suspicion the person has engaged in serious crime related activity, or the property has been derived from such activity. There is no need for there to be an actual or imminent criminal charge against the person, or a requirement that the property be linked to the serious crime related activity.
290. Restrained property may ultimately be forfeited to the State if a court is satisfied, on the balance of probabilities, that it is:
- a) Derived from serious crime related activity, or
 - b) Required to satisfy an assessment of the benefit a person has derived from illegal activity, or
 - c) The unexplained wealth of a person who has engaged in serious crime related activity.
291. Where a court makes a serious drug offender confiscation order under Chapter 2A of the CPCA against a person following their conviction for a qualifying drug offence, their assets may be confiscated by the State, even where the assets may have been lawfully acquired.
292. Several of the CCC's powers may be exercised for the purpose of our proceeds confiscation jurisdiction, and while we are not permitted to exercise our hearing powers for this purpose, we may use those powers in support of our major crime or intelligence operations by exploring and obtaining evidence of money or other assets, or unexplained wealth a person may have gained from engaging in major crime.
293. The DPP acts as solicitor on the record for all confiscation actions brought by the CCC on behalf of the State of Queensland under these schemes, and we work closely with the DPP and the QPS, and other law enforcement agencies on confiscation related matters.

Key 5-year performance data

294. The tables and graphs below provide performance data on the civil confiscation function during the review period.

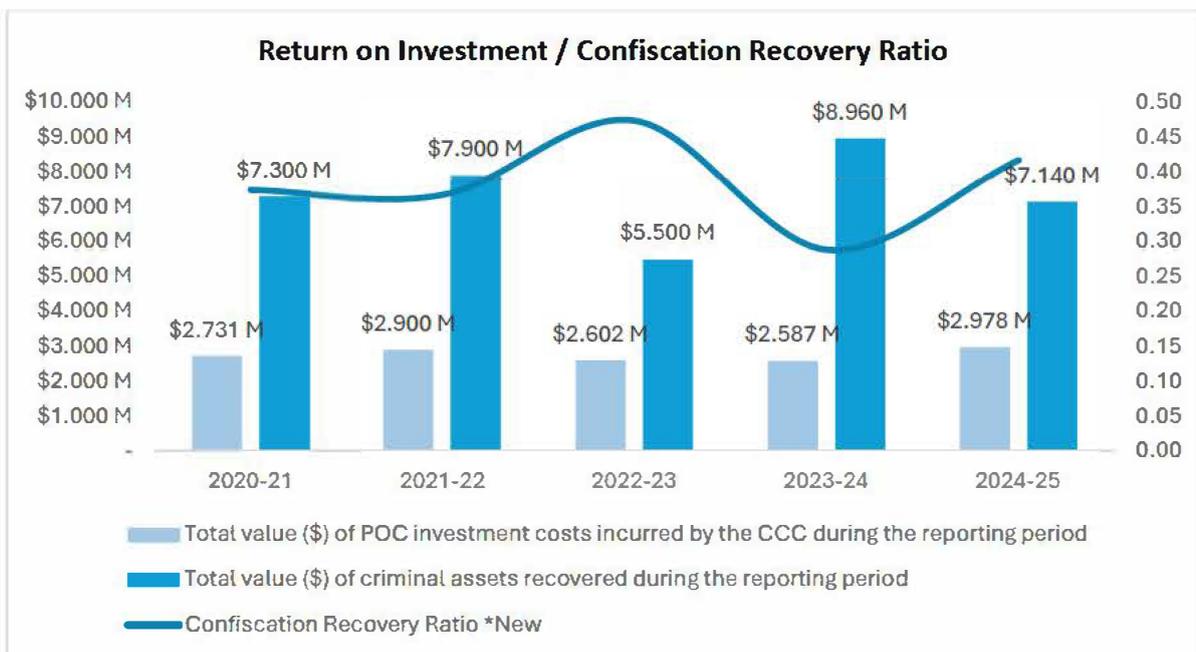
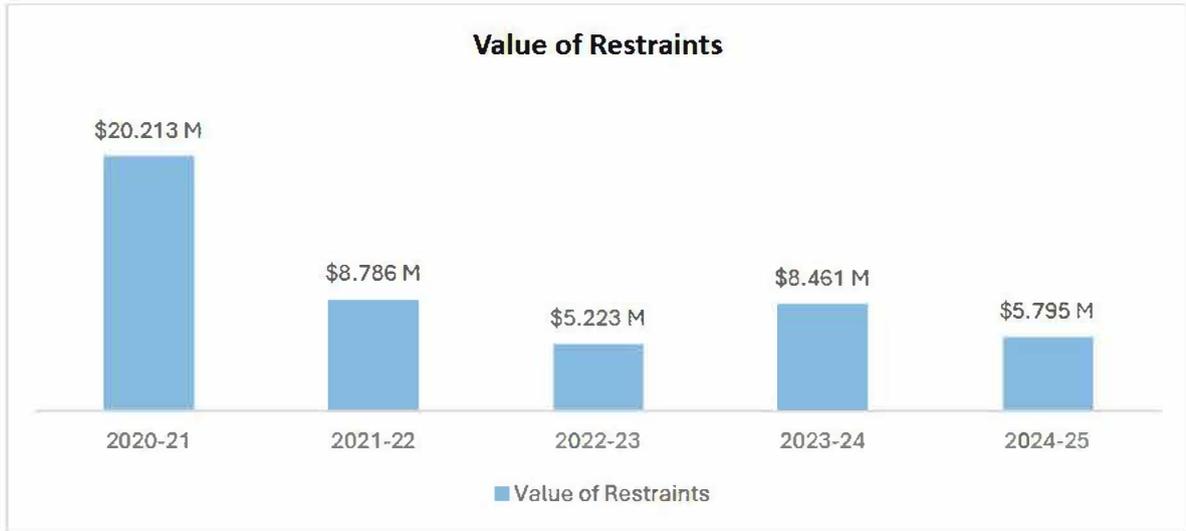
Year	Value of Restraints	Value of Confiscations	Impairment ⁵¹
2024-25	\$5.795 M	\$17.503 M	70%
2023-24	\$8.461 M	\$10.514 M	63%
2022-23	\$5.223 M	\$4.297 M	43%
2021-22	\$8.786 M	\$7.419 M	68%
2020-21	\$20.213 M	\$8.688 M	94%

Date range	Total value (\$) of POC investment costs incurred by the CCC	Total value (\$) of criminal assets recovered during the reporting period	Return on Investment Ratio ⁵²	Confiscation Recovery Ratio ⁵³
2024-25	\$2.978 M	\$7.140 M	2.4	0.42
2023-24	\$2.587 M	\$8.960 M	3.46	0.29
2022-23	\$2.602 M	\$5.500 M	2.11	0.47
2021-22	\$2.900 M	\$7.900 M	2.72	0.37
2020-21	\$2.731 M	\$7.300 M	2.67	0.37

⁵¹ Impairment is an effectiveness measure and represents the percentage of estimated recoverable value that is ultimately confiscated by the State, calculated at the time of final confiscation. This measure is directly related to the CCC's strategy to attack the profitability of crime and remove the incentive from serious and organised crime, preventing its expansion into further illegal activity by removing its funding source.

⁵² This is an effectiveness measure that divides the annual amount confiscated through Proceeds of Crime investigations and transferred to Queensland Treasury for the consolidated revenue fund, against the costs of delivering the CCC's Proceeds of Crime function, with a target measure of more than 1.00. This service standard aligns with the focus and priorities of the CCC's strategy in making serious crime not pay by working to make Queensland a hostile place to engage in crime for profit, and to acquire criminal wealth.

⁵³ This is an effectiveness measure that divides the annual costs of delivering the CCC's Proceeds of Crime function, against the amount confiscated through Proceeds of Crime investigations and transferred to Queensland Treasury for the consolidated revenue fund, with a target measure of less than 1.00. This service standard aligns with the focus and priorities of the CCC's strategy in making serious crime not pay by working to make Queensland a hostile place to engage in crime for profit, and to acquire criminal wealth.



Chapter 8: Research and Intelligence

295. Research and intelligence have been important functions of the CCC and its predecessors since the commencement of the Criminal Justice Commission in 1992. Although the structure, composition and focus of these functions have undergone significant changes since that time, the work of undertaking research into matters relevant to the CCC's functions, and gathering, utilising and disseminating intelligence in relation to major crime and corruption in Queensland, remains a valuable part of the CCC's work.

Research

296. The Research function is provided for in section 52 of the CC Act. The Research function is primarily to support the proper performance of the CCC's functions, but extends to 'any other matter relating to the administration of criminal justice or relating to corruption referred to the commission by the Minister'. Subsection (2) provides for matters related to policing in Queensland which may be the subject of research activities.

297. The CCC has a team of dedicated research officers whose function is to undertake those research activities.

298. Research activities may be identified through a variety of sources. The research program is developed in consultation with other business units within the CCC, to determine what research may be most beneficial at a given time.

299. Research activities may also be externally generated (noting the Minister has the power to refer matters to the CCC).

300. The Research team also undertakes legislative reviews in relation to the operation of various policing powers, as set out in legislation. Those activities have resulted in reports tabled in Parliament, and/or published on the CCC's website.

301. In addition, the CCC's Research team provides direct support to the CCC's core functions, aiding in developing analytical tools and methodologies which inform the identification of focus areas for each of the Crime and Corruption divisions.

Key 5-year performance data

302. An overview of significant externally facing research and statutory review activities undertaken by the CCC during the review period is set out below:

a) ***Measuring the impacts of proceeds of crime actions*** - In 2021–22, the CCC completed a research project on the deterrent effects of confiscating the proceeds of crime through tracking offenders' contacts within the justice system before and after that action.

b) ***Modernising Queensland's asset confiscation regime*** - In July 2023, the CCC commenced a review of the *Criminal Proceeds Confiscation Act 2002*. While that legislation is directed to undermining the profitability of serious and organised crime, such activity is complex, highly adaptive, and can be quite lucrative. In April 2024 the CCC published a report on its review. It identified that the Act requires

significant reform over seven priority areas, and made 10 recommendations to modernise the legislative scheme.

- c) ***Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004*** - On 21 June 2023, the CCC tabled in State Parliament a report following its legislative review. The review presented 23 recommendations to Government that seek to improve the Act and how it operates.
- d) ***High-Risk Missing Persons*** - In 2018, Queensland was the first Australian jurisdiction to provide police with new powers to conduct searches in particular cases.⁵⁴ The CCC's review commenced in September 2023, and the report was tabled in October 2024. The review identified that while these powers are rarely needed, they are a useful and valuable tool to progress missing person investigations. The CCC made two recommendations for consideration by government.
- e) ***Corruption Perceptions Survey*** - During March – May 2025 the CCC undertook a survey which was directed to Queensland public sector employees, local government employees, members of the police service and members of the Queensland community, to obtain their views and experiences of corruption and corruption prevention. The survey received 10,059 completed responses. This survey builds on previous surveys conducted of the community and public sector in 2018, 2020 and 2021. It is intended that this survey will be repeated on a 3-yearly cycle, which will allow the CCC to compare its results and track progress. The survey results were published on the CCC website on 29 July 2025.

Intelligence

- 303. The Intelligence function is provided for primarily in section 53 of the CC Act. Its primary focus is to undertake intelligence activities to support the proper performance of the CCC's functions. The CCC is building a database of intelligence information, which may incorporate information from a variety of sources.
- 304. As noted above, the CCC undertakes a range of intelligence activities in support of its functions, including Crime and Corruption, but also Witness Protection.
- 305. Intelligence activities are integrated into those functions, both at an operational level (such as undertaking intelligence inquiries and collating intelligence to further particular investigations), and in support activities (such as supporting risk and security assessments in relation to various activities).
- 306. Intelligence activities also extend to preparation and distribution of intelligence reports. These may arise from operational activities, but may also include synthesising information from external sources.
- 307. The CCC may also undertake intelligence hearings in support of its crime and corruption functions.

⁵⁴ See chapter 7, Part 3A *Police Powers and Responsibilities Act 2000* (Qld) and section 879 which requires the CCC to review the relevant provisions in the PPRA that provide police with powers in missing persons investigations where the person is a 'high-risk missing person'.

Chapter 9: Witness Protection

308. Witness protection is a specified function of the CCC and an essential component of Queensland's criminal justice system.
309. Operating since 1987, the Witness Protection Program protects at risk individuals and their families or associates due to their cooperation with law enforcement or the courts in cases of criminal or corrupt activity.
310. The CCC's witness protection activities include personal protection, court security, secure relocation, welfare management, and identity changes.
311. The CCC is the only independent commission in Australasia with responsibility for a witness protection program. Elsewhere in Australia and New Zealand, such programs are managed by state, territory, or federal policing agencies.
312. Witness Protection Officers are QPS officers seconded for up to 8-years under cooperative arrangements between the QPS and CCC.
313. The Witness Protection Unit (**WPU**) is responsible for coordinating the national Advanced Diploma of Police Witness Protection consisting of competency-based learning modules and attendance on a national witness protection course. This engagement and formal training strengthen the capability ensuring operational procedures align with national and internationally accepted best practice and doctrine.
314. Since taking responsibility for the WPU program, the CCC has maintained a 100 percent success rate in protecting witnesses, safeguarding more than 1950 individuals.
315. The WPU delivers a rapid and effective assessment process and provides a response to eligible applications within 48 hours.

Key 5-year performance data

316. The tables below provide performance data on the witness protection function during the review period.

Year	Applications/ Referrals/# of persons	Interim offers of protection	Full offers of protection	Number of Protectees [Full and Interim]	Court [Short term protection]	Close personal protection
2024-25	29 app/ 37 p	2	0	5	13	1,200 hours
2023-24	18 app/ 22 p	5	4	8	14	2,086 hours
2022-23	30 app/ 34 p	6	2	9	14	2,415 hours
2021-22	31 app/ 43 p	14	3	25	13	4,836 hours
2020-21	40 app/ 65 p	17	6	44	23	5,704 hours

Chapter 10: Renewal and Continuous improvement

317. Over the last five years the CCC has undergone significant transformation, largely driven by the COVID-19 pandemic, external reviews, rapid technological enhancements and shifting workforce demographics.
318. As briefly mentioned above; to respond to the evolving environment we developed three enabling strategies – Workforce, Data and Analytics and Digital – which focus on the areas that we need to invest in.
319. The Workforce Strategy supports our people to be innovative and enabled by data, digital solutions and effective ways of working.
320. The Data and Analytics Strategy is designed to improve our data holdings and enable timely insights for data driven decision making.
321. The Digital Strategy has been designed to mature our digital capability and target our digital solutions on delivering simpler, smarter, people centric digital services.
322. Key changes implemented under renewal and continuous improvement are summarised below:
 - a) **Hybrid and other flexible work arrangements:** Flexible work arrangements have become more normal than ever before. Hybrid work is now widely expected, with the CCC offering full time hybrid schedules as part of its employee offering. With the adoption of a hybrid work model by the CCC, teams now collaborate differently, relying on digital tools to stay connected and productive. These digital tools are essential to the CCC enabling real-time communication, document sharing and teamwork across distances and places.
 - b) **Technology and automation:** There has been a major acceleration in the adoption of digital tools, cloud services and AI-driven automation. New systems will largely have AI embedded in workflows, streamlining repetitive tasks and informing decision-making. The CCC is taking a cautious approach to AI-driven automation but it, like other digital tools and technologies, needs to be understood by us and we are focussing on upskilling our officers to work alongside these new technologies.
 - c) **Cybersecurity:** Cybersecurity has always been a key priority, however as hybrid work in the CCC expanded, cybersecurity became our number one risk priority and continues to be. The CCC applies a zero-trust framework with multi-factor authentication and security is an organisation and executive team concern rather than just an IT issue to be managed.
 - d) **Workplace Culture and Leadership:** Changing societal expectations has shifted CCC culture toward greater emphasis on work-life balance, diversity, inclusion and general responsibility. Purpose-driven work, such as that offered by the CCC is highly valued.
 - e) **Employee Wellbeing:** Mental health and wellbeing have been a strong focus of the CCC over the last five years with the CCC investing more in support systems and flexible policies to help our officers to manage work-life boundaries and other general stressors.

Hybrid and other flexible work arrangements

323. As for many organisations, COVID-19 presented unique challenges for the CCC. The CCC's organisational agility and resilience was tested. The response to COVID-19 enabled the CCC to successfully deliver major crime, corruption, proceeds of crime, and witness protection functions during the pandemic's disruption.
324. In early 2020, the CCC undertook a wholesale mobilisation of the workforce enabled through accelerating planned investments in digital technologies and equipment. The ability to invest in equipment also allowed the CCC to more rapidly transition technology assets to more contemporary equipment that improved the overall workforce efficiency and effectiveness.
325. Likewise, the key tasks of the CCC were not disrupted, such as witness protection. The CCC did have to rapidly develop new procedures and revise them constantly as the pandemic played out over the 2020 to 2022 period.
326. Following the disruption caused by the pandemic, the CCC continued to modernise its digital fleet and maintain organisational resilience and workforce mobility.
327. To help support the wellbeing of commission officers, we support and promote a variety of flexible work arrangements (**FWA**), including telecommuting, compressed hours, accumulated hours and part-time/job-share arrangements.
328. While remote working is not the only FWA the CCC offers, it remains a commonly used tool to assist commission officers in balancing their work and non-work responsibilities. Since 2020 we have seen the reported use of FWA increase from 71% to 89% of our workforce. This includes an increase in the use of remote working from 61% to 71% of commission officers. The level of satisfaction reported by commission officers regarding FWAs has remained steady over this period from 94% in 2020 to 95% in 2024. Remote working remains the most utilised FWA followed by flexible work hours and then flexible start and finish times.
329. Both the CCC and our commission officers recognise the value of face-to-face interaction for team building, work culture and connectivity. As a result, the CCC were early adopters, in early 2022, of a formal position on hybrid working.
330. We use anchor days on Wednesdays and Thursdays to ensure that teams, units and divisions can regularly work in physical proximity to each other and enjoy the benefits that creates.
331. The CCC operates in a highly competitive labour market for niche skills. Our ability to offer FWA is a core element of our employee value proposition, but it must remain balanced with our operational requirements.

Technology and automation

332. Strong investment over the last five years has positioned the CCC to provide 'anywhere anytime' network access through cloud technologies, enhancing our intelligence gathering, forensic computing and data and insights capabilities.
333. As a result of the significant change and uplift in digital maturity it was imperative that we develop a value-chain oriented operating model that considers people, process and technology.

334. Our digital operating model features digital governance, demand management and service delivery and support. This initiative has ensured we remain focussed on having technology architecture that is resilient and provides solid foundations for the future.
335. Over the last five years we have also:
- a) Developed a five-year Applications Roadmap to guide future planning and decision making about potential system enhancements, replacements and decommissions;
 - b) Upgraded our systems to Microsoft Office Pro Plus from Microsoft Office 2013;
 - c) Deployed new email optimisation, security and protection services using Microsoft Office 365;
 - d) Provisioned additional data and insights cloud infrastructure;
 - e) Delivered new and improved functionality for our digital Governance, Risk and Compliance application;
 - f) Implemented a replacement program of the audiovisual equipment in CCC hearing and training rooms;
 - g) Implemented an Analytics Data Warehouse (**ADW**) which provides a contemporary platform to securely store, manage and apply a variety of data. The ADW is supported by technical capability and governance frameworks to manage the efficiency and effectiveness of the ADW as well as security of stored data. The ADW provides an opportunity to further enhance data management and application of data through analytical tools to improve the timeliness, accuracy and comprehensiveness of information to support the CCC's business activities;
 - h) Developed various business intelligence dashboards, largely automated from the ADW. The dashboards also enhance data accessibility, streamline reporting and improve decision-making;
 - i) Implemented new functionality to increase evidence extraction capacity and enable forensic investigators to perform this task autonomously;
 - j) Continued to support the mobility of our workforce by rolling out a new fleet of devices;
 - k) Implemented a new web-based forensic computing tool which allows our investigators to review electronic exhibits when working remotely, and providing remote access to CCC building security systems;
 - l) Developed and implemented digital applications to support improved decision-making, including a stakeholder management system to track engagements with key partners and finance, human resources and corruption referrals dashboards to improve overall performance management;
 - m) Implemented a major version upgrade of our electronic document and records management system;
 - n) Upgraded our financial investigation data analysis tool that delivered business critical changes and addressed issues in reporting, security, effectiveness, consistency and analysis;

- o) Significantly progressed a project to implement a new Human Resource Information System with implementation forecast to be completed by the end of 2025;
- p) Engaged in a comprehensive procurement process to procure a fit-for-purpose investigation case management system to support our crime and corruption investigations. The procurement is scheduled to be completed in the first quarter of the 2025-2026 financial year;
- q) Commenced work to identify a new electronic evidence review platform, including redesigning our underpinning infrastructure to increase the speed by which investigators can access and review electronic evidence. It is anticipated a new EERP solution will be available in the 2026-2027 financial year;
- r) Commenced implementation of new, industry leading software to deliver a replacement Call Charges Record Database which will deliver streamline services and provide an easier and faster, searching, reporting and uploading environment for Intelligence Officers and Investigators. Implementation is anticipated to be completed by the end of 2025.

Cybersecurity

336. To continually deliver and improve our services through sound investment decisions, the CCC has a rolling program of projects for uplifting our digital environment, strengthening our robust security posture in recognition of the value of the data assets that we hold and constantly monitoring our environment to 'stay ahead of' the increasingly sophisticated crime and corruption environment.

337. Over the last five years, we have:

- a) Continuously strengthened our information security posture, through both routine and emergent upgrades and security patches to operating systems, applications and appliances, across both the on-premises environment and cloud environment; and addressing recommendations from various security related audits.
- b) Matured our ISO 27001 aligned Information Security Management System (**ISMS**) and continuously monitored and updated our application of the ISO 27001 security controls.
- c) Focused on implementation of the Australian Cyber Security Centre's (**ACSC**) Essential 8 controls with a plan to move to the next maturity level.
- d) Undertaken an external assessment of the security posture of our Azure environment and implemented recommendations for tightening the posture.
- e) Undertaken an external assessment of our Office 365 Security Fundamentals and Cloud Services against the ACSC's Information Security Manual controls.
- f) Expanded the use of multifactor authentication and tuned conditional access policies (technical configurations).
- g) Implemented a secure file sharing platform for sharing of privileged information with external parties.
- h) Implemented a Microsoft Office macros assessment and digital signing solution to block the execution of untrusted macros.

- i) Implemented a Public Key Infrastructure-as-a-Service solution to improve the issuing and management of cryptographic certificates for the control of a variety of security mechanisms within the ICT environment.
- j) Developed a new information security logging and monitoring plan with subsequent implementation of a new Security Information and Event Management solution, in alignment with the plan.
- k) Developed a new secure infrastructure design to support the introduction of a new electronic evidence review platform product, for use in digital forensic work.
- l) Assessed options for unstructured data management to strengthen information asset management.
- m) Implemented an Enterprise Password manager solution to secure staff passwords.
- n) Developed, matured and exercised our comprehensive cybersecurity incident response plan.
- o) Undertaken phishing and penetration testing of the ICT environment.
- p) Undertaken penetration testing of a new significant enterprise application.
- q) Undertaken multiple audits including an ISMS assurance audit, IT disaster recovery audit and IT risk management audit.

338. Looking forward, our plans include:

- a) Migrating to Data Centre-as-a-Service (**DCaaS**) to mitigate availability risks.
- b) Implementing a unified communications solution to both mitigate voice communications availability risk and increase utility and functionality.
- c) Uplifting our ACSC Essential 8 maturity to the next level.

Workplace Culture and Leadership

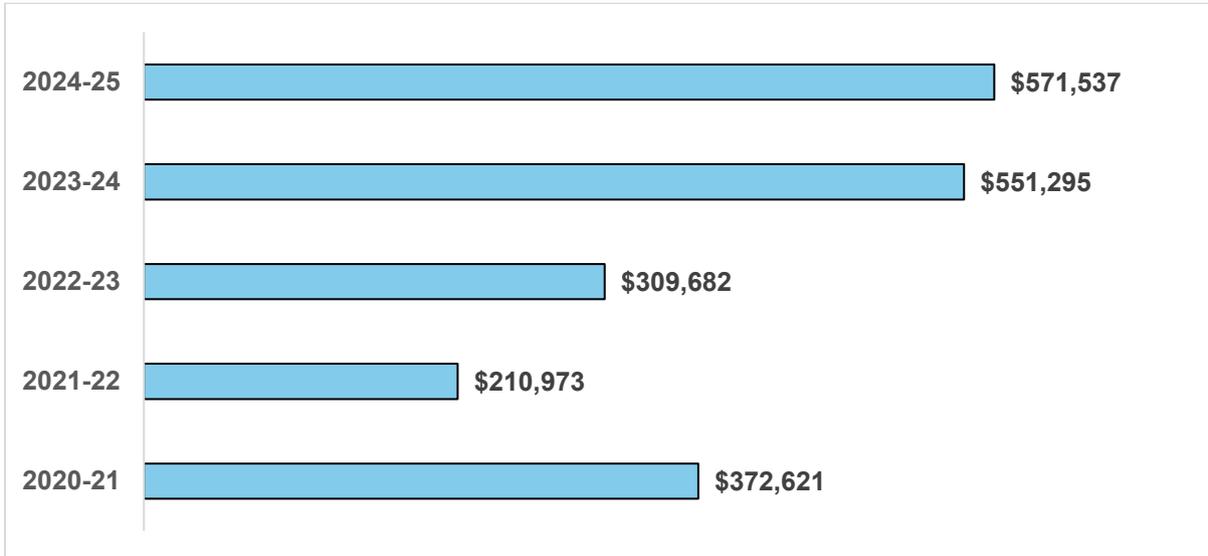
339. We continue to develop adaptable, confident and capable leaders who can steward the organisation through change.

340. We focus on supporting a mindset shift to what it means to be a leader within the CCC, where leaders at all levels, regardless of function, discipline or technical knowledge can inspire, who react well under pressure, support and collaborate with their colleagues, and exhibit sound judgement.

341. Over the last five years we have supported:

- a) 36 commission officers to attend a change management program to build their capability in leading themselves and their teams through change
- b) 50 commission officers to attend a program to develop confidence and capability in managing critical conversations
- c) 80 commission officers to undertake a program, to develop personal, business and team leadership capabilities
- d) 38 commission officers to undertake a program to develop and build their capability in emotional intelligence.
- e) 15 commission officers to undertake a program to develop and build their capability in communication skills for effective stakeholder engagement,
- f) 20 commission officers to complete a Leader as Coach program

342. The Early Career Pathways Program continues to assist us to develop the CCC workforce of the future. The program provides paid and unpaid opportunities for students and graduates in the disciplines of law, financial investigation and analysis, intelligence and research. The program includes a summer vacation internship program, graduate program, and professional practice program.
343. The table below charts the expenditure by the CCC on training and development during the review period.



New commission officers

344. We are committed to ensuring new staff have the knowledge they require to do their job effectively, as well as an understanding of their specific workplace context and how their role aligns with the priorities of the CCC.
345. Through our induction program, new employees immediately learn about our values, culture, and strategic and operational priorities.
346. During their first week, new employees undertake a range of mandatory eLearning programs that cover topics such as our Code of Conduct, workplace health and safety and information security.
347. We supplement this with a quarterly Corporate Induction Program, hosted by our Values and Culture Group (see below), which provides an opportunity for our new employees to hear directly from our senior leaders.

Values and Culture Group

348. Our Values and Culture Group (**VCG**), a group of representatives from across our agency, continues to find ways to champion and embed our organisational values (People, Accountability, Integrity, Courage and Excellence known as **PAICE**) into our working environment.
349. We support a day each year for our people to come together to participate in employee-led activities, strengthen workplace relationships and celebrate our value of ‘People’.
350. Before the commencement of the review period, we developed an online employee recognition tool — PAICE (reflecting the CCC values) which allow our people to thank and recognise their peers for demonstrating our values.

351. The PAICE system encourages our workforce to recognise each other when we see our values in action and helps to bring our values to life. Recognitions received across the year form the basis of recognitions received for the annual PAICE Awards.
352. In 2020–21, we redesigned the PAICE tool to make it more user friendly and to include new functionality that recognises multiple values within a single recognition.
353. The PAICE Awards are held each year and are another way the VCG works to bring our people together and recognise people who demonstrate our values in action.

Code of Conduct

354. Our Code of Conduct provides guidance to our commission officers on appropriate behaviour, consistent with the principles outlined in the *Public Sector Ethics Act 1994*:
 - Integrity and impartiality;
 - Promoting the public good;
 - Commitment to the system of government; and
 - Accountability and transparency.
355. These principles underpin our values, and they are embedded within individual Performance and Development Agreements.
356. New commission officers are provided with our Code of Conduct upon commencement and complete an eLearning module on this in their first week of employment.
357. Existing commission officer's also complete regular refresher training to maintain their knowledge.
358. We have a governance framework which outlines the values, attitudes and behaviours expected of our commission officers, in alignment with international standards of best practice and the principles of the *Public Sector Ethics Act 1994*.

Employee Wellbeing

359. The CCC's Workforce Strategy builds on our strong existing workforce foundations.
360. We are committed to creating a safe working environment for all our people. We know our work can often be challenging, and we remain focussed as we have over the last five years, on enhancing the wellbeing of commission officers and ensuring they are happy, productive and motivated at work.
361. We have employed several strategies over the review period to assist commission officers to look after their wellbeing, including:
 - a) Mental Health First Aid Training;
 - b) Ergonomic assessments;
 - c) Online training on mental health;
 - d) Time management; and
 - e) Work/life balance.
362. We maintain a regular, proactive psychological assessment program for commission officers deemed at risk of psychological injury because of the work they undertake.
363. We have trained 132 commission officers in Mental Health First Aid during the review period and in 2025 we were formally recognised as a Mental Health First Aid Skilled Workplace.

364. We also partner with Converge International to provide an Employee Assistance Program to ensure commission officers, and their immediate family members, can access wellbeing services including confidential personal coaching and counselling.
365. We actively promote these services through our induction program and published online materials.

Trauma-informed practice

366. The success of the CCC depends heavily on Queenslanders being confident that they can bring their experiences and concerns about crime and corruption to us and that we, as individual commission officers and as an organisation, are equipped to respond appropriately.
367. In some cases, this will depend on our ability to recognise and sensitively manage the impact of trauma on the people we deal with.
368. Forms of trauma may vary - they can include exposure to violence, loss and cultural disconnection, and may lead people to feel unsafe or unsupported when interacting with us.
369. The CCC engages with a diverse population, some of whom have complex histories, including trauma.
370. We have a responsibility to recognise an individual's history, that minimises individual trauma and builds trust.
371. Being trauma-informed does not mean that we can eliminate the risk to individuals engaging with the CCC, it means we endeavour to manage such risks through reasonable conduct while still achieving our purpose and outcomes in the public interest.
372. That is why we have developed the trauma-informed practice framework to guide us in the important work we do.
373. Our trauma-informed framework developed during the review period:
- a) Defines the concepts of trauma;
 - b) Outlines the core principles and fundamental elements of the approach;
 - c) Describes the different domains of the approach to be embedded within the CCC; and
 - d) Provides practical examples of how trauma-informed principles can be applied in practice.
374. The framework aims to:
- a) Increase awareness and understanding of trauma and how trauma-informed practice applies in our workplace;
 - b) Reduce the risk of individuals engaging with, or working for, the CCC experiencing trauma or re-traumatisation;
 - c) Promote respectful, inclusive, and accessible ways of working that are relevant and tailored to individuals interacting with the CCC;
 - d) Promote the safety and wellbeing of people engaging with the CCC; and
 - e) Promote the safety and wellbeing of our people.

375. In 2025-26 we will focus our trauma-informed practice efforts on Intake and Assessment, corruption investigations, crime hearings, witness protection and human source teams, to support:

- a) Improved employee wellbeing;
- b) Improved escalation pathways for individuals presenting with mental health concerns/risk to others;
- c) Improved communication techniques with relevant people external to the CCC, to ensure adoption of trauma informed communication, for example, when obtaining information, taking referrals, communicating outcomes, conducting interviews or any other times when engaging with witnesses, subject officers and others who encounter the CCC from an operational perspective.

Chapter 11: Telecommunications Interception Powers

376. Telecommunications interception powers are a critically important investigative tool for law enforcement agencies, including the CCC. These powers are regulated under a co-ordinated scheme of Commonwealth and State legislation.
377. The information obtained through the exercise of these powers provides intelligence and evidence in support of the CCC's investigative functions.
378. The exercise of powers under this legislation is highly regulated, and subject to oversight from a variety of bodies.
379. As a starting point, all applications for telecommunications interception warrants, stored communications warrants, as well as journalist information warrants, must be made to an eligible issuing authority (an eligible judge or nominated member of the Administrative Review Tribunal).
380. When an application for a telecommunications interception warrant is made, a copy of the material is to be provided to the Public Interest Monitor (**PIM**).
381. The PIM may appear at the warrant application and make submissions in relation to the application.
382. Applications for stored communications warrants are also made to an issuing authority, although (given their less invasive nature), the PIM does not appear on such applications. In any event, stored communications may also be obtained under a telecommunications warrant, and that is the usual process by which such communications are obtained.
383. Applications for Journalist Information Warrants (warrants which seek to access telecommunications data of journalists for investigative purposes) are subject to a similar scheme, in which the Public Interest Advocate is provided a copy of the application material, and may make submissions in relation to the application.
384. Applications for less invasive types of information under the *Telecommunications (Interception and Access) Act 1979* (Cth) (**TIA Act**) (such as telecommunications data) may be authorised by decision-makers within the CCC, under the established legislative framework of delegations.
385. The CCC's use of those powers, and its compliance with statutory requirements, is then subject to various inspection and reporting arrangements.
386. At a State level, an annual report is provided on the effectiveness of telecommunications interception warrants and the cost of executing these. Reports are also required within three months of a telecommunications interception warrant ceasing to be in force which details the use and communication of information obtained under the warrant. These reports are provided under the *Telecommunications Interception Act 2009* (Qld) (**TI Act (Qld)**).
387. At a Commonwealth level, the CCC provides annual reports on:
 - The effectiveness of telecommunications interception warrants and the cost of executing these warrants;⁵⁵

⁵⁵ This is the same report as provided at a State level.

- Access to and destruction of stored communications and domestic preservation notices;
- Access to and use of telecommunications data;
- The use of the powers under the *Surveillance Devices Act 2004* (Cth); and ⁵⁶
- The use of the *Industry Assistance Regime under the Telecommunications Act 1997* (Cth).

388. As part of its obligations under the TIA Act, the CCC provides a quarterly report to the Commonwealth Minister responsible for administering the TIA Act detailing all telecommunications interception warrants that fall within the reporting period, that are not expected to result in criminal proceedings. In addition, the CCC provides a report within three months after a named person telecommunications interception warrant has ceased to be in force.

389. Since the introduction of these powers in 2009, the CCC has had a dedicated legal team which deals specifically with telecommunications interception, stored communications and telecommunications data. This team is responsible for providing advice, undertaking internal compliance inspections, and otherwise ensuring compliance with the CCC's legislative obligations in relation to the TIA Act and TI Act (Qld).

⁵⁶ This is not strictly a report in relation to telecommunications interception but is part of the CCC's surveillance reporting obligations to the Commonwealth and is dealt with as part of the same annual reporting process.

Chapter 12: Oversight arrangements

390. Various external oversight bodies and mechanisms provide for scrutiny of the CCC's activities and its officers. This includes the Parliamentary Crime and Corruption Committee, the Parliamentary Crime and Corruption Commissioner, the Public Interest Monitor, the courts and relevant tribunals. Further detail about the entities that inspect and report on the CCC's activities, and the CCC's reporting obligations, are provided below.

External accountability and oversight

391. The CCC reports on strategic and operational performance through its annual report, reports requested by the PCCC, various publications and the CCC website. The reporting includes both qualitative and statistical information and updates to the PCCC on projects and activities.
392. There are several external stakeholders to whom the CCC reports, or who have a role in oversight of the performance of the CCC's functions. The CCC's strategic and operational performance targets are published through the Service Delivery Statement (part of the State Budget Papers) and are given actionable expression in the CCC's Strategic and Operational Plans. These performance targets include a range of measures relating to the efficiency and effectiveness of the CCC. Operational performance is reported to the Minister for Justice and Queensland Treasury within the Service Delivery Statement performance reporting regime.
393. The CCC's annual financial statements are audited by the Queensland Audit Office and are published in the CCC Annual Report. The CCC also participates in the Parliamentary Estimates Committee proceedings.

Attorney-General, Minister for Justice and Minister for Integrity

394. The CCC falls within the justice portfolio, and its budget is allocated by the Minister. The CCC reports to the Minister for Justice on a six-monthly basis.⁵⁷

Parliamentary Crime and Corruption Committee

395. The Parliamentary Crime and Corruption Committee (**PCCC**) is the external body primarily responsible for monitoring and overseeing the CCC's performance of its functions.
396. The PCCC may receive and consider complaints against the CCC and its officers, and deal with issues concerning the CCC as they arise.
397. Under section 329 of the CC Act, the CEO (or, if the suspicion relates to the CEO, the Chairperson) must notify the PCCC and the Parliamentary Commissioner of suspected improper conduct of its officers. The PCCC may then determine how such notifications are to be investigated or dealt with.

⁵⁷ The obligation to report to the Minister is set out in s.260 of the CC Act, which requires reporting at a frequency determined by the Minister. At present, these reports are provided on a six-monthly basis.

Parliamentary Crime and Corruption Commissioner

398. The Parliamentary Crime and Corruption Commissioner (the Parliamentary Commissioner) assists the PCCC in its oversight and monitoring of the CCC's activities.
399. The Parliamentary Commissioner investigates complaints against the CCC or its officers, either at the direction of the PCCC, or in some cases on their own initiative. The Parliamentary Commissioner's powers include compelling CCC officers and others to give evidence at a hearing, and the power to require the production of records, files and other documents.
400. The Parliamentary Commissioner also conducts reviews of the CCC's activities, and inspections and audits of its records (either as mandated by legislation, or at the PCCC's direction).
401. The Parliamentary Commissioner is the inspecting entity, for example, in relation to the CCC's compliance with its obligations in relation to records for covert activities undertaken under the PPRA and the CC Act.
402. The Parliamentary Commissioner submits reports on the results of its inspections to the PCCC. These inspections represent an important check on the CCC's activities, as they involve a review "after the fact" of the exercise of covert powers by the CCC.
403. The Parliamentary Commissioner may also be tasked by the PCCC to investigate allegations of suspected improper conduct under section 329, or perform other functions as considered necessary or desirable by the PCCC.
404. The Parliamentary Commissioner inspects the CCC's telecommunications interception records twice a year to assess compliance with requirements under the TI Act (Qld).

Public Interest Monitor (PIM)

405. The PIM is responsible for monitoring applications for, and the use of, particular types of warrants (covert search warrants, surveillance warrants and TI warrants) obtained by the CCC under the PPRA or the CC Act.
406. The PIM's primary responsibility is to appear on applications for the exercise of covert powers, and to make submissions about, and test the appropriateness of, the warrants sought.⁵⁸
407. The PIM's functions in relation to surveillance warrants and covert search warrants are set out in section 326 of the CC Act and broadly speaking the PIM is responsible for monitoring the use of these covert powers, and to report where appropriate regarding identified issues of non-compliance.
408. The PIM is also responsible for gathering statistical information about the use and effectiveness of surveillance and covert search warrants.

Commonwealth Ombudsman

409. As mentioned above, the Commonwealth Ombudsman conducts yearly inspections of the CCC's stored communications and telecommunications data records.
410. Both the Commonwealth and Queensland inspecting entities continue to report favourably on the CCC's compliance with its obligations under the TI scheme.

⁵⁸ See section 11 *Crime and Corruption Act 2001*.

Public Interest Advocate

411. The TIA Act regulates the circumstances in which law enforcement and security agencies may obtain telecommunications information in relation to journalists and media organisations (**JIW**s). Applications for JIW are considered and tested by the Public Interest Advocate.
412. The Public Interest Advocate is a statutorily appointed officer who exercises a similar role in respect of such applications as does the Public Interest Monitor in other applications by the CCC.

Supreme Court

413. Many of the CCC's coercive powers, and powers for compulsorily obtaining information, are exercisable only with the approval of a Supreme Court judge.
414. These include applications for covert searches, surveillance devices, monitoring and suspension orders for financial institutions, and notices for witnesses to immediately attend a hearing.
415. The Supreme Court also exercises an oversight role in respect of certain activities by the CCC.
416. A person may apply to the Supreme Court for a review of the CCC's investigation where they believe the investigation is proceeding unfairly.⁵⁹
417. Further, the Supreme Court is responsible for determining claims of privilege and reasonable excuse raised by persons subject of the CCC's compulsory powers.

Crime Reference Committee

418. As briefly mentioned in chapter 2 of this submission, the Crime Reference Committee (**CRC**) is established under the CC Act, and section 275 sets out its functions:
- a) To refer major crime to the CCC for investigation;
 - b) To authorise the CCC to undertake specific intelligence operations;
 - c) To review general referrals; and
 - d) To coordinate investigations into major crime conducted by the CCC with another entity.
419. The CRC may also give the CCC directions imposing limitations on a crime investigation, including limitations on the exercise of the CCC's powers for the investigation, and may direct an investigation to end in certain circumstances.⁶⁰
420. The CRC may also exercise these powers in respect of a particular investigation commenced under a general referral.⁶¹

Controlled Operations Committee

421. The Controlled Operations Committee (**COC**) is chaired by a retired Court of Appeal judge (the independent member) and consists of the Commissioner of Police (or a nominee) and the Chairperson of the CCC.

⁵⁹ See section 332 *Crime and Corruption Act 2001*.

⁶⁰ See section 29 *Crime and Corruption Act 2001*.

⁶¹ See section 29A *Crime and Corruption Act 2001*.

422. The COC is established under the PPRA to consider and make recommendations about applications for “controlled operations” to be undertaken by the QPS or the CCC.
423. Controlled operations are investigations of serious indictable offences, misconduct or organised crime that involve police officers and others engaging in activities that may be unlawful.