

Review of the Crime and Corruption Commission's activities

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Parliamentary Crime and Corruption Committee
Parliament House
George Street
Brisbane 4000
By email: pccc@parliament.qld.gov.au

Dear Committee Secretary and Honourable Members of the Parliamentary Crime and Corruption Committee,

Submission - Review of the Crime and Corruption Commission's activities

The Corruption Prevention Network Queensland (**CPNQ**) welcomes the opportunity to provide this submission regarding the review of the activities of the Crime and Corruption Commission (**CCC**). I am making this submission to the Parliamentary Crime and Corruption Committee (PCCC) in my capacity as Treasurer of the Corruption Prevention Network Queensland (CPNQ) on behalf of the Management Committee of CPNQ, with approval to send this submission having been obtained by email from all of the eight members of the committee.

What is CPNQ

CPNQ is a nonprofit incorporated association managed by a volunteer committee and aims to provide networking and professional development opportunities for fraud and corruption prevention practitioners as well as others interested in this work. CPNQ has a membership base of nearly 100 members, comprising representatives from State and local government agencies, private sector organisations (including professional services and law firms), academia, university students and other interested parties. Members contribute an annual fee of \$65 (or \$45 if not employed) to join CPNQ and have access to professional development events, such as lunch time seminars, panel discussions, and newsletters providing current information and resources on fraud and corruption prevention. Membership fees are used to support the CPNQ's operational needs including maintaining its website, email system and administrative expenses.

Past relationship between CPNQ and the Crime and Corruption Commission

CPNQ was borne out of initiatives stemming back to the Criminal Justice Commission (CJC) and the perceived need for practitioners in the corruption prevention space to share knowledge and collaborate. Relevantly, the CJC Annual Report for 2000–2001 noted that:

Twice during the year the CJC arranged meetings of public sector staff interested in establishing a self-funded Corruption Prevention Network to exchange ideas and share information. A working group of representatives from various agencies helped us develop the draft aims, objectives and rules of the Network. Participants have now agreed over these matters and sought to have the Network registered as a not-for-profit incorporated body. We offered the Network a modest seeding grant to help it meet its establishment costs.¹

The newly-established Crime and Misconduct Commission (CMC) continued its active support and engagement of CPNQ, with the agency's 2001–2002 Annual Report stating that "*CMC staff hold positions on the network's management committee and each of its subcommittees.*"²

The CMC, and subsequently the CCC have continued to support CPNQ over the following years. This ongoing relationship was reflected in the CCC's Annual Report for 2016-2017 noted that:

This year the Chairperson accepted an invitation to be the patron of the Corruption Prevention Network Queensland (CPNQ). The CPNQ is a non-profit incorporated association established approximately 17 years ago with the purpose of developing strategies to prevent corruption and fraud and improve the ethical conduct of staff in the private and public sector. The CCC also provides professional support and in 2016–17 sponsored \$1500 to administer the network.³

In 2020, the CPNQ's website, which had been operating for 20 years, reached the end of its functionality, and was no longer supported. The cost to develop a modern website to support the CPNQ's networking, professional development, and administrative activities was determined to be approximately \$10,000 based on the receipt of quotes. These costs were far greater than the CPNQ's budget, primarily comprised of

¹ Criminal Justice Commission Annual Report 2000 – 2001 p.54

<https://www.ccc.qld.gov.au/publications/cjc-annual-report-2000-2001>

² "Crime and Misconduct Commission Annual Report 2001 – 2002 p.71

<https://www.ccc.qld.gov.au/publications/cmc-annual-report-2001-2002>

³ Crime and Corruption Commission Annual Report 2016 – 2017 p.28

<https://www.ccc.qld.gov.au/publications/ccc-annual-report-2016-2017>

sponsorship funds from the CCC, and it was understood that the costs to support and maintain an updated website would increase.

In September 2020, following a request from CPNQ, the CCC provided \$1,600 as a partial sponsorship for the website upgrade. This support was provided on the basis that the CCC's statutory function includes preventing major crime and corruption by increasing the capacity of units of public administration, and it was acknowledged that CPNQ's work aligned with and complemented this objective.

Despite the CCC's contribution and a generous donation from the University of Queensland there remained a significant shortfall. The result of the increased management costs of a new website ultimately resulted in the Management Committee making the difficult decision to require fees for membership of CPNQ for the first time. This decision enabled CPNQ to proceed with the development of its new website within budget and, since 2021. The organisation has successfully covered its ongoing operational costs without the support from any government agency, organisation, or individual. A small number of CCC officers, mostly those with engagement and prevention roles, have maintained their membership of CPNQ.

In January 2022, the then Chair of the CCC resigned and CPNQ was left without a Patron. The CPNQ's Rules of Association establish the formalised position of Patron, stating:

36. NETWORK PATRON

i. The head of an integrity or other similar body can hold the honorary role of the Network's Patron singularly or by agreement jointly. The Patron's role will be to, where practicable:

(a) attend the Annual General Meeting where availability permits, a general meeting or Management Committee meeting in a non-voting capacity;

(b) provide input into presenter and/or presentation topics of interest being considered by the Management Committee when scheduling Network events;

(c) raise awareness of the Network and the Network Patron role within the Network Patron's organisation where appropriate;

(d) promote the existence of the Network through inclusion of a link to the Networks website on Network Patron's website; and

(e) consider and if approved release funding to the Network to allow the Network to continue to operate.⁴

⁴ Corruption Prevention Network Queensland Rules of Association

While the role of Patron is an honorary one, CPNQ highly values the role as it brings a gravitas and has consequential positive reputational benefits to the organisation and helps to attract members. The former CCC Chair was an active participant in CPNQ, attending meetings including Annual General Meetings (**AGMs**), presenting at sessions as well as attending networking events.

In 2022, following the former CCC Chair's resignation, CPNQ invited the current Chair of the CCC to be Patron of CPNQ. The current Chair declined CPNQ's invitation and suggested another integrity agency head be offered the role. Given this suggestion, CPNQ invited the current Queensland Integrity Commissioner to be its Patron. The Queensland Integrity Commissioner accepted the role and has been an active Patron and supporter of CPNQ, attending meetings including the AGM, attending networking events, and delivering and organising presentations to members on lobbying regulation.

Current relationship with the CCC

CPNQ has made consistent efforts to maintain a collaborative relationship with the CCC. Over the last two years members of CPNQ's Management Committee have held annual meetings with senior officers from the CCC's prevention area to discuss proposed presentation topics and events, with invitations to speak at presentations being extended. In February of this year, the newly appointed Senior Executive Officer Corruption participated in a CPNQ panel discussion on conducting best practice internal reviews of investigation.

The CCC's Annual Report for 2024 – 25 describes the relationship between CPNQ and the CCC in the following terms:

Established in 2003 as an initiative of the CCC's predecessor organisation the Crime and Misconduct Commission (CMC), the CPNQ assists its members to develop knowledge, skills and professional networks to build more fraud-resilient and corruption-resilient organisations in Queensland. The primary sponsor of the network is now the Integrity Commissioner, however the CCC retains its strong relationship with the Committee and recognises its value in amplifying our anti-corruption messaging to its members. Network members come from the public sector (local, state and federal), private sector, academia, and the wider community, and work together to strengthen the State's resilience against corruption and fraud. This year the CCC participated in a CPNQ panel discussion on "How to achieve best practice in conducting internal reviews of investigations", alongside officers from the Queensland Ombudsman, Public Sector Commission and Gadens Law Firm. Attendees included integrity professionals from across Queensland's public sector including the public service, statutory authorities, GOCs and local government. CPNQ also promoted

*various anti-corruption messaging in their newsletter, including Fraud Awareness Week resources.*⁵

By way of correction to the information set out in the CCC's Annual Report, the Queensland Integrity Commissioner is Patron of CPNQ, rather than the primary sponsor of CPNQ. Since the implementation of membership fees in 2020, the CPNQ has been wholly self-funded through the annual membership fees paid by members.

The Management Committee of CPNQ is grateful for the past support, both financial and otherwise, of the CCC and acknowledges and is proud of our historical origin as an initiative of a small number of dedicated and passionate corruption prevention officers of the former CJC and CMC. Despite this, the Management Committee of CPNQ would characterise the relationship as a professional and cordial relationship that seeks to obtain mutual benefit and collaboration on some fraud and corruption prevention activities, but would not characterise the current relationship between CPNQ and the CCC as being as strong as it historically has been, given the Chair's decision to not continue as Patron, the relatively small number of CCC officers that are members of CPNQ, and the level and regularity of engagement and activity between the CCC and CPNQ.

Comments on CCC performance on corruption prevention and engagement

The Management Committee of the CPNQ believes the CCC's performance in relation to its prevention function is best evaluated against its legislative requirements under section 24 of the Crime and Corruption Act 2001 (the **Act**) and the benchmark of comparable interstate integrity bodies. Section 24 of the Act relevantly states:

24 How commission performs its prevention function

Without limiting the ways the commission may perform its prevention function, the commission performs the function by—

- (a) analysing the intelligence it gathers in support of its investigations into major crime and corruption; and*
- (b) analysing the results of its investigations and the information it gathers in performing its functions; and*
- (c) analysing systems used within units of public administration to prevent corruption; and*
- (d) using information it gathers from any source in support of its prevention function; and*
- (e) providing information to, consulting with, and making recommendations to, units of public administration; and*

⁵ Crime and Corruption Commission Annual Report p.62
<https://www.ccc.qld.gov.au/publications/annual-report-2024-25>

- (f) providing information relevant to its prevention function to the general community; and*
- (g) ensuring that in performing all of its functions it has regard to its prevention function; and*
- (h) generally increasing the capacity of units of public administration to prevent corruption by providing*

Section 24 of the Act, cited above, presupposes that the CCC will be an active and proactive agency that collaborates and engages regularly with both public sector and other stakeholders.

The view of the CPNQ Management Committee is that the CCC's prevention and engagement activities with the public sector, stakeholders like CPNQ, and the broader community has been significantly less than it has been in the past. This is borne out in terms of forums and meetings with agencies and stakeholders, production of corruption prevention advisories and useful tools and resources to assist fraud and corruption prevention.

CPNQ expects to see the CCC actively lead continuous preventative activities across the Queensland public sector and community, and showcase their efforts of proactive engagement in larger activities such as international fraud awareness week with speakers and events. The CPNQ acknowledges that, in recent years, there have been limitations in what the CCC has been able to share publicly, due to the High Court of Australia's decision in *Crime and Corruption Commission v Carne* [2023] HCA 28, however these limitations have since been corrected through amendments to the Act, and the CPNQ looks forward to seeing increased transparency from the CCC in due course.

We note that, when considering the activities of interstate counterparts, the CCC more broadly appears, at least from the public perspective, to be less active and less proactive in its corruption prevention and engagement activity. By way of example, the Independent Broad-based Anti-Corruption Commission in Victoria frequently releases guidance materials for the general public and the sector (roughly 30 this year thus far), and newsletters with general information, outside of media releases and information about completed or ongoing investigations, as well as routinely hosting events throughout Victoria for both practitioners in the prevention space and the general public.

The Management Committee of CPNQ recognises the limitations imposed by the decision in *Carne*, but notes that a greater volume of resources made available to those in the corruption prevention space, and the broader general public, would undoubtedly raise engagement.

These observations can be repeated across other integrity bodies, such as the Corruption and Crime Commission in Western Australia, which frequently reports on its activities relating to corruption and oversight of the activities of the Western Australia Police Force, the New South Wales Independent Commission Against Corruption, which routinely provides updates on investigations and resources for practitioners, and the various other integrity bodies.

Recommendations for improvement

The Management Committee of CPNQ considers the following recommendations may assist in improving the CCC's performance in corruption prevention and engagement with stakeholders:

- (a) more regular engagement and delivery of training and professional development on fraud and corruption prevention with stakeholders in both face-to-face and online modalities;
- (b) more regular regional visits to agencies and presentation to regional leadership groups within the public sector and community groups;
- (c) closer and more regular engagement with units of public administration (**UPA**) and other stakeholders to better understand particular fraud and corruption risk areas; and
- (d) closer and more involved engagement with UPA and stakeholders, which would provide greater opportunity for understanding and the utilisation of the very broad statistics gathered and published by the CCC.

The Management Committee of CPNQ trusts the information in this submission with assist the PCCC to guide and improve the activities of the CCC to make it a more effective and collaborative integrity body, especially in regard to its corruption prevention and engagement activities.

Should you have any queries regarding the contents of the CPNQ's submission, please do not hesitate to contact me.



Jim Meyers

CPNQ Treasurer

On behalf of the Management Committee of CPNQ