



Our ref: CD/21/51913

7 October 2021

Dr Sean Turner
Committee Secretary
Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: aclei.committee@aph.gov.au

Dear Committee Secretary

Inquiry into the expansion of the Australian Commission for Law Enforcement Integrity's (ACLEI) jurisdiction and the corruption vulnerabilities of law enforcement agencies' contracted services

Thank you for inviting the Independent Broad-based Anti-corruption Commission (IBAC) to make a submission to the Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity's (the Committee) inquiry into the expansion of ACLEI's jurisdiction and the corruption vulnerabilities of law enforcement agencies' contracted services.

As you may be aware, IBAC is Victoria's independent agency responsible for preventing and exposing public sector corruption and police misconduct. Our jurisdiction covers state and local government, police, parliament and the judiciary.

IBAC provides independent oversight of Victoria Police by receiving and assessing complaints and notifications about police conduct, and investigating serious or systemic police misconduct, including initiating inquiries on our "own motion". IBAC also has important functions to assist in preventing police misconduct and promoting integrity (among other relevant functions).

Considering IBAC's jurisdiction, as Victoria's anti-corruption and police oversight agency, we are not in a position to respond specifically to the Committee's terms of reference in relation to ACLEI's expanded jurisdiction and the federal law enforcement agency arrangements subject to this inquiry.

However, consistent with our prevention and education functions, we draw your attention to some relevant IBAC publications, which may be of general interest to the Committee in relation to corruption risks associated with public sector procurement and contracted services.

Corruption vulnerabilities associated with procurement

IBAC's investigations and research have highlighted corruption vulnerabilities associated with procurement across a range of public sector agencies.

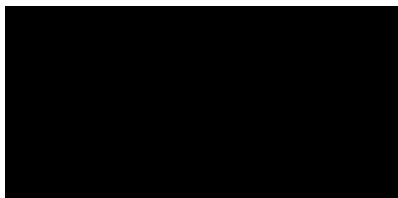
IBAC's 2019 *Special report on corruption risks associated with procurement in local government* may be a useful reference for the Committee's work in identifying and addressing risks associated with contracted services.¹ Although focussed on the local government sector, many of the vulnerabilities and prevention opportunities are relevant across other public sector agencies.

The special report also highlights the importance of sector-specific codes of conduct for suppliers. These codes of conduct can help suppliers understand the minimum expected standards of integrity and conduct, including declaring and addressing conflicts of interest.

Corruption risks associated with the delivery of government funded services by community service organisations

IBAC's 2021 research report, *Corruption risks associated with government funded human services delivered by community service organisations*² highlighted key corruption risks related to the delivery of public functions by community service organisations. These vulnerabilities, including the misuse of information, may be relevant to the Committee's consideration of law enforcement agencies' contracted services.

Thank you again for the opportunity to make a submission to the Committee's inquiry. Should you require further information or assistance, please contact Helen Stewart, Director, Prevention Policy & Research at helen.stewart@ibac.vic.gov.au.



Christine Howlett

Executive Director, Prevention & Communication

¹ IBAC (2019), [*Special report on corruption risks associated with procurement in local government*](#)

² IBAC (2021), [*Corruption risks associated with government funded human services delivered by community service organisations*](#).