



**Australian Government**  
**Australian Commission for  
Law Enforcement Integrity**

**AUSTRALIAN COMMISSION FOR  
LAW ENFORCEMENT INTEGRITY**  
CORPORATE PLAN 2018–22



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# OVERVIEW 2018–22

## ACLEI's purpose (2018–19 Portfolio Budget Statements)

**MAKE IT MORE DIFFICULT FOR CORRUPTION IN DESIGNATED AUSTRALIAN GOVERNMENT LAW ENFORCEMENT AGENCIES TO OCCUR OR REMAIN UNDETECTED**

### Achieving Public Value: *We detect, disrupt, deter high-risk corruption threats*

- Play a productive role in the national response to corruption risk
- Use statutory powers to uncover and prevent corrupt conduct
- Work with other agencies to foster anti-corruption expertise and strengthen corruption resistance

### Strategy: *We are integrity leaders*

- Take a visible role in integrity leadership (as a practitioner agency)
- Monitor and manage corruption threats, particularly in high-risk operating environments or high-harm functions
- Undertake or facilitate innovative projects that identify corruption risks and inform their treatment
- Share information, intelligence and resources with other Commonwealth and State agencies—and, when appropriate, with the private sector—to counter corruption
- Further develop ACLEI's proactive investigative capabilities and breadth of operational partnerships

### Environment: *We operate in a dynamic system*

- ACLEI's areas of focus can change suddenly to respond to government priorities and emerging risks
- Integrity cultures of government entities, including in shared working environments, don't stay stable
- External factors (such as financial uncertainty or the price of illicit drugs) can affect the corruption-incentive climate (such as the potential size of bribes)
- Capability of organised crime groups to use corruption methods (such as aggressive targeting of officials) appears to be increasing
- New vulnerabilities can arise in government agencies as processes change or agencies reorganise (including technology, outsourcing or management change)
- The perceived and actual effectiveness of corruption deterrence settings and controls can vary over time and place

## ACLEI's resources

	2018–19	2019–20	2020–21	2021–22
Appropriation <sup>1</sup>	\$11.587m	\$11.625m <sup>2</sup>	\$11.725m	\$11.932
s74 receipts <sup>3</sup>	\$2.489m	-	-	-
ASL <sup>4</sup>	48	43	45	45

<sup>1</sup> 2018–19 Portfolio Budget Statements: Table 2.1 (operating expenses) and Table 3.5 (capital budget)

<sup>2</sup> Existing arrangements for resourcing are subject to review prior to the 2019–20 Budget

<sup>3</sup> Includes Visa Integrity Taskforce funding, approved under the *Proceeds of Crime Act 2002* (Confiscated Assets Account)

<sup>4</sup> ASL: Notional Average Staffing Level

# STATEMENT OF PREPARATION

As the Accountable Authority of the Australian Commission for Law Enforcement Integrity, I present the ACLEI 2018–2019 Corporate Plan, as required under paragraph 35(1) of the *Public Governance, Performance and Accountability Act 2013* (the PGPA Act).

This Plan has regard to the requirements for Corporate Plans specified in the *Public Governance, Performance and Accountability Rule 2014* and ACLEI's functions and responsibilities as set out in the *Law Enforcement Integrity Commissioner Act 2006* (the LEIC Act). It has been prepared for the 2018–19 financial year and covers the four year period from 1 July 2018 to 30 June 2022.



**Michael Griffin AM**  
Integrity Commissioner  
8 August 2018

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# ACLEI'S PURPOSE

ACLEI's strategic purpose—through performance of functions prescribed by the LEIC Act—is to make it more difficult for corruption in law enforcement agencies to occur or remain undetected.

The LEIC Act provides the basis for ACLEI's purpose and activities (see **Appendix A**). The agencies subject to the Integrity Commissioner's jurisdiction are:

- the Australian Criminal Intelligence Commission
- the Australian Federal Police (including Australian Capital Territory Policing)
- the Australian Transaction Reports and Analysis Centre (AUSTRAC)
- prescribed aspects of the Department of Agriculture and Water Resources (DAWR)
- the Department of Home Affairs (including the Australian Border Force), and
- any other agencies with law enforcement functions that may be added by regulation.

## ACLEI's Outcome and Program

The Portfolio Budget Statements (PBS) specify the Outcome and Program that government expects ACLEI to deliver in a given year and in forward years.

2018–19 PBS	
<b>OUTCOME</b>	Independent assurance to the Australian Government that Commonwealth law enforcement agencies and their staff act with integrity by detecting, investigating and preventing corruption
<b>PROGRAM</b>	Detect, investigate and prevent corruption in prescribed law enforcement agencies; assist law enforcement agencies to maintain and improve the integrity of staff members

The LEIC Act and PBS together establish a framework whereby the Integrity Commissioner and the relevant agency heads can prevent and deal with corrupt conduct jointly and cooperatively. Accordingly, the Integrity Commissioner—as an independent officer—aims to ensure that indications and risks of corrupt conduct in law enforcement agencies are identified and appropriately addressed, to strengthen those agencies against compromise.

# STRATEGY

ACLEI’s operational strategy is to prioritise its detection, disruption and deterrence efforts against high-impact risk themes—those areas of administration, regulatory or law enforcement activity that would be significantly undermined if corruption were to become established. This approach aligns with the LEIC Act which directs that the Integrity Commissioner must give priority to countering serious corruption and systemic corruption.

By working to detect, disrupt and deter corrupt conduct, ACLEI aims to deliver an effective and fair anti-corruption capability that:

- addresses the risk that corruption poses to the legitimate objectives of LEIC Act agencies
- holds individuals to account for their conduct (including through prosecutions), and
- adds broader value to the government integrity system.

Drawing on observations gained from its investigation and intelligence-gathering functions, ACLEI will capture and share anti-corruption insights as broadly as possible. Specifically, ACLEI will identify possible systemic vulnerabilities, and contribute to corruption detection and prevention initiatives in law enforcement agencies and, as appropriate, across government.

Since ACLEI’s operating environment involves high inherent risks, ACLEI also maintains an internal focus on ethical leadership, strong governance and active risk management.

## ACLEI’s output framework

ACLEI’s outputs and activities are described in detail at **Appendix B**.



# CAPABILITY AND DELIVERY

ACLEI's ten strategic priority groups to 2022 are intended to build and maintain an agency which makes the best use of public resources for maximum public value. A description of each priority group is at **Appendix C**.

## Capability Priorities 2018–22

1. Maintaining professional standards
2. Investing in staff
3. Building operational capabilities
4. Reinforcing technology and facilities
5. Engaging with enterprise risk

## Delivery Priorities 2018–22

6. Applying resources to highest effect
7. Addressing the detection challenge
8. Preventing corruption
9. Leading and engaging
10. Responding to government priorities

## 2018–19 activities, mapped against strategic priority groups

Integrity leadership (5, 7, 8, 9)	Place a focus on <i>Integrity Leadership</i> as a driver of culture and mitigator of risk. Continue to engage with LEIC Act agency heads—and, as appropriate, across government—to focus and align anti-corruption efforts. Encourage innovation and sharing of insights and methods between anti-corruption practitioners.
Government strategy (3, 4, 6–10)	Respond to priorities of Government, including the implementation of the Home Affairs Portfolio, the strengthening of whistle-blower protections, and continuing reviews of ACLEI's jurisdiction and resources. Contribute to external reviews and dialogues about ACLEI's role in the public sector integrity framework.
Corruption-enabled crime (6, 7, 9, 10)	Engage with relevant agencies to strengthen joint understandings of corruption methods and motivations—including in administration of biosecurity, anti-money laundering and visa arrangements—and the role of corruption as an enabler of serious crime types. Continue to partner with State-based law enforcement and integrity agencies to share criminal intelligence relating to law enforcement and border corruption.
Internal culture (1, 2, 5)	Maintain and reinforce a professional, adaptive culture across ACLEI's Canberra and Sydney locations—focussing on efficiency, accountability and delivering value. Strengthen measures of resource allocation and undertake regular case management reviews to ensure agency resources are directed effectively. Look for opportunities to automate work flow and digitise records.
Priority setting (3, 5, 6)	Integrate decision and risk tools into everyday practices that better support operational case selection and resource allocation in a more complex organisational environment. Undertake a feasibility study to improve case data management, intelligence linking and statistical reporting.
Intelligence gathering (3, 5, 6, 7, 8)	Further invest in ACLEI's ability to detect serious and systemic corruption through the enhancement of ACLEI's intelligence collection capability—including through human intelligence collection and undercover operations—as well as targeted detection projects and investigation task forces with other agencies.
Technical capabilities (2, 3, 4, 5)	Consolidate gains already made in ACLEI's key operational capabilities—namely, forensic financial analysis, law enforcement data access, and legal service delivery—to enhance operational efficiency and effectiveness, and to better manage operational risk.
Prevention (5, 7, 8, 9)	Proactively disseminate information about corruption risks and vulnerabilities to assist LEIC Act and other relevant agencies to disrupt insider threat. Work with LEIC Act agencies to continue to attune their integrity systems to a dynamic risk environment.
Relationships (3, 5, 6, 8, 9)	Explore new or strengthened relationships with counterpart agencies, and more broadly, to build capability and capacity to combat corruption-enabled crime. Assess the feasibility of establishing additional interstate taskforces or offices, where such a measure would lead to breakthroughs or otherwise improve outcomes.
Facilities (2, 3, 4, 5)	Commission a fit-for-purpose secure operations facility in Sydney.

# STRATEGIC CONTEXT

ACLEI's priorities, delivery strategy, capability development, and risk management approach have regard to the main factors likely to be encountered across the four-year term of this Plan. Expectations about prevailing conditions—in broad terms—remain largely unchanged from the 2017–18 cycle. However, improvements in ACLEI's effectiveness in uncovering hard-to-detect corruption are likely to have flow on effects, with more effort being directed to complex, high risk investigations, confiscation of assets, litigation, prosecution and corruption prevention.

## Operational environment

Australia—unenviably—remains one of the world's most profitable markets for illicit drug importations. Corruption pressures also arise from within regulated industries that may seek to circumvent legitimate controls. These factors, among others, place those agencies with law enforcement, border regulation, and anti-money laundering functions at increased risk of criminal infiltration and corrupt compromise by organised crime groups. Increasingly, these threats also bring an international dimension to ACLEI's work.

These corruption risks have high potential impacts on individuals, Australian society and the economy—including by: aiding the illicit drug, counterfeit and contraband trades; avoiding duties and taxes owed; compromising biosecurity, safety and environmental protections; facilitating money laundering and terrorism financing; contributing to identity theft and fraud; and enabling people smuggling, sexual servitude and violent crime.

A broad focus on countering corruption and averting its harms—rather than a narrower focus on investigating and prosecuting criminal offences—provides opportunities for ACLEI to disrupt entire corrupt networks, capture both the corrupted and the corruptors and, most importantly, to harden law enforcement agencies against compromise.

The Integrity Commissioner's leadership in this area will become increasingly important as ACLEI's jurisdictional agencies evolve their systems to cope with changes in risk .

## Organisational environment

ACLEI's management strategies (including taskforce and joint investigation models) are designed to respond flexibly to enable rapid shifts in priority. However, many aspects of ACLEI's work require highly-specialised staff, whose skill sets are rare or in high demand, and which can be difficult to replace or scale-up at short notice.

In response to these factors, ACLEI must continue to develop partnerships and internal capabilities to enable it to have a positive effect on the corruption risk environment. Identifying new technologies, shaping ACLEI's workforce and skills base, sharing resources and capabilities across agencies, capitalising on goodwill in industry and other areas of government, and forging new connections outside the public sector will all form part of this approach.

Approximately one quarter of ACLEI's staff are now located in Sydney, with the remainder based in Canberra. This geographical arrangement diversifies ACLEI's access to skilled-employment markets, as well as increasing the opportunities to partner with State agencies. In the longer term—subject to resourcing—expanding into other locations may be a valuable means of further managing recruitment risk (as well as assisting ACLEI to deal more efficiently with its national investigation footprint).

To manage ACLEI's already dynamic and complex workload—as well as the productivity, integrity and business continuity factors associated with a small, specialised workforce—a continuing priority is to keep a focus on internal governance (including personnel safety and operational security). Introducing a range of metrics to track workflow, productivity, and efficiency will be a priority as ACLEI's workload and operating locations diversify.



## Stakeholder environment

“Delivery risk”—if ACLEI were perceived to fail to meet the expectations of government or the public—is a realistic concern of any public sector entity. The effectiveness, methods, role, independence, resource levels, profile and reputation of anti-corruption commissions in Australia will continue as topics of a continuing conversation about integrity and accountability systems in Australia (whether in the private or public sector). This dynamic can be expected to inform the way ACLEI performs its functions in the future, as well as shape its policy context.

For more than eleven years, ACLEI has worked closely with the agencies in the LEIC Act jurisdiction—for instance, by sharing resources and information to counter corruption risk. In more recent years, joining with a broader range of agencies in investigations and taskforces has provided even more contextual information and options to ensure that serious and systemic issues are investigated using the most appropriate combination of powers, jurisdiction and law enforcement methods. These partners—at Commonwealth, State and Territory levels, and internationally—include integrity, prosecution, law enforcement and related government agencies.

However, in other instances—such as when an even higher level of assurance or confidentiality is required—it has been important for ACLEI to investigate matters entirely independent of other agencies. However, as a small agency, such investigations can divert resources disproportionately (since ACLEI must deal with every aspect itself).

Accordingly, the ACLEI Internal Governance Board and Executive Directors will continue to assist the Integrity Commissioner to make the best use of resources—including any specialist and supplementary resources provided by other agencies under joint arrangements—and to manage the risks noted above. The Integrity Commissioner will also continue to monitor the appropriateness of ACLEI’s structure and arrangements, to deal with a changing case profile characterised by volume, complexity, seriousness, and impact.

## Resources

A number of measures affecting ACLEI’s resources and priorities are likely during the term of this Plan, including:

- the continuing work of a joint anti-corruption taskforce to counter Visa Fraud
- consideration by Government of recommendations by various Parliamentary Committees to modify ACLEI’s jurisdiction or functions (including adding further aspects of DAWR to jurisdiction)
- ACLEI’s resources (relating to the inclusion of AUSTRAC, CrimTrac, and prescribed aspects of DAWR in ACLEI’s jurisdiction in 2013–14) are expected to be reviewed in 2018, prior to nominal expiry of the measure at the end of 2018–19
- developing Australia’s Second Open Government Partnership National Action Plan (to commence in 2019) which will involve an assessment of ACLEI’s jurisdiction and capabilities (see Commitment 4.2 of the OGP National Action Plan 2016–18).

ACLEI’s systems of internal governance track financial sustainability risks—including the prospect that some resources may diminish or terminate—and align levels of recruitment (and expenditure strategy) to control this risk. Resourcing measures are dealt with by Government in the context of the Federal Budget process.

# RISK MANAGEMENT

As with other Australian Government entities, ACLEI's corporate risks include governance failure, financial mismanagement, workplace health and safety, business continuity and fraud. In addition, ACLEI faces particular risks which arise from its role of investigating corrupt conduct in law enforcement agencies.

Since effective controls must be in place across the whole range of risks, ACLEI's system of risk management aims to scrutinise and strengthen agency compliance and performance with regard to high-harm risks—for example, appropriate and lawful use of powers, security of information, proper handling of evidence, and operational safety. These controls also focus on maintaining ACLEI's integrity (including by protecting ACLEI against possible compromise or infiltration).

Internal governance arrangements, financial delegations and authorisations, Accountable Authority Instructions and internal audits assist ACLEI to manage financial risks and comply with the finance law.

## ACLEI's top ten enterprise risks at August 2018

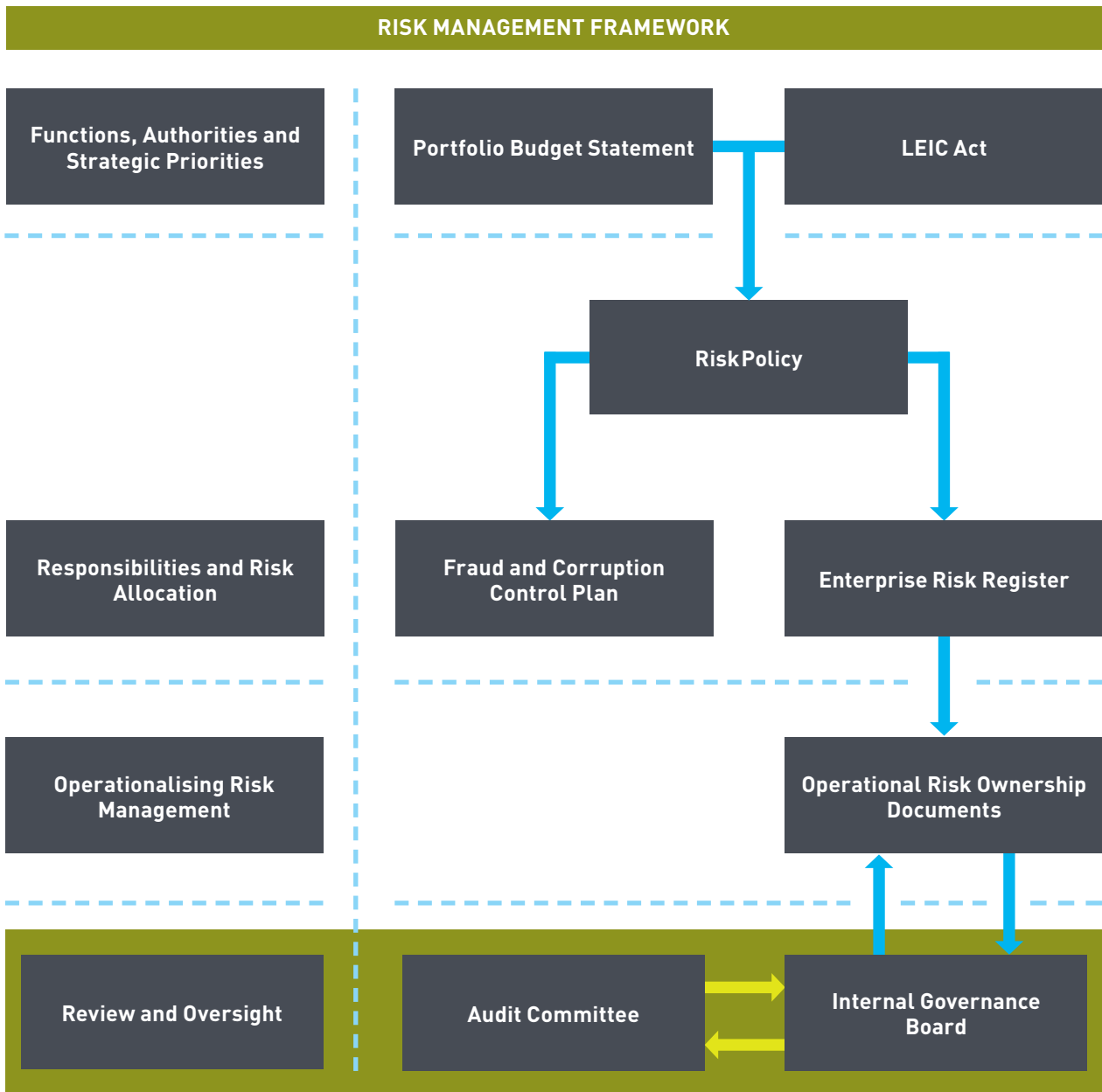
- **Safety and security**  
Threat or injury to staff members, witnesses or ACLEI operations
- **Information security**  
Leaks or inadvertent disclosures, compromise to information and evidence
- **Security compromise**  
Engaging staff with potential security risk; failure to identify insider threat
- **Risk culture**  
Declaring and managing staff conflicts of interest; failure to escalate agency risks; grey area judgement
- **Bullying and harassment**  
Intimidating or behaving inappropriately to a colleague or other person
- **Data integrity/availability**  
Compromise or destruction of data or systems; temporary business interruptions
- **Interagency relationships**  
Breakdown or diminishing quality; threat to integrity partnerships, cooperation and intelligence transfer
- **Capability—detection**  
Failure to develop LEIC Act agency capabilities; missed opportunities to detect corruption
- **Capability—skills and resources**  
Not having the skills and resources needed to perform functions
- **Capability—delivery and effectiveness**  
Legislative non-compliance; poor case prioritisation or management; compromise to investigations outcomes and quality

Responses to these risks are reflected in ACLEI's strategic priorities and performance measures.

ACLEI's *Enterprise Risk Management Policy and Framework* aims for a structured and consistent approach to identifying, analysing and mitigating risk. This approach is informed by the annual Comcover Risk Management Benchmarking Program, which provides an objective view of ACLEI's risk maturity against agencies with similar profiles.

Operational and strategic risks are managed through ownership plans which are reviewed regularly. ACLEI's Executive receives monthly status reports on individual risks. Additionally, the Audit Committee provides advice to the Integrity Commissioner about ACLEI's risk control framework, governance, compliance and financial accountability.

# ACLEI's enterprise risk management framework



# MEASURING PERFORMANCE

## Performance framework

The LEIC Act prescribes how the Integrity Commissioner must report against his or her functions.

In addition, the 2018–19 Portfolio Budget Statements (at pages 62 and 63) set out five key performance indicators which track how ACLEI is progressing toward meeting its outcome.

## ACLEI's performance story



### KPI CONTRIBUTION

- 1 The corruption notification and referral system is effective.
- 2 ACLEI's investigations are conducted professionally and efficiently, and add value to the law enforcement integrity system.
- 3 ACLEI monitors corruption investigations conducted by law enforcement agencies.
- 4 ACLEI insights contribute to accountability and anti-corruption policy development.
- 5 ACLEI's governance and risk management controls are effective and take account of its operational role.

Each year, these key performance indicators—using the qualitative and quantitative measures listed at **Appendix D**—tell the story of system improvement and milestone events, and demonstrate progress towards ACLEI's outcomes.

The Integrity Commissioner must also provide evidence that the PGPA Act obligation has been met: to govern ACLEI in a way which promotes the 'proper'—that is, the efficient, effective, economical and ethical—use and management of public resources (Section 8, PGPA Act). Accordingly, ACLEI seeks to establish the link between the resources provided and the results delivered by asking the following questions.

- What did we do?
- How much of it did we do?
- How much did it cost?
- How well did we do it?
- Who was better off—how was the system improved?
- How did it contribute to our purpose?
- Did we go about it the 'right' way—professionally, accountably, honestly and respectfully?
- How can we use the results—to improve ACLEI's approach, or inform future strategies, including resource allocation?

## Reviewing performance

Data is collected throughout the financial year and recorded in the Integrity Commissioner's Annual Report and Performance Statements, which are public documents.

The Parliamentary Joint Committee on ACLEI also reviews the performance of the Integrity Commissioner's functions and reports to both Houses of the Parliament. The Committee's examination each year of the Integrity Commissioner's Annual Report provides a valuable external view to inform ACLEI's work.

# APPENDICES

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## APPENDIX A ACLEI's role under the LEIC Act

The office of the Integrity Commissioner, and ACLEI, are established by the *Law Enforcement Integrity Commissioner Act 2006*. The Integrity Commissioner's functions under the LEIC Act are to detect, investigate and prevent corrupt conduct in law enforcement agencies within his or her jurisdiction.

The objects of the LEIC Act (at section 3) are:

- a) to facilitate:
  - i. the detection of corrupt conduct in law enforcement agencies; and
  - ii. the investigation of corruption issues that relate to law enforcement agencies; and
- b) to enable criminal offences to be prosecuted, and civil penalty proceedings to be brought, following those investigations; and
- c) to prevent corrupt conduct in law enforcement agencies; and
- d) to maintain and improve the integrity of staff members of law enforcement agencies.

To achieve those objects, the LEIC Act charges the Integrity Commissioner with duties and obligations and provides a range of law enforcement and coercive powers.

ACLEI's function is to support the Integrity Commissioner to provide independent assurance to government about the integrity of prescribed law enforcement agencies and their staff.

# APPENDIX B

## ACLEI's activities

### Program outputs

The following program outputs and activities summarise ACLEI's contribution and impact, namely to: *detect* indications of corrupt conduct and corruption vulnerabilities, *disrupt* corrupt conduct through investigations and mitigating corruption risk, and *deter* corrupt conduct by strengthening anti-corruption arrangements.

#### Detect

- **Instances of possible corrupt conduct are identified**
- **Vulnerabilities and corruption risks are identified**
  - The LEIC Act provides that law enforcement agency heads must notify the Integrity Commissioner of any information or allegation about possible corrupt conduct in their agencies.
  - Other people, including the Minister, other government agencies, members of the public or staff members of agencies in jurisdiction may also refer matters to the Integrity Commissioner.
  - ACLEI works with the LEIC Act agencies and other partners to bring together and analyse information about the factors that may allow or indicate corrupt conduct, and to target areas at risk.

#### Disrupt

- **Instances of possible corrupt conduct are addressed**
- **Information is given to partner agencies to mitigate corruption risk and vulnerabilities**
  - The Integrity Commissioner determines independently how each notification and referral should be dealt with and may initiate an investigation on his or her own initiative.
  - The Integrity Commissioner has the authority to investigate a corruption issue independently or jointly, to refer issues back to the agency—or to another agency—for investigation, or to decide that investigation is not warranted in the circumstances.
  - The Integrity Commissioner brings forward evidence for prosecution or disciplinary action, and disseminates information to address or prevent corrupt conduct in law enforcement agencies.

#### Deter

- **Insights about corruption risk contribute to strengthening anti-corruption frameworks**
  - The Integrity Commissioner may make recommendations for improvements to laws of the Commonwealth or the administrative practices of law enforcement agencies.
  - Drawing on lessons learned from investigations, ACLEI captures and shares anti-corruption insights as broadly as possible.
  - ACLEI contributes to agency corruption detection and prevention initiatives, to address possible systemic vulnerabilities.

### Enabler outputs

The Integrity Commissioner is the Accountable Authority for ACLEI under the PGPA Act and is required to govern ACLEI in a way which promotes the proper use and management of public resources, the achievement of ACLEI's purposes and its financial sustainability. The following enabler outputs ensure that ACLEI's governance, financial and management arrangements support the Integrity Commissioner to meet his or her statutory obligations.

## Capable and Strategic

- **Operational resources are matched to the task and targeted for maximum public value**
- **Cooperative arrangements with other agencies make effective use of resources and specialist skills**
  - ACLEI places emphasis on ensuring it has the skills, powers and technical capabilities required to investigate corruption in law enforcement.
  - The Integrity Commissioner has the ability to agree with agency heads what types of issues may be significant in the context of each agency's risk environment.
  - The Internal Governance Board manages resources and directs ACLEI's efforts towards high-impact risks, where there would be the greatest strategic benefit.
  - Joint initiatives are an important part of the ACLEI business model. For example, ACLEI may enter into joint investigations to ensure the most appropriate combination of skills, knowledge and resources is applied to each issue.

## Well-governed and Efficient

- **Governance and risk management arrangements take account of ACLEI's operational role**
- **Staff maintain high professional standards**
- **Financial and management controls ensure the proper use of resources**
  - Particular governance risks arise from ACLEI's role of investigating corrupt conduct in law enforcement agencies. The harm which would be caused by fraud or corruption within ACLEI could be direct and long lasting, affecting ACLEI's relationships, investigations, and its ability to perform its functions.
  - ACLEI places emphasis on developing and meeting sound integrity protocols and governance arrangements, which are overseen by its Internal Governance Board and Audit Committee.
  - Robust financial and management controls ensure that ACLEI's resources are directed to the achievement of its legitimate objectives.

## Lawful and Fair

- **Legislative obligations for use of powers are met**
- **Powers are used ethically and proportionately**
- **Sensitive and personal information is managed securely and respectfully**
  - Various laws hold the Integrity Commissioner accountable for the proper use of a range of investigation powers—for example, coercive hearings, telecommunications interception, technical surveillance, controlled operations and integrity testing.
  - Any proposal to use powers under the LEIC Act is subject to review by the General Counsel, an Executive Director or the Integrity Commissioner. Each approval is accompanied by a record of the reasons for the decision.
  - Mechanisms are in place to ensure ACLEI handles information accountably, securely and respectfully.

# APPENDIX C

## Strategic priority groups 2018–22

### Capability Priorities

#### 1. Maintaining professional standards

While ACLEI's role is focused on ensuring the integrity of other agencies, its staff can only discharge their duties properly if ACLEI has clear and effective internal governance and a strong culture of personal and organisational integrity. For this reason, ACLEI will continue to place emphasis on the maintenance and further strengthening of ACLEI's professional standards to match its high-risk environment.

#### 2. Investing in staff

ACLEI will continue to develop and build its workforce capability by recruiting or seconding appropriately skilled and experienced staff and investing in professional development and sharing of corporate knowledge.

#### 3. Building operational capabilities

ACLEI continually reviews its operational capabilities to respond to changes in its operating environment and to ensure they are matched to emerging criminal methods, such as money-laundering. ACLEI maintains a multi-disciplinary and flexible workforce with core skills in investigation management, intelligence collection and analysis, technical surveillance, forensic financial analysis and legal counsel. Other disciplines—among them, physical and electronic surveillance—are presently obtained through cooperative arrangements with other agencies.

#### 4. Reinforcing technology and facilities

As with all law enforcement agencies, technological capability is a key component in developing intelligence, conducting investigations and managing operational risk. ACLEI will continue to review its facilities and technological capability—both in Canberra and Sydney—to match its operational model.

#### 5. Engaging with enterprise risk

Changes in ACLEI's operational environment can be expected to increase its risk exposure during the term of this Plan. Each of ACLEI's enterprise risks carries associated implications for ACLEI's standing within government, its cooperative relationship with law enforcement and its reputation for integrity, competence and trustworthiness. ACLEI will monitor and manage these risks as part of its routine business practice.



## Delivery Priorities

### 6. Applying resources to highest effect

ACLEI will decide independently which investigation options are most likely to yield the highest strategic contribution to maintaining and improving integrity in law enforcement agencies. Management of resources will be overseen by the Internal Governance Board.

### 7. Addressing the detection challenge

ACLEI will address the constant challenge of detecting corruption in LEIC Act agencies by partnering with them—in particular, the Australian Criminal Intelligence Commission—to assess patterns and trends and identify indicators of corrupt conduct. ACLEI will also help to drive agency-based detection initiatives such as data analytics, drug testing and organisational suitability assessments. A program of vulnerabilities assessments and intelligence gathering will complement this strategy.

### 8. Preventing corruption

ACLEI will capture and promulgate corruption prevention insights as broadly as possible by identifying current and emerging threats and by understanding and tackling corruption risk. To achieve this aim, ACLEI will: develop expertise through bringing together knowledge from investigations, other government experience, the private sector and academia; work with partner agencies to influence the policy and legislative environment to strengthen corruption resistance; and develop practical tools and products to strengthen jurisdiction agencies' corruption prevention expertise and capabilities.

### 9. Leading and engaging

ACLEI will engage with other Australian Government, State and Territory agencies with public sector integrity responsibilities to ensure that policy settings and legislative arrangements remain responsive to the challenges of building resistance to corruption. Joint arrangements with operational partners will target the most important and pressing threats to law enforcement integrity, including from organised crime and at the border.

ACLEI will also pursue its involvement with anti-corruption agencies in Australia's region to share and receive knowledge about fighting corruption. ACLEI also intends to engage closely with LEIC Act agency Executives and Audit Committees, to emphasise integrity leadership.

### 10. Responding to government priorities

Within the parameters of its functions under the LEIC Act, ACLEI will respond to government priorities as indicated from time to time by the Minister.

# APPENDIX D

## Performance measures and indicators

### 1. The corruption notification and referral system is effective

#### How does this measure contribute to ACLEI's outcome?

If law enforcement agencies have sound anti-corruption and detection arrangements in place, public confidence can be maintained. The preparedness of LEIC Act agencies to notify corruption issues to the Integrity Commissioner—and to share other information concerning corruption risks and indicators—indicates healthy and positive agency cultures that resist corruption. Timely information about corruption risks also allows ACLEI's efforts to focus on investigations for which the Integrity Commissioner's independence or powers under the LEIC Act would be of greatest use.

Diversity in the sources of information also demonstrates confidence that there will be an appropriate response to information or concerns about integrity.

Effective prioritisation of notifications and referrals by ACLEI ensures urgent matters are dealt with promptly, directs ACLEI's resources to the most serious and systemic issues and is a further basis for confidence in the integrity system.

#### ACLEI knows it is meeting this measure when:

- 1.1 Law enforcement agencies notify ACLEI of corruption issues and related information in a timely way
- 1.2 Other agencies or individuals provide information about corruption issues, risks and vulnerabilities to ACLEI
- 1.3 Partner agencies indicate confidence in sharing information or intelligence with ACLEI
- 1.4 ACLEI prioritises credible information about serious or systemic corruption
- 1.5 ACLEI supports awareness-raising activities in agencies within the Integrity Commissioner's jurisdiction, including by participating in joint initiatives

#### What methods will ACLEI use to demonstrate it meets this measure?

- Interpreting trends in notifications and referrals; exception reporting if warranted
- Providing evidence of cooperative information-sharing arrangements with other agencies
- Describing how prioritisation of corruption issues was aligned with the Integrity Commissioner's assessment guidelines
- Reporting timeliness of assessments in the reporting period against a benchmark of 75% completed within 90 days of receipt
- Reporting on the number and type of awareness-raising activities and joint initiatives undertaken, and any feedback received
- Describing how business processes have been reviewed or improved during the reporting year to improve efficiency and effectiveness
- Through peer review, understanding the extent to which ACLEI is effective as a capable, trustworthy strategic partner

## 2. ACLEI's investigations are conducted professionally and efficiently, and add value to the law enforcement integrity system

### How does this measure contribute to ACLEI's outcome?

Fair practices, objective decision-making and high quality products contribute to ACLEI's effectiveness, reputation and the impact it can have on strengthening law enforcement integrity. As a result, ACLEI's investigations aim to be well managed, solutions-oriented and constructive. Careful management and evaluation of investigations ensures that resources are directed appropriately and efficiently. Maintaining an awareness of other agencies' operational risks is also an important part of ACLEI's decision-making model.

### ACLEI knows it is meeting this measure when:

- 2.1 Each investigation considers corruption risk and the broader impact on law enforcement outcomes
- 2.2 Operational resources are actively managed and targeted for maximum effect
- 2.3 Risks relating to the operating context of law enforcement agencies are taken into account and, in appropriate circumstances, mitigation strategies are agreed with the agency concerned

### What methods will ACLEI use to demonstrate it meets this measure?

- Reporting observations made in investigation reports and by other means
- Describing how investigations were aligned to the Integrity Commissioner's strategic focus
- Reporting the number of investigations commenced, concluded or reconsidered in the reporting period, assessed against workload, priorities and resources
- Monitoring the age and number of corruption issues carried forward each reporting period
- Assessing ACLEI's process for assigning operational resources during the reporting period
- Describing how operational risk to agencies was managed
- Peer review will test perceptions about how law enforcement agency business risks and challenges are reflected in ACLEI's decisions

## 3. ACLEI monitors corruption investigations conducted by law enforcement agencies

### How does this measure contribute to ACLEI's outcome?

Under the LEIC Act, the Integrity Commissioner may refer corruption issues for internal investigation, or investigation by another agency. ACLEI's scrutiny of the resulting investigation reports provides assurance that LEIC Act agencies exercise appropriate responsibility for the integrity of their own staff members and for the management of corruption risk.

### ACLEI knows it is meeting this measure when:

- 3.1 All agency corruption investigation reports provided to ACLEI for review are assessed for intelligence value and completeness
- 3.2 ACLEI liaises regularly with the agencies' professional standards units about the progress of agency investigations

## What methods will ACLEI use to demonstrate it meets this measure?

- Reporting trends in the number of agency reports received and reviewed annually
- Noting any agency investigations that ACLEI agreed should be discontinued
- Describing any actions or concerns raised as a result of reviews
- Demonstrating awareness of the status of agency investigations
- Describing and assessing the success of liaison and monitoring arrangements

## 4. ACLEI insights contribute to accountability and anti-corruption policy development

### How does this measure contribute to ACLEI's outcome?

Government policy settings influence the corruption deterrence environment, and may affect the threat environment—for instance, new corruption risks or opportunities can arise when new law enforcement methods or powers are introduced. Accordingly, a function of the Integrity Commissioner under the LEIC Act is to advise the Australian Government and the Parliament about patterns and trends in corruption risks in law enforcement, and to recommend any changes to law and policy or to agency practices and procedures that may be desirable.

ACLEI draws insights from investigations to inform corruption prevention advice to LEIC Act agencies and more broadly. In these ways, ACLEI adds value to the agencies' own efforts to manage corruption risks and protect integrity.

### ACLEI knows it is meeting this measure when:

- 4.1** When warranted, the Integrity Commissioner makes recommendations for improvement in corruption prevention or detection measures
- 4.2** Submissions that relate to corruption prevention or enhancing integrity arrangements are made to government or in other relevant forums
- 4.3** Targeted presentations about integrity are made to diverse audiences
- 4.4** The Integrity Commissioner's Annual Report or other publications contain analysis of patterns and trends in law enforcement corruption

## What methods will ACLEI use to demonstrate it meets this measure?

- Describing how the Integrity Commissioner's activities (such as observations, recommendations, patterns and trends analyses, or policy contributions) were targeted to minimising corruption risk and aligned to ACLEI's outcome
- Reporting on citations or the take-up of recommendations in policy
- Reporting the number and type of presentations made during the reporting period
- Publishing analysis of patterns and trends relating to law enforcement corruption
- Peer review will collect information about the impact of ACLEI's policy contributions and recommendations

## 5. ACLEI's governance and risk management controls are effective and take account of its operational role

### How does this measure contribute to ACLEI's outcome?

Effective governance arrangements, high standards of performance and ethical practice, and sound risk management provide the basis and evidence for confidence in ACLEI.

A variety of safeguards ensure that the significant powers used in investigations and information-gathering are used lawfully, fairly and appropriately. Some of these measures take the form of external checks, while others are administered by the Integrity Commissioner as head of ACLEI.

### ACLEI knows it is meeting this measure when:

**5.1** Systems are in place to ensure ACLEI officers act ethically, comply with legislative requirements and adhere to standards set by the Integrity Commissioner

**5.2** Regular reviews and audits indicate effective governance, risk management and integrity

### What methods will ACLEI use to demonstrate it meets this measure?

- Reporting how standards set by the Integrity Commissioner were maintained in the reporting period
- Describing control systems to maintain compliance and ethical standards, and reporting any breaches
- Reporting on complaints about ACLEI, including how they were handled
- Reporting on compliance with legislative requirements and external inspections, including any breaches
- Reporting the number, type and outcomes of reviews and audits during the reporting period, including any action taken
- Describing how ACLEI has reviewed or strengthened its control and governance processes during the reporting period

# APPENDIX E

## Compliance index

### PGPA requirements for Corporate Plans

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