

# CORRUPTION PREVENTION CONCEPTS: GROOMING



Australian Government  
Australian Commission for  
Law Enforcement Integrity

The application of manipulation and grooming methodologies within the public service and law enforcement environment is an emerging risk.

These techniques have been observed previously within the Corrections environment, and the Australian Commission for Law Enforcement Integrity (ACLEI) has observed similar grooming methodology during recent investigations into serious and systemic law enforcement corruption.

This factsheet shares key risk areas ACLEI has observed during its recent investigations, as well as broader patterns and trends observed in similar environments both here and overseas.

## Criminal Compromise

ACLEI investigations continue to uncover the deliberate targeting of employees, particularly through the exploitation of existing relationship with criminal entities.

Relationships with organised crime have the potential to compromise law enforcement integrity and support criminal activity through the disclosure of classified information.

What you need to know:

### High risk area — police-informant relationship:

Grooming by criminal entities can be enabled by junior or inexperienced officers with a lack of proper training.<sup>1</sup> This risk can be further amplified if comprehensive and intrusive supervision and auditing are not appropriately adopted. The realisation of this risk could potentially mean that handlers do not have the capability to manage experienced criminals as informants — instead they may become managed and manipulated by the criminals.<sup>2</sup>

To reduce corruption vulnerability, human source handling should be managed with adequate safeguards, such as intrusive oversight and a requirement for all sources to be formally registered with law enforcement.

### High risk area — existing relationships

Criminal entities will look for access to law enforcement through intimate relationships, family connections, or cultural and social links. Long-term relationships may represent significant corruption vulnerability.<sup>3</sup> Organised crime will attempt to compromise a law enforcement employee's loyalty to their employer by exploiting their relationship and creating a conflict of interest.<sup>4</sup>

### High risk area — risk taking behaviour

Risk taking behaviour by law enforcement employees can expose them to compromise. While not constituting corrupt conduct in its own right, the use of illicit substances by law enforcement employees creates a fundamental conflict with a sworn duty to uphold the law.<sup>5</sup> Access to illicit substances necessarily involves contact with drug suppliers and creates opportunities for compromise and coercion.<sup>6</sup>



Existing relationships with organised crime represent a particular risk in regional areas. Smaller pools of social connectivity mean there is a greater likelihood of organised crime members having a shared social history with law enforcement employees.

<sup>1</sup> Chisholm, D. & Morley, J. (2004). Police corruption and organised crime. *Royal Canadian Mounted Police Gazette*, 66(2), pp 29-30

<sup>2</sup> Crous, C. (2009). Human intelligence sources: Challenges in policy development. *Security Challenges*, 5(3), pp 117-127

<sup>3</sup> Strategic Centre for Organised Crime (2015). *Individuals at risk of being drawn in serious and organised crime*. Available [here](#).

<sup>4</sup> Davids, C. (2008). *Conflict of interest in policing: problems, practices and principles*. Institute of Criminology Press: Sydney.

<sup>5</sup> NSW Police Integrity Commission. (1999). *Operation Saigon: Royal Commission into the NSW Police Service*, Final Report Volume II: Reform.

<sup>6</sup> Chisholm & Morley. (2004).

## High risk area — social media

Information shared through social media platforms can provide a large amount of personal, sensitive information that may provide vulnerabilities for organised crime to exploit.<sup>7</sup> ACLEI investigators have observed targeting of law enforcement employees through social media and shared social interests.

## High risk area — non-operational staff

Non-operational employees may be just as vulnerable to grooming and other improper approaches by criminal entities. Non-operational staff may have similar or higher levels of access to sensitive information than their operational colleagues, and they may be less aware and able to respond to organised crimes methodology.

The cultivation of public servants with access to sensitive policy information or personal data and identity documents also represent an attractive target for organised crime.<sup>8</sup>

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## Business entities

Law enforcement agencies working in a regulatory environment, particularly at the border, can be vulnerable to approaches by legitimate business entities seeking illegitimate access to information or preferential treatment.

What you need to know:

### High risk area — gifts and hospitality

Law enforcement employees should never expect to receive additional benefits for doing what they are paid to do.<sup>9</sup> However, some business entities or individuals may seek to build loyalty and favour through the provision of gifts and hospitality.<sup>10</sup>

Employees must remain impartial, and any potential, actual or perceived conflicts of interest (such as accepting gifts or hospitality) should be managed appropriately. Poor guidelines and procedures — or the poor application of good guidelines and procedures — facilitate misconduct and corruption, even with those employees who may not otherwise be so inclined. The establishment of a culture of entitlement can expose an agency to corruption and misconduct vulnerability.<sup>11</sup>



### High risk area — the media

The media has an important role to play in exposing corruption. It represents the public interest and holds institutions to account. Law enforcement agencies in Australia expect that professional interactions between media representatives and law enforcement employees are managed via dedicated media teams, or in accordance with established agency media policies.

Informal associations or relationships with people working in the media are expected by all agencies to be reported as declarable associations. This helps manage both agency and individual risk.

<sup>7</sup> Rowe, E., Akman, T., Smith, R. & Tomison, A. (2013). *Organised crime and public sector corruption: A crime scripts analysis of tactical displacement risks*. Australian Institute of Criminology. Available [here](#).

<sup>8</sup> Rowe et al. (2013); Independent Broad-based Anti-corruption Commission. (2015). *Organised crime group cultivation of public sector employees*. Available [here](#); Victorian Law Reform Commission. (2016). *Use of regulatory regimes in preventing the infiltration of organised crime into lawful occupations and industries*. Available [here](#).

<sup>9</sup> Ombudsman NSW. (2012). *Gifts and Benefits*. Available [here](#); Audit Office of NSW. (2013). *Managing gifts and benefits*. Available [here](#).

<sup>10</sup> Victorian Public Service Commission. (2017). *Gifts, benefits and hospitality policy framework*. Available [here](#).

<sup>11</sup> Corruption and Crime Commission. (2011). Report on the investigation of alleged public sector misconduct in relation to the purchase of toner cartridges in exchange for gifts outside government procurement policies and arrangements. Available [here](#).

## Reach back

ACLEI has observed the unique culture of law enforcement creating vulnerability through the 'reach back' of former law enforcement employees. Reach back occurs when former law enforcement employees seek out serving employees to provide favours, access, or information.

What you need to know:

### High risk area — police culture

Law enforcement culture, particularly policing culture, has adapted as a result of the expectations of the role — unsociable hours and shift work, occupational hazards and violence, high officer discretion, and isolation from the general public.<sup>12</sup>

The early years of employment are a particularly vulnerable time, as a new officer is learning the realities of 'how we do things', which can be markedly different to what they were taught in a training environment. Relationships with experienced officers are crucial, and situations can arise where mistakes or indiscretions by junior officers are 'smoothed over' by their more experienced counterparts.<sup>13</sup> This can create a culture of favours or 'debt' repayment.

The nature of law enforcement work can create an intense group loyalty, which can be maintained even in the face of corruption by colleagues and at the expense of the expectations of the agency.<sup>14</sup> This loyalty can extend even after officers leave law enforcement employment, allowing them inappropriate access to information or law enforcement decision-making.

### High risk area — private investigations

The relationship between former law enforcement officers and the private investigations industry creates a potential vulnerability that sensitive information may be improperly disclosed to private investigators. This risk is also heightened where Australian law enforcement agencies enforce a mandatory retirement age<sup>15</sup> and experienced officers may elect to continue their careers in the private investigations industry.

Former law enforcement officer working in the private investigations industry could use their personal networks and relationships to 'reach back' into their former colleagues, who may feel pressured to provide information due to misplaced loyalty, or the repayment of a debt or favour.

### High risk area — security industry

Law enforcement officers undertaking secondary employment (moonlighting), or pursuing a second career, in the security industry also creates a potential integrity vulnerability. Security consultancy and businesses supplying security contractors are also popular as post-law enforcement employment. Former law enforcement officers may seek to access training materials or law enforcement methodology, or approach trusted former colleagues to undertake secondary employment.

Law enforcement agencies generally don't support secondary employment for their officers in regulated industries, because of the conflict it creates with their primary employment and the risk of contact with individuals who may seek to gain access to law enforcement information.



The UK Institute of Professional investigators estimate that 60-65% of private investigators in the UK are former police officers.<sup>16</sup> Figures in Australia are likely to be similar, with many private investigations agencies actively promoting the former police experience of their employees.

<sup>16</sup>Parliament UK. [2012]. *Private Investigators — Home Affairs Committee*. Available here.

ACLEI investigation — an Australian Federal Police officer admitted to sourcing internal AFP training manuals at the request of a former colleague, who intended to use AFP methodology to train overseas security officers.

<sup>12</sup> Prenzler, T. (1997). Is there a police culture? *Australian Journal of Public Administration* 56(4):47-56; McCafferty, F., Souryal, S. & McCafferty, M. (1998). The corruption process of a law enforcement officer: A paradigm of occupational stress and deviancy. *Journal of the American Academy of Psychiatry and the Law*, 26(3), pp 433 – 458; White, V. & Robinson, S. (2014). Leading change in policing: Police culture and the psychological contract. *The Police Journal*, 87(4), pp 258 – 269; Workman-Stark, A. (2017). *Inclusive policing from the inside out*. Springer International Publishing.

<sup>13</sup> McCafferty et al. (1998).

<sup>14</sup> McCafferty et al. (1998); Coady, T. (2000). *Violence and Police Culture*. Melbourne University Publishers: Melbourne; Lawson, C. (2011). *The ideal cop in 2011* – Association for Women in Psychology Conference; White & Robinson. (2014); Workman-Stark. (2017).

<sup>15</sup> For example, the Queensland Police Service enforces a mandatory retirement age of 60.

## What should you do?

### For managers:

- Consider questions to ask yourself and your staff. How will you know?
- You operate in an environment with unique risks. Understanding what these are will assist you to manage vulnerability.
- Know your staff — foster an environment where your team are empowered to ask questions, seek advice, and raise concerns — they are best placed to know if something is going on with a colleague.

### For employees:

- You need to understand the value of the information and access you hold.
- Be aware rather than beware — you may find yourself in a situation where someone is seeking to gain your confidence for improper reasons.
- Flex your decision making muscles — mentally practice how you will respond to improper approaches. Develop 'muscle memory' for ethical decision making.
- Don't self-manage risk — if someone does approach you, or seek to groom you for information, act early and report it.

### Further information

- ACLEI case study: [allegation a law enforcement officer released classified information.](#)

