



Australian Government

Australian Commission for
Law Enforcement Integrity

Corporate Plan

2020–24

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Acknowledgement of Country

The Australian Commission for Law Enforcement Integrity acknowledges the Traditional Owners of the land on which we live and work. We pay our respects to Elders past and present, and extend our respects to all Aboriginal and Torres Strait Islander people.

Integrity Commissioner's foreword

As the accountable authority for the Australian Commission for Law Enforcement Integrity (ACLEI), I am pleased to present ACLEI's Corporate Plan 2020-24, covering the four financial years from 2020-21 to 2023-24, as required under paragraph 35(1) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

Established under the *Law Enforcement Integrity Commission Act 2006* (LEIC Act), ACLEI performs an important oversight role in relation to the integrity of Australian Government law enforcement agencies. We undertake this role in four main ways:

- We receive and assess notifications and referrals of alleged corrupt conduct by members of Australian Government law enforcement agencies.
- We conduct investigations into serious and systemic corrupt conduct.
- We support our partner law enforcement agencies to conduct their own investigations.
- We prevent corruption through engagement, support and identification of vulnerabilities.

While we perform an oversight role in relation to Australian Government law enforcement agencies, we also work in partnership with those agencies to maintain a strong integrity system. This partnership is well established within the LEIC Act, which mandates that I concentrate on serious and systemic corruption issues, while providing support to law enforcement agencies in relation to the corruption investigations that they undertake. The Act also provides a feedback mechanism by which law enforcement agencies provide me with reports of their investigations once completed.

In undertaking our oversight role, my goal is to ensure that corruption issues are investigated appropriately and in a timely manner and that any lessons or vulnerabilities that are identified from an investigation are shared.

In early 2020, in response to the COVID-19 pandemic, we made adjustments to our working arrangements to enable us to continue our essential work. We will continue to be flexible throughout this pandemic to keep our staff safe, while continuing our work. The flexibility that we have learnt during this time will serve us well over the life of this plan as we continue to refine our internal processes and systems to ensure that we are quickly identifying how matters should be dealt with and that investigations are conducted in a timely manner, whether they are ACLEI investigations or partner agency investigations.

We have commenced work on updating our performance framework to ensure that it supports our management of ACLEI's resources, particularly our ability to ensure that we are focused on investigating serious and systemic corrupt conduct – consistent with the requirements of the LEIC Act – and that we are delivering outcomes in a timely way. While some new performance measures are included in this year's corporate plan, further work will be undertaken in 2020-21 to ensure that our performance framework is fit for purpose and supports us to measure and assess our performance.

I look forward to meeting the challenges and building on our achievements in 2020-21, through the dedication and expertise of ACLEI staff.



Jaala Hinchcliffe
Integrity Commissioner
22 July 2020

Overview

Our purpose

Our purpose is to make it more difficult for corruption to occur or remain undetected in the Australian Government law enforcement agencies which we oversee.

Our objective

Our objective is to provide independent assurance to the Australian Government that Commonwealth law enforcement agencies and their staff act with integrity by detecting, investigating and preventing corruption.

Our key activities

We deliver on our purpose and objective through four key activities:

1. Assessment
2. ACLEI Investigations
3. Supporting partner investigations
4. Prevention

Our context and environment

ACLEI works in cooperation and partnership with the Australian Government law enforcement agencies under our jurisdiction.

Serious and organised crime and their use of technology to avoid detection are key operational challenges.

The ongoing response to COVID-19 is also likely to be an environmental factor for us over several years of this plan.

Our budget and workforce are key enablers, but also areas where we will experience challenges over the life of this plan.

Changes in the Australian Government integrity framework are likely to significantly affect ACLEI during the life of this plan.

Our enabling capabilities

Our people and supporting technology are critical to our ability to achieve our purpose.

Our purpose

ACLEI's purpose is to make it more difficult for corruption to occur or remain undetected in designated Australian Government law enforcement agencies.

As set out in the LEIC Act, the law enforcement agencies that we oversee are:

- the Australian Criminal Intelligence Commission (ACIC)
- the Australian Federal Police (including ACT Policing) (AFP)
- the Australian Transaction Reports and Analysis Centre (AUSTRAC)
- the Department of Home Affairs (including the Australian Border Force), and
- prescribed parts of the Department of Agriculture, Water and the Environment.

Our jurisdiction can be expanded to other law enforcement agencies through regulation.

Our purpose supports our outcome which is to provide 'Independent assurance to the Australian Government that Commonwealth law enforcement agencies and their staff act with integrity by detecting, investigating and preventing corruption'.¹

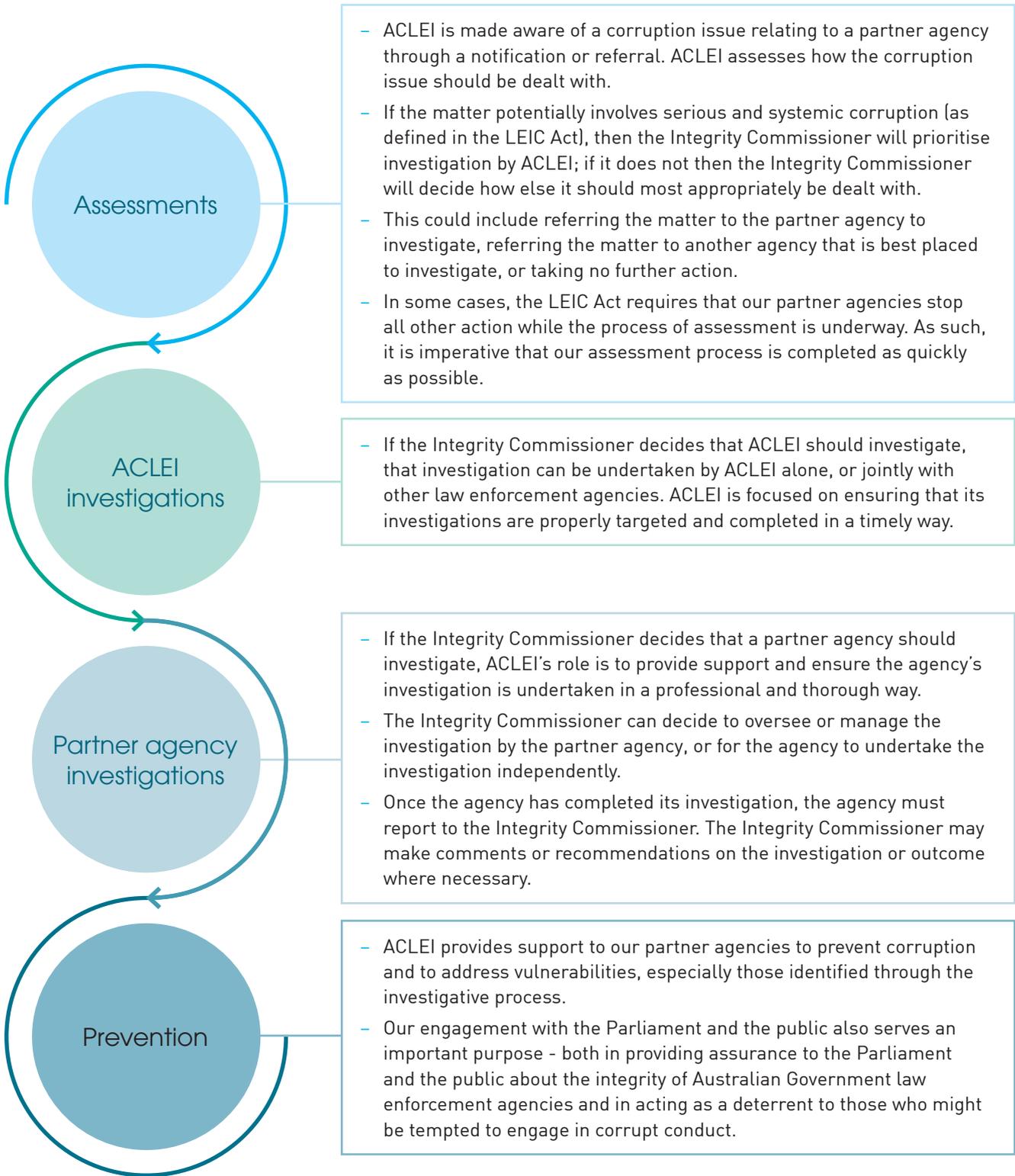
¹ Attorney-General's Portfolio Budget Statements 2019-20.

Our key activities

ACLEI delivers on our purpose through our key activities.

OUR PURPOSE:			
To make it more difficult for corruption to occur or remain undetected in designated Australian Government law enforcement agencies			
Our key activities			
1. Assessment	2. ACLEI investigations	3. Supporting partner investigations	4. Prevention
<p>We receive and assess notifications and referrals of alleged corrupt conduct by members of Australian Government law enforcement agencies, ensuring:</p> <ul style="list-style-type: none"> – pathways exist for notifications or referrals to occur from agencies and members of the public – assessments occur in a timely fashion, and – our processes support notifications and referrals to be dealt with in the most appropriate manner. 	<p>We conduct investigations into serious and systemic corrupt conduct in Australian Government law enforcement agencies:</p> <ul style="list-style-type: none"> – using our expertise as investigators – ensuring investigations are completed in a timely fashion – jointly with other law enforcement agencies where appropriate, and – within the bounds of our jurisdiction. 	<p>We support our partner law enforcement agencies to conduct their own investigations, including through:</p> <ul style="list-style-type: none"> – the use of our oversight and management powers under the LEIC Act where appropriate – reviewing the progress of investigations, and – providing feedback and advice on final reports on those investigations provided to us under section 66 of the LEIC Act. 	<p>We prevent corruption through:</p> <ul style="list-style-type: none"> – awareness raising – support to other law enforcement agencies and corruption prevention mechanisms – identification and dissemination of information on vulnerabilities and risks to partner agencies and the public – assisting partner law enforcement agencies to detect corrupt conduct by increasing understanding about the threat environment – contributing to the understanding of corruption through specialist projects and reviews, and – engagement with the Parliament, agencies and the public on our role in investigating and preventing corruption.
<p>We are supported in undertaking our key activities by professional and multi-disciplinary corporate and governance services.</p>			

The four key activities reflect ACLEI's prescribed role as set out in the LEIC Act:



Our performance

In 2019–20 we commenced work to refresh our performance framework, including our performance measures, to ensure that they provide a useful tool by which to manage the work of ACLEI and to ensure we are undertaking our activities in a timely and rigorous way in accordance with the requirements of the LEIC Act. We have aligned our performance measures with our key activities to create a direct line between our purpose, activities and performance. We have also taken into account the range of information we are required to report on in our Annual Report, which is set out in section 201 of the LEIC Act and detailed in the *Law Enforcement Integrity Commissioner Regulations 2017*. Much of that information goes to providing the Parliament and the public with assurance that we are:

- focusing on investigating serious and systemic corrupt conduct – which the Parliament has decided should be the priority for the use of ACLEI’s specialist expertise and significant investigative powers
- ensuring that other matters are appropriately dealt with by other agencies
- supporting partner agencies to prevent and address vulnerabilities to corruption, and
- undertaking our activities in a timely way – noting the importance of addressing alleged corrupt conduct as quickly as possible.

In the past, we have been particularly focused on reporting against qualitative measures. This has told one part of the ACLEI performance story but can be balanced with further quantitative measures to assess our performance, as set out below.

We will continue to develop our performance framework in 2020–21, with a particular focus on identifying new data sets and reporting capabilities that can assist us to measure our performance.

KEY ACTIVITY 1: ASSESSMENT

We receive and assess notifications and referrals of alleged corrupt conduct by members of Australian Government law enforcement agencies, ensuring:

- pathways exist for notifications and referrals to occur from agencies and members of the public
- assessments occur in a timely fashion, and
- our processes support notifications and referrals to be dealt with in the most appropriate manner.

Performance Criteria	Measure	Targets			
		2020–21	2021–22	2022–23	2023–24
1.1	Number of notifications and referrals of alleged corrupt conduct received by ACLEI ²	Annual count	Annual count	Annual count	Annual count
1.2	Number of assessments of notifications and referrals completed by ACLEI	The equivalent of 90% of the number of notifications and referrals received that year	As for 2020–21	As for 2020–21	As for 2020–21
1.3	Percentage of assessments completed within 30 days	90%	90%	90%	90%
1.4	Percentage of satisfaction survey responses from agencies indicating a rating of satisfied (or better) with the timeliness of our assessment work ³		70%		70%

2 As provided by Rule 16E(2) item 5 of the *Public Governance, Performance and Accountability Rule 2014*, it is not reasonably practicable to include targets for this measure and instead an annual count will be used. This is because the number will vary from year to year and is not within ACLEI’s control. However, this number, when combined with the other measures outlined, provides important information against which to assess the workload of the agency during the period and our efficiency and effectiveness in managing that workload.

3 This measure will be assessed via a biennial stakeholder survey.

KEY ACTIVITY 2: ACLEI INVESTIGATIONS

We conduct investigations into serious and systemic corrupt conduct in Australian Government law enforcement agencies:

- using our expertise as investigators
- ensuring investigations are completed in a timely fashion
- jointly with other law enforcement agencies where appropriate, and
- within the bounds of our jurisdiction.

Performance Criteria	Measure	Targets			
		2020–21	2021–22	2022–23	2023–24
2.1	Number of investigations commenced ⁴	Annual count	Annual count	Annual count	Annual count
2.2	Number of investigations finalised, either through being completed, discontinued or reconsidered	The equivalent of 80% of the number of investigations commenced that year	As for 2020–21	As for 2020–21	As for 2020–21
2.3	Average duration of finalised investigations	Baseline to be established	Analysis against 2020–21 results	Analysis against 2021–22 results	Analysis against 2022–23 results
2.4	Percentage of briefs of evidence where a charge is recommended after assessment by the CDPP	90%	90%	90%	90%
2.5	Number of reports under section 54 of the LEIC Act completed	Baseline to be established	Analysis against 2020–21 results	Analysis against 2021–22 results	Analysis against 2022–23 results
2.6	Number of corruption findings made ⁵	Annual count	Annual count	Annual count	Annual count
2.7	Number of times evidence is disseminated under section 146 of the LEIC Act ⁶	Annual count	Annual count and analysis against 2020–21 results	Annual count and analysis against 2021–22 results	Annual count and analysis against 2022–23 results
2.8	Percentage of satisfaction survey responses from agencies demonstrating a rating of satisfied (or better) with the timeliness and professionalism of our investigations ⁷		70%		70%

4 As for note 2, above.

5 As for note 2, above.

6 As for note 2, above.

7 This measure will be assessed via a biennial stakeholder survey.

KEY ACTIVITY 3: SUPPORTING PARTNER AGENCIES

We support our partner law enforcement agencies to conduct their own investigations, including through:

- the use of our oversight and management powers under the LEIC Act where appropriate
- reviewing the progress of investigations, and
- providing feedback and advice on final reports on those investigations provided to us under section 66 of the LEIC Act.

Performance Criteria	Measure	Targets			
		2020–21	2021–22	2022–23	2023–24
3.1	Number of investigations referred to partner agencies for investigation (broken down by referred, referred with oversight and referred with management) ⁸	Annual count	Annual count and analysis against 2020–21 results	Annual count and analysis against 2021–22 results	Annual count and analysis against 2022–23 results
3.2	Number of investigations by partner agencies finalised and report provided under section 66 of the LEIC Act ⁹	Annual count	Annual count and analysis against 2020–21 results	Annual count and analysis against 2021–22 results	Annual count and analysis against 2022–23 results
3.3	Average duration of finalised investigations by partner agencies	Baseline to be established	Analysis against 2020–21 results	Analysis against 2021–22 results	Analysis against 2022–23 results
3.4	Percentage of reviews of section 66 reports completed within 30 days	80%	80%	80%	80%
3.5	Percentage of satisfaction survey responses from agencies demonstrating a rating of satisfied (or better) with the quality of our contributions ¹⁰		70%		70%

8 As for note 2, above.

9 As for note 2, above.

10 This measure will be assessed via a biennial stakeholder survey.

KEY ACTIVITY 4: PREVENTION

We prevent corruption through:

- awareness raising
- support to other law enforcement agencies and corruption prevention mechanisms
- identification and dissemination of information on vulnerabilities and risks to partner agencies and the public
- assisting partner law enforcement agencies to detect corrupt conduct by increasing understanding about the threat environment
- contributing to the understanding of corruption through specialist projects and reviews, and
- engagement with the Parliament, agencies and the public on our role in investigating and preventing corruption.

Performance Criteria	Measure	Targets			
		2020–21	2021–22	2022–23	2023–24
4.1	Number of presentations provided ¹¹	Annual count	Annual count and analysis against 2020–21 results	Annual count and analysis against 2021–22 results	Annual count and analysis against 2022–23 results
4.2	Percentage of feedback response from participants in presentations demonstrating a rating of 'satisfied' or better	80%	80%	80%	80%
4.3	Number of corruption prevention products published ¹²	Annual count	Annual count and analysis against 2020–21 results	Annual count and analysis against 2021–22 results	Annual count and analysis against 2022–23 results
4.4	Trends are identified in: <ul style="list-style-type: none"> – notifications and referrals, and – section 66 reports received from partner agencies 	Qualitative survey of the trend analysis undertaken on incoming notifications and referrals	As for 2020–21	As for 2020–21	As for 2020–21
4.5	Number of submissions made to, and appearances before, parliamentary committee processes ¹³	Annual count	Annual count and analysis against 2020–21 results	Annual count and analysis against 2021–22 results	Annual count and analysis against 2022–23 results
4.6	Percentage of satisfaction survey responses from agencies demonstrating a rating of satisfied (or better) with the quality of our corruption prevention work ¹⁴		70%		70%

11 As for note 2, above.

12 As for note 2, above.

13 As for note 2, above.

14 This measure will be assessed via a biennial stakeholder survey.

Our operating context

Cooperation and partnership

To achieve our purpose to make it more difficult for corruption in designated Australian Government law enforcement agencies to occur or remain undetected, we work closely with the Australian Government law enforcement agencies that are within our jurisdiction:

- ACIC
- AFP
- AUSTRAC
- the Department of Home Affairs (including the Australian Border Force), and
- prescribed parts of the Department of Agriculture, Water and the Environment.

While we investigate allegations of corruption within these law enforcement agencies, we also partner with them to ensure the highest standards of integrity are maintained within Australian Government law enforcement. This partnership approach is established by the LEIC Act and reflects the general principle established by the PGPA Act that Australian Government agency heads are ultimately responsible for ensuring the integrity of the people working in their agencies.

In relation to investigations, this partnership involves:

- our partner agencies notifying or referring allegations of corruption to ACLEI to assess under the LEIC Act
- ACLEI determining the most appropriate mechanism by which the corruption issue should be dealt with, including whether investigations should be conducted by ACLEI, by partner agencies or jointly
- partner agencies reporting back to ACLEI at the end of their investigations, and
- ACLEI sharing with partner agencies findings, information and intelligence about vulnerabilities to help deter and prevent corruption into the future.

Like all law enforcement agencies, ACLEI also benefits from information shared between law enforcement agencies, which ensures that matters are investigated by the most appropriate agency.

Similarly, ACLEI shares information with other agencies in accordance with the LEIC Act, to enable matters to be appropriately dealt with. By way of illustration, each financial year, ACLEI prepares a Corruption Vulnerabilities Brief for our partner agencies summarising the corruption vulnerabilities identified during the course of ACLEI's investigations in the previous financial year. The brief also includes practical advice for agencies that are looking to counter these vulnerabilities and enhance their integrity systems. ACLEI also hosts the ACLEI Community of Practice for Corruption Prevention which is a collaborative forum for Integrity and Professional Standards units of our partner agencies to identify corruption risks, share information, work together to counter threats to law enforcement integrity and strengthen their respective agency integrity systems.

ACLEI is also a key part of the broader Australian Government integrity framework. We work closely with other Australian Government integrity and oversight agencies, including the Australian Public Service Commission, the Commonwealth Director of Public Prosecutions, the Commonwealth Ombudsman, the Independent Parliamentary Expenses Authority, the Inspector-General of Intelligence and Security, the Merit Protection Commissioner and the Office of the Australian Information Commissioner. The Integrity Commissioner meets regularly with the heads of these agencies to discuss issues that are common to integrity and oversight agencies and to consider the ways that we can work together.

ACLEI also collaborates with state and territory law enforcement and integrity agencies and international counterparts. Through this collaboration we gain important insights and contribute to strengthening the broader integrity system.

The public are also key partners for ACLEI. We receive reports of potential corrupt conduct from members of the public, which we assess through our assessments process.

ACLEI’s collaborative relationships are set out in the diagram below.



On 13 December 2018, the Australian Government announced its intention to establish a Commonwealth Integrity Commission (CIC), with two divisions – a law enforcement integrity division and a public sector integrity division. The Government has indicated its intention that the law enforcement integrity division will have the same functions and powers as ACLEI but with broader jurisdiction. Given ACLEI’s role in the new CIC, we will continue to work in partnership with other agencies and departments to support the establishment of the Commission and our role within it.

Environment

In delivering on our purpose across the four years of this plan, we are conscious of the following environmental contexts that we operate in:

Our operational environment

Serious and organised crime

Australia remains a profitable market for illicit importations. As Australia’s border controls tighten, serious and organised crime syndicates increasingly rely on attempts at infiltration and corruption of law enforcement staff members to facilitate their operations. The ‘trusted insider’ is an important business asset for serious and organised crime in conducting their business and so there continue to be corruption pressures for staff members of Commonwealth law enforcement agencies.

Technology

The impact of technological change is a challenge for ACLEI and all law enforcement agencies. Most organised crime groups, and the corrupt officials who work with them, use encrypted communication platforms. These platforms range from simple smart phone apps like WhatsApp or Signal to more sophisticated platforms like Encro and Ciphre.

While telecommunication interception remains a critical investigative tool, its effect has been diminished in recent years by the increasing shift toward encrypted communications. As a result, ACLEI needs to rely more heavily on other investigative capabilities such as physical and technical surveillance and human source engagement in conducting our investigations.

We expect that over the four year life of this plan we will continue to see new technologies being adopted by those that we investigate. We will need to continue to adapt our approach and evaluate which of the investigative tools at our disposal are best used to investigate in each case.

The ongoing response to COVID-19

In early 2020, in response to the COVID-19 pandemic, ACLEI was able to pivot its workforce to work from home, with staff being able to access our offices where this was needed for operational reasons. Given the nature of our investigation work, this was a significant achievement for the office. It was also a demonstration of our ability to be flexible and adaptable in our work practices, whilst not impacting on the integrity of our investigations.

However, at the height of the first wave of the pandemic in April and May 2020, there were some restrictions to our investigation options, including in relation to executing search warrants and deployment of some surveillance methods. ACLEI continues to evaluate the impact of the COVID-19 pandemic and to adjust operations as the situation evolves.

The COVID-19 pandemic is likely to continue as an environmental factor across several years of this plan. Our response to the pandemic will continue to be guided by the advice that is provided by the Chief Medical Officer and the federal, state and territory governments.

Budget and workforce

ACLEI is a very small agency. Our people are critical to our ability to perform our functions under the LEIC Act, and to fulfil our purpose efficiently and effectively for the benefit of the Australian community. Over the life of this plan, we expect to continue to see challenges in attracting and retaining the highly skilled and experienced staff we need to achieve our purpose. This is a challenge shared by other investigatory and law enforcement agencies. We will work with those agencies to ensure we can maintain our staffing levels while providing opportunities for development and advancement of those people across the community of agencies.

Changes in the Australian Government integrity framework

The Commonwealth integrity framework includes a number of Commonwealth agencies, including ACLEI. We work together when needed, particularly to ensure that our investigations do not overlap or impinge on each other.

The integrity framework is set to change over the four years of this plan with the establishment of a CIC, which was announced by the Commonwealth government in 2018. The law enforcement integrity division will continue ACLEI's current powers and functions, but with broader jurisdiction. The new public sector integrity division will represent a new aspect of the Commonwealth integrity framework. ACLEI will work over the course of this plan to support the establishment of the CIC and the public sector integrity division.

Key enablers

To deliver on our purpose over the next four years, we will focus on enhancing two key enablers: our people and our technology.

Our people

ACLEI's success is entirely dependent on the quality and hard work of our staff. As a very small agency with specialist functions, we have sometimes found it difficult to attract and retain staff with the necessary skills and experience. This is a common challenge for investigatory and law enforcement agencies. Over the period of this plan, ACLEI will develop and implement a workforce strategy focused on attracting and retaining highly skilled and experienced staff and ensuring that ACLEI has access to the capabilities we will need in the future. We will also work with other agencies to identify opportunities for staff development and advancement through secondment and exchange programs. Such programs will also provide opportunities to advance diversity and encourage innovative approaches to our work.

Our technology

ACLEI relies on a shared services arrangement with the Attorney-General's Department (AGD) for its ICT services. Having access to appropriate ICT is critical to our ability to progress our work in a timely manner. We will continue to work closely with AGD to ensure we have access to the ICT resources we need.

During the life of this plan, ACLEI's key ICT platform – its case management system – will be refreshed. Not only is this essential to our ability to undertake investigations effectively and efficiently, but it will be an important step for ACLEI in enhancing the way we record information about our performance – enhancing our ability to measure and analyse our performance to ensure we are maximising our impact.

As well as working in partnership with the Australian Government agencies under our jurisdiction to prevent and investigate corruption, ACLEI also works in cooperation with partner agencies and other law enforcement agencies to ensure that ACLEI has access to the technical capabilities needed for ACLEI to conduct our own investigations. ACLEI is a very small agency and it is not efficient for ACLEI to maintain all of the technical capabilities it requires to perform its functions in house. For example, in some investigations, ACLEI relies on the use of telecommunications interception or surveillance devices to obtain evidence. These capabilities are resource intensive and expensive to develop and maintain. Accordingly, ACLEI purchases these technical capabilities from other agencies when they are needed.

Risk

ACLEI is committed to managing risk through our *Enterprise Risk Management Policy and Framework*, which provides a structured and consistent approach to identifying, analysing and mitigating risk.

We continue to build on our positive risk management culture, encouraging staff to build competency and skills to manage risk as part of their everyday work. Operational and strategic risks are managed through risk registers which are reviewed regularly. Monthly status updates are considered by ACLEI’s executive. The Executive team consider risk at each Internal Governance Board meeting, particularly asking “are there any new or emerging risks we need to discuss?” This process helps us to actively engage in our risk management process and ensure that we are continuously reassessing the strategic risks that we are managing. Additionally, the Audit Committee provides advice to the Integrity Commissioner about ACLEI’s risk control framework, governance, compliance and financial accountability.

We also use risk assessments as a tool to manage our investigations. We identify risks for ACLEI investigations at the assessment stage and ensure that appropriate mitigation strategies are put in place. The Threat, Risk and Assessment Model (TRAM) is used to determine the relative priority of an investigation. The TRAM assesses and assigns a numerical score to a corruption allegation at an early stage of investigation, with a high TRAM score corresponding to high threat and risk. The TRAM is used to enable early identification and comparison of those corruption issues which should be given higher priority.

Specific risk assessments are also conducted when various investigative tools are utilised, such as executing search warrants. This ensures that the risk associated with the use of the investigative tool are considered and mitigating strategies are put in place when appropriate.

The strategic risks being managed by ACLEI include:

STRATEGIC RISK	MITIGATING STRATEGIES
<p>The security of our staff, witnesses, information or data is compromised</p>	<p>We have encouraged a security conscious culture in our office, where security plans and risk assessments are in place and followed.</p> <p>We ensure that our systems are secure, access can be audited and we monitor use.</p>
<p>There is a breakdown in our relationship with our partner agencies or those agencies that we depend upon for services</p>	<p>We ensure that we have developed relationships at various levels with our partner agencies, from Integrity Commissioner to investigator. We regularly engage at these different levels to ensure the relationships are working well.</p> <p>We also lead and participate in a number of communities of practice and forums to share knowledge and experience.</p>
<p>We do not have the capability or capacity to achieve our purposes</p>	<p>We use secondment arrangements and joint investigations to ensure that the right skills are available for each operation.</p> <p>We enhance our own capability through our learning and development program.</p> <p>We utilise our data and our risk management framework to ensure capacity to undertake serious and systemic investigations.</p>

During the life of this plan, the strategic risks being managed by ACLEI will be impacted by the establishment of a CIC. As mentioned above, the law enforcement integrity division of the CIC will continue ACLEI’s current powers and functions, but with broader jurisdiction. An additional risk to be managed by ACLEI over the implementation period of the CIC relates to the potential for ineffective implementation of that broader jurisdiction. We will manage this risk collaboratively with any new jurisdictional agencies through strong project planning and building effective stakeholder relationships.