

R.E.D (RELEVANT, EXISTING, DESIRABLE) ASSESSMENT FOR CORRUPTION CONTROL



Internal corruption controls used by law enforcement agencies (examples)	ANTI-CORRUPTION STRATEGIES						R.E.D ASSESSMENT		
	Reinforce standards	Protect agency from infiltration and compromise	Reduce opportunities for corrupt conduct	Detection mechanisms	Improve deterrence effect	Enable effective investigations and enforcement of penalties	Relevant	Existing	Desirable
CULTURAL APPROACHES									
Reduce cultural acceptance of unethical behaviour by instilling loyalty to professional standards rather than to colleagues or sub-cultures	•			•	•				
Promote confidence in management and reporting systems — promote a reporting culture				•	•				
Consideration of integrity risk when managing change		•	•						
Supervisors consider and manage the integrity implications of staff performance issues and report possible corrupt conduct	•		•	•	•				
Review board or committee for sanctions	•					•			
Regular staff surveys and organisational health checks		•							
Integrity advisory committee for policy, program and/or triage	•	•	•			•			
Active participation in multi-agency integrity forums or communities of practice		•							
Factor in shadow and legitimate systems in change programs		•	•						
'Integrity adviser' role	•				•				

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COMMUNICATIONS									
'Sunshine' policy (controlled, formal release of information about the outcome of corruption and misconduct investigations, investigation debriefs for affected staff, capturing of 'lessons learned')	•				•				
Tone from the top and from the bottom	•				•				
Adopt behavioural insights practices in communications (i.e. 'nudge theory')	•				•				
Messages crafted to normalise desired behaviours and anticipate unintended consequences	•	•			•				
Integrity messaging integrated into all agency communications	•	•			•				
RECRUITMENT AND ONBOARDING PRACTICES									
Pre-recruitment screening		•							
Suitability testing (including psychometrics)		•	•						
Tiered security assessment		•							
Referee checking (including personal and professional referees, non-nominated referees and open source check on suitability of referee)		•	•						
Recruiting for diversity		•	•						
Risk analysis for secondment arrangements (including warranty arrangements)		•	•						
Open source social media checks		•	•						
Exit management systems		•	•						

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TRAINING AND DEVELOPMENT									
Ethics and integrity training / corruption-risk awareness raising	•		•	•					
Induction ethics and integrity training	•		•						
Targeted case study development and use	•	•	•	•					
'Front-line of corruption control' middle management training	•	•	•	•					
WHISTLEBLOWER AND REPORTING SYSTEMS									
Designated reporting channels		•		•					
'Professional reporting' internal whistleblower schemes — support and encourage reporters and whistleblowers	•	•		•					
Obligation for staff members to report misconduct and suspected misconduct (including self-reports on integrity issues)	•			•					
Proportionate responses to ethical failures	•			•	•				
Systems to deal with complaints and reports from outside the agency or the public	•			•	•				
EARLY INTERVENTION STRATEGIES									
IT security audits, data security standards, 'red flag' analysis				•					
Personnel security, approvals or assessments	•	•		•					
Ongoing organisational suitability assessment (regular and repeated)	•	•		•					

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Intelligence led target development (Person)		•		•					
Vulnerabilities assessment of work type, functions and assets (Purpose)		•	•	•					
Environment risk-profiling of sites and teams (Place)		•	•	•					
Regular notifications of changes in circumstances (linked to declarable associations, financial circumstances, conflicts of interest etc)		•	•	•					
Quality review programs which target high corruption-risk investigations or other activities	•		•	•					
'Fusion approach' — coordinated intelligence collection and analysis, cooperation with other law enforcement or criminal intelligence agencies		•		•					
Mandatory random alcohol and drug testing, and targeted testing following critical incidents	•			•	•				
Confidante networks	•		•						
CORRUPTION RISK ASSESSMENT AND MANAGEMENT									
Published Fraud and Corruption Control Plan	•		•						
Measures matched to risk			•						
Pressure testing			•	•					
Regular risk management review (at set points and event triggers)	•		•	•					
Collection and analysis of data to identify emerging risk patterns and trends			•	•					
Integrity gateway in project and procurement governance	•		•		•				

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POLICIES AND PRACTICES									
Formal 'release of information' protocol	•		•						
Gifts and benefits policies	•	•	•						
'Letter of comfort' — strict internal controls	•		•						
Secondary work and volunteering policies	•	•	•						
Regular rotation of staff in high corruption-risk task areas	•		•	•					
Strict record-keeping policies and practices, including relating to official notebooks	•		•	•	•				
Mobile phone / internet usage auditing (overt)	•			•					
Declarable associations and conflict of interest policies	•	•	•						
Contact and incident reporting regime	•	•		•					
Corporate credit card and expenditure policy and controls	•		•						
Financial assets and private interests declarations	•	•	•						
Social media policies	•	•	•						
Personal use of mobile phones policies	•	•	•						
Statement of Expectations for suppliers and business partners	•	•	•						
Overseas travel advices	•	•	•	•					

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ACCOUNTABILITY IN HIGH-RISK ACTIVITIES									
Intrusive powers — strict accountability regime comprising independent inspection of records	•			•					
Evidence Act requirements for interviews, such as ‘caution’ or ‘Judge’s’ rules	•		•						
Controlled and auditable access to sensitive information and databases	•		•	•	•	•			
Controlled ability to inappropriately remove information from systems or premises		•	•	•	•				
Strict internal controls for covert human information source management		•	•	•	•				
Drug-handling policies and drug registry practices			•	•	•				
Property-handling controls			•	•	•				
Video and audio taping of searches and seizures			•	•		•			
Video and audio taping of interviews			•	•		•			
‘Use of force’ reporting policies and ‘taser cam’			•	•					
Risk-based supervision	•		•	•	•				
Operational risk assessment and attentive management of corruption-vulnerable areas		•	•	•	•				
Reduce operational discretion in high corruption-risk areas (‘many hands’ policy)			•						

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INTERNAL INVESTIGATION POWERS AND PRACTICES									
Documented investigative processes and tools						•			
Qualified internal investigators or access to external providers						•			
Investigation considers both specific and systemic implications		•	•	•	•				
Coercive interview powers (via external agency and/or internal), including a disciplinary offence for failing to attend or answer questions				•		•			
Targeted integrity testing programs					•	•			
CEO'S EMPLOYMENT POWERS									
Ability to declare that dismissal was for serious misconduct, with limited appeal right		•	•		•	•			
Power to refuse resignation		•				•			
Ability to issue 'Orders' about standards and conduct that would be binding on the workforce	•		•		•				

Action Items

(Internal corruption controls identified as both **relevant** and **desirable** during the R.E.D assessment)

