



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

# **CORRUPTION AND THE CHANGING OPPORTUNITIES FOR WOMEN IN LAW ENFORCEMENT**



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*Queensland Police Service*

*South Australia Police*

*Victoria Police*



## Executive Summary

Australian law enforcement agencies have committed to significant reform to reshape traditional masculine cultures, in response to reviews into the experience of women in law enforcement. Diversity programs, if implemented effectively, are likely to result in an increase in the number of female law enforcement officers, as well as an improvement in proportional representation of female employees in senior and commissioned officer roles.

Women deserve to be active participants in law enforcement and the public service, and be recognised and valued for the unique skills and experience they bring. However, as with any organisational change processes, the impact on organisational integrity must be considered.

The Australian Commission for Law Enforcement Integrity (ACLEI) observes that where opportunity or pressure exists, women are no less likely than men to engage in corruption. Yet stereotypes of feminine morality and ethics assume, purely based on gender, that women are a lower corruption risk—with the potential for serious misconduct or corruption by female employees to go undetected.

This paper draws on findings from ACLEI's investigations as well as observations from representatives from law enforcement agencies and integrity agencies, to highlight areas of potential corruption vulnerability for women in law enforcement. It also provides recommendations for engaging with female law enforcement employees to mitigate potential risk, as well as some broader strategies for influencing positive organisational culture.



## Introduction

The demographics of Australian law enforcement are anticipated to change over the next decade, with a significant and public commitment to improving diversity within law enforcement agencies. The benefits of diversity to an organisation and society as a whole are manifold—increased community trust and engagement, improved local knowledge, increased talent pool, increased productivity and innovation, and greater opportunity for personal and professional growth of employees.<sup>1</sup>

However, as with any period of significant organisational change, there is potential for a corresponding integrity impact as opportunities or pressures to engage in serious misconduct or corruption become apparent. While most law enforcement agencies have strong governance in place to respond to corruption when it is discovered, it is believed that some corruption still goes undetected.<sup>2</sup>

An idea that “women’s higher moral nature [and] propensity to bring their final moral sensibilities to bear on public life”<sup>3</sup> remains prevalent in debate around diversity, and may mask a risk for Australian law enforcement. It has been the experience of ACLEI that where certain pressures and opportunities exist, women are no less likely to engage in corrupt behaviour than men.

This paper provides an overview of the observations made by representatives from several Australian law enforcement agencies and integrity agencies in relation to patterns and trends in corrupt behaviour perpetrated by female law enforcement employees, and vulnerabilities they have observed as being of a particular risk to women. This paper is not a comparative analysis of male and female law enforcement employees.

### Definitions

Under section 6(1) of the *Law Enforcement Integrity Commissioner Act 2006* (the LEIC Act), a staff member of a law enforcement agency **engages in corrupt conduct** if the staff member, while a staff member of the agency, engages in:

- a) Conduct that involves, or that is engaged in for the purpose of, the staff member abusing his or her office as a staff member of the agency; or
- b) Conduct that perverts, or that is engaged in for the purpose of perverting, the course of justice; or

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<sup>1</sup> McGrath *et al* (1995); Shore *et al* (2009)

<sup>2</sup> Klockars *et al* (2000)

<sup>3</sup> Goetz (2007)

- 
- c) Conduct that, having regard to the duties and powers of the staff member as a staff member of the agency, involves, or is engaged in for the purpose of, corruption of any other kind.

Under section 5 of the LEIC Act, **serious corruption** means corrupt conduct engaged in by a staff member of a law enforcement agency that could result in the staff member being charged with an offence punishable, on conviction, by a term of imprisonment for 12 months or more.

Under section 4 of the *Australian Crime Commission Act 2002* (Commonwealth), **serious and organised crime** means an offence:

- a) that involves 2 or more offenders and substantial planning and organisation; and that involves, or is of a kind that ordinarily involves, the use of sophisticated methods and techniques; and
- b) that is committed, or is of a kind that is ordinarily committed, in conjunction with other offences of a like kind.

### **Perpetuating the myth: Women as a treatment for corruption**

Debate on the issues of gender and corruption has been strongly influenced by studies which concluded that increased female participation in public service and government can reduce corruption.<sup>4</sup> One particular study, funded by the World Bank, concluded that “women may have higher standards of ethical behaviour and be more concerned with the common good”,<sup>5</sup> having given consideration to earlier studies which made a case for the female inclination to altruism and moral behaviour in comparison to men.<sup>6</sup> This study also concluded that women are more trustworthy and public-spirited than men, and that in a large cross-section of countries, greater representation of women in parliament led to lower levels of corruption.

Studies which draw a link between female political representation and lower levels of corruption have influenced international development policy. Active employment of women is used as a treatment for organisations, with an expectation that corrupt behaviour will decrease and reporting of suspected corrupt behaviour will increase.<sup>7</sup>

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<sup>4</sup> Dollar *et al* (2001); Swamy *et al* (2001)

<sup>5</sup> Dollar *et al* (2001), pg 427

<sup>6</sup> Eagly & Crowley (1986); Eckel & Grossman (1998)

<sup>7</sup> Swamy *et al* (2001)



Countries in Africa and Asia have been encouraged by their development partners to integrate women into the public sector as a potential anti-corruption remedy. A quota for female employment has become a platform in the public policy agendas in a number of developing countries.<sup>8</sup>

However, the causal relationship between female participation in organisations and reduced corruption may have been overstated. Early studies were criticised for relying on research in Western democracies, without necessarily taking into account cultural or social explanations for corruption rates.<sup>9</sup> When considering external influences, Sung (2003) argued that liberal, democratic governments and organisations which promote fairness and equal opportunity for women will likely already have less corruption risk due to transparency and strong governance. Rather than assuming a causal, gender-based relationship between female political participation and lower levels of corruption, Sung concluded that gender equality and reduced corruption are both benefits of liberal democracies.<sup>10</sup>

Similarly, some researchers, while supporting the concept that women are inherently less likely to engage in corruption to a certain extent, also acknowledge the impact that culture plays in setting context. Esarey and Chirillo (2013) used data from the World Values Survey to determine the importance of context. They concluded that in autocracies, and where corruption is endemic, women will condone corruption as much as men do, as an adaptation to social and institutional norms. Conversely, in situations where corruption is stigmatised, women will disapprove of corruption more than men, and are less likely to engage in corrupt practices.

Earlier studies also found that the likelihood of gender differences in engagement with corruption was dependent on a country's cultural and social norms. This study observed that in highly patriarchal societies, female attitudes towards corruption were closely influenced by male views, whereas in countries with higher levels of equality, gender-based differences in views of corruption became apparent.<sup>11</sup>

These results have been repeated in a number of international field studies, demonstrating that simply bringing women into key decision making roles in public service does not tangibly address corruption risk. This is evident where cultural or social norms excuse corruption or where accountability structures and systems are not also reformed.<sup>12</sup>

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<sup>8</sup> Alhassan-Alolo (2007)

<sup>9</sup> Alatas *et al* (2009)

<sup>10</sup> Sung (2003)

<sup>11</sup> Alatas *et al* (2009)

<sup>12</sup> Seppanen & Virtanen (2008)



At an organisational level, researchers have observed that while increased employment of women in public sector organisations could result in an initial decrease in corruption, this change could be attributed to the disruption of already existing groups within the organisation, with corrupt officials no longer able to count on the reliable actions of their fellow employees. However, once women become established in an organisation, and if an existing culture of corruption is not addressed, corruption risk can increase again while reporting of corruption decreases.<sup>13</sup>

This suggests that group dynamics and other existing variables (for example, cultural or social norms), rather than gender, may play a stronger role in determining corruption risk. Consideration must also be given to opportunity, or lack thereof, to engage in corruption. A number of researchers conclude that in certain circumstances women will be as likely as men to engage in corrupt behaviour,<sup>14</sup> but it is the gendered access to roles in politics or public service that influences opportunities for corruption.<sup>15</sup>

### **A brief history of women in law enforcement**

Although women were employed by police forces from 1915<sup>16</sup> onwards, it took legislative change in the 1970s for women to be employed in general duties. No woman was promoted to the rank of chief superintendent or above until 1984, in any Australian police force.

The States weren't subject to the Commonwealth *Sex Discrimination Act 1984*—this was applicable only to the federal government and private employers.<sup>17</sup> Consequently, those that didn't have their own anti-discrimination legislation continued to limit women's opportunities in law enforcement.

In illustration, in 1987 Queensland Police still had an official quota of one woman to eight men and were rejecting applications from married women on the basis that working as a police officer would have a negative impact on their primary role as home-based carers. In Tasmania, female police officers required the Commissioner's approval to marry, well into the 1980s. Female officers who formed part of the initial operational response to the Franklin Dam blockades of 1982-1983 did so in skirts, high heels, and stockings.

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<sup>13</sup> Gokcekus & Bengyak (2015); similar findings were also observed in Gokcekus & Mukherjee (2002) and Esarey & Chirillo (2013)

<sup>14</sup> Alhassan-Alolo (2007); Goetz (2007); Bjarnegard (2013)

<sup>15</sup> Goetz (2007), pg 87

<sup>16</sup> Maude Rhodes and Lillian Armfield were the first women employed for police duties in the Commonwealth, sworn in as Probationary Special Constables of the New South Wales Police Department in 1915.

<sup>17</sup> [www.mypolice.qld.gov.au/blog/2015/03/31/women-in-policing-a-change-in-times](http://www.mypolice.qld.gov.au/blog/2015/03/31/women-in-policing-a-change-in-times)



One of the “selling points” of women entering operational law enforcement roles was an expectation that they would raise the ethical standards of policing, as female police officers were expected to be less likely than their male counterparts to engage in misconduct or tolerate such behaviour by fellow officers.<sup>18</sup>

This belief was not limited to Australia. The introduction of women to operational duties in the United States caused concern amongst existing officers because women were associated with ‘moral virtue, cleanliness, honesty, non-violence and irrationality’.<sup>19</sup> In the New York Police Department in the 1970s even senior management were apprehensive that the rank and file corruption inevitably exposed by female officers would then lead to investigations into their own activities. In the United Kingdom an influx of women into the police force was expected to reduce corruption, as it was believed women would be less likely to engage in risky behaviour involving corruption.<sup>20</sup>

## Method

This research paper draws upon ACLEI corruption notifications and investigations, consultations with jurisdictional agencies, other Commonwealth agencies, and State law enforcement agencies and integrity agencies, as well as open source research.

### Investigations analysis

A review was undertaken of ACLEI’s investigative holdings, which considered all corruption issues notified or referred to the Integrity Commissioner for the period 1 July 2015 to 30 June 2017, which the Integrity Commissioner elected:

- to investigate, in accordance with section 26(1)(a) of the *Law Enforcement Integrity Commissioner Act 2006* (the LEIC Act)
- to refer back to the law enforcement agency for investigation, in accordance with section 26(1)(b) of the LEIC Act, or
- to investigate jointly with another government agency or an integrity agency for a State or Territory, in accordance with section 26(2) of the LEIC Act.

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<sup>18</sup> Waugh & Ede (1996)

<sup>19</sup> Hunt (1990)

<sup>20</sup> Gounev & Bezlov (2010)



The purpose of this review was to identify the number of corruption referrals or notifications which related to a female person of interest. This included all instances where the sole person of interest was female, or where allegations were made regarding the behaviour of multiple persons of interest involving at least one female.

Where notifications or referrals were identified as relating to female persons of interest, the case was then analysed through two lenses – alleged activity, and motivation. This was then overlaid with other information sourced from jurisdiction agencies, State integrity agencies, and State law enforcement agencies to identify patterns and trends in the corrupt behaviour, and perceived motivation of female law enforcement employees who are the subject of a corruption investigation.

### **Stakeholder meetings**

Over the course of several months, ACLEI corruption prevention practitioners met with counterparts from integrity agencies and the professional/ethical standards departments of State law enforcement agencies. The purpose of these meetings was to discuss observations of corrupt behaviour by female law enforcement employees, to determine if trends or patterns could be identified between the agencies consulted. In particular, ACLEI would like to acknowledge the significant contribution made by:

- South Australia Police
- Victoria Police
- Queensland Police Service
- New South Wales Police Force
- Independent Commissioner Against Corruption/Office for Public Integrity (South Australia)
- Independent Broad-based Anti-corruption Commission (Victoria)
- Crime and Corruption Commission (Queensland), and
- Independent Commission Against Corruption (New South Wales).

### **Gender and Corruption Workshop**

The workshop was hosted by ACLEI and attended by senior officers and their staff (male and female) from:

- Australian Criminal Intelligence Commission
- Australian Federal Police
- Australian Taxation Office
- Australian Transaction Reports and Analysis Centre
- Department of Agriculture and Water Resources
- Department of Defence
- Department of Health

- 
- Department of Immigration and Border Protection.

This workshop was designed to generate new thinking about gender and corruption, drawing upon the experience and expertise of Commonwealth officers, both in law enforcement and other regulatory functions. Participants provided suggestions and considered opportunities for innovation in the corruption prevention space, and considered whether current integrity frameworks can adapt for changing demographics.

Responses provided to some of the case studies during the Gender and Corruption Workshop posed some interesting questions. All of the examples used during the session related to corruption or misconduct by female law enforcement officers, and the project team was interested to observe if gender bias existed in the way participants responded in their written and oral feedback on the cases. These responses led to the development of a further case study exercise.

### **Case Study Exercise**

Two of ACLEI's jurisdictional agencies volunteered to assist with a blind exercise, which was undertaken over several days. The aim of this activity was to determine whether people responded differently to examples of corrupt behaviour depending on whether the subject was male or female.

Participation in the exercises was voluntary and participants came from a variety of business areas within their agency. They were provided with a briefing on ACLEI's role and operating environment and were initially advised that the purpose of the session was to test the relevance and utility of a number of case studies to their agency's business practices.

Participants were then divided into two groups and invited to separate rooms, each with an ACLEI facilitator. Each room contained three case studies which were identical apart from the gender of the subject in each case. Participants were not advised of this difference.

Participants were encouraged to engage in conversation about each of the three case studies in turn, recording their thoughts and observations as they went. The facilitators guided the conversation in parts, by asking questions about behaviours, justifications, mitigations, and likely outcomes.

Although the three case studies used were de-identified, two contain law enforcement information that is not in the public domain and cannot be included in this report. They are summarised briefly below. Case study three is included in its entirety.



### **Case Study One**

This case related to inappropriate information access by a law enforcement officer. It was included to demonstrate that corrupt behaviour is not always motivated by financial gain. The reward in this case was social capital—namely in the form of future employment opportunities.

### **Case Study Two**

This case related to unauthorised disclosure of classified law enforcement information by an employee in a non-operational role. It demonstrates the value of information held by law enforcement agencies and the need to manage the access available to back-office staff.

### **Case Study Three**

This case involved a law enforcement officer responsible for a team undertaking community outreach and liaison duties. He/she was a member of an ethnic community group and had high standing among other members of this community.

On numerous occasions he/she accessed law enforcement databases and systems at the request of friends and acquaintances from within his/her community and provided them with law enforcement information to assist them in the resolution of personal matters.

He/she also provided a range of testimonials and personal references to friends and acquaintances in support of applications to work in regulated industries, and as character references tendered to courts in relation to criminal matters. These testimonials and references were provided on his/her employer's letterhead, in breach of internal governance relating to the writing of testimonials.

He/she received no financial or other tangible benefit from providing this assistance. When questioned he/she said he/she felt that providing assistance of this kind formed part of his/her role as a community liaison officer.

At the conclusion of the exercise, participants were debriefed on the primary reason for the exercise and had the opportunity to share further observations and ask questions.



## Workshop observations

The Gender and Corruption Workshop was a valuable exercise which drew on the experience of senior executives in law enforcement and regulatory agencies. A number of recommendations for creating and maintaining robust integrity frameworks were identified, and will be discussed later in this paper.

Of interest to the project team were some of the responses to case studies presented to participants. Based on literature which indicates that corruption by women is treated more severely than that by men,<sup>21</sup> corrupt activity by the female subjects of the case studies was expected to evoke strong criticism from participants.

However, in response to case studies involving young, female officers, the discussion reflected on issues around ‘vulnerability’ and ‘exploitation’. This was particularly interesting as the material was deliberately included because it related to matters where ACLEI observed some apparent inconsistencies in sanctions applied by investigating agencies. ACLEI is aware of other cases (involving young, male officers), currently not in the public domain, with similar behaviours to that of the case study, which resulted in serious sanctions—including termination of employment and criminal charges.

Responses from the Workshop were examined further in the separate case study exercises with a number of ACLEI’s jurisdiction agencies. In this exercise facilitators observed broadly similar responses to all case studies, irrespective of the gender of the subject.

However, during the case study exercises a greater consideration of mitigating circumstances occurred where the subject was female, particularly with regards to case studies one and three. Participants were more inclined to question whether inadequate supervision by senior officers or inducement was a factor. These issues were not raised by any groups in relation to a male subject.

Noting the variety of responses, the project team gave consideration to the differing levels of seniority between participants of the Gender and Corruption Workshop and the case study exercises. It was hypothesised that senior executive workshop attendees were more likely to have had responsibility for performance management or the application of sanctions against employees. This level of decision-making may encourage a greater strategic awareness of potentially mitigating factors in the event that a decision is scrutinised either through an appeal or judicial process or via questions by media entities.

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<sup>21</sup> Esarey & Chirillo (2013); Esarey & Schwindt-Bayer (2016)



## Findings

The engagements with State law enforcement and integrity agency stakeholders, while primarily anecdotal, established that similar patterns and trends in engagement with corruption by female law enforcement employees are being observed at both a State and Federal level.

Information from these stakeholders was overlaid with ACLEI's jurisdictional investigations analysis and the observational data from the Gender and Corruption Workshop and the case study exercises, to assist in establishing a qualitative analysis of potential areas of risk.

### **Risk aversion – planning and manipulation**

A number of international studies have observed that women are more attuned to social attitudes towards corruption—where corruption is culturally and institutionally stigmatised women will be more vocal in their resistance than men.<sup>22</sup> It is theorised that this is the case because systematic discrimination makes women's positions in politics and public service more tenuous.<sup>23</sup>

Macro-level findings from cross country comparative studies may have relevance at an organisation level—for example, in countries with strong democratic institutions there are clear differences in responses to corruption between men and women as opposed to countries with weak democratic institutions where gendered differences are non-existent. It could be inferred that in an organisation with strong governance, transparency, and a culture of reporting, the risk of corruption will be perceived as too great and women will be more risk averse than their male colleagues.<sup>24</sup>

In separate experiments testing willingness to engage in bribe-taking, Schulze and Frank (2003) and Armantier and Boly (2008) observed that women showed a significantly lower probability (compared to men) of accepting bribes where they perceived strong controls to be in place. However, both studies concluded that men and women were equally likely to accept a bribe when no controls were in place.

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<sup>22</sup> Schulze & Frank (2003); Armantier & Boly (2008); Croson & Gneezy (2009); Esarey & Chirillo (2013)

<sup>23</sup> Esarey & Chirillo (2013)

<sup>24</sup> Eckel & Grossman (2008); Esarey & Chirillo (2013); Agerberg (2014)



Interestingly, Lambsdorff and Frank (2011) observed that female public servants are less likely to reciprocate after accepting a bribe and are therefore less reliable corrupt partners—suggesting that a level of opportunism enters the scenario after a risk assessment occurs. This finding was also repeated by Rivas (2013).

Some Australian law enforcement and integrity agency representatives noted a trend for female corruption and serious misconduct to be less opportunistic than corruption perpetrated by men—using a high level of planning to avoid detection. As an example, ACLEI has observed through its investigations a pattern of female law enforcement employees using false statutory declarations and medical documents to actively conceal other adverse behaviour.

If observations of planning and active risk analysis by female employees are accurate, the implication for law enforcement is that some serious misconduct and corruption by female employees may be going undetected.

#### **Case study – South Australia Police: officer involved in cannabis growing operation**

In 2015 a female South Australia Police officer was jailed for fabricating, altering and concealing evidence in relation to a cannabis growing operation.

The officer actively concealed her involvement in the operation, run with her partner, by creating a false identity to rent a property that she already owned. She established an e-mail trail between herself as the landlord and her false identity as the tenant, corresponding about moving dates, the theft of a wheelie bin, and the ‘tenant’s’ request for approval for a dog. Utilities and electricity, as well as the registration of a car, were all in the name of the false identity.

The deception was undertaken to ensure she wouldn’t be linked to the cannabis cultivation in the event the crop was discovered, and used her knowledge of police investigations to create a realistic backstory for her false identity.

The officer was also charged with tipping off another drug supplier and trafficker about a police investigation into his activities.

See media reporting from this matter—for example: <http://www.abc.net.au/news/2015-06-25/sa-police-officer-who-let-boyfriend-grow-pot-jailed/6572528>





## Motivation

Motivation to engage in corruption can be intrinsic—personal values, ambition, need for excitement, or disengagement or disenfranchisement, or extrinsic—situational factors. These factors tend to be personal circumstances, like financial stress, but could also include organisational culture.

This paper does not seek to draw comparisons between male or female motivation for engaging in corruption. However, where women have engaged in corrupt activity, ACLEI has observed potential patterns in the primary motivation of female law enforcement employees.

### *Financial gain*

Law enforcement and integrity agencies are observing corrupt behaviour by women motivated for financial gain. ACLEI has received reports of allegations of fraud and bribery in the processing of visas for travellers intending to visit or relocate to Australia, and has seen indicators of criminals attempting to corrupt the visa issuing process both in Australia and offshore to enable criminal activity. ALCEI notes these complaints are primarily against contracted female employees—although it is not known whether women are more likely to fill offshore customer service based roles, thus skewing these results.

Corruption by female law enforcement employees, involving the abuse of procurement processes or official credit cards has been observed by integrity agencies as an emerging risk area. This was an interesting finding given that fraud profiles tend to identify male employees as a higher risk.<sup>25</sup> Rises in the cost of living, particularly in major capital cities, may create external pressure in the form of financial stress. An increasing number of women in primary breadwinner or sole carer roles, and even the financial pressures on dual-income households, may mean this is a risk area where female representation will continue to increase.

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<sup>25</sup> KPMG has observed a rise in the proportion of women engaging in fraud—currently at 17%, up from 13% in 2010: <https://assets.kpmg.com/content/dam/kpmg/pdf/2016/05/profiles-of-the-fraudster.pdf>



## ***Social capital***

Women remain significantly underrepresented in Australian law enforcement agencies, particularly in senior executive or commissioned officer roles. Unconscious bias in selection for opportunities, training, and promotions is reported to have limited career progression for women into leadership roles.<sup>26</sup> Limited numbers of women in policing roles often means that women are denied career development because they are not released from particular duties where a woman is required,<sup>27</sup> and women with children are often overlooked or unable to attend residential training programs because of home-based responsibilities.<sup>28</sup> Additionally, they may not be assigned as case officers for serious or complex investigations because of assumptions regarding the dual roles of police officer and carer for children.

Therefore, even where bias is actively being addressed, the professional experience of female officers applying for promotion can lag behind that of their male colleagues. Female officers may not have the same access to significant operational experience as male officers, which can be detrimental in advancement processes which rely heavily on this experience. Women may also lack access to many of the traditional social networks through which senior sponsorship or mentoring may be gained.<sup>29</sup>

ACLEI has observed corrupt behaviour where, rather than an immediate financial gain, reward comes in the form of social capital—for example, unauthorised disclosure of classified information in the pursuit of potential sponsorship or recommendation for promotion or transfer. This could be occurring as a reaction to the traditionally closed doors of male law enforcement networks and as a way to “catch up” on previously missed opportunities and experience, and justified as a mechanism to address issues of inequality.<sup>30</sup>

Law enforcement is also observing an emerging risk for female officers created where there is a conflict of interest between law enforcement role and loyalty to a community or ethnic group. Unauthorised disclosure of classified information or preferential treatment in decision making are the primary risks in this area and do not usually appear to involve an exchange of money—disclosure instead occurs as a favour or perceived responsibility to particular individuals, and the reward is continued good standing within the community.

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<sup>26</sup> Boni (2005); Irving (2009); Prenzler & Fleming (2010); Robinson (2013 & 2015); Broderick (2016).

<sup>27</sup> Broderick (2016). This report noted experiences of female AFP officers being tasked on search warrants to mind children and supervise female occupants, limiting full involvement in operational activities.

<sup>28</sup> Boni & Circelli (2002); Boni, (2005)

<sup>29</sup> Boni (2005)

<sup>30</sup> Andreoni & Vesterlund (2001); Silvestri (2003)



ACLEI acknowledges that this is not a risk exclusive to female officers<sup>31</sup> but does caution that women may be particularly attractive as targets because of traditional roles they may play within their community or ethnic group.

### ***Nepotism***

Early studies which concluded that women are more likely to display helping behaviour, behave more generously when faced with financial decisions, and will ultimately be less selfish than men<sup>32</sup> were used by Dollar *et al* (1999) to support a conclusion that women may have higher standards of ethical behaviour, or a “morality of care”,<sup>33</sup> and be less engaged in corrupt activity. Assumptions around the application of women’s traditional home-based caring roles to law enforcement have led, in some instances, to anti-corruption measures in policing agencies which are based solely on the employment of women.<sup>34</sup>

If assumptions around women’s caring natures are true, it raises a question regarding what happens when a conflict arises between loyalty to family, friends, or community, and the expectations of an employer.

When considering motivation for engaging in corrupt activity, integrity agencies have observed that nepotism—particularly in securing a benefit for a partner or children—appears as a strong driver. This supports findings by Goetz (2007), who dismissed the idea that women would “passively conform to the idealised notions of their final moral nature”<sup>35</sup> when there were opportunities to secure benefit for family members and to make money from public office.

ACLEI recognises that men are also well represented in corrupt activity where nepotism is a significant motivation. The particular vulnerability for law enforcement agencies is where gender stereotypes pervade the assessment of employee risk, and where behaviour by female employees may be overlooked due to assumptions regarding corruption vulnerability.

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<sup>31</sup> ACLEI’s Operation GARAN investigated unauthorised disclosure and giving of testimonials by a male Australian Federal Police Officer: <https://www.aclei.gov.au/reports/investigation-reports>

<sup>32</sup> See Eagly & Crowley (1986); Eckel & Grossman (1998)

<sup>33</sup> Christie (1996)

<sup>34</sup> For example, in 1998 the President of Peru announced that the Lima traffic police would be transformed into an all-female force. Likewise, in 2003 the Mexican Customs Service announced that only women would be employed in its anti-corruption department.

<sup>35</sup> Goetz (2007), pg 102



**Case study – Victorian Ombudsman: conflict of interest of an officer of the Metropolitan Fire and Emergency Services Board (MFB)**

A 2017 report into the activities of MFB Chief Information Officer found that she had hired her son without declaring the relationship, and having falsified his resume and coached him prior to interview. The son had legally changed his name three weeks prior to being hired, in order to conceal his relationship to his mother.

After the first son was moved into a permanent position and given a pay rise, the officer hired her other son, having also falsified his resume and interviewed him in her home. This son also legally changed his name.

The falsified resumes included fabricated qualifications and work experience which concealed a lack of suitability for the roles both men had been hired for at the MFB. One resume also concealed a period of incarceration for traffic related offences.

In total, approximately \$400,000 was inappropriately paid to the two sons between 2014 and 2016.

*See: Victorian Ombudsman. (2017). Report into allegations of conflict of interest of an officer at the Metropolitan Fire and Emergency Services Board.*

Similar behaviour from a female senior executive officer has been observed by the NSW ICAC. Hearings into the allegedly corrupt activities of the Chief Executive Officer of a not-for-profit organisation heard evidence that she assisted her son to secure employment at the organisation through the use of a fake name and falsified employment history.<sup>36</sup>

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<sup>36</sup> <http://www.abc.net.au/news/2017-07-12/icac-hears-from-eman-sharobeems-sons/8702202>



## Activities

### *Drug use*

While drug use in itself may not be considered corruption, it nevertheless represents a significant conflict with a law enforcement employee's professional responsibilities and gives rise to corruption vulnerability.

Even where a law enforcement employee considers their use of illicit drugs to be a "personal" matter, the practice will involve liaison with drug suppliers and other users. Such people will inevitably have some connection to organised crime, who are likely to have an interest in accessing confidential law enforcement information or identifying an individual who can be groomed or coerced into influencing decisions.

Some law enforcement agencies consulted for this report identified that female officers and civilian law enforcement employees were proportionally represented in serious misconduct relating to illicit drug use, and some observed an over-representation of female officers identified as abusing pharmaceutical products.

Law enforcement agencies acknowledge that the trends and patterns observed in society are likely to be reflected in some capacity within their agency. Preliminary findings from the National Drug Strategy Household Survey (NDSHS) 2016 showed females aged 18 or over reported a significant increase in recent use of illicit substances from 2013 when the last survey was undertaken. This increase was mainly driven by an increase in illicit drug use among females in their 30's, with an increase from 12.1% to 16%. Women in their 30's were significantly more likely to have used cannabis, ecstasy and/or cocaine in the 12 months prior to completing the survey.<sup>37</sup>

Some law enforcement agencies and integrity agencies have anecdotally observed an increase in experienced and older female officers identified using illicit drugs, as part of a general upward trend of illicit drug use by female law enforcement employees. What is currently unknown is whether this is long-term drug use continued from early-adulthood, or a decision or pressure to commence drug use as an adult.

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<sup>37</sup> Australian Institute of Health and Welfare, National Drug Strategy Household Survey 2016



### **Case study – ACLEI Operation Myrrh: illicit drug use in the (former) Australian Customs and Border Protection Service (ACBPS)**

In 2013 ACLEI investigated allegations of social drug use by two female frontline employees of the ACBPS and their male colleague—whose primary responsibilities were preventing the importation of illicit substances by air and sea.

The officers acknowledged they timed their drug use to actively avoid drug testing and admitted to being in regular contact with other drug users and suppliers.

The officers involved believed their drug use was a personal matter and had no relevance to their professional responsibilities. They failed to see the significant conflict of interest given the mandate of the ACBPS and the vulnerability posed by their regular association with people connected to the drug supply trade—people who had knowledge of their employment with the ACBPS.

*See: ACLEI (2014). Operation Myrrh – An investigation into ‘private’ illicit drug use by certain Australian Customs and Border Protection Service officers.*

### **Subcultures**

As female officers have traditionally not been part of policing networks, they may consider themselves separate, or be deliberately excluded, from existing subcultures.<sup>38</sup> As numbers of female officers have increased, independent female subcultures have evolved potentially in response to minority status and a feeling of being separate from the dominant organisational culture. While subcultures based around shared experiences or issues may be supportive or empowering, law enforcement agencies have observed that some groups have become adversarial, subversive and exclusionary.

Some of these groups have begun innocuously as social or sporting groups, or through a shared identity as part of a minority group. Closed social media groups have perpetuated a culture of exclusion, and bullying and harassing behaviour has occurred both in the exclusion of individuals from groups and within the groups themselves.

At their most damaging female subcultures have been linked to patterns of behaviour around illicit drug taking and, in some cases, the sale of drugs by female officers to other female colleagues. This has been observed at both a State and Federal level.

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<sup>38</sup> Brown (1994)



### **Case study – (former) Crime and Misconduct Commission (CMC) Operation Nighthawk: illicit drug supply and use in the Queensland Police Service (QPS)**

A 2010 CMC investigation revealed drug related police misconduct by six female police officers and one female civilian QPS employee. All worked in the same police district.

A female former police sergeant received a suspended jail sentence after pleading guilty to five counts of supplying dangerous drugs, four others resigned, and two officers received formal sanctions but retained their employment.

The former sergeant claimed the drug use, commenced as a coping mechanism for the psychological pressures of her job and personal life, was enabled and supported through her association with female colleagues of the same sexual orientation. The women socialised together outside of work, engaging in illicit drug use for recreational purposes.

*See: Crime and Corruption Commission (2012). Media release—CMC investigation results in drug conviction against former QPS officer; and associated media from this matter.*

Corruption can thrive in networks that are formed around social constructs—like gender—upon which trust is built. It is the relationship between these social constructs and the institutions that influence their creation that is important in shaping corruption vulnerability.<sup>39</sup>

An important observation for law enforcement agencies is that subversive subcultures don't tend to eventuate where employees feel safe and valued by their organisation and colleagues. Indeed, several law enforcement agencies which have implemented significant reform with regards to the treatment of female officers in the workplace have observed a subsequent decrease in behaviour associated with subversive subcultures and an increase in engagement with traditional internal support and advocacy networks.

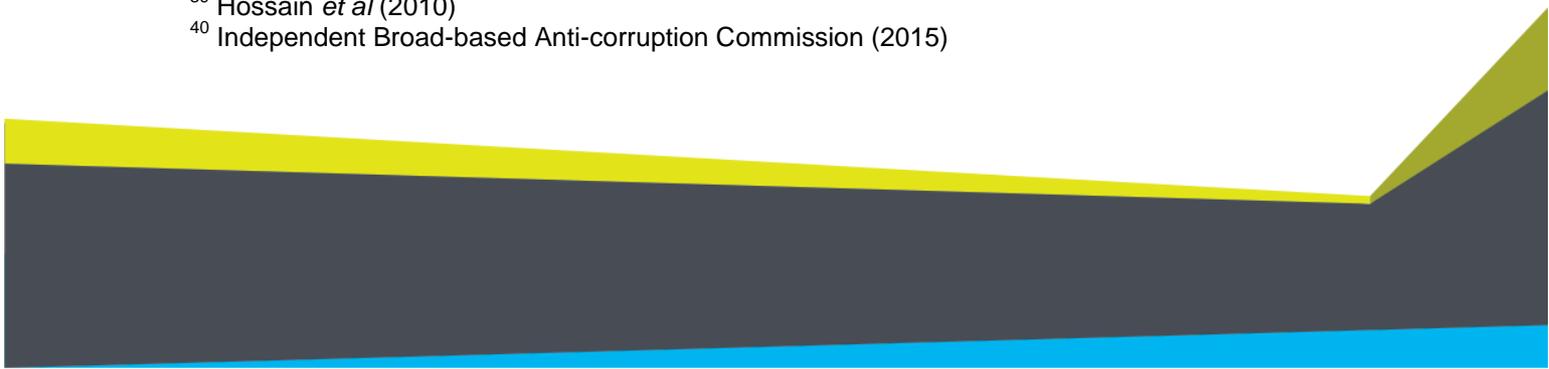
### **Organised crime**

Organised crime covers a broad range of activities, but at its most serious involves large-scale criminal entities exploiting illicit markets and infiltrating legitimate industries for profit. Organised crime groups are structured to enable operation across state and national borders, engaging in criminal activities in multiple jurisdictions.<sup>40</sup>

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<sup>39</sup> Hossain *et al* (2010)

<sup>40</sup> Independent Broad-based Anti-corruption Commission (2015)





Law enforcement and associated regulatory agencies hold information or assets that are attractive to organised crime. Cultivation of contacts in these agencies represents opportunities to access information, systems, or decision-making processes. State and Federal law enforcement agencies acknowledge that deliberate targeting is occurring, but the level of infiltration is difficult to measure and most may be occurring undetected.

Increased female representation in law enforcement offers new opportunities for organised crime groups, and there are concerns from law enforcement agencies and integrity agencies about both the cultivation of existing female employees and the deliberate infiltration into law enforcement of women connected to organised crime.

**Case study – South Australia Police: unauthorised disclosure to an outlaw motorcycle gang (OMCG)**

In 2009 a female South Australia Police officer was jailed on corruption charges after an internal police investigation into allegations that the female partners of OMCG members had infiltrated the South Australian public service in order to access confidential information.

The officer provided a police incident report and car registration details to a known drug dealer. The details provided the personal information of a member of the public who had witnessed an assault, allegedly committed by a member of an OMCG. The drug dealer then provided this information to a rival OMCG.

The officer claimed that her actions were not corruption in the traditional sense, because she didn't obtain any financial or material benefit. In her defence she stated that she acted out of naivety and wasn't aware of the seriousness of her actions.

See: *Buckskin v. R* (2010) SASC 138

**Grooming**

Grooming is becoming increasingly sophisticated and targeting of women, often through domestic relationships or family connections, represents an opportunity for organised crime, including OMCG.



Employees in non-operational positions may be particularly vulnerable, and less prepared to respond, to improper approaches. Many have similar or higher levels of access to sensitive information and systems than their operational colleagues do.<sup>41</sup>

Key risk areas for female law enforcement employees include targeting through social media and exploitation of existing relationships with criminal entities and other declarable associations. In contrast, law enforcement agencies have anecdotally observed that approaches to men occur more through shared social interests, including fitness and tattooing.

### ***Social media***

Social media represents an additional opportunity through which criminal entities can identify and approach law enforcement employees. When targeting female law enforcement employees, contact has been observed under the guise of shared interests or a developing relationship and can escalate into requests for information or access.

The particular vulnerability of social media is that it not only enables organised crime to potentially identify a large number of law enforcement employees, but the 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>42</sup>

### ***Declarable associations***

Organised crime will look for access to law enforcement through intimate relationships, family connections, or cultural and social links. Long-term relationships, characterised by loyalty to family, partner, friends, or culture, may represent significant corruption vulnerability. 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.

ACLEI engagement with law enforcement in Australia has identified that existing relationships with organised crime represent a particular risk in regional areas.<sup>43</sup> Smaller pools of social connectivity mean there is a greater likelihood of organised crime members having a shared social history with law enforcement employees. Internationally, vulnerability to compromise has been observed where female law enforcement officers work in the same small communities as where they live and socialise.

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<sup>41</sup> ACLEI discusses the assumption that corruption vulnerability is a frontline risk in its piece "Top 5 corruption prevention myths". Available here: <https://www.aclei.gov.au/corruption-prevention/corruption-prevention-myths>

<sup>42</sup> Rowe *et al* (2013)

<sup>43</sup> IBAC (2015)



It is inevitable that there will be associations between public service and law enforcement employees, and criminal entities. These associations need to be declared to an employer so any actual or potential risk can be managed.

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

**Case study – (former) NSW Police Integrity Commission: unauthorised disclosure by an officer to an organised crime gang**

In 2003 a female New South Wales Police officer was jailed on corruption charges for illegally accessing the NSWPF police database and providing information to her boyfriends, one of whom was a personal bodyguard to the head of a well-known Sydney organised crime family.

On one occasion the officer provided specific information on a police investigation into the theft of a car by her partner and another associate. The officer then further accessed the police database on multiple occasions to look up personal information of an individual who was publicly known to be a rival of her partner's organised crime employer.

The officer attempted to conceal her access on one occasion by entering a false intelligence report into the system, and then lied to the Police Integrity Commission about her actions.

The officer claimed that she was young and impressionable, but the judge rejected her claim she wasn't aware of her partner's connection to organised crime.

The judge also commented that the officer should never have been allowed to join the police, and had engaged in serious deception during psychological evaluation and while at the academy.

See media reporting from this matter—for example: <http://www.smh.com.au/nsw/expolicewoman-turned-bikini-model-jailed-for-leaking-info-to-john-ibrahims-bouncer-20130328-2gw2e.html>





## Proportional representation and opportunity

In terms of gender, women still represent the minority in Australian law enforcement agencies. The gap widens further when considering representation of women in senior executive and commissioned officer roles. There are currently a small number of women in senior executive roles at the apex of what is still a primarily masculine structure. Female senior executives represent the minority, not the norm—the majority of female law enforcement officers operate in junior roles. Even in civilian roles within law enforcement agencies, where women tend to be overrepresented, men hold the majority of supervisory positions.<sup>44</sup>

Allegations against female employees are proportional for some types of corrupt activities—for example, in unauthorised disclosure investigations, women are equally or over-represented. This might suggest that there are some types of corrupt activities that female law enforcement employees are more likely to engage in than others.

In a 2010 report by the former Police Integrity Commission (NSW) into characteristics of complaints about misconduct by off duty police officers, although more males than females were the subject of complaints about alleged off duty misconduct (76.5% to 23.5%), this was in proportion to the distribution of males and females in the NSW Police Force.<sup>45</sup>

However, overall law enforcement agencies have noted that women are not proportionally represented in serious misconduct and corruption matters, even when accounting for lower total numbers.

There is a question about whether the law enforcement environment operates in a way that limits opportunities for female employees to engage in corruption. Historically, women entering law enforcement roles in the 1970's were deliberately excluded from participation and isolated from corrupt police subcultures.<sup>46</sup>

While law enforcement has changed significantly since the 1970's, it is still acknowledged as a masculine environment. Corrupt activities may run in networks, formed on patronage relationships or based on long-established organisational ties. Women may be excluded from opportunities to engage in or benefit from corrupt activities, whether due to being relative newcomers to these relationships, or due to their having less access to the networks through which corrupt dealings are organised.<sup>47</sup>

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<sup>44</sup> Boni (2005); Broderick (2016)

<sup>45</sup> People (2010)

<sup>46</sup> Brown (1994)

<sup>47</sup> Goetz (2007); Rabe-Hemp (2007); Hossain *et al* (2010); Robinson (2013)



Likewise, 'merit-based' promotions may still exclude women from accessing positions that could provide opportunities for corruption. Previous decades of limited operational participation and formal barriers to promotion or training are potentially still impacting the career progression of female law enforcement officers.<sup>48</sup>

**Case study – IBAC Operation Ord: conduct of officers of the Victorian Department of Education and Training**

A 2016 IBAC investigation into corrupt activities in the Department of Education and Training uncovered a failure of systems and controls, as well as a culture characterised by “a ‘boys club’ mentality of drinking, lunching and preferential treatment”.

A manager and a Deputy Secretary, with a long history of friendship, colluded to de-fraud the Department by systemically abusing weaknesses in the funding arrangements between the Department and the school system.

Even though the manager reported to the Chief Financial Officer, she allegedly had no knowledge of his wrongdoing because of her deliberate exclusion by her supervisor, the Deputy Secretary, and her subordinate officer. The undermining of her position was tacitly endorsed by the “malevolent culture of non-compliance and entitlement”, and by the corrupt involvement of a senior officer.

*See: IBAC. (2016). Operation Ord: An investigation into the conduct of officers of the Department of Education and Training, in connection with the use of ‘banker schools’ and related activities*

ACLEI hypothesises that in agencies which perform a regulatory rather than a law enforcement function, women may be more proportionally represented in misconduct and corruption findings. As an example, in 2016, one Australian Public Service agency found that out of 135 substantiated allegations of internal fraud or serious misconduct, 72 (53.3%) were female, from an agency gender breakdown of 56% female, 44% male in the same reporting period.

If this is the case, it could indicate that lower female representation in corruption findings from law enforcement agencies may be influenced by other factors, such as lack of opportunity or access to positions that can enable corruption.

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<sup>48</sup> Rabe-Hemp (2007); Irving (2009); Robinson (2013 & 2015)



ACLEI considers that gender currently shapes opportunity for corruption in law enforcement, which may explain apparently low levels of corruption by female law enforcement employees. Furthermore, an under-represented group in a law enforcement environment could view engaging in corruption as too great of a risk due to concerns of retribution by the majority. This would likely be true for any under-represented group, not just women.<sup>49</sup>

However, if there is a significant demographic shift, in both equal and proportional representation of women in law enforcement, there is little to suggest that female officers will be less susceptible to corrupt activity than their male colleagues.<sup>50</sup>

### Responses to corruption or misconduct

A number of studies have considered whether engaging in corruption is a greater risk to women due to gender discrimination, which “makes violating institutional norms a riskier proposition for women than men”.<sup>51</sup> If a ‘fairer sex’ stereotype does exist, then failing to meet the expectations of this stereotype could reasonably produce a harsher punishment for a female engaged in corruption.

However, ACLEI has observed discussion that attributed behaviour to the ‘vulnerability’ or ‘exploitation’ of female officers, particularly where the respondent perceived the officer to be young or inexperienced in law enforcement. Respondents to ACLEI’s case study exercise were more inclined to believe that a female officer’s actions were well-intentioned, or motivated by a desire to help others—these mitigating factors weren’t considered in relation to activities undertaken by a male subject.

Female officers are still treated differently in a law enforcement environment, in ways that are overt or stem from unconscious bias in everyday interactions. There have been a number of comprehensive reviews into the treatment of women in law enforcement agencies that have resulted in recommendations for significant reform—recommendations to correct bias in recruitment and promotion and address adverse cultural issues.<sup>52</sup>

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<sup>49</sup> Echazu 2010

<sup>50</sup> Goetz (2007); Hossain *et al* (2010); Esarey & Chirillo (2013)

<sup>51</sup> Esarey & Chirillo (2013); Esarey & Schwindt-Bayer (2017)

<sup>52</sup> See the *Independent review into sex discrimination and sexual harassment, including predatory behaviour, in Victoria Police*, conducted by the Victorian Equal Opportunity and Human Rights Commission 2015; *Cultural change: gender diversity and inclusion in the Australian Federal Police* conducted by Elizabeth Broderick 2016; *Sex discrimination, sexual harassment and predatory behaviour in South Australia Police* conducted by the South Australia Equal Opportunity Commission 2016.



It is interesting to consider though, those attitudes and actions that come from a well-meaning place which nevertheless draw a distinction between male and female police officers. When discussing gender-based differences, some law enforcement representatives acknowledged that while official practice was that all officers are treated the same, in reality some behaviours have evolved which may have the unintended consequence of reducing access to opportunities for female officers.<sup>53</sup>

One example provided was that when mentoring female recruits, senior male officers would liken the relationship to that of a 'big brother'. When assessing an operational situation as high risk, senior officers acknowledged that some officers might be more likely to direct a female recruit to remain in the vehicle than they would a male recruit.

This report doesn't seek to judge unconscious protective instincts, but does consider whether this establishes a precedent for female officers missing key experiences which impact on future career prospects.

Supervisors may also make assumptions about a female officer's ability to undertake residential training or case officer responsibilities where the officer has children or works part-time.<sup>54</sup> This can further limit opportunities for transfers into operational or specialist roles which require specific contemporary experience, and also impact on promotion.<sup>55</sup>

When thinking about the issue of 'protectionism' it is interesting to consider whether assumptions about female officers, particularly those perceived as young or naïve, are a continuation of the same attitudes that assume an inherent feminine morality of care and a natural resistance to corruption.

Do these assumptions excuse serious misconduct or corruption and leave agencies vulnerable? ACLEI acknowledges that if a conduct matter is escalated to investigation and sanction by a professional or ethical standards command, there is governance and legislation in place which mostly ensures a level of consistency in the application of sanctions—irrespective of gender. Where a level of inconsistency might occur is at a team or station level in determining whether a matter is reportable or can be addressed with informal sanctions.

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<sup>53</sup> Irving (2009)

<sup>54</sup> Boni (2005)

<sup>55</sup> Silvestri (2003)



An awareness of potential unconscious bias in the application of an agency's integrity principles may be necessary for law enforcement agencies. There may be an opportunity to build in more controls with regards to informal counselling or supervisor actions to ensure consistent application—giving consideration to the impact of unconscious bias in perceptions of integrity.

**Case study – (former) Office of Police Integrity (OPI): Victoria Police armed offender squad**

A 2006 investigation into allegations of assault by the Victoria Police armed offenders squad found that some members of the squad were regularly involved in the excessive and unlawful use of force against people in police custody. The squad was disbanded and three officers were charged with assault and misleading the OPI investigation.

The squad's sole female member was identified by a complainant as having been involved in a serious assault against him that included being pushed down a flight of stairs. Despite this testimony, adverse findings by the OPI, and an extended history of excessive use of force complaints, the officer retained her employment with Victoria Police.

*See: Office of Police Integrity. (2008). The Victorian Armed Offenders Squad – a case study*

**Influence of culture**

Some of the strongest feedback ACLEI received in relation to this research was the importance of organisational culture in determining corruption risk. Law enforcement agencies and integrity agencies felt that the most significant predictor of corrupt behaviour was a toxic operating environment that provided pressure or opportunity to engage in corruption.

In a toxic environment corruption is genderless—corrupt institutions corrupt the people working in them, regardless of gender.<sup>56</sup> Organisational culture also has a significant role in creating opportunity—in law enforcement agencies still dominated by masculine values women may simply lack opportunities to engage in corruption due to gender inequality in access to senior positions.

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<sup>56</sup> Goetz (2007)



A Queensland Police Service longitudinal study (1996) did not support the argument that female police officers are inherently 'more ethical' in their outlook than their male counterparts. This research concluded that police views on ethical issues appear to be shaped much more by occupational and organisational factors and exposure to police culture (either negative or positive). There were few attitudinal differences between male and female police officers in terms of their views of ethical conduct. Female recruits were as likely as males to modify their views once they have spent some time 'in the field'.<sup>57</sup>

A recent study into police integrity in the Philadelphia Police Force examined the likelihood of officers reporting another officer using a series of case studies of escalating seriousness. This study found that there was significant variation in the likelihood of reporting a fellow officer, and that this variation was evident at a station or even team level. There was no consistent organisational response, demonstrating a lack of consistent organisational culture.

Gender of the respondent was not a significant predictor of likelihood of reporting misconduct—female officer reporting varied across police districts in much the same patterns as their male counterparts.<sup>58</sup>

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<sup>57</sup> Waugh & Ede (1996)

<sup>58</sup> Hickman (2016)



## Case study – two examples of adverse police watch-house culture

### ***IBAC – Operation Ross***

A 2016 investigation into police conduct at Ballarat Police Station examined allegations of excessive use of force in the treatment of a female person in custody. The investigation considered a Victoria Police intelligence briefing, which identified that Ballarat members predominantly respond ‘hands-on’ to incidents, and that it was likely that use of force was being underreported at this station.

Adverse findings were made against a number of officers, both male and female. A female officer and a male officer were subsequently charged with common assault. At the time of writing, a committal hearing is pending.

*See: IBAC. (2016). Operation Ross: An investigation into police conduct in the Ballarat Police Service Area*

### ***Australian Federal Police/Commonwealth Ombudsman – Review of ACT Policing’s Watch-house operations***

A joint review into the Canberra City watch-house was commenced in 2006, following allegations against multiple ACT police officers of excessive use of force, including inappropriate use of capsicum foam.

The review found deficiencies in many aspects of the watch-house operations, including inconsistent or incomplete guidelines for management of persons in custody, lack of formal training, poor staff supervision and low staff morale, limited staff understanding of duty of care to vulnerable detainees, and inadequate staffing.

One male officer was convicted of administering an injurious substance causing pain and discomfort to nine detainees in separate instances. One female officer was found guilty of using undue force, but did not have a conviction recorded.

The Magistrate found that the use of capsicum foam wasn’t used for any proper purpose; rather it was used for offender management and punishment. It was further observed that this behaviour appeared accepted among other officers in the watch-house, with video evidence showing little surprise or concern from officers present during the incidents.

*See: Commonwealth Ombudsman. (2007). Review of ACT Policing’s watch house operations: A joint report by the Australian Federal Police and the Commonwealth Ombudsman*

*In both these examples, ACLEI observed that gender appeared to have little influence. Male and female officers were equally likely to engage in inappropriate conduct where it was tacitly endorsed by the culture of their operational environment.*



## Research Gaps

### **Narrow definition of corruption**

The studies conducted into the relationship between gender and corruption seem to so far be focused heavily on engagement in bribery. Research examining women's involvement in other corrupt practices, such as favouritism and nepotism, unauthorised disclosure, fraud, and embezzlement is currently lacking.

### **Lack of longitudinal research**

Longitudinal studies which examine how women adapt to corrupt environments, and replicated studies which properly control for cultural and other differences are also missing from the research space. ACLEI has also not identified any studies with a gender nexus that focus specifically on corruption in law enforcement, although there have been several which consider the impact of gender as one factor in predicting engagement with misconduct or corruption.

### **Focus on the 'typical fraudster'**

Corruption is still thought of as a predominantly masculine activity—particularly in environments that have traditionally seen women in the minority.

When it comes to determining what your 'average' corrupt individual may look like, this profile is drawn from statistics derived from those who have already been caught, but doesn't necessarily provide any predictive capability where adverse behaviour isn't identified or where there is rapid demographic change.

It is interesting to consider whether the idea of a 'typical fraudster' is creating a self-fulfilling prophecy. If statistics show that 67% of internal fraud is perpetrated by male employees, does this demonstrate that female employees are significantly less likely than their male counterparts to engage in fraud, or could it suggest that fraud perpetrated by women is less likely to be detected?<sup>59</sup>

### **Lack of data**

Australian law enforcement agencies and integrity agencies acknowledge that significant differences exist in the sophistication of their respective data holdings, which may make comparative or longitudinal studies difficult.

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<sup>59</sup> KPMG (2016b)



Where there are robust information holdings, there is still the challenge of women representing a minority in law enforcement—a smaller data set means generalisations may be problematic as trends or patterns could be incorrectly identified as statistically significant.

One significant challenge for law enforcement at both a State and Federal level is data being held in departmental ‘silos’ which impacts on the ability to holistically assess agency risk. There are also variances between agencies in the application of policy and governance—for example, the treatment of declarable associations or secondary employment, which currently makes drawing comparisons problematic.

### **Impact of 50/50**

A number of law enforcement agencies have implemented a quota system for gender equality in all new recruit classes. This is a relatively new policy for most agencies, which seeks to address perceived long-term bias in entry level recruitment.

However, currently women are also outnumbered as applicants for police training, so there is a significant body of work needed to promote policing as a viable career opportunity for women that is well outside the scope of this paper.<sup>60</sup>

Any kind of targeted recruitment requires different recruitment strategies or aftercare arrangements. During times of high recruitment<sup>61</sup> there is opportunity for recruits to be drawn from backgrounds that traditionally don’t engage with law enforcement or those with different life experiences. There may also be a need to review and modify recruitment standards. This does not have to have adverse implications if the agency is aware that a significant demographic shift will impact the overall risk and integrity profile and are prepared to support and manage these changes.

Affirmative action strategies, like targeted recruitment or gender-based quotas, have been criticised for perpetuating paternalistic attitudes and potentially reinforcing stereotypes—in the case of gender-based quotas, that women require special assistance because they are less competent and weaker.<sup>62</sup> Researchers have also been concerned that in previously male-dominated industries, like law enforcement, hostility towards female officers may occur because of a perception that men are losing jobs to women.<sup>63</sup>

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<sup>60</sup> For example—between 2012-2015 75% of applicants to South Australia Police were men. Spence *et al* (2017) examine issues with recruitment to meet the QPS 50/50 gender quota.

<sup>61</sup> For example—the Victorian Government has committed \$2 billion between 2016-2020 to the recruitment of 2729 new general duties and specialist Victoria Police officers – an increase of 20% on current numbers.

<sup>62</sup> Levinson (2011); Heilman (1994)

<sup>63</sup> Levinson (2011)



If adverse responses to agency policy are left unaddressed, the result could be widespread disenfranchisement by both employees who feel threatened by affirmative action, and those who are being stigmatised because of the strategies that were intended to help them. This could become a potential area of integrity risk, as employees' organisational loyalty is compromised.

It is unsurprising that affirmative action strategies are viewed more favourably by those who will initially benefit from their implementation. However, when introduced as part of a broader organisational strategy to address inequity for all employees—for example, a more robust and transparent promotions system to counter perceptions of nepotism, such policies are more likely to be viewed favourably as a necessary element of a fair and equitable workplace,<sup>64</sup> and have a positive overall impact on an agency's integrity culture.

## Recommendations

### Inclusivity rather than just diversity

Promoting diversity in law enforcement is a key focus for most agencies. Diversity, the respect for, and acceptance and understanding of individual differences, is measurable and reportable through corporate reporting, recruitment initiatives, and mandatory training.

If diversity strategies aren't perceived as genuine by employees, there may be little in the way of benefit. If a dominant majority is still evident, those who are different may attempt to assimilate by conforming to dominant cultural norms in order to be accepted—negating the positive impact of having diversity in the organisation.<sup>65</sup>

Beyond diversity and assimilation is inclusion—genuine acceptance of all employees as valuable contributors to an agency, and an appreciation for the benefits that individual differences and experiences bring.<sup>66</sup> When considering organisational and individual integrity, inclusion can promote greater employee trust, information sharing, and organisational loyalty and engagement.

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<sup>64</sup> Parker *et al* (1997); Marquette (2012)

<sup>65</sup> Riordan (2014)

<sup>66</sup> Nembhard & Edmondson (2006)



Inclusivity is not treating everyone the same – it is about everyone having an equal opportunity to contribute in a meaningful and valued way. If agencies do determine that some employees face particular corruption vulnerabilities, consideration could be given to specific training opportunities, mentoring, or career development support. For example— understanding or addressing the potential conflict between employment and the expectations of family or community, or putting into place strategies to counter the subversive subcultures that may occur in response to female law enforcement officers lacking legitimate avenues for support and advocacy.

### **Don't design for average**

There is no 'one size fits all' integrity framework to reduce corruption vulnerability. Even though law enforcement agencies have a broadly similar core function, differences will exist in internal and external risk profiles. Law enforcement agencies need to design integrity frameworks to address their specific risk environment, noting that different functions of an agency may also have different vulnerabilities.<sup>67</sup>

With a continuing emphasis on 'best practice', in attempting to make integrity strategies as broad and general as possible agencies run the risk of implementing integrity systems that are not relevant to their employees. ACLEI considers that a 'best fit' approach to integrity system design is more appropriate, as the focus is on addressing agency-specific risk.

If male and female law enforcement employees have different experiences with, and vulnerabilities to corruption, organisational integrity frameworks should have the capability and maturity to adapt to the particular requirements of individuals, teams, or functions.

### **Agile integrity frameworks**

Integrity frameworks should not be set and forget. They should be designed to orient towards particular changes in environments, and be flexible towards emerging risk.

As an example, some law enforcement agencies are currently considering a review of internal drug testing to become more targeted in identifying areas of need. A risk-based, intelligence-led model allows for targeting of high risk targets, which can be continually re-evaluated and re-prioritised.

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<sup>67</sup> Hickman *et al* (2016)



Significant changes in organisational demographics may have a corresponding impact on an agency's risk profile. An agile integrity framework will have the capacity to shift and adapt to this organisational change. A robust and effective system will also have an external awareness of social and community trends—for example, illicit drug use, or increased financial pressure from rising cost of living or housing affordability—which may also represent corruption vulnerability for law enforcement employees.

### **Detection and early intervention**

If male and female law enforcement employees do engage differently with corruption, this is something agencies could consider in developing an early intervention system. Observations from law enforcement agencies indicate that female employees may be likely to use high level of planning to avoid detection. If gender stereotypes influence perceptions of integrity there is a risk that agencies aren't looking at areas of most vulnerability—with the potential for serious misconduct or corruption by female employees to go undetected.

At its most basic level, early intervention is a systems-based tool for identifying at-risk employees, allowing an agency to identify patterns of adverse behaviour and intervene before these issues become serious misconduct or corruption.<sup>68</sup>

A number of law enforcement agencies use a 'red flag' type system for identifying employees who may require intervention. Ideally, this system should be informed by data from a wide range of organisational sources—professional standards, human resources, security, IT, and health and wellbeing, and enable an agency to orient systems towards risk.

### **Consistency**

Noting the potential impact of bias and the opportunity for this to have an impact on the way an agency's integrity principles are applied, agencies might consider building protections against unconscious bias into their integrity framework.

Formal professional standards investigations and determinations generally have governance and processes—for example, panel-based decision making or independent adjudicators—to ensure consistency in the application of sanctions. However, there may be an opportunity to build more controls around informal management counselling or sanctions to ensure consistency and appropriate escalation.

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<sup>68</sup> Office of Police Integrity (2008)



## Targeted communication and messaging

Research and the observations of law enforcement and integrity agencies appear to indicate that women may be more risk averse than men, and may make a more considered decision to engage in corrupt activity. If this is the case, there is an opportunity to tailor the way integrity messaging is designed and communicated to the agency.

Communications messaging needs to highlight both the risk and probability of detection. This messaging should be supported by facts and evidence in order to make the risk genuine and avoid the unintended consequence of an employee making a risk assessment and proceeding with adverse behaviour. Use of case studies could also increase believability and personalise the risk of engaging in corruption.

Likewise, if male and female law enforcement employees are targeted differently by organised crime, then the way an agency might raise awareness of methodologies used by organised crime could be targeted to particular employee groups.

## Tailored training

A study by Hickman (2016) found no significant correlation between gender and likelihood of reporting serious misconduct. What was observed was a significant correlation between likelihood of reporting and cynicism—that an officer who scored highly on a cynicism scale would be less likely to report serious misconduct.<sup>69</sup>

Employees who are disengaged or who feel like they are missing opportunities afforded to others, can become vulnerable to corruption. One mechanism for addressing this corruption risk would be through the reduction of inequality<sup>70</sup>—in the case of learning and development, providing all employees with the training and guidance needed to undertake their roles and fulfil their career development aspirations.

Lack of access to training and lack of career guidance have been identified by Australian female law enforcement officers as some of the most significant barriers impeding their careers.<sup>71</sup> In particular, residential training programs, which may be gateway programs to promotion eligibility, can be less accessible for those who live in regional areas or have family care commitments.

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<sup>69</sup> Hickman (2016)

<sup>70</sup> Marquette (2012)

<sup>71</sup> Boni & Circelli (2002)



A number of law enforcement agencies now run tailored leadership development programs for women, or facilitate the attendance of female employees at externally run programs. However, consideration is also being given to providing female only operational training—South Australia Police trialled running their standard Incident Management Training as a women-only program. This was well received by participants as an opportunity to actively practice for command roles—which they felt tended to be dominated by male officers in both operational and training environments.<sup>72</sup>

Female-only training may be an interim measure to address decades of unconscious bias in how training is delivered and how participants are selected. Research has demonstrated that female-only training can successfully create an environment which facilitates improved self-confidence and skills-based learning—but only when combined with a broader organisational focus on improving support from senior management and comprehensive recruitment and promotion reform.<sup>73</sup>

Tailored training may support a broader organisational strategy for increasing proportional representation of women in law enforcement and address frustration and disengagement from female officers who have been negatively impacted by a focus on traditional training methods—potentially improving organisational loyalty and engagement.

### **Female integrity mentors**

A key recommendation from the Gender and Corruption Workshop was the creation of female integrity mentors.

One strategy for addressing gender inequity is mentoring programs—in this instance mentoring programs specifically designed for women and aimed at encouraging and supporting their transition into leadership roles.

Studies indicate that women are responsive to the attitudes around them, and are more likely than men to perceive that lack of support or prejudice from colleagues negatively impact their professional development.<sup>74</sup> Likewise, lack of career guidance from senior officers may be a significant career barrier, and may also leave female law enforcement employees without a trusted avenue for support with ethical or integrity dilemmas.

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<sup>72</sup> Niederle *et al* (2012); South Australian Equal Opportunity Commission (2016)

<sup>73</sup> Clarke (2011)

<sup>74</sup> Adams (2001); Boni and Circelli (2002)



At a time where there may be significant demographic shifts within law enforcement, with women from different backgrounds entering law enforcement roles, there may be opportunity for female integrity mentors to model desired behaviour and support female colleagues with integrity challenges.

## Research Opportunities

This research project was primarily observational in nature and in many ways asks more questions than provides answers. There are significant opportunities for further qualitative or quantitative studies. In particular, ACLEI believes there would be value in further analysis of the following:

- Longitudinal study on the impact of affirmative action or targeted recruitment strategies from an integrity perspective.
- Laboratory or field experiments that test engagement with corruption that doesn't culminate in financial reward, considered from a gendered perspective.
- An empirical analysis of all data holdings of Australian law enforcement agencies on corrupt activity by employees, specifically analysing motivation for engaging in corruption, adjusting for differences in definitions of corruption and mechanisms for reporting.

## Conclusion

Increasing participation of women in law enforcement is an important goal, and not simply as a treatment for corruption. Women deserve to be active participants in law enforcement and public service, and be recognised and valued for the unique skills and experience they bring. Assumptions about gender stereotypes as proof of higher ethical standards amongst women may ultimately be more harmful than beneficial to gender equity goals. If high expectations are disappointed, or the anticipated benefits of employing women to resolve issues with systemic corruption are not met, this could harm future efforts towards diversity and inclusion.<sup>75</sup>

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<sup>75</sup> Goetz (2007)



Empirical research is needed to establish whether opportunities and pressures to engage in corruption are different for men and women in a law enforcement environment. However, the observations drawn from Australian law enforcement seem to indicate that women have specific vulnerabilities to corruption—particularly in relation to approaches by organised crime, and may be motivated to engage in corruption for different reasons than their male colleagues.

While women lack equal or proportional representation in law enforcement, it is possible that gender influences opportunity to engage in corruption. However, if the status quo changes and a demographic shift provides opportunities for women, there is little to suggest that female officers will be less susceptible to corrupt activity than their male colleagues.<sup>76</sup> As the traditional paradigm of law enforcement changes, anti-corruption and integrity measures must change also.

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<sup>76</sup> Goetz (2007); Hossain *et al* (2010); Esarey & Chirillo (2013)



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