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

# **Investigation Report – Operation Denmark**

Operation Denmark –

An investigation into the misuse of a Commonwealth credit card  
by a staff member of the Department of Home Affairs

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## About ACLEI Reports

### The Law Enforcement Integrity Commissioner Act

1. The *Law Enforcement Integrity Commissioner Act 2006* (Cth) (LEIC Act) establishes the position of the Integrity Commissioner, supported by a statutory agency, the Australian Commission for Law Enforcement Integrity (ACLEI).

### The role of the Integrity Commissioner and ACLEI

2. The role of the Integrity Commissioner and ACLEI is to detect and prevent corrupt conduct and deal with corruption issues in designated agencies—presently the:
  - Australian Criminal Intelligence Commission (including the former Australian Crime Commission, the former National Crime Authority and the former CrimTrac Agency);
  - Australian Federal Police (including ACT Policing);
  - Australian Transaction Reports and Analysis Centre (AUSTRAC); and
  - Department of Home Affairs (including the Australian Border Force).
3. Other Australian Government agencies with law enforcement functions may be prescribed by regulation as being within the jurisdiction of the Integrity Commissioner.<sup>1</sup> At present those agencies include prescribed aspects of the:
  - Department of Agriculture, Water and the Environment (DAWE);
  - Australian Competition and Consumer Commission (ACCC);
  - Australian Prudential Regulation Authority (APRA);
  - Australian Securities and Investment Commission (ASIC);
  - Australian Taxation Office (ATO); and
  - Office of the Special Investigator (OSI).

### Corrupt conduct

4. A staff member of a law enforcement agency 'engages in corrupt conduct' if the staff member:
  - abuses his or her office;
  - perverts the course of justice; or
  - having regard to his or her duties and powers, engages in corrupt conduct of any other kind.
5. The Integrity Commissioner is to give priority to dealing with serious and systemic corruption.<sup>2</sup>

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<sup>1</sup> *Law Enforcement Integrity Commissioner Act 2006* (Cth) s 5(1) (definition of 'law enforcement agency') (LEIC Act); *Law Enforcement Integrity Commissioner Regulations 2017* (Cth) s 7.

<sup>2</sup> *Ibid* s 6(1).

## Dealing with corruption issues

6. A corruption investigation can commence in different ways:
  - the Minister may refer to the Integrity Commissioner an allegation or information that raises a corruption issue.
  - the head of a law enforcement agency within ACLEI's jurisdiction must notify the Integrity Commissioner of any allegation or information that raises a corruption issue which relates to that agency.
  - any person or government agency can refer to the Integrity Commissioner an allegation or information that raises a corruption issue. A referral may be anonymous, or on behalf of another person.
  - the Integrity Commissioner can commence an investigation on his or her own initiative.<sup>3</sup>
7. The Integrity Commissioner may decide to deal with the corruption issue in a number of ways:
  - have ACLEI investigate the corruption issue either alone or jointly with another government agency or an integrity agency for a State or Territory.
  - refer the corruption issue to the law enforcement agency to conduct its own investigation.
  - decide that an investigation is not warranted.
8. The Integrity Commissioner can decide to manage or oversee any investigation that has been referred to a law enforcement agency. If the law enforcement agency were not the Australian Federal Police (AFP), the Integrity Commissioner can also refer the issue to the AFP for investigation and may manage or oversee that investigation.<sup>4</sup>

## Reports

9. After completing a corruption investigation, the Integrity Commissioner must prepare a report setting out:
  - a) the Integrity Commissioner's findings on the corruption issue;
  - b) the evidence and other material on which those findings are based;
  - c) any action that the Integrity Commissioner has taken, or proposes to take, under Part 10 in relation to the investigation; and
  - d) any recommendations that the Integrity Commissioner thinks fit to make and, if recommendations are made, the reasons for those recommendations.<sup>5</sup>
10. The Integrity Commissioner must give the report on the investigation to the Minister who administers the LEIC Act and a copy to the head of the law enforcement agency to which the corruption issue relates.<sup>6</sup>

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<sup>3</sup> Ibid ss 18–24 and 38.

<sup>4</sup> Ibid ss 26–30.

<sup>5</sup> Ibid ss 54(1)–(2).

<sup>6</sup> Ibid s 55.

## Standard of proof

11. The Integrity Commissioner makes findings about whether a person has engaged in corrupt conduct, based on the balance of probabilities. Those findings may not be the same as those that would be made by a court deciding on criminal guilt beyond a reasonable doubt.
12. Before making a finding, the Integrity Commissioner is required to be 'reasonably satisfied', based on relevant facts, that the corrupt conduct occurred and that the corrupt conduct was within the meaning of the LEIC Act.
13. In considering whether or not the Integrity Commissioner is 'reasonably satisfied' of relevant facts, the Integrity Commissioner applies the reasoning set out in *Briginshaw v Briginshaw*,<sup>7</sup> *Rejtek v McElroy*,<sup>8</sup> and *Re Day*.<sup>9</sup>

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<sup>7</sup> (1938) 60 CLR 336, 361–62 (Dixon J).

<sup>8</sup> (1965) 112 CLR 517, 521.

<sup>9</sup> (2017) 91 ALJR 262, 268 [14]–[18].

## Preface to the public version of Investigation Report

14. This Investigation Report is a report on Operation Denmark, a corruption investigation into the misuse of a Commonwealth credit card issued to a former employee of the Department of Home Affairs (Home Affairs) in their course of employment.
15. Operation Denmark commenced on 3 February 2020. The investigation established that 'Officer X' misused their Commonwealth credit card for personal expenditures on 59 separate occasions. As a result, Officer X caused a loss of \$1,578 to the Commonwealth.
16. The investigation resulted in Officer X pleading guilty to one count of dishonestly intending to cause a loss pursuant to s 135.1(3) of the Criminal Code (Cth). They were discharged without proceeding to conviction pursuant to s 19B(1)(d) of the *Crimes Act 1914* (Cth) upon giving recognizance in the sum of \$1,500 and on condition to remain of good behaviour for a period of 12 months.
17. Following this, I prepared my report on Operation Denmark pursuant to s 54 of the LEIC Act and undertook a procedural fairness process as required by s 51.
18. On 5 April 2022, I gave the Attorney-General and the Secretary of Home Affairs my finalised Investigation Report on Operation Denmark in accordance with s 55 of the LEIC Act. I did not make a corruption finding against Officer X.
19. I then considered whether it was in the public interest to publish the Investigation Report on Operation Denmark under s 209 of the LEIC Act.
20. On 25 May 2022, I notified Home Affairs and Officer X that I was considering publishing the Investigation Report on Operation Denmark, giving them the opportunity to provide submissions on the proposed publication in accordance with s 210 of the LEIC Act. The process concluded on 17 June 2022 with submissions from Home Affairs.
21. This is the version of the Investigation Report I have decided is in the public interest to disclose.



Jaala Hinchcliffe  
Integrity Commissioner

12 July 2022

# Summary of the Investigation

## Notification

22. On 19 December 2019, the Secretary of Home Affairs notified the former Integrity Commissioner of a corruption issue under section 19 of the LEIC Act. It was alleged that Home Affairs employee, 'Officer X', had misused their Commonwealth credit card (CCC) by making personal purchases with it.

## Jurisdiction

23. On 3 February 2020, the then Integrity Commissioner decided to investigate the matter as a significant corruption issue jointly with Home Affairs under sections 26(1)(a) and 26(2) of the LEIC Act. The corruption investigation was named 'Operation Denmark'. The then Integrity Commissioner was satisfied:
  - a) Officer X was an employee of Home Affairs, being a 'staff member of a law enforcement agency' as defined in section 10(2A) of the LEIC Act; and
  - b) the information raised a 'corruption issue' as defined by section 7 of the LEIC Act as it was alleged that Officer X had repeatedly used their CCC for personal expenses.

## Investigation

24. The objective of the investigation was to determine whether Officer X had abused their office as a staff member of Home Affairs by improperly using their CCC for personal expenses.
25. At the time of the conduct, Officer X was an ongoing Executive Level 1 employee and worked from the Melbourne Office. Their supervisor ('the supervisor') was based in Canberra. Officer X was responsible for supervising APS Level 6 employees.
26. Officer X's role involved frequent travel within Melbourne and interstate and they were authorised to use their CCC for work related travel expenses, such as paying for a taxi.

## Commonwealth credit cards

27. On 1 July 2015, Home Affairs issued Officer X a CCC.
28. Within Home Affairs, the CCC includes:
  - a) a Diners Card virtual credit card to pay for travel related expenses; and
  - b) a companion Diners MasterCard to pay for other appropriate goods and services for official purposes.
29. CCC accounts operate on a monthly billing cycle, akin to personal credit cards. At the end of each billing cycle a statement is automatically generated, detailing the transactions attributed to that credit card for the previous month. This statement is generated in Home Affairs' finance and human resources system 'easySAP'.
30. In verifying monthly statements, employees are required to go through each individual transaction and perform a number of administrative actions. These include a requirement to upload a receipt, nominate whether the expense was



personal or official and enter a detailed description of the transaction. Once complete, employees are required to submit the statement electronically to their supervisor for review.

31. In reviewing a statement, the supervisor must be satisfied that the transactions were an official expense relating to the duties of the employee, as well as confirming other details are correct such as tax codes. If satisfied, the reviewer can finalise the statement. However, if the reviewer identifies issues they can return the statement to the employee for correction and to make comments.

### **Personal expenses**

32. Credit cards are not permitted to be used for personal expenses, except in very limited and pre-approved circumstances. However, occasionally credit cards are accidentally used by employees to pay for personal expenses.
33. The process to acquit personal expenditure incurred on a CCC must be processed in the same way as official expenditures. The cardholder is required to attribute relevant transactions as being personal expenses when verifying their statement. Once the statement is verified and reviewed, a debt is automatically raised in easySAP. An invoice is then automatically emailed to the cardholder providing details of the debt and the available payment methods. The debt owed to Home Affairs must be repaid in full to the Collector of Public Monies within 7 days.

### **Policies, agreements and training**

34. The issuing, use and management of CCC within Home Affairs is governed by a number of policies and guidelines, which includes:
  - Credit Cards – Financial Management Guideline, Procedural Instruction (1.05.01);
  - Credit Card Management – Financial Management Guideline, Procedural Instruction (1.05.02);
  - Cardholder instructional document – Responsibilities of a Commonwealth credit card holder; and
  - Cardholder instructional document – Personal expenditure on a corporate credit card.
35. On 14 March 2018, Officer X signed a Cardholder Agreement Form acknowledging the conditions on which the CCC was issued to them, including:
  - a) The credit card is not to be used for anything other than official purposes.
  - b) The credit card is not to be used for private expenditure unless specifically authorised to do so and to repay any such private expenditure strictly in accordance with the arrangements specified by the delegate.
  - c) A TRIM file is to be maintained to record all purchases made by the credit card and a copy of all tax invoices and supporting documentation will be retained for recording and audit purposes. If an invoice / receipt is not issued or lost, a statutory declaration is to be completed in its place.
  - d) If the credit card is lost, stolen or used without authority, the card provider is to be immediately contacted and notified and an email is to be sent to the corporate credit card team.
36. In signing this form, Officer X also acknowledged that wilful non-compliance may lead to disciplinary action and/or criminal investigation.

37. Officer X successfully completed an online e-learning module about using a CCC on 17 April 2018. They also completed a virtual classroom course on verification and review of CCCs on 21 November 2017.

**Review of Officer X's credit card statements**

38. Home Affairs records show that during the acquittal of Officer X's 2019 statements, concerns were raised about the transactions identified as personal expenses.
39. For example, following verification of their May 2019 credit card statement, Officer X emailed their supervisor on 4 June 2019 with the subject line 'Credit Card'. The email stated:

*"Hi*

*Just reviewed my corporate credit card and just awoken to the fact that I have used the card for several personal expenses. I had the corporate card in front of mine and was just tapping and not looking. Total accident but my bad.*

*The process is once verified an invoice is generated and I pay that.*

*Sorry for the accidental mistakes.*

*Regards..."*

40. On the same day, the supervisor responded to the email requesting that Officer X make arrangements for the payments.
41. On 5 June 2019, the supervisor received an email informing him that Officer X's May 2019 credit card statement was ready for review. The supervisor forwarded the email to Officer X asking about arrangements for repayment and advised the following:

*"...I am not going to approve this in its present format as it is all personal expenses. Returning for you to raise a ticket with HR and make arrangement to pay the credit card.*

*Note that the costs incurred were in different venues over a month period. Please ensure this doesn't happen again as I will have to make arrangements to revoked the use of the work credit card.*

*Regards"*

42. On the same day, Officer X contacted Home Affairs' Finance Service Desk (Service Desk) to clarify the process for managing personal expenses incurred on a CCC.
43. Officer X forwarded the advice from the Service Desk to the supervisor about the process for accidental use of the CCC for personal purchases. Based on the advice, the supervisor approved Officer X's May 2019 statement in easySAP and requested that Officer X redo the online credit card training by the end of July 2019.
44. Officer X's credit card statement for June 2019 was approved by another officer, who was supervising Officer X at the time. Officer X's permanent supervisor was consulted about Officer X's personal expenses listed on the statement.
45. No personal expenses were incurred in July or August 2019.
46. In November 2019, the supervisor referred their concerns about Officer X's use of their CCC to Home Affairs' Integrity and Professional standards section. They were also sent an email to the Credit Card Management team requesting to cancel Officer X's CCC.

47. At time of referral, the supervisor had not approved Officer X's September and October 2019 statements following concerns about some of the transactions listed as 'official expenses'. The suspicious transactions included payment for a taxi fare at 10.08pm, which was outside of their work hours. The supervisor raised their concerns about this transaction with Officer X on 27 November 2019, with Officer X's response being that they will "get to [it] tomorrow" and that it "does appear a mess".
48. Following a preliminary review of Officer X's credit card statements by the Credit Card Management team, their CCC was cancelled on 22 November 2019 in accordance with Home Affairs 'Credit Cards – Financial Management Guideline, Procedural Instruction (1.05.01)' (The Guidelines). The Guidelines provide that 'persistent non-compliance by a cardholder may result in the cancellation or suspension of their card'.
49. At no time while managing Officer X did the supervisor give them permission to use their CCC for personal expenditure.

### **Unauthorised transactions**

50. The investigation identified that between 25 April 2019 and 18 November 2019, Officer X made 59 unauthorised transactions with their CCC for personal expenditures totalling \$1,578.
51. 58 out of 96 transactions for that period were nominated by Officer X as personal expenses and made in error. The majority of the transactions occurred in November 2019 with Officer X using their CCC 26 times for personal expenses, including during a period of annual leave.
52. The majority of the unauthorised transactions were for food, alcohol and transport. However, some of the transactions were linked to a horse racing club and a sports stadium.
53. The investigation also established that Officer X claimed two personal expenditure transactions as 'official expenses'. One transaction was for \$84.84 on 17 September 2019 and Officer X allocated it to a work trip. In reviewing Officer X's September 2019 statement, their supervisor questioned the legitimacy of this transaction and resubmitted the statement for review. Upon review, Officer X marked this transaction as a personal expense but did not change the reason for the expense as being for 'staff meetings'.
54. Officer X also claimed a transaction on 29 September 2019 of \$22.68 as an official expense and allocated it a trip number. The transaction was approved by the supervisor by accident even though the charge incurred on a Sunday afternoon when Officer X was not performing any official duties.
55. Officer X's personal banking records showed that on at least 7 occasions in May 2019 prior to using their CCC, they attempted to use their personal credit card which was declined due to insufficient funds.

### **Repayments by Officer X**

56. Officer X nominated and paid the following amounts to Home Affairs for personal expenses incurred on their CCC:
  - a) May 2019 statement - repaid \$438.84 on 14 June 2019 for 14 transactions.
  - b) June 2019 statement – repaid \$87.83 on 5 September 2019 for 6 transactions.

- c) September 2019 statement – repaid \$159.99 on 13 December 2019 for 3 transactions.
  - d) October 2019 statement – repaid \$179.48 on 24 December 2019 for 7 transactions.
57. In relation to their November 2019 statement, Officer X nominated 28 transactions totalling \$689.65 as personal expenses not related to their official duties. On 7 July 2021, Home Affairs deducted \$689.65 from Officer X’s final payslip in satisfaction of the administrative debt.
58. The investigation identified that at the time of the offending, Officer X was undergoing some difficult personal circumstances, including financial strain.

## Findings

59. In considering the evidence obtained in the course of Operation Denmark, I must also consider whether the evidence is sufficient, and whether it is appropriate, to make a finding that Officer X engaged in corrupt conduct, namely an abuse of office.
60. ‘Abuse of office’ is not defined in the LEIC Act. It is a concept primarily used in the context of criminal law. It generally involves using one’s office to dishonestly benefit oneself or another, or to dishonestly cause detriment to another.<sup>10</sup>
61. The investigation established that Officer X used their CCC from 24 April 2019 to 18 November 2019 for personal expenditure on 59 separate occasions. As a result, Officer X caused a loss of \$1,578 to the Commonwealth.
62. While the amount of the financial benefit obtained by Officer X through the use of their CCC was a relatively small amount, the investigation identified a course of conduct by Officer X in relation to their use of their CCC for personal expenditure. This course of conduct included Officer X using their CCC on multiple occasions immediately after their personal credit card was declined due to insufficient funds. This shows their conscious decision to use their CCC to make personal purchases. The investigation also identified two occasions where Officer X claimed that personal expenses were for legitimate business purposes in their reconciliation of their CCC.
63. The evidence showed that Officer X was questioned about the use of their CCC for personal expenses. Despite this, they continued to use their CCC for personal use.
64. The investigation found that at no time was Officer X authorised to use their CCC for personal expenditure.
65. Officer X had been issued with a CCC since 2015. They signed a Cardholder Agreement Form acknowledging the conditions on which the CCC was issued to them and they participated in training about the use and management of CCCs.
66. I am reasonably satisfied that Officer X was aware that they were not authorised to use their CCC for personal use and that their conduct was improper. I am also satisfied that Officer X dishonestly obtained an ongoing financial benefit for themselves, albeit a relatively small benefit.

<sup>10</sup> See for example s 142.2(1) of the *Criminal Code* (Cth).

67. While I am satisfied that the evidence obtained from the investigation is sufficient to meet the definition of engaging in corrupt conduct through an abuse of office as defined in s 6(1)(a) of the LEIC Act, given the circumstances of this matter, including the small amount of money involved, I do not consider it necessary to make a corruption finding.

## Action under Part 10 of the LEIC Act

68. On 9 April and 20 July 2020, I provided information arising from the investigation to the Home Affairs Secretary under s 146 of the LEIC Act. This section permits disclosure of information that amounts to evidence of a breach of duty or misconduct.
69. On 1 July 2020, I referred a brief of evidence to the Commonwealth Director of Public Prosecutions as required by s 142 of the LEIC Act.
70. Officer X resigned from Home Affairs in December 2020 following an Australian Public Service Code of Conduct investigation which established that Officer X had breached their duties to:
- behave honestly and with integrity in connection with APS employment;
  - act with care and diligence in connection with APS employment;
  - comply with any lawful and reasonable direction given by someone in the employee's Agency who has authority to give direction; and
  - use Commonwealth resources in a proper manner and for a proper purpose.
71. On 5 August 2021, Officer X pleaded guilty before the Melbourne Magistrates Court to one count of dishonestly intending to cause a loss pursuant to s 135.1(3) of the Criminal Code (Cth).
72. Officer X was discharged without proceeding to conviction pursuant to s 19B(1)(d) of the *Crimes Act 1914* (Cth) upon giving recognizance in the sum of \$1,500 and on the condition to remain of good behaviour for a period of 12 months. The Magistrate commented that the offending was serious in that it was a direct breach of trust by Officer X.

## Corruption Prevention Observation

73. The conduct investigated in this matter gives rise to a number of corruption vulnerabilities with respect to the misuse of CCCs and the heightened risks associated with remote management.

### Use of Commonwealth credit cards

74. Officials with direct and immediate access to government funds via CCCs are in a privileged and trusted position. It is therefore critical that the controls surrounding CCC expenditure are fit for purpose. At the time of the offending, Home Affairs had implemented the following controls:
- A detailed application process that included mandatory online training, prior to the provision of a CCC.

- An established recording, approval and acquittals process in relation to each expense. This included a process to recoup any personal expenses made on CCCs through the provision of an invoice, but only once the transactions in question had been approved, which managers were separately accountable to approve within specific timeframes.
  - Compulsory annual online Fraud and Corruption awareness training.
75. In spite of the above, Officer X was able to repeatedly use their CCC for a large number of unauthorised personal expenses over a period of several months. This was because at the time, there was no process in place at a departmental level to identify and escalate repeated misuse of a CCC where the associated automatically generated invoices were subsequently paid.
76. I note that in 2019-2020, Home Affairs implemented a new Credit Card Compliance Monitoring Program (CCCMP). This is a risk-based program aimed at identifying instances of non-compliance with legislation, the Accountable Authority Instructions and the Credit Card Policy. As it stands, the CCCMP stipulates a quarterly review of persistent use of credit cards for a personal nature.
77. In the first year of the CCCMP, it was found that in the vast majority of cases, the use of the CCC for personal reasons was accidental in nature, such as paying for groceries or ride share payments. In response to the latter, communications were sent to all staff regarding the use of ride-sharing services and steps that should be taken to minimise accidental personal use. However, after it was found that there was no significant decrease in personal expenditure relating to ride-sharing services, the option to use ride-sharing services for official travel was removed.
78. Ten cardholders were issued warnings for repeatedly using the CCC for personal reasons in the 2019/2020 Financial Year, and only one cardholder has been referred to the Integrity and Professional Standards Branch for further consideration.

### **Manager support and training**

79. This matter also demonstrates the important role that immediate managers play in identifying and responding to corruption risks and behavioural red flags.<sup>11</sup> In this regard, Home Affairs could consider:
- a) Ensuring that all managers are aware of how to address and escalate any concerns they have regarding behavioural red flags in relation to their staff (including the persistent misuse of CCCs), and ensure they are properly supported when doing so.
  - b) Whether additional support and/or training should be provided to staff and managers who work in different locations. This could include providing access to supervisors at a local level, for example through the establishment of site leaders who are tasked to monitor and report on staff attendance and wellbeing.

### **The importance of early intervention**

80. This investigation revealed that the CCC misuse undertaken by Officer X was associated with a number of significant personal challenges. Identifying CCC misuse at an earlier stage presents opportunities to better understand an employee's personal circumstances, and ensures the risks associated with increased personal

<sup>11</sup> See also, [ACLEI, Key Prevention Concepts: Frontline Manager Capability](#)

vulnerabilities are properly assessed and mitigated. This kind of proactive response, is broadly known as early intervention.<sup>12</sup>

81. Further information on early intervention, the role of frontline managers in preventing and identifying corrupt conduct, and on corruption risks and prevention opportunities is available on the Corruption Prevention pages of the ACLEI website (<https://www.aclei.gov.au/corruption-prevention/>).



Jaala Hinchcliffe  
Integrity Commissioner  
5 April 2022

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<sup>12</sup> See also, [ACLEI, Key Prevention Concepts: What is the best approach to early intervention?](#)