Australian Government

Australian Commission for Law Enforcement Integrity

INTERNATIONAL DEPLOYMENTS
CORRUPTION RISKS FOR LAW ENFORCEMENT

AN ACLEI CORRUPTION PREVENTION REPORT

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Acknowledgements

ACLEI would like to acknowledge the involvement and generous contributions of representatives from the following agencies:

Australian Border Force

Australian Criminal Intelligence Commission

Australian Federal Police

Australian Transaction Reports and Analysis Centre

Department of Agriculture and Water Resources

Department of Home Affairs

Department of Foreign Affairs and Trade

Executive Summary

All of Australia's federal law enforcement agencies deploy officers overseas in response to the global nature of threats to Australia's national security, community safety, public revenue, tourism and trade industries. This includes deployment of staff to countries perceived to have high levels of crime and corruption, and deployment into situations where association with criminal entities and other corrupting influences is either necessary or unavoidable. These entities may seek to exploit and corrupt vulnerable officers as a means to advance their own interests. Internationally deployed officers may be exposed to corruption risks unlike those in the domestic environment. Additionally, officers may be deployed on their own for extended periods of time with little or no direct oversight. Concurrently, the support structures and governance arrangements in place to mitigate domestic corruption risks may not be transferable to an international context, or may not be readily accessible by deployed officers.

The Australian Commission for Law Enforcement Integrity (ACLEI) observes that existing corruption prevention measures employed by law enforcement agencies under ACLEI's jurisdiction (LEIC Act agencies) could be enhanced to better respond to international corruption risks.

Drawing on observations from LEIC Act agencies, findings from ACLEI investigations and insights from the research literature on corruption risk management and international deployments, ACLEI highlights potential corruption vulnerabilities and makes recommendations for agencies to better mitigate international corruption risks.
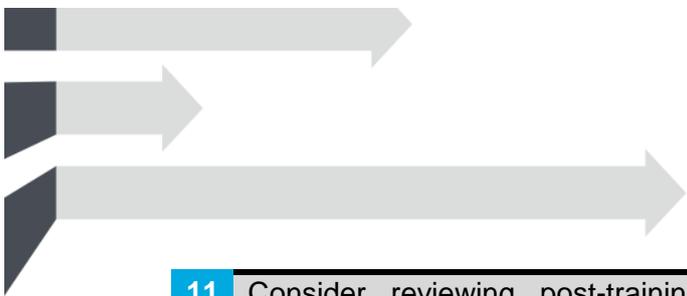
These recommendations are included below.

ACLEI has considered corruption risk management across the whole international deployment lifecycle (pre, during and post-deployment) and placed particular emphasis on managing the risks associated with importing corruption via the repatriation of officers returning from deployment.

Recommendations for agencies

Agencies should:

#	Recommendation	Page
1	Identify and assess specific corruption risks (including those arising in the course of classified/sensitive operations) within the context of the recommendations outlined in this report and engage with ACLEI as necessary to ensure treatment measures are fit for purpose.	Pg. 22
2	Consider establishing a suitable forum, such as an ACLEI Community of Practice specialist sub-group, focused on sharing international deployment information with specific emphasis on improving understanding of international corruption risks for law enforcement.	Pg. 22
3	Update relevant documentation to include practical measures that can be used by officers to maintain required integrity standards while deployed.	Pg. 23
4	Include explicit reference to corruption risks in international deployment documentation.	Pg. 23
5	Consider placing stronger emphasis on the personality traits and behavioural characteristics required for international deployments in their recruitment documentation.	Pg. 24
6	Consider incorporating specific reference to maintaining staff integrity standards at post in all manager position descriptions.	Pg. 24
7	Consider assessing the personality traits and behavioural characteristics of potential international deployees against the specific requirements of the international deployment to assess risk of compromise.	Pg. 24
8	Update their existing integrity assessment measures to explicitly consider officer vulnerability to corruption while on deployment, including through holistic corruption risk assessment of the person, place and purpose.	Pg. 25
9	Ensure pre-deployment preparation incorporates engagement with relevant anti-corruption (ACLEI) and foreign interference (ASIO) subject matter experts.	Pg. 26
10	If not already doing so, consider whether their pre-deployment preparation measures could incorporate information and/or briefings for accompanying partners/spouses and other dependents.	Pg. 26

11	Consider reviewing post-training communication and governance mechanisms to ensure integrity requirements are continually reinforced throughout the duration of the deployment.	Pg. 26
12	Have all officers disclose and/or update changes in circumstance and declare any actual or potential conflicts of interest during the pre-deployment process.	Pg. 27
13	Regularly review communication and reporting mechanisms to ensure consistent and frequent communication of integrity standards.	Pg. 29
14	Consider how they prepare their officers for repatriation to ensure potential corruption risks are treated effectively.	Pg. 29
15	Consider how they can reduce corruption risk caused by high levels of autonomy and discretion for officers deployed for extended periods of time and/or on their own. For example, agencies may look at regularly rotating officers to different locations and/or varied duties to minimise the vulnerability of compromise.	Pg. 30
16	Document and communicate the process for notifying integrity issues occurring overseas, with communication of this process incorporated into pre-deployment preparation and dissemination to all agencies operating at post.	Pg. 31
17	Consider establishing protocols for managing information dissemination to post regarding ongoing investigations, in accordance with their specific operational and privacy requirements.	Pg. 31
18	Consider reviewing the information provided to officers before, during and on completion of deployment to ensure it accurately reflects and clearly communicates the responsibilities and obligations of all parties (including the agency and the officer) to the repatriation process.	Pg. 32
19	Ensure mandatory reporting directions provide clear practical examples of the types of conduct or behaviour that repatriates must report on their return.	Pg. 33
20	Consider reviewing their post-deployment processes and practices to ensure they are fit for purpose and effective in treating identified corruption risks.	Pg. 33

Introduction

Critical objections to a globally uniform definition of the term [corruption] indicate that corruption is a phenomenon that differs in appearance, extent and moral acceptance from culture to culture.[1]

Australia's federal law enforcement agencies overseas

Serious crime is becoming increasingly complex and global. Both the *2017 Foreign Policy White Paper* (the White Paper) and the *2018 National Strategy to Fight Transnational, Serious and Organised Crime* contend that approximately 70 per cent of Australia's serious criminal threats have an international dimension[2]. The White Paper notes the evolving nature of the threat posed by transnational crime and highlights the need for Australia to boost international capacity and engage with (and in) regional states, particularly within Asia and the South Pacific, to combat serious criminal threats[3].

In response, Australian law enforcement agencies are increasing cooperation with international partners by deploying officers overseas to address vulnerabilities in our region that enable criminal networks and corrupt individuals to operate[4]. This also ensures Australia has access to the information, intelligence and capabilities it needs to respond. Additionally, the White Paper commits Australia to continue building regional capacity to combat corruption through the framework of the *United Nations Convention against Corruption[5]*.

ACLEI's role

The *ACLEI Corporate Plan 2018-22* (the Corporate Plan) recognises that the effectiveness of corruption deterrence settings and controls can vary over time and place[6]. The Corporate Plan states ACLEI will undertake projects that identify corruption risks and inform their treatment, and commits ACLEI to working with other agencies to foster anti-corruption expertise and strengthen corruption resistance[7].

Noting the evolving threat environment and Australian law enforcement's increased international presence (including in countries identified as containing significant crime

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[1] (Hauser, 2019)
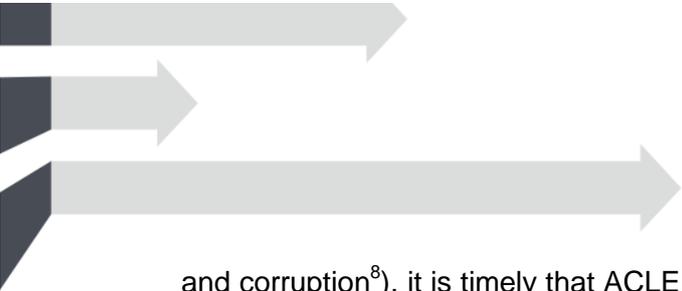[2] (Department of Foreign Affairs and Trade, 2017)
[3] ibid
[4] ibid
[5] ibid
[6] (Australian Commission for Law Enforcement Integrity, 2019)
[7] ibid

and corruption[8]), it is timely that ACLEI reviews the current landscape and works with LEIC Act agencies to ensure corruption prevention measures remain fit for purpose. Consistent with ACLEI's strategic purpose[9], this report has been prepared to support enhancements to LEIC Act agency responses to the corruption risks they face in their respective international operations.

ACLEI jurisdiction

As at the date of this report's publication, ACLEI's jurisdiction consisted of the following agencies:

- the Australian Criminal Intelligence Commission (ACIC) (including the former Australian Crime Commission, the former CrimTrac Agency and the former National Crime Authority);
- the Australian Federal Police (AFP) (including ACT Policing);
- the Australian Transaction Reports and Analysis Centre (AUSTRAC);
- prescribed aspects of the Department of Agriculture; and
- the Department of Home Affairs, including the Australian Border Force (ABF).

Project scope

The primary objective of this project has been to increase awareness and understanding of the potential corruption vulnerabilities facing Australia's law enforcement agencies in their respective international operations – and to recommend practical measures for agencies to adopt to mitigate corruption risk. With this in mind, the project focused on answering the following questions:

- What does the international deployment landscape look like?

- What are the key corruption risks facing international deployments and how do we effectively treat these risks?

- What are the current gaps in our management of corruption risk associated with international deployments?

The project will:

- examine current LEIC Act agency international deployment management practices to determine the scope and nature of their respective international operations;
- review the existing measures in place within LEIC Act agencies to manage corruption risk across the international deployment lifecycle – including pre-deployment, on deployment and post-deployment;

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[8] (Australian Criminal Intelligence Commission, 2017)- the ACIC Organised Crime in Australia 2017 report highlights several countries within which Australian law enforcement agencies are operating. Some of these countries rank substantially lower than Australia on the latest (2018) Transparency International Corruption Perceptions Index.
[9] (Australian Commission for Law Enforcement Integrity, 2019) - ACLEI's strategic purpose is to make it more difficult for corruption to occur or remain undetected in designated Australian Government law enforcement agencies.
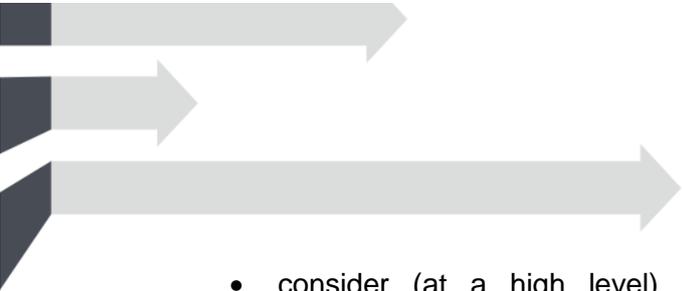
- consider (at a high level) measures in place within other Australian Government entities to manage offshore corruption risks;
- review the research literature to identify relevant themes and issues associated with international deployment management, including links to existing and emerging corruption risks and (actual and theoretical) treatment options; and
- examine ACLEI investigation and intelligence holdings, and open source materials, with an international deployment nexus.
- compare current international deployment corruption risk management practices in LEIC Act agencies against better practice in the research literature to identify opportunities to strengthen corruption prevention measures.

Out of Scope
This project focused specifically on corruption risk and treatment measures. It does not address health and safety or broader security matters (except to the extent that there is a strong nexus with corruption).

Noting ACLEI's current jurisdiction and time and resourcing constraints, consultation for this project did not extend beyond LEIC Act agencies and other selected Australian Government entities. However, the outcomes of this project (including this report) may form the basis for consultation with a broader range of stakeholders in the future.

Key project deliverables
The primary project deliverable is preparation of a report (this document) which compiles collected information and includes key findings and recommendations for LEIC Act agencies to consider in order to strengthen corruption prevention for international deployments.

Subsequent materials will likely be derived from the material presented in the report, including training products for incorporation into international deployment management programs.

Presentation of the data
This report combines information gathered from LEIC Act agency representatives and representatives from other relevant Australian Government entities – including policies, guidelines, training programs and case studies – with information collected via face to face consultations with relevant LEIC agency staff responsible for integrity and/or professional standards and international operations. Declassified ACLEI holdings, as they relate to international deployments, have also been included where relevant.

Findings in this report are presented with reference to the international deployment lifecycle, incorporating the pre-deployment, on deployment and post-deployment stages. Each stage is considered in detail via an analysis of the data provided by agencies as it relates to the relevant research literature. From this analysis, the relative strengths, opportunities, weaknesses and risks associated with agency responses to international corruption risk are identified and used to inform the report's recommendations.

Pre-Deployment

On Deployment
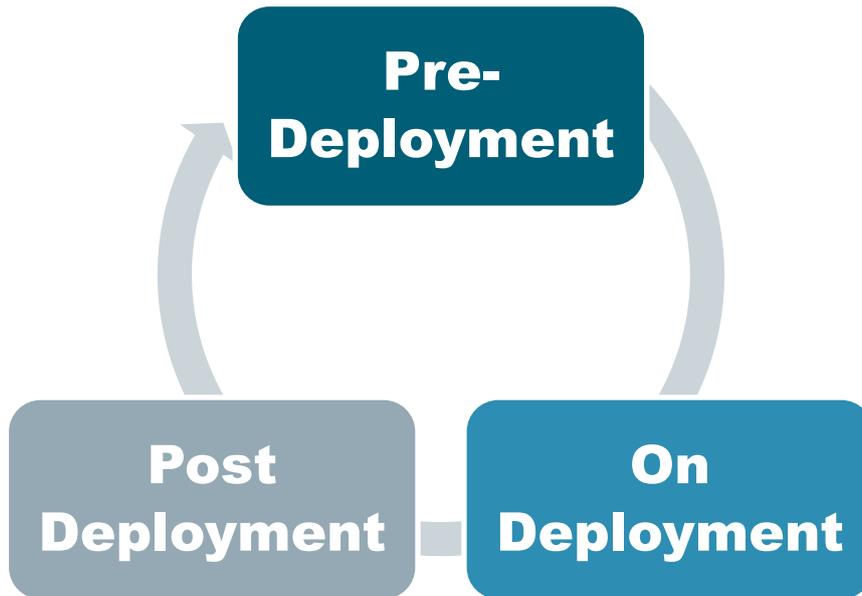
Post Deployment

The international deployment lifecycle: adapted from Paik et al 2002

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:

- conduct that involves, or that is engaged in for the purposes of, the staff member abusing his or her office as a staff member of the agency; or
- conduct that perverts, or that is engaged in for the purpose of perverting, the course of justice; or
- 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.
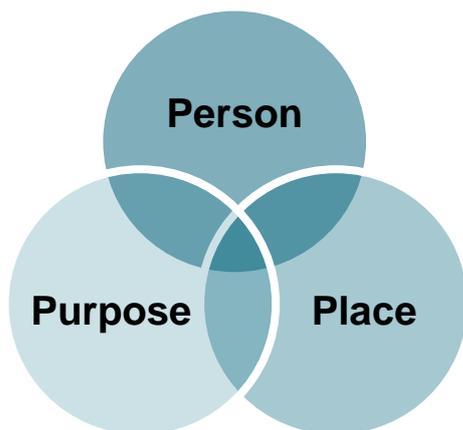
Throughout this report, reference is made to the consideration of corruption risk management by identifying and considering risk across the **purpose, place** and **person** spectrum – the Three Lens Approach. This approach recognises there is no one 'best practice' solution to managing corruption risk and that what may be effective in one organisation or environment may have limited impact in a different context.

ACLEI recommends that organisations take a 'best fit' or 'situational' approach, whereby a combination of strategies is implemented – that is, a 'purpose, place, person' solution contingent to environment and risk.

For the purpose of this report:
- an **expatriate** is an officer who is deployed to work in a location outside their country of origin or usual country of work;
- a **repatriate** is an officer who has returned, or is in the process of returning, to their country of origin or usual country of work; and unless otherwise specified
- **agency/agencies** refers specifically to an agency within ACLEI's jurisdiction; and
- **organisation** refers broadly to all public, private or not-for-profit sector entities.

Literature Review

Pre-Deployment

The pre-deployment stage of the international deployment lifecycle has and continues to attract a substantial degree of focus in the research literature. Identifying and assessing risks (including those relating to corruption) specific to the location and purpose of the deployment is presented as fundamental to informing specific treatment and management options. Additionally, analysis of the assessment, selection and training practices employed across multiple sectors (public, private and not-for-profit)[10] has been afforded particular attention for the purpose of identifying better practice approaches and common process gaps in expatriate management.

Identifying, assessing and treating international corruption risks

To effectively treat corruption risk, agencies must identify and assess risks holistically to ensure management approaches are targeted and implemented for greatest mitigation effect[11]. Johnsøn (2015) suggests that agencies often disregard holistic assessment of identified corruption risks (i.e. the severity of the risk measured by likelihood x impact). Instead, agencies tend to limit their corruption prevention approaches to identification only, resulting in the implementation of broad controls which may not account for the specific characteristics of the risk in question[12]. Likelihood and impact factors considered during the assessment phase of the corruption risk management process will inevitably be influenced by variances in location (place) and purpose[13].

For example, Powpaka (2002) states that the ethical decision making capability of expatriates will be tested when working in environments where corruption is prevalent and ethical standards differ from those in the domestic context[14]. Further, an expatriate required to work in isolation for extended periods as a consequence of their work (purpose) may become more susceptible to corruption if they have limited access to report (or share) potential concerns with their agency[15]. Treatments for corruption risks such as these will necessarily vary to consider place and purpose if they are to have the desired mitigation effect.

Assessing and selecting for the personal skills, not just the technical

There is broad agreement that expatriate assessment and selection practices across all sectors focus heavily on evaluating (and making deployment decisions based on) the technical competencies of the individual[16]. Consequently, relatively limited assessment and consideration is given to the behavioural characteristics and capabilities of the expatriate, and those who may accompany them (e.g. a spouse and/or dependent children) or remain onshore during the deployment[17]. In both

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[10] (Anderson, 2001)

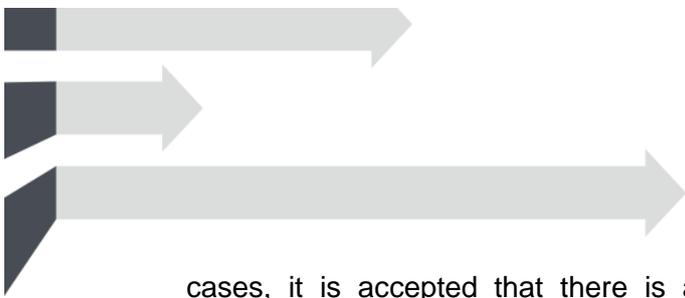[11] (Johnsøn, 2015)

[12] ibid

[13] See https://www.aclei.gov.au/corruption-prevention/key-concepts/what-best-approach-early-intervention

[14] (Powpaka, 2002)

[15] (Greppin, et al., 2017)

[16] (Minter, 2008); (Anderson, 2001); (Bonache, et al., 2001)

[17] (Punnett, 1997)

cases, it is accepted that there is a social and emotional cost associated with deployment for the expatriate and their family/friends that must be managed[18]. In fact, expatriate failures are most commonly attributed to issues involving spouses and/or family[19]. The capacity for all parties involved in the deployment – the expatriate, family members and close friends – to adjust to the circumstances of the deployment have a substantial influence on the ability of the expatriate to perform effectively and in accordance with agency expectations[20].

While personal norms[21], values and circumstances may be assessed as part of an agency's onboarding process[22], there is less emphasis placed on revalidating the assessment prior to deployment[23]. Employee circumstances will almost certainly change over time and decisions to act (or not act) according to one's set of personal values will inherently be affected by contextual and contemporary factors[24]. In an international deployment context, an employee may inadvertently be placed into a situation which exposes them to compromise and susceptibility to corruption. Harvey and Novicevic (2001) recommend that assessment and selection processes for expatriates incorporate measures which assess a variety of behavioural competencies[25] which may include the use of tools such as psychometric and employee reliability testing, so agencies can better understand how their employees might respond in certain scenarios while deployed[26]. This approach allows agencies to identify, assess and manage potential corruption risks accordingly.

Understanding the limitations of pre-deployment training
Formal pre-deployment training is used almost universally as a measure to prepare expatriates for their deployments[27]. Training is an attractive mechanism as it is measurable (from an organisational performance indicator perspective) and can be implemented and/or modified relatively quickly[28]. However, researchers argue that to be effective, pre-deployment training must be complemented by additional measures once the expatriate is deployed[29]. The effectiveness and influence of formal pre-deployment training on desired behaviour (including the capacity for expatriates to act consistently with their agency's integrity expectations), may diminish rapidly if expectations are not continually reinforced and the expatriate is exposed to norms, interactions and informal situations while deployed that run counter to the expectations set during the training[30].

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[18] (Gudmundsdottir, et al., 2019)
[19] (Harvey & Novicevic, 2001)
[20] (Gudmundsdottir, et al., 2019)
[21] (Reynolds, et al., 2014)
[22] For example, several LEIC Act agencies conduct pre-employment organisational suitability assessments prior to making offers of employment.
[23] (Bonache, et al., 2001)
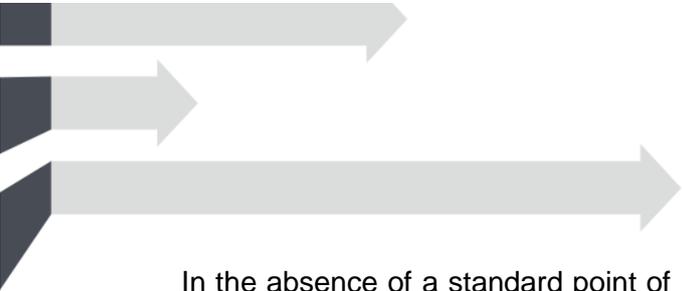[24] (Schwartz, 2012)
[25] (Harvey & Novicevic, 2001)
[26] (Matsumoto & Hwang, 2013)
[27] (Bonache, et al., 2001)
[28] See https://www.aclei.gov.au/corruption-prevention/corruption-prevention-myths
[29] (Bonache, et al., 2001)
[30] (Kobis, et al., 2015)

In the absence of a standard point of reference for information on how to respond in challenging scenarios (particularly those with an ethical dimension), Mendenhall and Stahl (2000) contend that expatriates will seek advice from alternative sources, including their deployed counterparts[31]. This may result in the formation of new norms that run counter to the expectations set during the training program, negating its impact as a control for consistent behaviour.

Reinforcing the integrity messages conveyed during pre-deployment training throughout the expatriate's deployment will ensure training has the greatest possible impact (and increase training return on investment)[32]. It may also provide agencies with greater assurance that the risk associated with varied or unacceptable behavioural standards is subject to an active mitigation approach.

Keeping preparation specific
There is suggestion in the research literature that some organisations place limited stock in location-specific preparatory activities (such as targeted cultural awareness training), relying instead on domestic integrity measures to control for risk that may eventuate in the overseas environment[33]. However, Harzing (2001) contends that expatriate preparation, including assessment, selection and pre-deployment training must be specific and cater holistically for the deployment[34] across the person, place and purpose spectrum[35].

Agencies should factor in the risk of designing preparation programs for the 'average' expatriate as they may ultimately be of limited relevance to the target audience[36]. To the extent possible, preparation should be tailored to ensure corruption risk can be treated effectively[37].

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[31] (Mendenhall & Stahl, 2000)
[32] ibid
[33] (Bonache, et al., 2001)
[34] (Harzing, 2001)
[35] See **Definitions** page - the Three Lens Approach
[36] See https://www.aclei.gov.au/corruption-prevention/corruption-prevention-myths
[37] ibid

On Deployment

The unique characteristics of international deployments coupled with the challenges of undertaking law enforcement functions, may result in expatriates responding to situations very differently to how they might respond to a similar situation in a domestic context. These responses may be perversely exacerbated as the expatriate attempts to adapt to local cultural norms which may run counter to the behavioural expectations established during pre-deployment preparation.

Displacement and detachment

Expatriates are confronted with significant adaptation challenges while deployed as they attempt to acclimatise to their international operating environment[38]. Historically, these challenges have caused relatively high expatriate failure rates[39]. When considered in the context of corruption risk, displacement from the domestic integrity environment coupled with detachment from the agency's domestic integrity framework may increase the likelihood of an expatriate being compromised[40].

From an Australian law enforcement perspective, it is not uncommon for international operations to involve significant interagency and interpersonal cooperation and collaboration[41]. In this setting, integrity standards will almost certainly differ between agencies and across cultures[42]. Expatriates who may be experiencing displacement from strong domestic integrity environments could be exposed to weaker integrity cultures[43]. Weaker integrity cultures are likely to pervade environments where multiple integrity cultures exist[44] and expatriates from stronger cultures may, deliberately or inadvertently, adopt these weaker standards – perceiving the 'pressure to be off'[45] – while deployed.

If coupled with detachment from the home agency's domestic integrity framework (the measures in place to mitigate corruption risk), which may be unavoidable for some deployments[46], corruption risks may increase. Detachment, in the form of isolation due to the nature of certain deployments, can present additional risk as pressures created by corrupting influences may not be reportable via established mechanisms in the integrity framework[47].

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[38] (Webb & Wright, 1996)

[39] ibid

[40] (Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity, 2013)

[41] ibid. For example – law enforcement officers may be required to engage regularly with local government officials or locally engaged employees in the course of their duties. Additionally, officers may be working as part of a joint taskforce or joint-agency initiative overseas.

[42] ibid
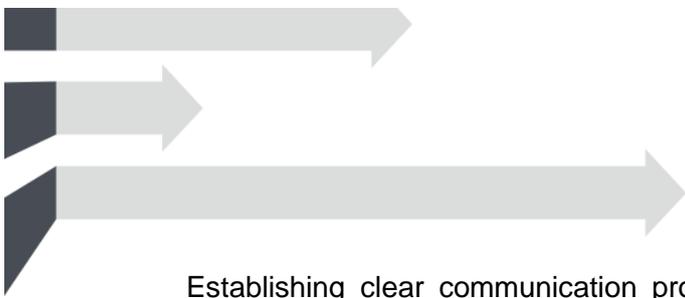
[43] ibid

[44] ibid

[45] ibid

[46] That is, the nature of some deployments is such that officers may be subject to isolation for extended periods of time with limited access to communication with the home agency.

[47] (Greppin, et al., 2017)

Establishing clear communication protocols, and enforcing regular communication with the home agency, will help to alleviate the impact of displacement and detachment for expatriates[48] and mitigate associated corruption risks.

The impact of culture on integrity standards – a blurring of the boundaries
Expatriates are frequently required to manage conflicting expectations. They must be able to operate effectively alongside local cultural values, attitudes and behaviours[49] that may or may not be congruent with the behavioural expectations of their home agency[50].

This potential conflict presents the expatriate with several challenges from an integrity and corruption risk perspective. Expatriates may find it difficult to reconcile competing expectations, creating confusion and ambiguity around what may or may not be acceptable behaviour[51] - particularly if they are experiencing detachment from their domestic integrity framework and have limited immediate access to suitable support and/or information. Furthermore, and perhaps of greater concern with respect to increased corruption risk, expatriates exposed to local cultures with very strong group and social norms are likely to adopt these behaviours as well[52], blurring the boundaries between acceptable and unacceptable integrity standards.

Continual reinforcement of the behavioural expectations espoused in the home agency integrity framework will help to counter the conforming effect of a local culture's social norms[53]. Consistent communication expectations are also likely to reduce the likelihood of corruption and/or inappropriate behaviours going unreported due to confusion, culture, power imbalances and/or unclear policy and process.

Post-Deployment
The research literature covering repatriation management is predominantly grounded in the human resource management discipline, with limited specific focus on associated corruption risk. However, there is broad agreement across the literature that repatriation is not managed effectively in the public sector[54] and that the 'casual' treatment of repatriation may have unintended consequences[55]. Expectation management is also identified as a key factor in the repatriation process.

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[48] (Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity, 2013)
[49] (Caligiuri, 2000); (Tung, 1987)
[50] ibid
[51] (Sanchez, et al., 2000)
[52] (Brugger, et al., 2019)
[53] ibid
[54] (Anderson, 2001); (Bonache, et al., 2001)
[55] (Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity, 2013)

> *"Corruption may start overseas and be repatriated with the returning Australian official. Either knowingly or unwittingly, Australian officials can be co-opted for corrupt purposes. Corruption risks may manifest overseas and be imported back into Australia, with potential corrupters looking for a point of entry into Australian agencies. Bribery, subordination and other forms of compromise of officials who work or holiday overseas are some of the corrupt methods that can be used to achieve this aim".*
> *Philip Moss-former Integrity Commissioner*

The 'casual' treatment of repatriation and the risk of importing corruption

The research literature contends that repatriation is generally not managed well in both the public and private sectors[56]. Instead, organisations tend to focus heavily on pre-deployment measures to manage international deployments[57] leaving a potential gap in their management of corruption risk. The passive or complacent management of repatriating law enforcement officers may increase the risk that corruption is imported from overseas[58].

Former Integrity Commissioner Philip Moss, appearing before a Parliamentary Inquiry examining the integrity of overseas law enforcement operations, stated that entities may seek to corrupt internationally deployed law enforcement officers for the purposes of gaining domestic access to Australian law enforcement agencies upon the officer's return[59]. Corrupting entities may not look to exploit this access immediately, waiting instead for opportunities to maximise their utility for greatest benefit, sometimes many years in the future[60].

Expectation Management

The research argues that the expectations of repatriates require active management to ensure they do not lead to unintended adverse consequences, which may include heightened corruption risk. Specifically, organisations should ensure there are no opportunities for discrepancies to exist between the repatriate's expectations and the reality facing them upon return[61].

The repatriation process represents a period of substantial change for the repatriate and their family[62]. For example, reintegration into a domestic environment may be accompanied with reverse culture shock – whereby the repatriate and his or her accompanying family members experience difficulty reintegrating into a domestic setting[63], adding complexity to an already difficult process. Managed ineffectively, this change may adversely impact the wellbeing of the repatriate[64] leading to the repatriate forming a negative perception of their organisation[65]. Negative employee

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[56] (Anderson, 2001)
[57] (Bonache, et al., 2001)
[58] (Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity, 2013)
[59] ibid
[60] ibid
[61] (Bonache, et al., 2001)
[62] (Paik, et al., 2002)
[63] (Bonache, et al., 2001)
[64] (Rafferty & Griffin, 2006)
[65] (Gorta, 1998)

perceptions may also develop if the repatriate perceives the terms of their psychological contract with the organisation have been broken[66]. Negative perceptions may subsequently be used by the repatriate as a means to justify engaging in corrupt conduct[67].

To mitigate these challenges, regular communication from the organisation aimed at clearly managing expectations of both the repatriate and their family members is essential[68].

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[66] (Kingshott & Dincer, 2008)
[67] (Gabor, 1994)
[68] (Hammer, et al., 1998)

Method

This report has been informed by consultation with LEIC Act agency representatives, other Commonwealth agency representatives, ACLEI corruption issue notifications and investigations, and open source research.

Investigations analysis

A review of ACLEI's investigative holdings was undertaken to identify the quantity and nature of all corruption issue notifications and referrals with an international nexus. Due to a relatively small data set, the utility of the review was limited for the purpose of this report. However, the review process has highlighted a potential gap in the current reporting mechanisms made available for international deployments which should be considered in further detail by all agencies moving forward.

Stakeholder meetings

ACLEI officers held meetings with relevant LEIC Act agency officers to provide an overview of the project and seek pre-existing materials dealing with international deployments and the management of corruption risk. The purpose and scope of the strategic workshop was also discussed.

LEIC Act agency officers were also consulted following the strategic workshop to check assumptions and conclusions arising from the review of information provided prior to and during the strategic workshop.

International Deployment Management Workshop

The strategic workshop was held in Canberra on 14 February 2019 and was attended by officers working in integrity/professional standards and international operations teams from all LEIC Act agencies and DFAT.

The workshop was facilitated by Mark Spain of Global Learning Pty Ltd.

Workshop observations

The strategic workshop highlighted a general consensus amongst agency representatives that pre-existing prevention measures could be enhanced to better target the corruption risks specific to international deployments. The limited focus on post-deployment management, particularly from a corruption risk management perspective, was also acknowledged. Participants expressed a keen interest in the topic of international deployments noting the increasing international focus of Australia's law enforcement agencies.

Discussion amongst participants, and questions put forward by the group, highlight an emerging opportunity to enhance the collective understanding of the corruption risk environment Australia's law enforcement agencies face overseas. Participants expressed their desire for enhanced information sharing between agencies, particularly in the areas of identified corruption risks and instances of corrupt conduct.

Findings

Pre-Deployment

Consistent with the research literature, the pre-deployment stage of international deployment management emerged as the primary means by which agencies identify and treat corruption risk. Information provided by agencies indicates the pre-deployment stage is generally inclusive of the following phases:

- consideration of operating (corruption) risks in the offshore environment and decisions about how best to manage these risks;
- communication of information, including integrity expectations and requirements for officers who will be, or are considering applying to be, deployed internationally;
- assessment and selection of international deployment candidates; and
- preparation of officers to undertake international deployment.

Agency representatives that attended the workshop strongly agreed that corruption risks vary over time and place, and treatment measures should be tailored to reflect these variances. Agency representatives also agreed that pre-deployment measures appear to be generally robust considering the wealth of information developed by agencies to manage international deployments, including in relation to mandatory behavioural expectations. This includes consistent reference to mandatory reporting. Most agencies have deployed some or all of the following additional measures to complement these expectations:

- the requirement for officers to hold a current security clearance and organisational suitability clearance;
- pre-deployment psychological testing;
- pre-deployment briefings from subject matter experts (including ASIO and ACLEI); and
- targeted integrity and resilience testing.

Although pre-deployment training is considered a fundamental component of the preparation of officers by all agencies, the nature of this training and information provided varies between agencies. This reflects the very different scale and purpose of each agency's respective operations overseas. Training also varies in terms of its specificity to the particular corruption risk associated with place and purpose.

The findings indicate a heavy reliance on identifying and countering corruption risk associated with the individual (or person) and less consideration of the purpose and place dimensions associated with corruption risk. This approach was evident across the entire pre-deployment stage – including during the assessment, selection and preparation of officers. This is likely in part due to an understandable reluctance for agency representatives to discuss sensitive operational information regarding the purpose of their international deployments in an unclassified context. Comments received during the strategic workshop indicated that agency representatives believe more could be done to enhance agency understanding of the specific corruption risks arising from undertaking their respective operational activity in different locations.

> **Recommendation 1**
> *Agencies should identify and assess specific corruption risks (including those arising in the course of classified/sensitive operations) within the context of the recommendations outlined in this report and engage with ACLEI as necessary to ensure treatment measures are fit for purpose.*

While some emphasis was given to risks associated with specific locations (i.e. place), this information was usually provided in a generic sense only in the form of advice from a relevant source (such as a DFAT travel advice). Noting the strong desire expressed by agency representatives in the strategic workshop to enhance information sharing between agencies, exploration of this dimension of international deployments may be worth further consideration in a suitable forum in the future. Recent legislative amendments that enable greater information sharing between agencies for integrity purposes[69] should support this approach.

> **Recommendation 2**
> *Agencies should consider establishing a suitable forum, such as an ACLEI Community of Practice specialist sub-group, focused on sharing international deployment information with specific emphasis on improving understanding of international corruption risks for law enforcement.*

Strengths and Opportunities
The majority of agencies have documented their integrity expectations into codes of conduct (or similar directions/policy etc.) for officers deployed overseas and this documentation features prominently at different stages throughout the deployment lifecycle, although predominantly during the pre-deployment phase. Encouragingly, the integrity documentation of several agencies contains better practice integrity information specific to overseas deployment, including:

- being on duty 24/7;
- working in close proximity with colleagues;
- managing personal and professional relationships;
- balancing personal and professional responsibilities; and
- working within a foreign culture.

Most agencies require their officers to sign an acknowledgement and agreement to the requirements specified in the integrity documentation prior to commencing deployment. This documentation also forms the basis for key messages imparted during integrity-related pre-deployment training.

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[69] See Crimes Legislation Amendment (Powers, Offences and Other Measures) Act 2018: https://www.legislation.gov.au/Details/C2018A00075

> **Case Study: Communicating integrity expectations early and persistently**
>
> *One LEIC Act agency's Code of Conduct contains many better practice elements relating to international deployments, including specific and comprehensive information outlining the differences between the international and domestic operating environments.*
>
> *Information in the Code of Conduct is subsequently reinforced during pre-deployment training and is supported by a broad suite of governance arrangements that provide deployed officers with relevant and practical directions and advice on how best to maintain required integrity standards.*
>
> *This information encompasses:*
> - *integrity reporting requirements;*
> - *managing conflicts of interest; and*
> - *working effectively with other agencies (both Australian Government and foreign government agencies).*

Most agency integrity documentation includes the requirement for deployed officers to maintain regular (in some cases, daily) contact with their domestic manager and/or handling team. This approach may counter the risks associated with displacement and detachment from domestic integrity frameworks. When enforced effectively, this approach reduces the likelihood that officers will become detached from their agency's integrity framework. Minimising detachment mitigates the corruption risks arising from the isolation which some officers experience as part of their international deployment[70].

It is less common for agency documentation to include practical measures that could be used by officers to maintain the required standard of integrity i.e. agencies emphasise 'what' officers should do and are less clear on 'how' they should do it. Similarly, agency documentation contained minimal specific reference to the likelihood of exposure to corruption risk and how this should be managed and/or mitigated. Being more explicit about corruption risk and the inclusion of this information would further strengthen international deployment documentation.

> **Recommendation 3**
> *Agencies should update relevant documentation to include practical measures that can be used by officers to maintain required integrity standards while deployed.*

> **Recommendation 4**
> *Agencies should include explicit reference to corruption risks in international deployment documentation.*

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[70] (Parliamentary Joint Committee on the Australian Commission for Law Enforcement Integrity, 2013)

Some agencies that maintain longer term and/or permanent international positions have developed comprehensive packages of information for prospective deployees to consider in advance of applying for an international deployment. This recruitment documentation usually includes detailed position descriptions outlining the requirements of the position and the requisite technical capabilities required. One agency's documentation also placed a strong emphasis on the personal characteristics necessary for international deployments – a key measure used by the agency to holistically assess the suitability of applicants. This approach also provides officers with a realistic view of the requirements of the international deployment, allowing them to better determine their own suitability (i.e. some officers may self-select out of the application process).

Recommendation 5
Agencies should consider placing stronger emphasis on the personality traits and behavioural characteristics required for international deployments in their recruitment documentation.

Position descriptions were less likely to include specific reference to acting in accordance with integrity standards over the course of the deployment. In particular, it is recommended that agencies consider supplementing their existing recruitment documentation to include a specific responsibility for maintaining integrity standards for officers deployed to management roles.

Recommendation 6
Agencies should consider incorporating specific reference to maintaining staff integrity standards at post in all manager position descriptions.

It is also recommended that agencies consider using a broad range of measures to assess both personal and technical capabilities of officers. Doing so may provide agencies with a better understanding of how officers might respond in particular situations – allowing agencies to better assess if any emerging risks can be mitigated.

Recommendation 7
Agencies should consider assessing the personality traits and behavioural characteristics of potential international deployees against the specific requirements of the international deployment to assess risk of compromise.

All agencies require officers to obtain and maintain Commonwealth security clearances and in some cases, additional organisational suitability clearances. Security clearance classifications[71] vary between agencies recognising the differing levels of risk associated with the functions performed. The information provided by agencies did not specify the particular requirements considered when deciding to require a security clearance at a particular level. Common benefits associated with security and organisational suitability clearances include assessing for personal

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[71] See http://www.defence.gov.au/AGSVA/FAQ/clearance-subject.asp for more information on Australian Government security clearances.
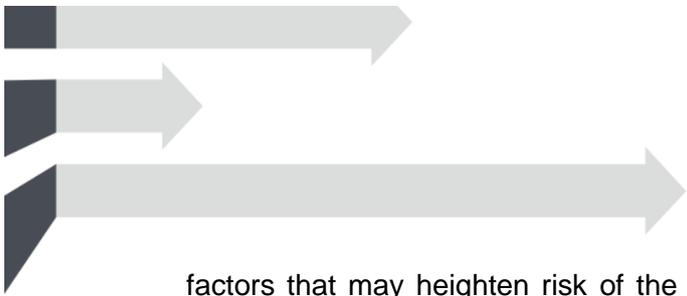
factors that may heighten risk of the officer being compromised (or corrupted) and the requirement for officers to report changes of circumstance as they occur[72].

Several agencies employ additional measures to assess the capacity of their officers to perform effectively whilst they are deployed overseas. Some of these measures complement their stated integrity expectations by actively or passively assessing the propensity of officers to act in accordance (or not) with the agency's integrity requirements. Common measures include pre-deployment psychological testing, resilience testing, and integrity checks which consist of a review of past matters reported to the respective professional standards or integrity area within the agency.

The information provided by agencies did not confirm whether these measures explicitly consider officer vulnerability to corruption risk and, with respect to the integrity background check in particular, offer only limited prospective information for agencies to assess the likelihood of corruption occurring. Assessing corruption risk more holistically, for example by reviewing integrity holdings in the context of the nature (place and purpose) of the international deployment may enhance the pre-deployment integrity screening process.

> **Recommendation 8**
> *Agencies should update their existing integrity assessment measures to explicitly consider officer vulnerability to corruption while on deployment, including through holistic corruption risk assessment of the person, place and purpose.*

The engagement of anti-corruption and foreign interference subject matter experts, including ACLEI and ASIO, is increasingly being utilised by agencies during the pre-deployment process including during pre-deployment training. However, advice from several agencies indicates this is not yet business as usual and only undertaken on an ad hoc basis. Subject to resource availability, agencies should consider utilising the subject matter expertise of ACLEI and ASIO to bolster pre-deployment preparation as standard practice in the future.
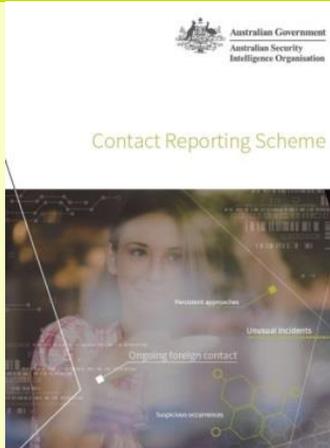
Case Study: Reporting contact with foreign nationals

The Contact Reporting Scheme, managed by ASIO, is a core component of the Australian Government's strategy to counter espionage. Australia's federal law enforcement officers have access to information that may be of interest to foreign governments and must be protected.

ASIO uses information obtained through the scheme to better understand and mitigate the threat posed by foreign interference. All Australian Government employees should report any contact with foreign nationals that seems suspicious, unusual, and persistent or becomes ongoing.

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[72] See http://www.defence.gov.au/AGSVA/FAQ/clearance-subject.asp

Recommendation 9
Agencies should ensure pre-deployment preparation incorporates engagement with relevant anti-corruption (ACLEI) and foreign interference (ASIO) subject matter experts.

Most agencies have developed comprehensive pre-deployment preparation (training) programs for their officers. Some agencies also offer preparation briefings for spouses aimed at supporting their acclimatisation and adjustment to the requirements of the deployment. Programs are typically comprised of a broad range of information covering the various work requirements, living arrangements and cultural elements of the deployment; however, the emphasis afforded to each of these elements varies between agencies. Training programs are usually delivered to groups of officers undertaking deployments that are similar with respect to the type of work to be undertaken.

As a consequence, training programs may only offer limited information regarding specific corruption risks associated with the location and the individual officer. While some agencies indicated that officers being deployed to specific higher-risk locations will receive additional briefings, this does not appear to be standard practice for all deployments. To better consider location-related corruption risk, Leder-Luis (2017) recommends that organisations utilise information sources such as the annual Transparency International Corruption Perceptions Index to inform assessment of corruption risks overseas[73].

Ultimately the effectiveness of preparation programs from a corruption risk management perspective will be contingent on the extent to which agencies are able to continually reinforce integrity messaging during deployment. It is recommended that agencies review their post-training communication and governance mechanisms to support this.

Recommendation 10
Agencies that do not do so already should consider whether their pre-deployment preparation measures could incorporate information and/or briefings for accompanying partners/spouses and other dependents.

Recommendation 11
Agencies should consider reviewing post-training communication and governance mechanisms to ensure integrity requirements are continually reinforced throughout the duration of the deployment.

Weaknesses and Risks
Agency information does not specify whether officers are proactively required to report changes in circumstance during the pre-deployment process. Instead, agencies likely rely on officers to self-report changes as per standard security clearance processes[74]. Notwithstanding the ongoing requirement for officers that

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[73] (Leder-Luis, 2017)
[74] ibid
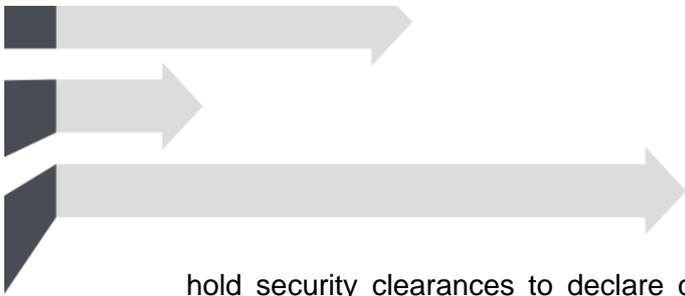
hold security clearances to declare changes in circumstance as they occur[75], the assessment process provides an appropriate mechanism to verify that changes in circumstance are up to date. It is recommended that agencies may be able to compile a more complete assessment of an officer's suitability for international deployment by building this step into their existing processes.

Recommendation 12
Agencies should have all officers disclose and/or update changes in circumstance and declare any actual or potential conflicts of interest during the pre-deployment process.

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[75] See http://www.defence.gov.au/AGSVA

On Deployment

There was significant variation across agencies with respect to how officers are managed while on deployment, reflecting the variety of different functions carried out by Australia's federal law enforcement agencies overseas. The deployment stage generally consists of the following phases:

- the deployed officer arrives offshore;
- the deployed officer works offshore; and
- the deployed officer prepares to return from their deployment.

Despite the variety of functions performed by agencies, some common themes emerged during analysis of agency information. In particular, all agencies have established clear and consistent behavioural standards applying to the deployed officers and have mechanisms in place to communicate these prior to and during deployment. The place and purpose of a deployment will significantly impact on the communication channels available to agencies to reinforce integrity expectations. It is appropriate that agencies regularly consider whether these communication channels remain fit for purpose.

The isolation associated with certain deployments – and the associated risk of compromise resulting from high levels of autonomy and discretion coupled with reduced accountability – was also evident across most agencies. Notwithstanding resourcing constraints – including the need for a relatively small number of select officers with specialist capabilities to undertake certain deployments – agencies should consider how they can best mitigate the risk of compromise in these situations, including by rotating officers on a regular basis.

Strengths and Opportunities

All agencies clearly articulate to their officers the expectation that integrity standards apply at all times during the course of the deployment. These expectations are introduced during the pre-deployment stage and reinforced in a variety of ways by agencies over the course of the deployment.

For example, the majority of agencies have documented and actively communicate the requirement for deployed officers to maintain regular frequent contact (in most cases, daily) with their domestic manager and/or domestic handling team. Some agencies have specified that contact must be via phone and ensure officers are equipped with the necessary tools for this to occur. In the case of one particular agency, officers are required to maintain a daily travel diary for the duration of their deployment. Frequent interaction with the home agency in this regard provides opportunity to reinforce integrity messaging in a practical and relevant manner.

Several agencies advise their officers to avoid unnecessary interactions with foreign nationals in the course of performing their duties. Where contact is unavoidable, officers are required to report details of the interaction through established channels.

Notwithstanding the measures already in place, it is recommended that all agencies regularly review how they communicate with their deployed officers to promote and reinforce integrity standards for the duration of the deployment, which in some cases
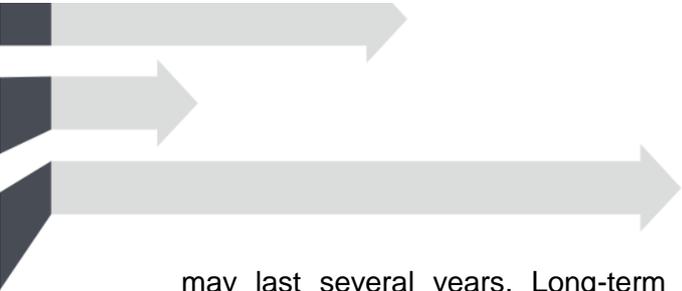
may last several years. Long-term deployments to environments with relatively weaker integrity standards may be particularly susceptible to corruption risk in the absence of ongoing integrity messaging, noting the effect of strong group and social norms on acceptable behaviour. Agencies should take steps to ensure the boundaries between acceptable and unacceptable behaviour do not become blurred.

> **Recommendation 13**
> *Agencies should regularly review communication and reporting mechanisms to ensure consistent and frequent communication of integrity standards.*

The majority of agencies demonstrated a proactive approach to managing the expectations of deployed officers during the course of their deployment. Several agencies have developed substantial documentation outlining the terms and conditions associated with the deployment and have sound measures in place to ensure these can be communicated effectively. Additionally, several agencies also maintain employee support services for deployed officers which ensure queries and issues raised regarding employment matters can be considered in a timely manner.

One agency outlined their approach to managing the expectations of deployed officers well in advance of their return to a domestic environment – engaging with the officer in regards to their preferences of placement upon their return. However, this is managed in such a way as to ensure the officer is made fully aware that their preferences may not be able to be accommodated. This approach may assist in preventing the officer forming a negative perception of their agency during their repatriation process which may in turn increase the likelihood of the officer engaging in corrupt conduct in the future.

It is recommended all agencies consider how they prepare their officers for repatriation to ensure potential corruption risks are treated effectively.

> **Recommendation 14**
> *All agencies should consider how they prepare their officers for repatriation to ensure potential corruption risks are treated effectively.*

Weaknesses and Risks

The nature of international deployments for LEIC Act agencies is such that officers are regularly afforded significant discretion to carry out their duties in an environment that limits opportunity for direct accountability – specifically in circumstances where officers are regularly deployed on their own and/or for extended periods of time.

Corruption equals monopoly [autonomy] plus discretion minus accountability[76]

Agencies generally manage international deployment risks via their assessment, selection and training processes, whereby communication of integrity expectations and the consequences of non-compliance are reinforced during the officer's preparation for deployment. Agencies appear to rely heavily on their deployed officers maintaining strict adherence to these standards, regardless of any situational

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[76] (Klitgaard 1988)
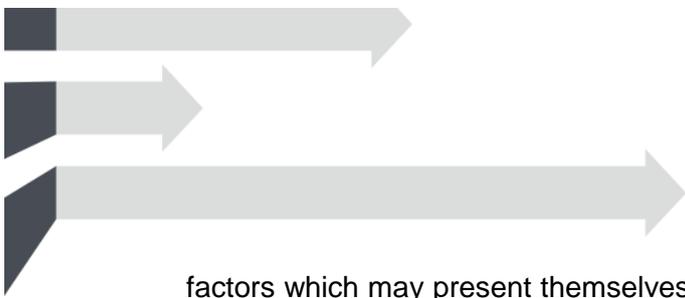
factors which may present themselves. Additionally, agencies place strong emphasis on officers self-reporting integrity matters as a key corruption risk treatment measure.

For the majority of officers, this is likely to be an acceptable mitigation strategy. However, officers placed in situations where they are afforded significant and ongoing autonomy and discretion over a particular commodity (such as information, intelligence or authority) may be at greater risk of compromise[77]. While acknowledging the operational benefits associated with longer-term deployments, agencies with officers deployed for extended periods of time and/or on their own should consider how they can reduce corruption risk caused by autonomy and discretion. For example, agencies may wish to consider the feasibility of rotating officers to different locations and/or varied duties to minimise the vulnerability of compromise.

Recommendation 15
Agencies should consider how they can reduce corruption risk caused by high levels of autonomy and discretion for officers deployed for extended periods of time and/or on their own. For example, agencies may look at regularly rotating officers to different locations and/or varied duties to minimise the vulnerability of compromise.

Notwithstanding the emphasis agencies place on integrity reporting as a key anti-corruption mechanism, agency representatives attending the workshop indicated that timeliness of reporting from post and/or officers deployed internationally is not ideal. Further, a previous ACLEI investigation determined that integrity issues regarding an officer deployed overseas had not been reported to that agency's integrity area. Following the officer's repatriation, they subsequently engaged in corrupt conduct. Management of the officer – and consequently the capacity for them to act corruptly – may have been different if the circumstances of their behaviour overseas had been notified.

Case Study: Operation Marlowe
An ACLEI investigation into unauthorised disclosure of classified AFP information by an AFP Protective Service Officer observed that the officer had exhibited a history of adverse behaviour. The officer was engaging in regular illicit drug use and associating with people involved in criminal activity.

The officer had been sent home from an overseas deployment because of alcohol abuse. However, as the matter was dealt with overseas, and because it did not reach a gravity threshold, it was not known to AFP Professional Standards before the ACLEI investigation was well underway.

The sharing of information at an earlier stage may have provided greater opportunities for intervention prior to the misconduct occurring.

The Integrity Commissioner found that the officer had engaged in corrupt conduct. The officer was terminated from his employment, sentenced to 12 months in prison and eight months on a recognisance (good behaviour) order.

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[77] (Graycar & Sidebottom, 2012)

Similarly, responses from home agencies to post following notification and preliminary investigation were also cited as an area of concern for matters where an identified corruption risk requires timely mitigation.

Regarding notifications from post, timeliness may be the result of uncertainty around who at post is ultimately responsible for reporting integrity issues and/or how and where issues should be reported. This may be exacerbated in environments where multiple agencies are present and responsibilities for particular matters (for example, protective security) are not clearly articulated.

In addition to **Recommendation 6** regarding the incorporation of integrity management as a core duty for all deployed managers, it is suggested that agencies document and communicate the process for notifying integrity issues occurring overseas. Communication should occur during pre-deployment preparation and throughout the duration of deployment.

Recommendation 16
Agencies should document and communicate the process for notifying integrity issues occurring overseas, with communication of this process incorporated into pre-deployment preparation and dissemination to all agencies operating at post.

With respect to communicating information regarding ongoing investigations to post and mitigating any ongoing risks, agencies should ensure they have established protocols for managing information dissemination in accordance with their specific operational and privacy requirements.

Recommendation 17
Agencies should consider establishing protocols for managing information dissemination to post regarding ongoing investigations, in accordance with their specific operational and privacy requirements.

Post-Deployment

The post-deployment stage of international deployment management emerged as the least mature stage from a corruption risk management perspective. Post-deployment consists of the following phases:

- the officer returns from the international deployment; and
- the officer is reintegrated into the domestic operating environment of their law enforcement agency.

Agency representatives acknowledged the narrow focus attributed to managing the repatriation and reintegration of returning officers. Several attendees at the workshop commented on their own experience returning from international deployments, highlighting the limited (and in some cases, non-existent) measures in place. Encouragingly, agency representatives demonstrated a strong commitment to considering more comprehensive measures to better manage the post-deployment process. In particular, workshop participants expressed a desire to reconsider their respective international deployment practices to include a holistic de-brief strategy covering all aspects of the deployment, including specific focus on matters pertaining to their identified corruption risks.

Strengths and Opportunities

Expectation management emerged as a key strength for most agencies in the post-deployment process, demonstrating mature approaches to communicating and actively managing their officers' ideas regarding their return to a domestic setting.

Several agencies provide returning officers with a suite of comprehensive information before, during and on completion of deployment and maintain dedicated resources to support international deployments, including during the repatriation process. The provision of clear and consistent information at all stages of the deployment minimises the likelihood that repatriates will develop expectations counter to the stated position of the agency.

Recommendation 18
Agencies should consider reviewing the information provided to officers before, during and on completion of deployment to ensure it accurately reflects and clearly communicates the responsibilities and obligations of all parties (including the agency and the officer) to the repatriation process.

One agency reported the requirement that officers must undergo a post-deployment debrief during which they must report any relevant and/or irregular observations arising in the course of their deployment. This approach would be strengthened by providing further advice for employees on what is considered 'irregular' behaviour, with specific focus on suspicious activity that may raise a corruption concern.

Similarly, another agency indicated that officers deployed to particular positions must complete a post-deployment debrief, during which they are required to disclose information regarding the nature and scope of interactions with certain entities. This approach enables the agency to better identify and assess potential irregularities
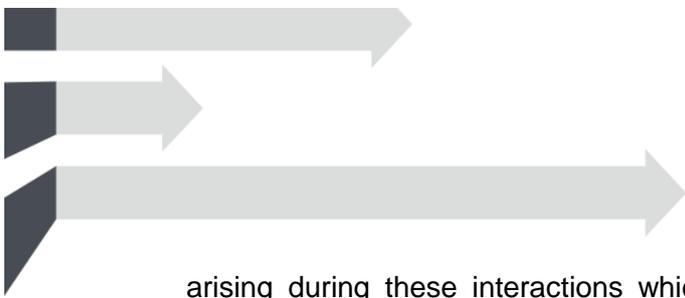
arising during these interactions which may indicate attempts to compromise the officer.

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Recommendation 19
Agencies should ensure mandatory reporting directions provide clear practical examples of the types of conduct or behaviour that repatriates must report on their return.

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Weaknesses and Risks

Across all agencies, there is limited focus afforded to the active management of the repatriation process and limited aftercare provided to returned officers – particularly from a corruption risk perspective. During the workshop agency representatives acknowledged a desire to improve the respective approaches taken to solicit relevant information from staff upon repatriation. This approach is consistent with the research literature insofar as it contends that repatriation is managed 'casually' across all sectors (public, private and not-for-profit)[78]. Further to identifying and assessing corruption risk associated with international deployments, which will differ from agency to agency, it is recommended that agencies review their approaches to post-deployment management to ensure they are effective in treating corruption risk.

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Recommendation 20
Agencies should consider reviewing their post-deployment processes and practices to ensure they are fit for purpose and effective in treating identified corruption risks.

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[78] (Anderson, 2001)

Research Gaps and Research Opportunities

There is limited investigative data currently available

ACLEI's investigative holdings relating to international deployments were extremely limited. As such, the ability to apply theoretical concepts put forward in the research literature to real-life scenarios was also limited. As outlined previously in this report (see Method section), it may be the case that some instances of suspected and/or actual corrupt conduct occurring overseas are not being reported to the home agency and/or ACLEI.

Consistent with the recommendations in this report, it is suggested that agencies review their existing integrity reporting mechanisms to ensure they remain fit for purpose and that a further review of ACLEI's investigative holdings is undertaken in the future.

Information on international operations must be protected

The need for law enforcement agencies to maintain strict confidentiality of information regarding the purpose and scope (including location) of some international operations has proven problematic when undertaking this unclassified analysis of international corruption risks. As a consequence, analysis has necessarily been limited in some circumstances.

Individual agencies are encouraged to consider their specific corruption risks (including those arising in the course of classified/sensitive operations) within the context of the recommendations outlined in this report and engage with ACLEI as they deem necessary.

Conclusion

Corruption continues to evolve domestically and abroad. As Australia's federal law enforcement agencies continue to build and maintain a strong international presence, corruption risk treatments must be both targeted and adaptable to respond to threats that will invariably change.

The holistic and systematic identification, assessment and treatment of corruption risks across the international deployment lifecycle – including analysis through the three lenses of the person, place and purpose – will ensure corruption prevention measures remain contemporary and effective. In turn, the Australian community will be reassured that appropriate measures are in place to mitigate the risk of corruption being imported into Australia.

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