



Grooming case study: Operation Voss

Between 2012 to 2017, a (former) official of the Department of Agriculture, Fisheries and Forestry (former Department of Agriculture, Water and the Environment) (the Department) was groomed by, and ultimately provided corrupt assistance to, an importer of cut flowers. The process of grooming followed a common pattern:

Stage 1 – Targeting

The official was introduced to the importer via a mutual friend. During the course of their initial conversations, the importer learned that the official was a cargo inspector, including for plant consignments. After learning this, the importer engaged more frequently with the official whenever he visited their friend.



Stage 2 – Relationship Building



The importer formed a friendship with the official that became increasingly close. In the initial phase of their friendship, the importer reached out to the official for assistance with the inspection process. At this stage the information sought and provided was publicly available and did not raise the suspicions of the official.

Over time their friendship deepened and the officer felt a strong personal allegiance to the importer. In the context of this friendship, the importer gave the official a range of gifts, including bottles of whiskey, cut flowers, holidays, cash and even secondary employment on his flower farm.

Stage 3 – Coercion and Corrupt Conduct

The importer started to request specific assistance and official information from the official. By this time, the official felt indebted to the importer and as a result made a number of illegal disclosures of commercially sensitive information that gave the importer insight into the activities and pricing of his competitors. In addition, the official illegitimately took control of inspections of the importer's

consignments, which he facilitated leniently such as by waiving fumigation requirements, acting outside of his official duties. The official knew what he was doing was wrong, but felt a greater sense of allegiance to the importer than he did to the Department. The importer had also promised to look out for him if he did ever get caught and lose his job.



Outcome

In late 2015, the then Department of Immigration and Border Protection received an anonymous letter alleging that the importer was importing plants into Australia with the assistance of certain officers. It was alleged that the importer had told others that he was fully in control of the Australian quarantine procedure and setting the timeframes for certain processes to be undertaken by officials.

The allegation was referred to the Australian Commission for Law Enforcement Integrity (ACLEI) and a joint investigation by ACLEI, the Department and the AFP ensued. At the end of the investigation the Integrity Commissioner determined that the official had engaged in corrupt conduct and referred the matter to the Commonwealth Director of Public Prosecutions.



The official was convicted of criminal offences of bribery and unauthorised disclosure and was given a suspended sentence of 3 years' imprisonment and a \$10,000 fine. He resigned from his job with the Department in 2017.

The importer was also convicted for providing corrupting benefits to a Commonwealth official and was sentenced to 18 months' imprisonment and a \$20,000 fine, to be released on a recognisance of \$2,000 to be of good behaviour for 2 years.

Corruption insights

Operation Voss reminds us that the perpetrators of grooming are not just organised criminals. Individuals and corporate entities can also groom officials for commercial advantage. This case highlights that bribes are not always transactional in nature. In Operation Voss, the official wasn't even aware that the gifts he'd been given in the context of his friendship with the importer constituted bribes until ACLEI interviewed him.

Read the full [ACLEI Operation Voss Investigation Report](#).

Prevention messages

- All government officials are vulnerable to grooming. The information, resources or decisions associated with your role are highly valuable to others and need to be protected.
- Ensure that you are aware of and follow your agency's integrity policies, such as identifying, declaring and managing conflicts of interest, outside/secondary employment, gifts and benefits, and declarable circumstances/associations. These policies aim to protect you as well as your agency.
- Maintain professional boundaries with clients, suppliers, contractors and other stakeholders. Ensure every action and decision you take is defensible, consistent with your role and authority and formally recorded.
- Flex your integrity muscles! Mentally practice how you will respond to improper approaches or approach difficult decisions in an ethical way.
- Be wary of anyone who takes an unusual or unexpected interest in what you or your agency does – especially if they start asking for more sensitive information, suggest you meet up outside of work or attempt to contact you in a personal context.
- Consider how much information you share on social media, it could be leveraged by someone to groom you. Be cautious when strangers want to connect online.
- Don't discuss official information with anyone who does not need to know, including colleagues. You never know who is listening to your conversations.
- Don't try to manage integrity risks yourself — if someone does approach you or seeks to groom you for information, **report it to your agency security or integrity unit.**
- Look out for signs that your colleagues might be being groomed or are engaging in improper or corrupt conduct. If you see anything that concerns you, report it.
- Report current or former colleagues who contact you seeking favours or information to your agency security or integrity area.
- Remember that even the *perception* of a conflict or bias can undermine the integrity of your duties and is something you have an obligation to avoid.