

41ST PARLIAMENT



Joint Standing Committee on the  
Corruption and Crime Commission

Report 16

THE CORRUPTION AND CRIME COMMISSION'S MANAGEMENT  
OF ITS MISCONDUCT RISKS

*A follow up to the 'Going Rogue' report*

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Presented by

Mr M. Hughes, MLA and Hon Dr S.C. Thomas, MLC

November 2024

## *Committee Members*

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Chair	Mr M. Hughes, MLA Member for Kalamunda
Deputy Chair	Hon Dr S.C. Thomas, MLC Member for South West Region
Members	Hon M.J. Davies, MLA Member for Central Wheatbelt  Hon K. Andric, MLC Member for South Metropolitan Region

## *Committee Staff*

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Principal Research Officer	Suzanne Veletta
Research Officer	Jovita Hogan

Legislative Assembly  
Parliament House  
4 Harvest Terrace  
WEST PERTH WA 6005

Tel: (08) 9222 7494  
Email: [jscccc@parliament.wa.gov.au](mailto:jscccc@parliament.wa.gov.au)  
Website: [www.parliament.wa.gov.au/jscccc](http://www.parliament.wa.gov.au/jscccc)

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# **Joint Standing Committee on the Corruption and Crime Commission**

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## **The Corruption and Crime Commission's management of its misconduct risks**

A follow up to the 'Going Rogue' report

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Report 16

Presented by

**Mr M. Hughes, MLA and Hon Dr S.C. Thomas, MLC**

Laid on the Table of the Legislative Assembly and Legislative Council on  
28 November 2024



## Chair's foreword

This report informs Parliament of the findings and recommendations of an independent review engaged by the Corruption and Crime Commission, and commission action to minimise its misconduct risks following serious misconduct by an officer.

In March 2024, the Joint Standing Committee on the Corruption and Crime Commission's Report 12, *Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report*, informed Parliament that, between early 2020 and early 2023, the commission's Human Source Coordinator corruptly used her position to obtain a personal benefit, namely, an extensive and intimate relationship with a human source (an informant).

The investigation by the Parliamentary Inspector exposed serious weaknesses in how the commission managed its misconduct risks over more than 4 years. From 2018, the officer repeatedly breached the commission's policies and procedures, but the commission did not detect the misconduct with the informant. The commission unreservedly accepted that system failure contributed to a climate in which the officer's deception was not only possible but continued over many years, and engaged an independent review.

The reviewer's report, *Review of circumstances that allowed a former Commission officer to maintain an inappropriate relationship with a human source* (Review Report), exposes glaring deficiencies in the commission's risk management systems and culture over many years. Its 6 key findings identify the range of reasons misconduct by the officer continued undetected over that time. This committee report attaches the commission's abridged version of the Review Report.

It is positive that the commission is taking remedial action to improve its internal governance and risk management, and implement the 10 recommendations in the Review Report relating to commission-wide misconduct risks. The commission anticipates that recommendations will be implemented within 12 months.

The committee recommends, in summary:

- That the Attorney General ensure that the commission is resourced to implement its response to the Review Report and improve internal governance and risk management.
- That the Joint Standing Committee on the Corruption and Crime Commission of the 42<sup>nd</sup> Parliament follow up:
  - the commission's implementation of recommendations in the Review Report and other actions to minimise its misconduct risks office-wide
  - whether the commission decides to reestablish its human source operations, and, if so, seeks assurances that these operations are managed and governed in a way that minimises misconduct risks.



**MR M. HUGHES, MLA**  
**CHAIR**



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## **Ministerial response**

In accordance with Standing Order 277(1) of the Standing Orders of the Legislative Assembly, the Joint Standing Committee on the Corruption and Crime Commission directs that the Attorney General report to the Assembly as to the action, if any, proposed to be taken by the government with respect to the recommendations of the committee.



## Findings and recommendations

### Finding 1

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The independent report, *Review of circumstances that allowed a former Commission officer to maintain an inappropriate relationship with a human source* (Review Report), engaged by the Corruption and Crime Commission, exposes glaring deficiencies in the commission's risk management systems and culture over many years.

This is evident in its key findings which outline the range of reasons misconduct by the commission's former Human Source Coordinator continued undetected over many years.

### Recommendation 1

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That the Attorney General consider if the law providing that staff of the commission not be appointed for a term exceeding 5 years is necessary, or should be amended, in the *Corruption, Crime and Misconduct Act 2003* or any new Act.

### Finding 2

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The Corruption and Crime Commission is taking remedial action to minimise its misconduct risks and implement the 10 recommendations in the Review Report relating to commission-wide risks. It has dedicated resources to this task.

It is clearly too early to evaluate the commission's implementation of the recommendations and its work to improve internal governance and risk management.

The commission anticipates that recommendations will be implemented within 12 months.

### Recommendation 2

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That the Attorney General ensure that the Corruption and Crime Commission is resourced to implement its response to the Review Report and improve internal governance and risk management.

### Recommendation 3

Page 11

That the Joint Standing Committee on the Corruption and Crime Commission of the 42<sup>nd</sup> Parliament follow up the commission's implementation of recommendations in the Review Report and other actions taken to minimise its misconduct risks office-wide.

The committee respectfully suggests that this be done in around 12 months, either late 2025 or early 2026, and that committee consults with the Parliamentary Inspector of the Corruption and Crime Commission about the above.

### Recommendation 4

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That the Joint Standing Committee on the Corruption and Crime Commission of the 42<sup>nd</sup> Parliament follow up on whether the commission decides to reestablish its human source operations, and, if so, seeks assurances that these operations are managed and governed in a way that minimises misconduct risks.



# The Corruption and Crime Commission's management of its misconduct risks

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## Introduction

This report informs Parliament of the findings and recommendations of an independent review engaged by the Corruption and Crime Commission (commission), and commission action to minimise its misconduct risks following serious misconduct by an officer.

The Joint Standing Committee on the Corruption and Crime Commission, in its Report 12, *Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report* tabled on 21 March 2024<sup>1</sup> (Report 12), informed Parliament that the commission's Human Source Coordinator and manager of its Human Source Team (the officer) had engaged in serious misconduct. Report 12 attached the investigation report by Matthew Zilko SC, the Parliamentary Inspector of the Corruption and Crime Commission (Parliamentary Inspector).

The Parliamentary Inspector found that between early 2020 and early 2023 the officer corruptly used her position to obtain a personal benefit, namely, an extensive and intimate relationship with one of the commission's human sources (an informant).<sup>2</sup>

The investigation by the Parliamentary Inspector into the conduct of the officer exposed serious weaknesses in how the commission managed the officer, its Human Source Team, and its misconduct risks over more than 4 years.

As noted in Report 12, the commission implemented policies, procedures and a framework for governing human source operations, but from 2018 the officer repeatedly and wilfully breached these in how she dealt with the human source, and the commission's managers and systems did not apparently identify and take action to address the officer's breaches or detect the officer's misconduct with the informant.<sup>3</sup>

The commission unreservedly accepted that system failure contributed to a climate in which the officer's deception was not only possible but continued over many years, and engaged an independent review with a management focus.<sup>4</sup>

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- 1 Joint Standing Committee on the Corruption and Crime Commission, Report 12, [\*Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report\*](#), 21 March 2024. The report of the Parliamentary Inspector is appendix 1 to the above report.
  - 2 The Parliamentary Inspector made 5 findings of serious misconduct: Appendix 1 to Report 12, p 14. The conduct was detected in January 2023. The commission dismissed the officer.
  - 3 The commission established a dedicated Human Source Team in mid-2017. The officer acted as its Human Source Coordinator before being permanently appointed to that role in June 2018. An example of a breach of policy and procedure is that from November 2018 the officer was both the Human Source Coordinator and handler of the human source, and no secondary handler was appointed. As the Parliamentary Inspector said, the importance of the delineation between coordinator and handler 'should not be understated': appendix 1 to Report 12, pp 3, 5.
  - 4 Appendix 2 to Report 12, p 2, and appendix 1 to Report 12, p 15. The Parliamentary Inspector recommended a full internal inquiry into how so many breaches occurred, uninterrupted and unidentified, for such a long period of time. The commission accepted this recommendation.

As noted in Report 12, the commission, the State's peak integrity agency responsible for exposing and overseeing serious misconduct by public officers, should set the example on how public agencies actively manage their misconduct risks.<sup>5</sup> And lessons must be learned from misconduct events. What happens next, to minimise misconduct risks, is a crucial aspect of any misconduct finding.

In Report 12 the committee recommended that the commission provide the committee with a copy of its independent review, and a report on the commission's plan of action and action taken to minimise misconduct risks.<sup>6</sup> The committee said it would evaluate the commission's response and report to Parliament.<sup>7</sup> We do so with this report.

The independent reviewer's report, titled *Review of circumstances that allowed a former Commission officer to maintain an inappropriate relationship with a human source* (Review Report), is dated September 2024. The commission provided the committee with a copy of its abridged version of the findings and recommendations in the Review Report. A copy of the commission's abridged version of the Review Report is at appendix 1.<sup>8</sup>

The commission's summary of action to address its misconduct risks and the recommendations in the Review Report is at appendix 2.<sup>9</sup>

In October 2024 the committee held separate closed hearings with the Commissioner, Hon John McKechnie AO KC, and the Parliamentary Inspector to discuss the review and the commission's management of its misconduct risks. That evidence remains closed.

## The independent review

The commission engaged an independent reviewer, AM Executive Pty Ltd, to conduct a review to identify the circumstance that allowed a former commission officer to maintain an inappropriate relationship with a human source for an extended period, and to provide recommendations on improving organisational practices to ensure a similar event does not happen again.<sup>10</sup>

The review commenced in February 2024. The reviewer conducted 60 hours of face-to-face interviews and workshops with current and former commission staff, and reviewed documents.<sup>11</sup>

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5 Joint Standing Committee on the Corruption and Crime Commission, Report 12, [\*Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report\*](#), 21 March 2024, p 1.

6 *ibid*, recommendation 4.

7 *ibid*, p 10.

8 This is an unredacted copy of the commission's abridged version of the Review Report. The committee carefully considered the Speaker's Procedural Rules, including rules 16 and 19, and Legislative Assembly Standing Order 91 when drafting this report and deciding whether to attach an unredacted copy of the abridged Review Report.

9 Provided under cover of letter from Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, 1 November 2024. (The committee has posted this letter and the commission's letter dated 4 October 2024 on its website.)

10 Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, letter, 4 October 2024, p 1, and appendix 1, p 1.

11 Appendix 1, p 1.

In early October 2024 the commission provided its abridged version of the Review Report to the committee after determining that it was not 'necessary in the public interest' to disclose sensitive operational information, including operational methodology, contained in the Review Report.<sup>12</sup>

After a committee request to read the Review Report, the commission certified that it was 'necessary in the public interest' to disclose an unredacted version of the Review Report to committee members. On 22 October 2024 committee members inspected unredacted copies of the Review Report at the commission's premises. The committee will not make public the contents of the Review Report that are not in the commission's abridged version.

In the committee's view, the Review Report is balanced, does not shy away from making critical findings and contains useful recommendations.

In the committee's view, the commission's abridged version of the Review Report is a reasonable summary of the Review Report. As may be expected, the abridged version of the Review Report does not detail and emphasise inadequacies that formed the basis of the findings.

The abridged version of the Review Report reflects and adds further detail to themes raised in the Parliamentary Inspector's report and Report 12 already in the public domain, with a greater focus on what happened from a management perspective and how to address risks.

### **The findings in the Review Report**

The Review Report is damning. It exposes glaring deficiencies in the commission's risk management systems and culture over many years. This is evident in its findings. The 6 key findings outline the range of reasons why the officer's conduct continued over many years.

The committee was disappointed and surprised by these findings. We repeat the findings below to give context to committee comments.

First, the reviewer found on the officer's deceptive behaviour:

[The officer's] deceptive behaviour, lies to colleagues and managers, inappropriate use of covert communications and individual control over the source/handler relationship meant that her activities would be difficult to detect by someone unfamiliar with human source management.<sup>13</sup>

The commission's abridged Review Report adds that the officer's behaviour was targeted at her managers, colleagues within the Human Source Team and other support areas within the commission. It says '[t]he primary reason [the officer] was able to continue her relationship with [the informant] without being detected was her deceptive behaviour.'<sup>14</sup>

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12 Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, letter, 4 October 2024, pp 1–2. A relevant person is not authorised to disclose 'operational information' unless the commission has certified that disclosure 'is necessary in the public interest': *Corruption, Crime and Misconduct Act 2003*, s 152(5). This provides the commission with a discretion on what to disclose.

13 Appendix 1, p 1.

14 *ibid.*

In the committee's view, emphasising the primary reason for misconduct can tend to deflect and minimise the responsibility of the commission (or any agency) to minimise its risk.<sup>15</sup> There is often an interplay between deceptive conduct and system failure when misconduct occurs. The primary reason for most misconduct will be employee deception, but agencies must minimise misconduct risks and not contribute to the risk.

In the committee's view, the officer's managers, the commission's deficient systems and, importantly, its culture (see below) created significant risk and resulted in the misconduct (the inappropriate relationship) not being detected for years. They enabled the officer to exploit the secrecy of human source work within the commission.

Secondly, the reviewer found on governance and oversight, and reporting frameworks:<sup>16</sup>

[Governance and oversight] [The officer's] repeated breaches of the governance framework supporting the Commission's use of human sources were ignored by managers and allowed to continue.

[Reporting frameworks] The limited internal reporting requirements for the [Human Source Team] meant the Commission's leadership had a poor understanding of how human sources were being managed and what risks the Commission was exposed to through its human source operations.

The officer repeatedly breached human source policy and procedure and there was 'the apparently unwillingness of her managers to address her non-compliance, despite clear breaches of the procedure, of which they were aware'.<sup>17</sup>

There were also deficiencies in policy and procedure which allowed the officer's activities to continue undetected. The commission was using an inappropriate human source management model.<sup>18</sup>

The lack of formalised reporting contributed to the misconduct (the inappropriate relationship) not being detected.<sup>19</sup> Audit requirements were deficient.<sup>20</sup>

It appears to the committee that managers ignored 'red flags'. Commission staff in and beyond the Human Source Team raised concerns about the officer's conduct or level of contact with the human source.<sup>21</sup>

The inadequate formalised reporting requirements surprised the committee. The inadequate monitoring of the officer was, at best, negligent. This enabled the officer's misconduct to continue undetected.

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15 The committee made a similar comment in Report 12, [Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report](#), 21 March 2024, p 7.

16 Appendix 1, pp 1, 2.

17 *ibid*, p 1.

18 *ibid*, p 2.

19 *ibid*, p 3.

20 *ibid*, p 2.

21 *ibid*, pp 3, 5.



Thirdly, and importantly, the reviewer made a damning finding on the culture of the commission's Operations Directorate at the time, namely:<sup>22</sup>

The culture of the Commission's Operations Directorate at the time of the compromised relationship was one in which dissenting opinions were discouraged, a strict chain of command was enforced within the [Human Source Team], and officers were afraid of losing their jobs due to the commission's reliance on short-term employment contracts.

The abridged Review Report says 'the culture of the Human Source Team *and the broader Commission* was likely a significant contributing factor' (to the misconduct) [committee emphasis].

It adds that 'some officers said they had reported concerns [about the officer] verbally to their line managers but were unaware whether any subsequent action had been taken'.<sup>23</sup>

As the committee has observed in the past, an integrity and 'speak-up' culture is essential to minimise misconduct risks.<sup>24</sup> It is not uncommon during investigations into misconduct to find that an agency has appropriate policies, procedures and governance frameworks, but they are not enforced.

The committee is surprised and concerned by the above finding, and the level of dysfunction it reveals. Not only were dissenting opinions discouraged in the Operations Directorate, but a strict chain of command was enforced within the Human Source Team, and team members were afraid of losing their jobs as they were on a contract, and their manager (the officer) had a reputation for removing team members who questioned her decision making.<sup>25</sup> These factors combined clearly worked against detecting misconduct by the officer.

Lastly, the reviewer found on leadership and capability management:<sup>26</sup>

[Leadership] Failures of leadership within the Commission meant that executives in the [Human Source Team's] management line did not effectively monitor [the officer's] performance as the Human Source Coordinator, clearly establish performance expectations and performance measurement indicators for the [Human Source Team], or strategic direction for the human source program.

[Capability management] The Commission's ability to safely and securely manage human source operations was limited. Few members of the [Human Source Team] had previous human source management experience, and no one in the management chain had previous practical experience with human sources.

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22 *ibid*, p 3.

23 *ibid*.

24 For example, see Joint Standing Committee on the Corruption and Crime Commission, [\*What happens next? Beyond a finding of serious misconduct: Examining the responses to a finding of serious misconduct and building integrity in public agencies\*](#), Report 11, 30 November 2023, p 99.

25 Appendix 1, p 4.

26 *ibid*, pp 4, 5.

The abridged Review Report says there were deficiencies in the recruitment and selection of the officer to the position of Human Source Coordinator.<sup>27</sup>

The officer contributed to writing the job description form for the position, and questions asked of candidates were more focused on leadership abilities than human source expertise. The panel members, who all knew the officer, unanimously selected her despite her having little previous human source experience other than time acting as Human Source Coordinator. External candidates with previous human source experience, including managing teams of handlers, were given significantly lower ratings than the officer in the selection process.<sup>28</sup>

The commission also lacked a process to assess human source handlers for their suitability for the role.<sup>29</sup>

The above practices exposed the commission to the risk that personnel in the Human Source Team were not qualified or appropriate to manage human sources.<sup>30</sup>

It is clear to the committee that from the time the Human Source Team was established in 2017 there were deficient recruitment, selection and risk management practices in an area as sensitive and high risk as human source work.

The committee was also disappointed that 'no one in the management chain for the Human Source Team from the time it was established until it was suspended [in January 2023] had any practical experience in human source operations prior to the establishment of the Team'.<sup>31</sup> (This has now changed.)<sup>32</sup>

The abridged Review Report adds that the sheer volume of organisational resources dedicated to supporting the officer's informant as a human source should have led to questions about the value that person offered the commission as a source. Members of the commission's covert support team raised concerns about the level of contact between the officer and human source.<sup>33</sup>

#### **Finding 1**

The independent report, *Review of circumstances that allowed a former Commission officer to maintain an inappropriate relationship with a human source* (Review Report), engaged by the Corruption and Crime Commission, exposes glaring deficiencies in the commission's risk management systems and culture over many years.

This is evident in its key findings which outline the range of reasons misconduct by the commission's former Human Source Coordinator continued undetected over many years.

27 Appendix 1, p 4. Also, Joint Standing Committee on the Corruption and Crime Commission, Report 12, *Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report*, 21 March 2024, appendix 1 (Parliamentary Inspector's report), p 3.

28 Appendix 1, p 4.

29 *ibid.*

30 *ibid.*

31 *ibid.*, p 2.

32 The commission has since employed a Director Investigations with extensive experience in human source management and governance: appendix 2, p 1.

33 Appendix 1, p 5.

## **Commission action to minimise misconduct risks and its response to recommendations in the Review Report**

### ***Commission focus on internal governance and risk management***

The commission has advised the committee that it is committed to addressing the issues identified to minimise risk, strengthen governance and implement positive change within the commission.<sup>34</sup>

The commission understands the need for positive change and remedial action.

Since May 2023, only a few months after the officer's misconduct was detected, the commission has placed a renewed focus on internal governance and risk management.<sup>35</sup>

Since September 2023, a new Director Executive at the commission, supported by a dedicated team of 3 to 4 staff, have worked on improving internal governance and risk management, including taking action to respond to the Review Report.<sup>36</sup> In the past 12 months the commission has implemented several strategies and projects to strengthen key governance processes, managed by its Director Executive and her team.<sup>37</sup>

Resources dedicated to the above work have been reallocated from other areas of the commission. The commission also obtained funding for governance reform through the 2024-2025 Streamlined Budget Process.<sup>38</sup>

The commission will consider if additional resources are required to implement the recommendations of the Review Report and deliver its governance and risk management work.<sup>39</sup>

### ***The commission's response to recommendations in the Review Report to address commission-wide matters***

The Review Report is positive in that it recommends action to minimise misconduct risks office-wide, and the commission is responding to these recommendations.

Recommendations 1 to 10 of the Review Report address commission-wide matters.

As noted in the table at appendix 2, the commission supports and is committed to implementing 7 of the 10 recommendations, and supports in principle 3 recommendations (recommendations 6, 7 and 9) pending further consideration of resourcing and/or budget requirements.<sup>40</sup>

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34 Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, letter, 1 November 2024, p 3.

35 *ibid*, p 2.

36 *ibid*.

37 Appendix 2, p 1.

38 Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, letter, 1 November 2024, pp 2, 3.

39 *ibid*, p 3.

40 Appendix 1, p 6, and appendix 2.

As at 1 November 2024, the commission had taken steps towards or implemented 4 recommendations, as noted below:<sup>41</sup>

- Recommendation 1 – Establish a mechanism for staff to securely and confidentially report their concerns about other officers as required by the Code of Conduct.

The commission has procured, and will soon implement, an anonymous reporting platform to enable staff to securely and confidentially report workplace misconduct and inappropriate behaviour as required by the Code of Conduct.

- Recommendation 2: Develop a method for prioritising, approving and reporting on the allocation of operational resources against investigation and/or intelligence priorities to ensure the use of all covert capability resources is accounted for and transparent to the Executive Director/Operations, Director/Investigations and the Operations Committee.

The commission has commenced a review of its operational reporting framework.

- Recommendation 4 – The commission should introduce annual refresher training and certification for all staff on the Code of Conduct, including the need to report and act on any potential integrity issues identified in the course of their duties.

The commission has introduced annual refresher training and certification for all staff on the Code of Conduct requirements and responsibilities.

- Recommendation 10 – Providing management and leadership training to all executives and team leaders within the commission to ensure they understand their responsibilities as leaders in a public sector organisation.

The commission is exploring options for executive and leadership coaching to strengthen leadership behaviours within the commission.

Of note, it is positive that the commission has acted reasonably quickly to implement an anonymous reporting platform and has provided integrity training encouraging officers to report concerns.

Further to the actions noted above, to address governance and oversight inadequacies the commission has:<sup>42</sup>

- developed and launched a *Strategic Plan 2024–2027*
- reviewed and updated its enterprise risk management framework, policy, registers and reporting templates
- strengthened the independent internal audit function by working with the internal auditor to develop a new internal audit charter; and introduced targeted reviews of key risks, critical controls and the assurance profile for nominated functions
- employed new processes to ensure greater oversight of the implementation of external and internal audit recommendations and action plans
- progressed developing a new compliance framework, policy and register of compliance obligations.

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41 Appendix 2 sets out the commission's responses to the recommendations, and governance and risk management action. These were provided under cover of letters from Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, dated 4 October and 1 November 2024. (These letters are posted on the committee's website.)

42 Appendix 2, p 1.

The commission says that in the next 12 months it is committed to embedding additional resources dedicated to its strategy, governance and integrity functions.<sup>43</sup> The commission says it remains committed to a culture of accountability, integrity and continuous improvement.<sup>44</sup>

Further to the actions noted above, commission action to address culture concerns includes adopting a new policy position on employee reappointment to alleviate staff concerns about the impact of speaking up on their job security.<sup>45</sup>

Section 179(2) of the *Corruption, Crime and Misconduct Act 2003* provides that a commission 'member of staff is not to be appointed for a term exceeding 5 years and is eligible for reappointment'.

In the committee's view, the Attorney General should consider if the above provision is necessary or should be amended in the *Corruption, Crime and Misconduct Act 2003* or any new Act to better support the operational requirements of the commission.

The Attorney General should carefully consider the commission's views on this, and how this requirement affects its staff, operations, culture and ability to recruit.

#### **Recommendation 1**

That the Attorney General consider if the law providing that staff of the commission not be appointed for a term exceeding 5 years is necessary, or should be amended, in the *Corruption, Crime and Misconduct Act 2003* or any new Act.

#### **Committee observations**

The commission, like all public agencies, is responsible for its integrity and minimising its misconduct risks.

Misconduct can happen in any agency. Systems and an integrity culture cannot prevent all misconduct. This is why agencies must be proactive and constantly vigilant, and have systems and an integrity culture that minimise their misconduct risks.

The circumstances that led to the misconduct of the officer have been a wake-up call for the commission.

The commission's actions to date are just the start of the process to address identified governance and cultural issues. Implementing the recommendations to address commission-wide risks should take between 3 and 12 months (see appendix 2).

It is clearly too early to comment on whether actions taken have been effective, but it is difficult to conceive that actions proposed to be taken will not minimise misconduct risks at the commission to some extent.

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43 *ibid.*

44 Hon John McKechnie AO KC, Commissioner, Corruption and Crime Commission, letter, 4 October 2024, p 1.

45 Appendix 2, p 2.

The committee respectfully recommends that, given the essential oversight role this committee undertakes on behalf of the Parliament, the Joint Standing Committee on the Corruption and Crime Commission of the 42<sup>nd</sup> Parliament follow up the commission's implementation of the recommendations of the Review Report and other actions taken to minimise its misconduct risks. We suggest that this be done in around 12 months' time; towards the end of 2025 or early 2026.

The committee also respectfully recommends that the committee of the 42<sup>nd</sup> Parliament discuss the above with the Parliamentary Inspector who will follow up the commission's implementation of the recommendations in 12 months' time.

The commission should be subject to the same degree of accountability and transparency as other agencies, where action is recommended to address misconduct risks following a finding of serious misconduct. Public confidence in the integrity of the peak integrity agency in this State is critical.

The commission itself, when it formally recommends that an agency takes particular action, evaluates the agency's response, usually in 12 months, to ensure that the agency implements positive change. The commission continues to follow up, evaluate and report to Parliament on the agency's implementation of recommendation/s until finalised, even if this takes years.

The committee also notes that the Government supported in principle the committee's recommendation in our *What happens next?* report, to amend the *Corruption, Crime and Misconduct Act 2003* or a new Act to provide a law similar to section 111E of the *Independent Commission Against Corruption Act 1988* (NSW). Section 111E of that Act, in summary, provides that a public authority must inform its commission of its plan of action to address recommendations and progress to implement the plan within 3 months, then 12 months after, then, if the plan is not fully implemented, 12 months after that.<sup>46</sup> Following up recommendations provides the public with the assurance that recommendations are actioned.

Finally, it is important to note that the commission is a busy multi-function agency responsible for exposing serious misconduct and combating organised crime. The conduct of the officer no doubt tarnished other commission officers who do good and important work.

Further to expanding its unexplained wealth function in recent years, the commission's latest compliance function, since June 2023, is to oversight the WA Police Force's use of Border Search Area powers under the *Misuse of Drugs Act 1981*. And the commission's budget has only increased marginally in the last few years.<sup>47</sup>

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46 Joint Standing Committee on the Corruption and Crime Commission, [\*What happens next? Beyond a finding of serious misconduct: Examining the responses to a finding of serious misconduct and building integrity in public agencies\*](#), Report 11, 30 November 2023, pp 88, 91 (recommendation 19) and [\*Government Response\*](#).

47 Over the past 5 years the budget for the commission for delivery of services has increased by only \$6.5 million, with appropriations of \$27.3 million in 2020-21 increasing to \$33.8 million for 2024-25. Part of this increase can be attributed to an additional \$12.1 million granted in 2023, over 4 years, to continue

Like all agencies, the commission makes difficult decisions on how to allocate its resources to deliver its various functions, and what resources to allocate to business practices that ensure its risk management is robust.

As noted above, since 2023 the commission has dedicated resources to improving internal governance and risk management and, more recently, responding to the recommendations in the Review Report.

It is important that the commission is properly funded to undertake action to minimise its misconduct risks.

### **Finding 2**

The Corruption and Crime Commission is taking remedial action to minimise its misconduct risks and implement the 10 recommendations in the Review Report relating to commission-wide risks. It has dedicated resources to this task.

It is clearly too early to evaluate the commission's implementation of the recommendations and its work to improve internal governance and risk management.

The commission anticipates that recommendations will be implemented within 12 months.

### **Recommendation 2**

That the Attorney General ensure that the Corruption and Crime Commission is resourced to implement its response to the Review Report and improve internal governance and risk management.

### **Recommendation 3**

That the Joint Standing Committee on the Corruption and Crime Commission of the 42<sup>nd</sup> Parliament follow up the commission's implementation of recommendations in the Review Report and other actions taken to minimise its misconduct risks office-wide.

The committee respectfully suggests that this be done in around 12 months, either late 2025 or early 2026, and that committee consults with the Parliamentary Inspector of the Corruption and Crime Commission about the above.

## **The commission's human source operations**

The Parliamentary Inspector's investigation into the conduct of the officer raised questions about the effectiveness of the commission's Human Source Team, and its management and governance. For example, the manager of the officer observed that the Human Source Team produced 'limited tangible outcomes'.<sup>48</sup> The Human Source Team remains suspended.

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and further develop its unexplained wealth function (around \$3 million per year): *WA State Budget 2023-24: Budget Paper 2, Vol 2*, p 468; *WA State Budget 2024-25: Budget Paper 2, Vol 2*, p 471.

48 Joint Standing Committee on the Corruption and Crime Commission, Report 12, *Going rogue: serious misconduct by a commission officer – Parliamentary Inspector's report*, 21 March 2024, appendix 1 (Parliamentary Inspector's report), p 11.

The reviewer made 7 recommendations that were human source specific. These relate to:<sup>49</sup>

- reviewing and altering human source policies and procedures to reflect the commission's unique requirements
- strengthening the commission's management and oversight model of human source operations
- introducing independent persons in the system management, oversight and reporting of human source operations.

The commission supports these recommendations in principle. As appropriate, the commission requires further time to consider whether to recommence human source operations. This is plainly a decision for the commission.

Should the commission decide to reestablish these operations it will be guided by the recommendations in the Review Report to ensure the integrity of the operations.<sup>50</sup>

It is evident that if this service is reestablished, steps must be taken to ensure that the commission proactively manages and minimises misconduct risks as far as possible. To give one example, in the committee's view it is important to introduce psychological and general suitability testing for officers seeking covert roles, as recommended in recommendation 9 of the Review Report.

The committee also observes that an important aspect of misconduct management in human source work is employing appropriately qualified people, as well as independent expertise, to undertake, manage and oversight this work.

#### **Recommendation 4**

That the Joint Standing Committee on the Corruption and Crime Commission of the 42<sup>nd</sup> Parliament follow up on whether the commission decides to reestablish its human source operations, and, if so, seeks assurances that these operations are managed and governed in a way that minimises misconduct risks.



**MR M. HUGHES, MLA**  
**CHAIR**

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49 Appendix 1, pp 6–7.

50 Appendix 2, p 1.



## Appendix 1

### The commission's abridged version of the *Review of circumstances that allowed a former Commission officer to maintain an inappropriate relationship with a human source*

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In February 2024, the Commission engaged an independent consultant to produce a succinct, targeted report suitable for the Commissioner and Chief Executive to understand how a Commission officer was able to continue a personal relationship with a human source undetected for several years and provide recommendations on improving organisational practices to ensure it would not happen again. The Report is the culmination of over 60 hours of face-to-face interviews and workshops with current and former Commission staff, and a comprehensive review of relevant documents.

The Report made six key findings, and two tranches of recommendations to ensure the integrity of the Commission's operational capabilities can be re-established and reduce the likelihood of a similar incident occurring again.

The initials and pseudonym used in the Parliamentary Inspector's 'Going Rogue' report have been used for consistency and ease of reference.

#### Part 1: Key Findings

##### 1. *The Officer's Deceptive Behaviour*

*LC's deceptive behaviour, lies to colleagues and managers, inappropriate use of covert communications and individual control over the source/handler relationship meant that her activities would be difficult to detect by someone unfamiliar with human source management.*

The primary reason LC was able to continue her relationship with Mr X without being detected was her deceptive behaviour. The review identified this behaviour occurred repeatedly throughout her relationship with Mr X and was targeted at her managers, colleagues within the Human Source Team (HST), and support areas within the Commission. To avoid challenges to her deception, LC used various tactics to deflect and deceive her colleagues at the Commission and continue her relationship with Mr X.

These included:

- Responding to questions with irrelevant information.
- Placing false deadlines on requests for assistance to create a false sense of urgency.
- Dismissing questions from outsiders by claiming they did not understand the intricacies of human source operations.

##### 2. *Governance and Oversight*

*LC's repeated breaches of the governance framework supporting the Commission's use of human sources were ignored by managers and allowed to continue.*

The Report identified that organisational factors also contributed to the behaviour continuing undetected for the length of time it did, including:

- repeated breaches by LC of the Commission's governance framework for managing human sources, specifically the human source policy and procedure. The Report determined that it was LC's ongoing non-compliance with the procedure and the apparent unwillingness of her managers to address her non-compliance, despite clear breaches of the procedure, of which they were aware, that allowed her activities to continue.

- deficiencies in existing policy and procedure which allowed LC's activities to continue undetected.
- failures in the management chain and oversight committees, specifically that no one in the management chain for the HST from the time it was established until it was suspended had any practical experience in human source operations prior to the establishment of the team. This meant no one in the chain of command had sufficient knowledge to provide meaningful supervision of the team and LC and were unlikely to identify and act upon risks emanating from the team.
- LC only provided the operational oversight committee with high-level information of limited use, which meant senior executives had little information on which to make decisions regarding resource allocation and value for money of the Human Source Team.
- the Commission was using an inappropriate human source management model, which imposed time-intensive requirements on LC's line manager, on top of a breadth of other responsibilities. The Report noted that had LC's manager delegated their Human Source Registrar responsibilities to another officer, LC's breaches of procedure could possibly have been detected earlier.
- an independent internal audit of human source management practices conducted in 2021, was compromised due to LC misleading the auditor. Through her deceptive behaviour, LC devalued the independence of the audit process and compromised one of the Commission's operational assurance mechanisms.
- the Risk and Audit Committee (RAC) had only limited visibility of the HST's activities through internal audit reports, with audits being planned based on the time since the last audit was conducted, rather than being prioritised based on relative risk. Given the risky nature of human source operations, it would have been appropriate for the RAC to take a more active role in monitoring risks and controls associated with the HST's activities.

### **3. Reporting Frameworks**

*The limited internal reporting requirements for the HST meant the Commission's leadership had a poor understanding of how human sources were being managed and what risks the Commission was exposed to through its human source operations.*

The HST's oversight mechanisms and committees relied on accurate and timely reporting from the HST to support their decision making related to operations. LC taking on the primary handler role (which was a breach of procedure) removed the first layer of oversight and reporting, making it simpler for her to hide her relationship with Mr X. Furthermore, the limited reporting she provided the Operations Committee meant Commission executives had limited information on which to make decisions regarding resource allocation and value for money of the HST. However, the limitations of reporting frameworks elsewhere across the Commission further assisted LC to hide her relationship.

A change to the Human Source policy in December 2020 removed an audit requirement and replaced it with a requirement for fortnightly briefings with LC's line manager A, the Deputy Director of Investigations (DDI), and their line manager, B, the Director of Operations (D/Ops). While there were regular informal verbal briefings with A, there were no formal reporting or records provided. There were no briefings provided to B, nor did they seek them.

The report found that the lack of formalised reporting contributed to LC continuing her relationship with Mr X undetected because responsible executives were operating without accurate and complete information.

Within the Investigations and Operations areas, investigation managers had no visibility of what the HST was doing or who they were engaging with to collect information. In part, this was due to the lack of regular management meetings within the Operations Directorate, which meant teams within the Directorate had no knowledge of other investigations and operations being conducted. The veil of secrecy surrounding human source operations further limited the understanding of how the HST contributed to the Commission's investigations. The absence of this information meant that within the Operations Directorate, the value to the Commission of HST and specific sources was poorly understood.

LC regularly engaged other areas of the Commission without the visibility of DDI or D/Ops. This included other Commission covert capabilities. This exposed the Commission to great risk in terms of deploying intrusive capabilities at significant cost.

The Report also found that the absence of an independent advisor with experience in human source operations meant the Commission relied on LC's own decision-making regarding human source operations to manage risk.

#### **4. Culture**

*The culture of the Commission's Operations Directorate at the time of the compromised relationship was one in which dissenting opinions were discouraged, a strict chain of command was enforced within the HST, and officers were afraid of losing their jobs due to the Commission's reliance on short-term employment contracts.*

The Report stated that the culture of the Human Source Team and the broader Commission was likely a significant contributing factor. It found that Commission officers had a clear understanding of the secrecy provisions associated with their work and were aware of their integrity obligations as holders of security clearances. They were also aware of the 'need-to-know' principle associated with intelligence operations and misconduct investigations, and the Report found that LC appeared to have exploited that principle and secrecy provisions to operate unethically and deflect questions about her relationship with Mr X.

The Report noted that while officers were acutely aware of their responsibilities to self-report on issues that may affect their suitability to hold a clearance, their obligation to report suspected integrity issues in other officers was less well understood. While a number of officers observed serious, repeated problematic professional and personal behaviour by LC, had they better understood their obligations to report suspected integrity issues, it is likely LC's general suitability to be involved in human source operations and her relationship with Mr X would have been identified earlier. Some officers said they had reported concerns verbally to their line managers but were unaware whether any subsequent action had been taken.

One factor repeatedly cited as a reason officers were unwilling to raise their concerns was the Commission's appointment of staff on short-term contracts, as required under the *Corruption, Crime and Misconduct Act 2003*. While the Commission has subsequently updated its policy to ensure employees now have greater employment security, at the time, the effect it had on existing staff

was that it created a culture in which team members became suspicious of one another and officers focused on protecting their own ongoing employment as a priority. In this environment, officers were unwilling to raise their concerns about LC, which contributed to her ability to continue her relationship with Mr X undetected.

The Report identified that the strict chain of command enforced within the Investigations by the DDI and LC and LC's reputation for removing team members who questioned her decision-making created an environment where concerns about her behaviour were not raised.

##### **5. Leadership**

*Failures of leadership within the Commission meant that executives in the HST's management line did not effectively monitor LC's performance as the Human Source Coordinator, clearly establish performance expectations and performance measurement indicators for the HST, or strategic direction for the human source program.*

As previously noted, the Report emphasised that there was no one in the management chain with sufficient knowledge of and experience in human source operations to provide effective leadership of the new Human Source Team. However, other failures of leadership were identified during the review. The most significant of these was the failure to effectively monitor LC's performance as the Human Source Coordinator, which allowed her to continually breach the policy and procedure.

The Report stated that the Commission would benefit from having its own internal program for new hires and newly promoted officers that outlines the expectations of managers and their specific responsibilities related to the Commission's function, legislation, Code of Conduct and internal policies.

The Report also noted deficiencies in the recruitment and selection of LC to the position of Human Source Coordinator. Whilst no breach of policy, procedure or Public Sector Commissioner's Instructions was identified, the Report noted that the decision to appoint LC to the position in an acting capacity prior to externally advertising the position exposed the Commission to significant risks based on her lack of previous experience in managing human sources.

When the role was advertised externally, the Report commented that the decision to have LC contribute to writing the job description form for the position, while not unusual, was poor, given her lack of experience to accurately describe the tasks required of the position. It also likely gave her an unfair advantage over other candidates during the selection process. Furthermore, the questions asked of candidates in the selection process, which were more focused on leadership abilities than human source expertise, were unlikely to select the most appropriate candidate for the position and may have unfairly advantaged LC. The Report noted that LC was known by all the panel members, who unanimously selected LC despite having little previous human source experience, other than her time acting as the HSC. The Report noted that other external candidates demonstrated they had previous human source experience, including managing teams of handlers, however they were given significantly lower ratings than LC during the selection process.

The Report also identified that the Commission's lack of a process to assess human source handlers for their suitability for the role exposed the Commission to the risk that personnel would be placed in the Human Source Team who were not qualified or appropriate to manage human sources.

## **6. Capability Management**

*The Commission's ability to safely and securely manage human source operations was limited. Few members of the HST had previous human source management experience, and no one in the management chain had previous practical experience with human sources.*

The Report identified several critical issues that affected how the Human Source Team contributed to the Commission's intelligence collection capabilities. For example:

- The Human Source Procedure did not make provisions for any intrusive operational oversight from an independent person or revalidation of sources. Using an independent advisor would likely have identified or prevented the development of an inappropriate relationship between LC and Mr X.
- The relative inexperience of Human Source Team members, including LC, meant effective operational control was not maintained for human source operations. No specific criteria (such as previous experience in human source management) was used to select team members and the Commission relied on training courses provided by external agencies, which meant HST members were trained to the standards required of other agencies, rather than Commission standards.
- There was no strategy for how the Human Source Team would be used to address the Commission's intelligence requirements, which led to the team, and in particular LC, setting their own requirements. This was a fundamental breakdown of the intelligence cycle which was likely used to justify the continuation of Mr X in a human source role.
- The Commission's information management systems were not optimised for managing human sources or providing automated reporting to decision-makers.
- The HST was reliant on support from the Commission's other covert investigative support capabilities. The sheer volume of organisational resources dedicated to supporting Mr X as a human source should have led to questions about the value he offered the Commission as a source. The report found that there were members of the Commission's covert support team who raised concerns about the level of contact between LC and Mr X.
- However, the Commission did not have a reporting framework in place to monitor or report how covert operational resources were being allocated or a method for prioritising the allocation of those scarce resources.

### **Part 2: Recommendations**

The Report made two tranches of recommendations: the first addressing Commission-wide matters; and the second relevant only if the Commission recommences human source operations.

#### *First tranche of recommendations*

##### *Short term recommendations*

1: Establish a mechanism for staff to securely and confidentially report their concerns about other Commission officers as required by the Code of Conduct.

2: Develop a method for prioritising, approving and reporting on the allocation of operational resources against investigation and/or intelligence priorities to ensure the use of all covert capability resources is

accounted for and transparent to the Executive Director/Operations, Director/Investigations and the Operations Committee.

3: Amend internal promotion and recruitment policies so that when a position has an applicant acting long-term in that role through a higher-duty appointment, the chair of the selection panel cannot be their line manager. This will maintain the integrity of promotion and specialist selection processes.

*Medium term recommendations*

4: The Commission should introduce annual refresher training and certification for all staff on the Code of Conduct, including the need to report and act on any potential integrity issues identified in the course of their duties.

5: Review the Controlled Operations procedure to ensure the Commission's capabilities are being used, authorised and reviewed appropriately against organisational priorities.

6: The Commission reviews its integrity frameworks and processes to better align security, vetting and integrity functions to ensure all relevant information is shared and considered during personnel recruitment and review processes. This should include considering the need for additional dedicated resources to support the Commission's internal integrity function.

7: Review the learning and development framework for the Operations Directorate, including updating capability mapping and training needs analysis, to ensure officers are equipped with the skills essential for their roles.

*Long term recommendations*

8: Review the governance structures surrounding the Commission's covert collection capabilities to ensure their use is subject to appropriate prioritisation, approval and oversight mechanisms as per recommendation 2.

9: Introduce psychological and general suitability testing for individuals seeking covert roles with the Commission, including human source handlers, to ensure people with appropriate psychological profiles are recruited for these positions.

10: Provide management and leadership training to all executives and team leaders within the Commission to ensure they understand their responsibilities as leaders in a public sector organisation.

*Commission response*

The Commission supports recommendations 1 - 5 and 10. As detailed below, the Commission has already implemented or taken steps to implement recommendations 1, 4 and 10. The Commission is committed to implementing the remainder of these recommendations.

The Commission supports recommendations 6 - 9 in principle, pending further consideration of resourcing and/or budget requirements.

*Second tranche of recommendations- Human Source specific*

The Report made a range of additional recommendations which relate to specific and sensitive operational methodologies. The recommendations broadly concern:

The commission's abridged version of the *Review of circumstances that allowed a former Commission officer to maintain an inappropriate relationship with a human source*

- Reviewing and altering human source policies and procedures to reflect the Commission's unique requirements;
- Strengthening the Commission's management and oversight model of human source operations;
- Introducing independent persons in the system management, oversight and reporting of human source operations.

The Commission supports the second tranche of recommendations in principle, noting that by its very nature, the human source capability is a high-risk function. The Commission requires further time to consider the findings of the Report and make a determination regarding recommencement of human source operations.





## Appendix 2

### Commission action to address misconduct risks and recommendations in the Review Report

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Source: Corruption and Crime Commission letter dated 4 October 2024

#### **Commission action to address misconduct risks**

The Commission is reassured that the Report identified the former officer's deception was the primary reason her conduct went undetected for several years, rather than widespread systemic failure. Nonetheless, as set out above, the Report identified multiple factors which enabled the conduct to occur. The Commission accepts that the identified failures in oversight, leadership and culture contributed to the conduct. The Commission is committed to addressing the issues identified in a holistic way to minimise risk, strengthen governance and implement positive change within the Commission.

It is important to note the Commission's human source capability remains suspended. The Commission has not yet decided whether it will recommence human source operations. Further time is required to consider the Report findings and recommendations. As the Report notes, when conducted correctly, human source operations can produce significant intelligence dividends at a lower resource cost than other collection capabilities. Should the Commission determine to go down that path, it will be guided by the Report to ensure the integrity of the capability is re-established and the risk of a similar incident occurring is minimised (see *Second Tranche of Recommendations*). Shortly before the review was commenced, the Commission appointed a Director Investigations with extensive previous experience in human source management and governance.

#### *Governance and Oversight*

Over the past 12 months the Commission has implemented a number of strategies and projects to strengthen key governance processes. This work has been managed and coordinated by a new team, led by the newly appointed Director Executive, with responsibility for improving governance and oversight of risk management, internal and external audit, strategic planning, and legislative and regulatory compliance. Since the team's inception, the Commission has:

- Developed and launched its 2024-2027 Strategic Plan, focusing the Commission's vision and priorities in response to its changing environment.
- Reviewed and updated its enterprise risk management framework, policy, registers and reporting templates.
- Strengthened the independent internal audit function by working with the internal auditor to develop a new internal audit charter; introducing targeted reviews of key risks, critical controls and the assurance profile for nominated functions; and maturing the Commission's risk-based approach to internal audit.
- Employed new processes to ensure greater oversight of the implementation of external and internal audit recommendations and action plans.
- Progressed development of a new compliance framework, policy and register of compliance obligations to better coordinate and oversight compliance management.
- Obtained funding through the 2024-2025 Streamlined Budget Process for governance reform. This funding will be used for various projects including a strategic and functional review of Commission policies and procedures.

Over the next 12 months the Commission commits to embedding the additional resources dedicated to the Commission's Strategy, Governance and Integrity functions.

*Leadership and Culture*

As stated in the Committee's Report 11 and reinforced by this Report, commitment by an agency to a culture of integrity and a culture of 'speaking up' is essential to minimise misconduct risks. The Commission agrees with this observation and accordingly has taken steps to implement an anonymous Integrity Reporting Platform. The platform will enhance the Commission's culture and employee well-being by providing a secure and confidential platform for staff to report workplace misconduct and inappropriate behaviour as required by the Code of Conduct.

In the same vein, the Commission has recently introduced annual refresher training and certification for all staff on the Code of Conduct requirements and responsibilities.

As stated in the Report, the Commission has adopted a new policy position on employee reappointment, alleviating staff concerns about the impact of speaking up on their job security.

The Commission is currently exploring options for executive and leadership coaching to strengthen leadership behaviours within the Commission.

Source: Corruption and Crime Commission letter dated 1 November 2024

Recommendations	Response	Proposed Implementation Plan	Proposed Timeframe
<b>Short-term recommendations</b>			
1: Establish a mechanism for staff to securely and confidentially report their concerns about other Commission officers as required by the Code of Conduct.	Supported	The Commission has procured and will soon implement an anonymous reporting platform to enable staff to securely and confidentially report workplace misconduct and inappropriate behaviour as required by the Code of Conduct.	3 months
2: Develop a method for prioritising, approving and reporting on the allocation of operational resources against investigation and/or intelligence priorities to ensure the use of all covert capability resources is accounted for and transparent to the Executive Director/ Operations, Director/ Investigations and the Operations Committee.	Supported	The Commission has commenced a review of its Operational reporting framework.  The Commission is committed to developing and embedding a method to prioritise the allocation of operational resources and ensuring such prioritisation is clear and transparent to the relevant oversight positions and committees.	3 - 6 months
3: Amend internal promotion and recruitment policies so that when a position has an applicant acting long-term in that role through a higher-duty appointment, the chair of the selection panel cannot be their line manager. This will maintain the integrity of promotion and specialist selection processes.	Supported	The Commission will review its recruitment processes to strengthen the independence and integrity of its selection panels.	3-6 months
<b>Medium Term Recommendations</b>			
4: The Commission should introduce annual refresher training and certification for all staff on the Code of Conduct, including the need to report and act on any potential integrity issues identified in the course of their duties.	Supported	The Commission recently introduced annual refresher training and certification for all staff on the Code of Conduct requirements and responsibilities.	3 - 6 months

<p>5: Review the Controlled Operations procedure to ensure the Commission's capabilities are being used, authorised and reviewed appropriately against organisational priorities.</p>		Supported	<p>The Commission will review the procedure.</p>	6 - 9 months
<p>6: The Commission reviews its integrity frameworks and processes to better align security, vetting and integrity functions to ensure all relevant information is shared and considered during personnel recruitment and review processes. This should include considering the need for additional dedicated resources to support the Commission's internal integrity function.</p>		Supported in principle	<p>The Commission will carry out a review of its integrity framework and processes, as well as ensure continuing education is delivered to all staff on security, vetting and integrity functions and obligations. This review will consider the resources required to support the integrity function.</p>	6 - 12 months
<p>7: Review the learning and development framework for the Operations Directorate, including updating capability mapping and training needs analysis, to ensure officers are equipped with the skills essential for their roles.</p>		Supported in principle	<p>The Commission has commenced work in the Operations Directorate to conduct capability mapping within this area.</p>	6 - 12 months
<b>Long term recommendations</b>				
<p>8: Review the governance structures surrounding the Commission's covert collection capabilities to ensure their use is subject to appropriate prioritisation, approval and oversight mechanisms as per recommendation 2.</p>		Supported	<p>The Commission will conduct a review as recommended.</p>	6 - 12 months
<p>9: Introduce psychological and general suitability testing for individuals seeking covert roles with the Commission, including human source handlers, to ensure people with appropriate psychological profiles are recruited for these positions.</p>		Supported in principle	<p>The Commission has existing psychological testing in place for certain roles within the Operations Directorate. The Commission is currently expanding ongoing psychological assessments across directorates and is taking a holistic approach to ensuring staff are fit to work and engage in various work tasks.</p>	6 - 12 months

<p>10: Provide management and leadership training to all executives and team leaders within the Commission to ensure they understand their responsibilities as leaders in a public sector organisation.</p>		<p>Supported</p>	<p>The Commission is currently exploring options for executive and leadership coaching to strengthen leadership behaviours within the Commission.</p>	<p>6 - 12 months</p>
<p><b>Human source recommendations</b></p>				
<p>11-17: Human source specific recommendations</p>		<p>Supported in principle</p>	<p>The Commission requires further time to consider the findings of the review and make a determination regarding commencement of human source operations.</p>	<p>12+ months</p>



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Parliament House  
4 Harvest Terrace, West Perth WA 6005  
Telephone: +61 8 9222 7222  
Email: [laco@parliament.wa.gov.au](mailto:laco@parliament.wa.gov.au)  
Website: [www.parliament.wa.gov.au](http://www.parliament.wa.gov.au)