

Corrupt conduct prevention policy

Human rights

Decision makers must act and make decisions in a way that is compatible with human rights and give proper consideration to a human right relevant to a decision, as required by section 58 of the *Human Rights Act 2019*. For further information please refer to the department's Human rights intranet [page](#).

1. Purpose

This policy establishes the underlying principles and obligations of the Department of Housing and Public Works (the department) concerning corrupt conduct prevention.

This policy should be read in conjunction with the [Corrupt conduct prevention procedure](#) and the relevant policies and procedures outlined in [Appendix A](#).

2. Authority

Under the [Crime and Corruption Act 2001](#), [Public Sector Act 2022](#), [Public Sector Ethics Act 1994](#), and the [Code of Conduct for the Queensland Public Service](#) the department is required to support the highest standards of professional and ethical conduct, enable strategies to prevent corrupt conduct impacting on the department, and facilitate the notification, assessment and management of complaints of suspected corrupt conduct.

This policy has been developed in accordance with the Crime and Corruption Commission's publication [Corruption in focus: A guide to dealing with corrupt conduct in the Queensland public sector](#).

3. Policy statement

The department is committed to:

- implementing fraud and corruption prevention initiatives and ensuring appropriate internal controls are in place to prevent corrupt conduct
- encouraging the internal reporting of wrongdoing
- accepting complaints made anonymously
- promoting public confidence, accountability, integrity and transparency in the way the department deals with complaints of suspected corrupt conduct
- promoting public confidence by appropriately assessing and dealing with complaints of suspected corrupt conduct received by the department
- ensuring that appropriate consideration is given to the rights of employees who are the subject of complaints (that is, subject officers), and
- taking appropriate action regarding proven corrupt conduct and wrongdoing by employees, contractors, and other external parties.

Complaints of suspected corrupt conduct (other than complaints relating to the Director-General) will be dealt with in accordance with this policy and the [Corrupt conduct prevention procedure](#).

Complaints of suspected corrupt conduct relating to the Director-General will be dealt with in accordance with the department's [Complaints about the Director-General: Section 48A of the Crime and Corruption Act 2001 policy](#).

4. Scope

This policy applies to all employees working for the department regardless of whether they are permanent, temporary, full-time, part-time or casual employees and/or on secondment from another department. It also applies to other persons who perform work for the department including contractors, students gaining work experience and volunteers. For the purposes of this policy, the term contractor includes on-hired temporary labour services (agency staff).

5. Delegations

Delegations ([Resource centre - Delegations \(sharepoint.com\)](#)) are to be exercised in accordance with the department's Human Resource, Financial and Contract, Legal, Property, Building Industry, Procurement, Project Commencement, and Administrative Delegations. It is recommended that delegate authority levels are confirmed prior to exercising any powers in relation to this policy and supporting procedures.

6. Roles and responsibilities

Role	Responsibilities
Director-General (accountable officer)	<ul style="list-style-type: none"> » Promotes and communicates, both within the department and externally, the expectation that all persons are required to demonstrate the highest professional and ethical standards when conducting their duties and always act in the public interest. » Ensures that the department has appropriate policies, training and awareness initiatives and other control systems to prevent corrupt conduct, including to effectively notify, assess and manage complaints of suspected corrupt conduct. » Leads a workplace culture that values professionalism, integrity and diligence. » Ensures that sufficient resources are available to the department's Crime and Corruption Commission Liaison Officer to enable them to deal with complaints of suspected corrupt conduct appropriately. » Takes appropriate action with respect to proven corrupt conduct.
Deputy Directors-General (DDG) and Executive Leadership Team (ELT)	<ul style="list-style-type: none"> » Communicate the expectation that all persons are required to demonstrate the highest professional and ethical standards when conducting their duties and always act in the public interest. » Educate persons on the requirement to report suspected corrupt conduct. » Promote a workplace culture that values professionalism, integrity and diligence. » Take appropriate action with respect to proven corrupt conduct. » Ensure that recommendations arising from investigations into suspected corrupt conduct are considered as a priority and actioned in a timely manner.

Chief Human Resources Officer (CHRO)	<ul style="list-style-type: none"> » Coordinates the effective implementation of department-wide education and training initiatives about public sector ethics and the Code of Conduct for the Queensland Public Service. » Ensures timely and effective support to delegates for recommendations arising from investigations into suspected corrupt conduct.
Crime and Corruption Commission (CCC) Liaison Officer	<ul style="list-style-type: none"> » Determines whether a complaint or information involves or may involve, suspected corrupt conduct. » Notifies the Crime and Corruption Commission of a complaint which the CCC Liaison Officer reasonably suspects involves, or may involve, suspected corrupt conduct in accordance with Assessments per section 40 directions. » Deals with complaints about, or information involving, suspected corrupt conduct.
Integrity Services Unit	<ul style="list-style-type: none"> » Develop and maintain policies and procedures regarding corrupt conduct. » Develop and implement education and awareness initiatives to prevent corrupt conduct. » Provide advice on integrity related matters, including matters relating to suspected corrupt conduct. » Assess complaints or information for suspected corrupt conduct and refer matters of suspected corrupt conduct to the Crime and Corruption Commission in accordance with Assessments per section 40 directions. » Manage or investigate complaints of suspected corrupt conduct in accordance with directions from the Crime and Corruption Commission. » Maintain appropriate records in relation to corrupt conduct matters in accordance with Assessments per section 40 directions.
Managers and supervisors	<ul style="list-style-type: none"> » Ensure employees under their supervision are aware of the requirements of this policy. » Immediately refer any complaints of, or information concerning suspected corrupt conduct to the Integrity Services Unit. » Maintain confidentiality in relation to complaints of suspected corrupt conduct. » Support a workplace culture that values professionalism, integrity and diligence. » Demonstrate positive ethical standards and values to persons through their own workplace conduct and communications. » Create a supportive environment that allows for the identification and reporting of suspected corrupt conduct. » Ensure all new employees and agency staff complete an induction process, including the completion of mandatory online training on public sector ethics and the Code of Conduct for the Queensland Public Service. » Provide appropriate support to persons who report suspected corrupt conduct

Employees, contractors, students (on work experience) and volunteers	<ul style="list-style-type: none"> » Immediately report suspected corrupt conduct to the Integrity Services Unit. » Conduct their duties and work activities to the highest professional and ethical standards. » Familiarise themselves and comply with this policy and the Corrupt conduct prevention procedure. » Cooperate fully with investigations into suspected corrupt conduct. » Maintain the confidentiality of suspected corrupt conduct matters. » Complete mandatory public sector ethics training provided by the department, including training in relation to the Code of Conduct for the Queensland Public Service.
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7. Human rights

A *Record for Assessing Compatibility with Human Rights* has been completed to demonstrate how human rights have been considered in the development of this policy. The outcome of the assessment is:

- » The policy has been reviewed for compatibility with human rights under the *Human Rights Act 2019* (the Act). The policy has been found to engage and limit human rights but only to the extent that is lawful, reasonable, and demonstrably justifiable in accordance with section 13 of the Act therefore, it is reasonable to conclude that the policy is compatible with human rights.

8. Contact

For further information, please contact:

- Integrity Services Unit
- Email: integrityservices@housing.qld.gov.au

9. Storage of information

All information should be managed in accordance with the [Public Records Act 2023](#), and the whole-of-Government [Records governance policy](#). In addition, personal information should be managed in accordance with the [Information Privacy Act 2009](#).

10. Document control

Document owner	Director, Integrity Services Unit			
Contact details	integrityservices@housing.qld.gov.au			
Next review	June, 2028			
Supersedes	Corrupt conduct prevention policy v1.1 (ISU:PY:2023:02)			
Version	Issue Date	Reason	Author	Approver
1.0	01 April 2022	New document	Director, Integrity Services Unit	Deputy Director-General, Strategy and Corporate Services
1.1	29 August 2023	Minor update – update to reflect changes due to MoG (May 2023)	Director, Integrity Services Unit	Deputy Director-General, Strategy and Corporate Services
1.2	20 June 2025	Minor update – updated to reflect changes due to MoG (November 2024)	Director, Integrity Services Unit	Executive Director, Professional Standards and Performance

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Appendix A: Additional contacts and information

Additional contacts

Contact	Information
Director-General, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: directorgeneral@housing.qld.gov.au » Phone: (07) 3017 5801 » Postal address: GPO Box 2457, Brisbane QLD 4001
Deputy Director-General, Corporate Services, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: ODDGCorporateServices@housing.qld.gov.au » Phone: (07) 3008 3800 » Postal address: GPO Box 2457, Brisbane QLD 4001
Chief Human Resources Officer, Corporate Services, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: CHRO@housing.qld.gov.au » Phone: (07) 3008 3039 » Postal address: GPO Box 2457, Brisbane QLD 4001
Director, Integrity Services Unit, Department of Housing and Public Works	<ul style="list-style-type: none"> » Email: integrityservices@housing.qld.gov.au » Phone: (07) 3109 4863 » Postal address: GPO Box 2457, Brisbane QLD 4001
Complaints Section, Crime and Corruption Commission	<ul style="list-style-type: none"> » Report corruption: Report corruption CCC - Crime and Corruption Commission Queensland » Phone: (07) 3360 6060 » Fax: (07) 3360 6333 » Toll Free: 1800 061 611 (outside Brisbane, within Queensland) » Postal Address: GPO Box 3123, Brisbane QLD 4001 » Website: www.ccc.qld.gov.au

Information

In addition to the documents mentioned in section 2 Authority, the requirements set out in this document are consistent with relevant Government legislation, regulations, directives, information standards and/or policies at the time of publication. Supporting information is available.

Examples are:

Legislation and regulations

- [Crime and Corruption Act 2001](#)
- [Criminal Code Act 1899](#)
- [Human Rights Act 2019](#)
- [Industrial Relations Act 2016](#)
- [Information Privacy Act 2009](#)
- [Integrity Act 2009](#)
- [Public Interest Disclosure Act 2010](#)
- [Public Records Act 2023](#)
- [Public Sector Act 2022](#)
- [Public Sector Ethics Act 1994](#)
- [Right to Information Act 2009](#)

Queensland Government

- [Assessments per section 40 directions, Crime and Corruption Commission, March 2020](#)
- [Code of Conduct for the Queensland Public Service](#)
- [Corruption in focus: A guide to dealing with corrupt conduct in the Queensland public sector, Crime and Corruption Commission, December 2024](#)
- [Queensland Government indemnity guideline](#) (legal protections for Queensland Government employees)

Department of Housing and Public Works

- [Complaints about the Director-General: Section 48A of the Crime and Corruption Act 2001](#)
- [Conflicts of interest policy](#)
- [Conflicts of interest procedure](#)
- [Corrupt conduct prevention procedure](#)
- [Criminal history screening policy](#)
- [Customer complaints management policy](#)
- [Customer complaints management procedure](#)
- [Data governance policy](#)
- [Delegations](#)
- [Employee complaints policy](#)
- [Employee complaints guideline](#)
- [Enterprise risk management framework](#)
- [Fraud and corruption control policy](#)
- [Fraud and corruption control plan](#)
- [Information security management policy](#)
- [Integrity framework](#)
- [Public interest disclosure policy](#)
- [Public interest disclosure procedure](#)
- [Risk management policy](#)
- [Standard of conduct policy](#) (For contractors, subcontractors, consultants, students and volunteers)
- [Use of ICT services, facilities and devices policy](#)
- [Workplace behaviour policy](#)

Appendix B: Definitions

The key terms referred to in this policy are as follows:

Term	Definition
Conduct	<p>A specific meaning under section 14 of the Crime and Corruption Act 2001, as follows:</p> <ol style="list-style-type: none"> 1) conduct includes— <ol style="list-style-type: none"> a) neglect, failure and inaction; and b) conspiracy to engage in conduct; and c) attempt to engage in conduct.
Contractor	<p>Contractors, subcontractors, consultants and their employees, and includes on-hired temporary labour services (agency staff).</p>
Corrupt conduct	<p>A specific meaning under section 15 of the Crime and Corruption Act 2001, as follows:</p> <ol style="list-style-type: none"> 1) Corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that— <ol style="list-style-type: none"> a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of— <ol style="list-style-type: none"> (i) a unit of public administration; or (ii) a person holding an appointment; and b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that— <ol style="list-style-type: none"> (i) is not honest or is not impartial; or (ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or (iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and c) would, if proved, be— <ol style="list-style-type: none"> (i) a criminal offence; or (ii) disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment. 2) Corrupt conduct also means conduct of a person, regardless of whether the person holds or held an appointment, that— <ol style="list-style-type: none"> a) impairs, or could impair, public confidence in public administration; and b) involves, or could involve, any of the following— <ol style="list-style-type: none"> (i) collusive tendering; (ii) fraud relating to an application for a licence, permit or other authority under an Act with a purpose or object of any of the following (however described)— <ol style="list-style-type: none"> a. protecting health or safety of persons; b. protecting the environment;

	<ul style="list-style-type: none"> c. protecting or managing the use of the State's natural, cultural, mining or energy resources; (iii) dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets; (iv) evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue; (v) fraudulently obtaining or retaining an appointment; and c) would, if proved, be— <ul style="list-style-type: none"> (i) a criminal offence; or (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.
Crime and Corruption Commission Liaison Officer	<p>A primary point of contact for the Crime and Corruption Commission and who has responsibilities outlined in section 6 of this policy.</p> <p>The department's designated Crime and Corruption Commission Liaison Officer is the Director, Integrity Services Unit.</p>
Employee/s	A person employed in the department under the Public Sector Act 2022 as a public service officer, general employee or temporary employee, and persons on secondment from other departments/agencies.
Manager/supervisor	Any person whose duties involve or include managing or supervising others in the carrying out of their duties, irrespective of their formal title.
Person/s	All persons described in Section 4 of this policy.
Reasonably suspects	Suspects on grounds that are reasonable in the circumstances.
Subject officer	A person subject of a complaint or information of suspected corrupt conduct.
Unit of Public Administration	<p>A specific meaning under section 20 of the Crime and Corruption Act 2001, as follows:</p> <ol style="list-style-type: none"> 1) Each of the following is a unit of public administration— <ol style="list-style-type: none"> a) the Legislative Assembly, and the parliamentary service; b) the Executive Council; c) a department; d) the police service; e) local government; f) a corporate entity established by an Act or that is of a description of a corporate entity provided for by an Act which, in either case, collects revenues or raises funds under the authority of an Act; g) a noncorporate entity, established or maintained under an Act, that— <ol style="list-style-type: none"> (i) is funded to any extent with State moneys; or (ii) is financially assisted by the State; h) a State court, of whatever jurisdiction, and its registry and other administrative offices; i) another entity prescribed under a regulation.

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- 2) However, none of the following is a unit of public administration—
- a) the commission;
 - b) the parliamentary commissioner;
 - c) the entity consisting of—
 - (i) the parliamentary commissioner; and
 - (ii) officers and employees of the parliamentary service assigned to the parliamentary commissioner; and
 - (iii) persons engaged to provide the parliamentary commissioner with services, information or advice;
 - (iv) an entity declared by an Act not to be a unit of public administration.
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Appendix C: Examples of suspected corrupt conduct

The following are provided as examples only and are not exhaustive. Any resemblance to actual conduct is purely coincidental.

- An employee shares confidential departmental information with a supplier or prospective supplier. This may be suspected corrupt conduct on the part of the employee, as well as on the part of the supplier if they fail to report the receipt of information.
- An employee fails to disclose a relationship with a contractor/supplier that conflicts with their work duties and continues to deal with the contractor/supplier without the appropriate authorisation.
- A contractor engaged by the department to develop a tender specification for a particular service, fails to disclose their partner works as a senior manager in a company that provides the particular service and is likely to submit an offer to the department.
- An employee falsifies their timesheets.
- Two contractors collude when submitting offers in response to a departmental tender (this may be suspected corrupt conduct on the part of both contractors).
- An employee favours a friend or a family member as part of recruitment and selection process.
- An employee gets a contractor to perform work at their home and the work is invoiced to the department (this may be suspected corrupt conduct on the part of the employee and the contractor).
- A former departmental employee uses confidential information obtained during their employment with the department to help their new employer obtain government business.
- A supplier gives an employee gifts in return for being awarded work (this may be suspected corrupt conduct on the part of the supplier and the employee).
- A contractor and an employee collude by agreeing that the contractor will invoice the department for work not performed, the employee will approve the false invoices, and they will share the proceeds (this may be suspected corrupt conduct on the part of the contractor and the employee).
- An employee misuses taxi vouchers (for example uses the vouchers for non-work-related travel).
- An employee accesses and/or changes information in a departmental system relating to a friend or family member.
- An employee misuses a government vehicle (for example uses the vehicle for non-work-related travel).
- An employee influences and/or manipulates a procurement process to favour a contractor.
- An employee forges a person's signature on a work document.
- An employee engages in conduct of sexual nature in the workplace.
- A contractor physically assaults another person in the course of performing work for the department.