



Australian Government

National Anti-Corruption Commission

Brief for Attorney-General for Palau

The Hon PLG Brereton, AM, RFD, SC
National Anti-Corruption Commissioner
24 January 2024

www.nacc.gov.au

Topics

- **Origins and Establishment**
- **Mission and Organisation**
- **Jurisdiction & corrupt conduct**
- **Referrals and assessment**
- **What is meant by serious and systemic?**
- **Powers and protections**
- **Outcomes and reports**

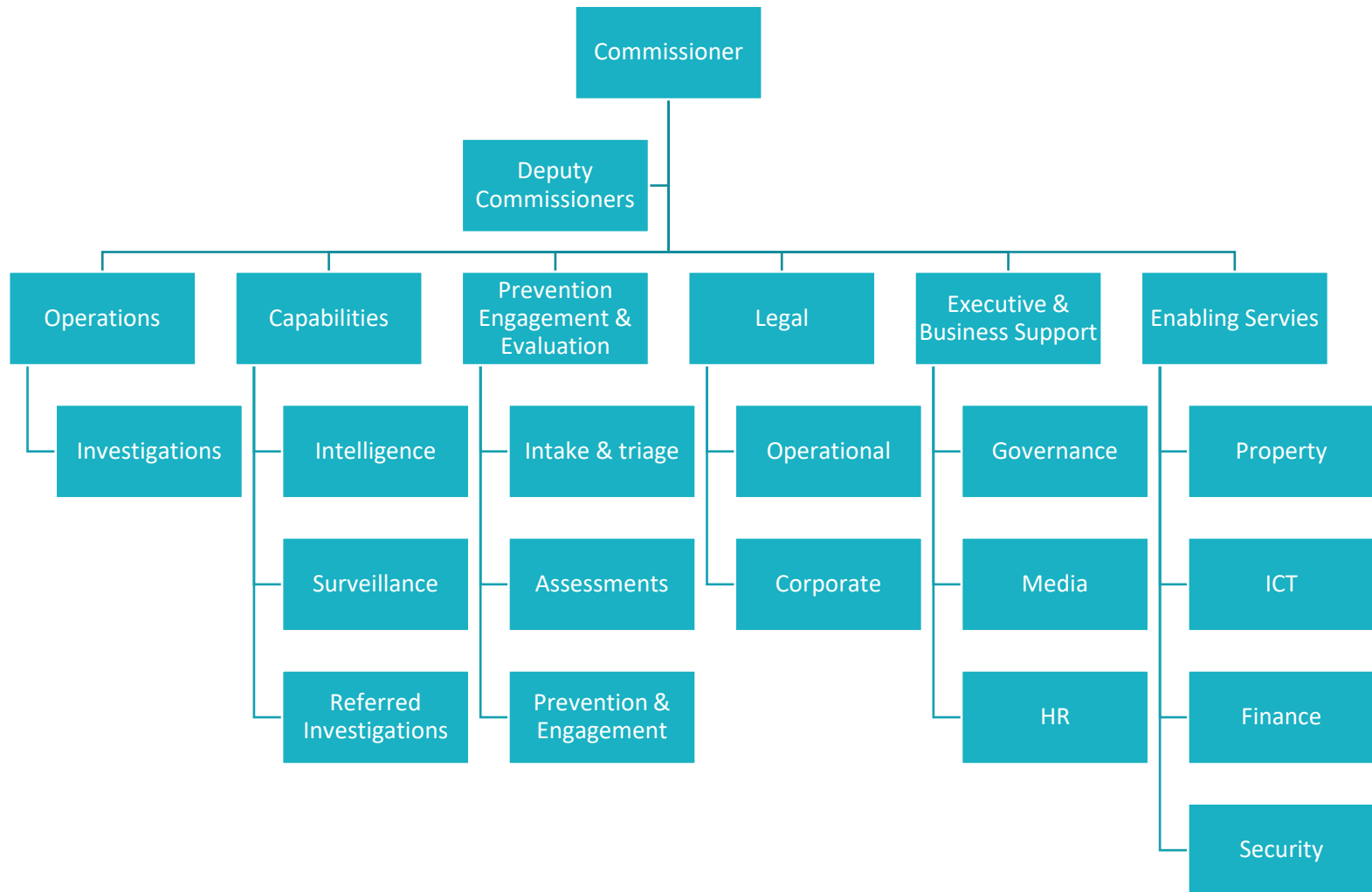
Origins and establishment

- State and territory anti-corruption commissions
- No Commonwealth commission with broad-based jurisdiction
- Election issue
- Legislation October 2022
- Commencement 1 July 2023

Mission

To enhance integrity in the Commonwealth public sector, by **detering, detecting** and **preventing** corrupt conduct involving Commonwealth public officials, through **education, monitoring, investigation, reporting** and **referral**.

Organisation



Corrupt conduct: s8(1)

(a) Conduct of any person that adversely affects a public official's *honest or impartial exercise of powers or performance of duties*

(b) Conduct of a public official that involves a *breach of public trust*

(c) Conduct of a public official that involves *abuse of office*

(d) Conduct of a public official or former public official that involves the *misuse of information or documents*

➤ **Not mere maladministration or mistakes**

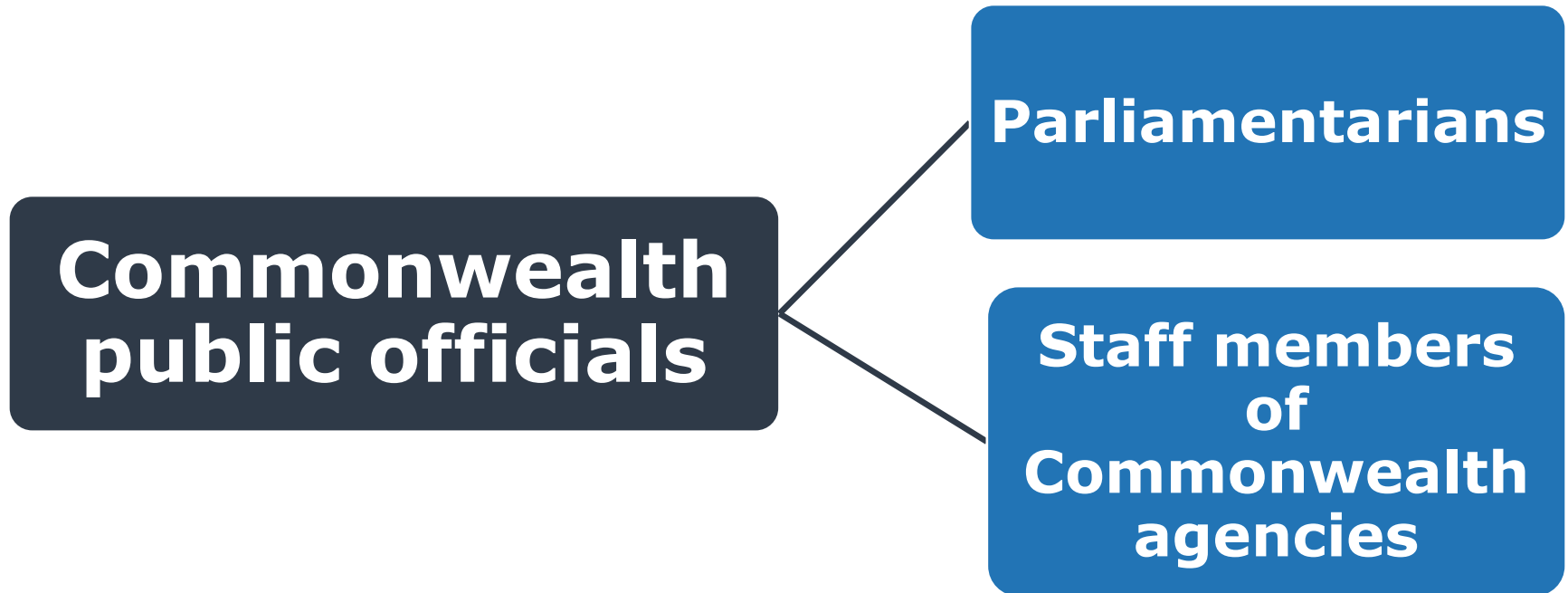
Exclusions: s8(2)

Paragraph 8(1)(a) (conduct of any person) does not apply in relation to conduct of the following:

- (a) the Governor-General;**
- (b) a Deputy Governor-General;**
- (c) a Justice of the High Court *or a judge of a court created by the Parliament;***
- (d) a judge of a court of a State or Territory;**
- (e) a member of a Royal Commission;**
- (f) the Inspector, or a person assisting the Inspector.**

Commonwealth public officials: s8, s10

The touchstone of jurisdiction is an issue of corrupt conduct by, or affecting, a *Commonwealth public official*.



Staff members: s12

Staff members of an agency include:

- **if the agency is a Commonwealth entity—*an official (within the meaning of the PGPA Act) of the entity;***
- **in any case—an individual who is employed by, or engaged in assisting the agency or a staff member of the agency on behalf of the agency or the Commonwealth (which could include consultants); and**
- **an individual involved in providing services to or for the agency under a Commonwealth contract.**

Referrals

- **Voluntary.** Anyone can refer a matter to the Commission
- **Mandatory.** An agency head who becomes aware of a corruption issue must refer the issue to the Commission if it concerns the conduct of a staff member of the agency, and the agency head suspects that the issue could involve corrupt conduct that is serious or systemic
- **Own motion.** the Commission can investigate a corruption issue of which it becomes aware of its own motion without any referral

Making a referral

Online:
www.nacc.gov.au

Phone:
1300 489 844

Post

Whistleblower protections

- ✓ If you refer or provide information to the Commission about a corruption issue, you are not subject to any civil, criminal or administrative liability (including disciplinary action) for doing so.
- ✓ In addition, no contractual or other right or remedy can be enforced against you for doing so.
 - These protections override all other laws of the Commonwealth.
 - The only exception is that action can still be taken for making false or misleading statements to the Commission.
- ✓ Taking reprisal action against anyone who makes a referral, provides information, or gives evidence to the Commission is a criminal offence.

Assessment

- **Triage:**
 - Does the referral concern a Commonwealth public official?
 - Does the referral raise a corruption issue?
 - Preliminary investigation?
- **Assessment:**
 - Should the Commission deal with the issue and if so how?
 - Conduct a Commission-only corruption investigation
 - Conduct a joint investigation with another agency
 - Refer to relevant agency for investigation
 - Refer to relevant agency for consideration
 - Take no further action
- No obligation to consider dealing with any referral
- Notification to referrers

Serious or systemic

Serious

Requires something that is significant; it involves something more than "negligible" or "trivial", but it does not have to be "severe" or "grave".

Systemic

Means something that is more than an isolated case; it involves a pattern of behaviour, or something that affects or is embedded in a system.

The mandatory referral obligation is triggered if the suspected corrupt conduct could be *either* serious or systemic

Investigatory powers

- To compel provision of documents and information
- To summons for examination at hearing
 - Ordinarily in private
 - Exceptionally in public
- Information cannot be withheld on grounds of
 - legal professional privilege
 - public interest immunity
 - privilege against self-incrimination. However, information provided under compulsion cannot be admitted in evidence in a criminal prosecution of the person providing it.

Outcomes and reports

- Finding of “corrupt conduct”
- Recommendations
- Referrals
- Report to Attorney-General
- Parliament
- Public release

Oversight

- Inspector
- Parliamentary Joint Committee

Data and trends to date

- 2424 referrals
 - 1920 referrals excluded at triage
 - 62 referrals pending triage
 - 200 triaged referrals under assessment including 11 under preliminary investigation
 - 161 referrals assessed :
 - no further action in 144 cases.
 - 3 referrals to agencies for investigation or consideration, in 1 of those cases with oversight by the Commission.
 - 6 Commission-only corruption investigations.
 - 3 joint investigations.
- Procurement
- Promotion
- Misuse of information

Prevention and Engagement

- Presentations to:
 - Parliamentarians
 - Senior public servants
 - High risk agencies
 - Professional associations
 - Civil society organisations
- International
 - CCPCJ
 - CoSP10
 - Teienewa Vision

The Pacific

- Staff exchanges
- Information exchange
- MoU

- APSACC Darwin 29-31 July 2024



Australian Government

National Anti-Corruption Commission

Questions?

- ✓ Subscribe to the website using your 'gov.au' email address and check back regularly for updates. More information and resources will be added when available.
- ✓ Call us on 1300 489 844 (voicemail is available outside standard business hours).

www.nacc.gov.au



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Commonwealth Procurement and Contract Management Conference

Combating corruption in
procurement

nacc.gov.au

Scope

- **A predominant theme in referrals**
- **A strategic corruption priority**
- **Case studies**
- **Risk factors and vulnerabilities**
- **Prevention frameworks**

Corruption in procurement

- Corruption in procurement will often lead to the overpaying of goods and services, at a cost to the taxpayer.
- It can also result in poor outcomes for projects that are awarded to tenderers that were not the most suitable.
- This can have negative impacts on public trust in institutions.

Themes in public sector corruption

Procurement

Recruitment

**Public/private
interface**

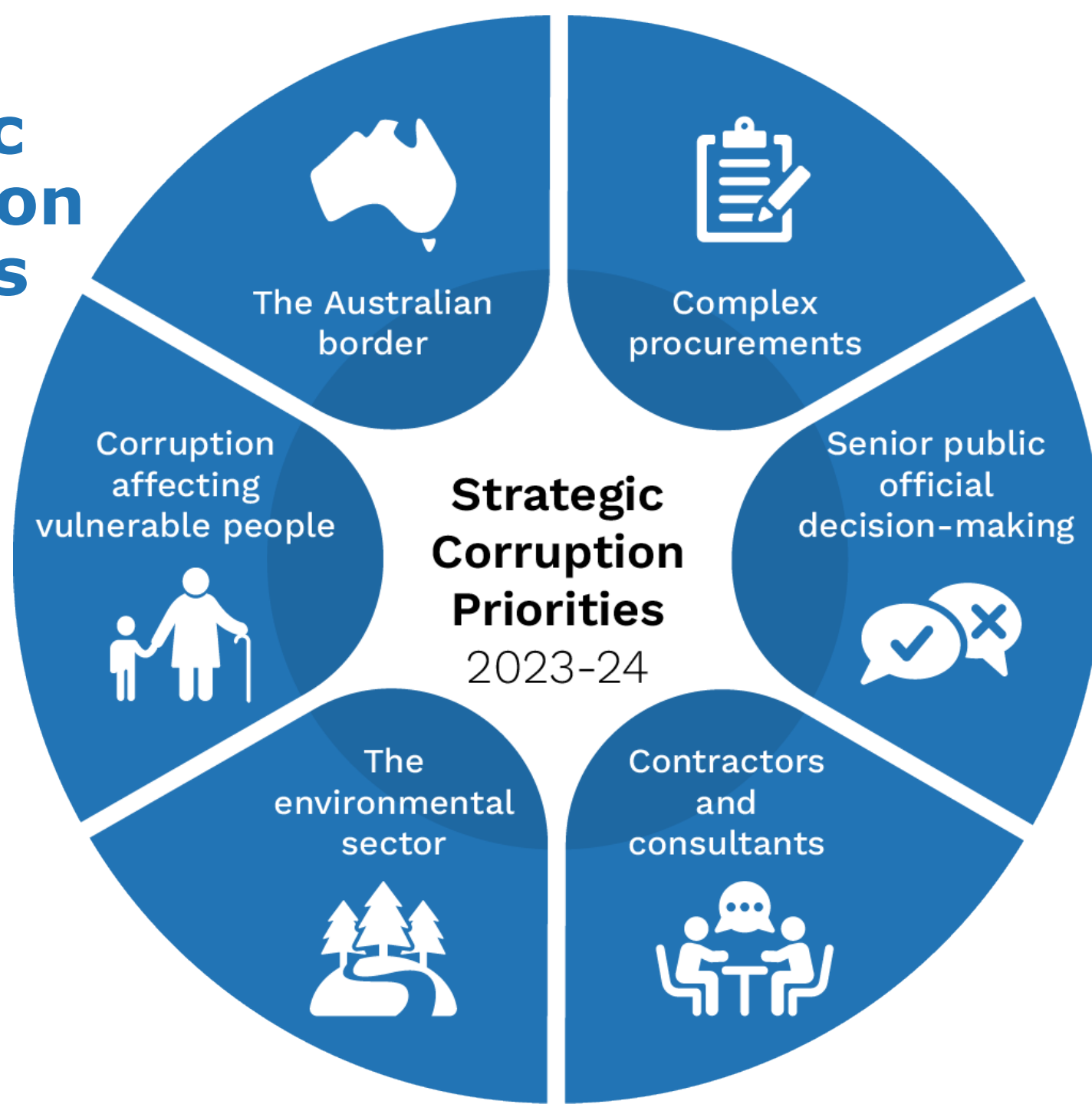
Preferring family,
friends and
associates

Use of insider
information

Compromised
decision
making

Conflict of
interests

Strategic Corruption Priorities





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Operation Tardis

Case study 1

nacc.gov.au

Operation Tardis - scope

- Whether a staff member of the Australian Border Force engaged in corrupt conduct in authorising two milestone payments in December 2015 and July 2016, during the acquisition phase of the Cape Class Patrol Boat project.
- It was suggested that the conditions were not satisfied.

Operation Tardis - findings

- The investigation found **no corrupt conduct**, but identified a number of issues with the decision-making process undertaken in authorising the payments which created corruption vulnerabilities:
 - Inadequate records had been kept by the ABF staff member to explain their rationale for authorising them.
 - Governance structures of the project had fallen away during the process.
 - Legal advice was not followed.

Operation Tardis - recommendations

- Review records management policy/procedures
- Review contract management process & ensure effective controls
- Review processes to ensure compliance with PGPA Rules and other obligations for high value contract management projects.
- Ensure employees in contract management know legislative obligations.



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Operation Turnover

Case study 2

nacc.gov.au

Operation Turnover - facts

- Joint investigation by the QLD CCC, Queensland Fire and Emergency Services (QFES) and Queensland Police into a former senior QFES employee.
- The employee had obtained secured secondary employment as a contractor with two companies tendering for QFES work and provided significant assistance preparing their tender documents, earning close to \$200,000.

Operation Turnover - outcome

- The employee had engaged in multiple types of misconduct including fraudulent procurement, improper disclosure of confidential information, and undeclared secondary employment.
- The employee pleaded guilty to four counts of official corruption and was sentenced to three years imprisonment.
- The investigation resulted in multiple recommendations to the QFES relating to secondary employment, conflicts of interest management and governance.



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Operation Daintree

Case study 3

nacc.gov.au

Operation Daintree - facts

- IBAC investigation of procurement and management of a \$1.2m contract to provide training services for health workers.
- A training provider received assistance from ministerial advisors to propose delivering training to health workers.
- Involvement of ministerial advisors led Department staff to believe the government wanted the training provider appointed.
- Despite concerns about the capacity of the provider, was a non-competitive procurement process which approached only the provider.
- After concerns about delivery were raised, intervention from ministerial advisors dissuaded department from terminating.

Operation Daintree – outcome

- The evidence fell short of 'corrupt conduct' but revealed breaches of duties and improper influence and misconduct by ministers, ministerial advisors and senior public servants.
- Key recommendations included:
 - Amendments to the Ministerial Code of Conduct to ensure consistent understanding of ministerial responsibility
 - Revised guidance to ministerial staff and public servants on their respective roles



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WA CCC matter

Case study 4

nacc.gov.au

Geraldton Port

- In 2021 the Mid West Ports Authority executed a contract for the provision of security services with a total value of more than \$2.8 million to the incumbent contractor, a company owned by the city's former mayor, despite it ranking second on the qualitative criteria for assessment.
- The investigation could not identify a legitimate justification for why the tender was not awarded to the highest scoring applicant.

Geraldton Port – risks identified

The Commission did not form an opinion of serious misconduct, but identified three crucial deviations from standard procurement process which represented serious misconduct risks:

- Failure to follow internal guidance;
- A presentation to the Executive which included misleading and inaccurate statements that appeared to favour awarding the contract to the incumbent;
- A failure to adequately record key information and decisions during the tender process.



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Operation Pelican

Case study 5

nacc.gov.au

Operation Pelican

Operation Pelican involved an Executive Procurement Manager overseeing a multi-million contract for facility development for a Commonwealth entity approached the Managing Director of one of the tenderers and asking for 5% of the contract value in return for an assurance the company would be awarded the contract.



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Key takeaways

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Procurement risks

- Failure to follow applicable processes
- Inadequate documentation of decisions and reasons
- Influence of associates, including existing connections and external actors
- Limited tender processes
- Misuse of inside information

Risk profiles

Entities are at a greater risk when they:

- Have a close relationship with industry
- Oversee very large and or very high value projects
- Have issues with governance, oversight, record-keeping and reporting

Conclusion: mere compliance is not enough

- The rules are intended to support value for money
- But there is still an overriding ethical obligation.
- Availability of a limited tender process does not permit preference of friends and associates.



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The National Anti-Corruption Commission

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The National Anti-Corruption Commission

**Council of Australasian Tribunals
NSW Chapter: Annual Conference**

nacc.gov.au

Scope

- Origin and functions:
 - Purpose and mission, jurisdiction
 - How we receive referrals and decide what to investigate
- The first year:
 - Emerging trends
 - Priorities
- Corruption prevention:
 - Corruption prevention strategies
 - Corruption prevention themes
- Opportunities for cooperation

Origins and establishment



Integrity

A key election issue clearly expressed by the Australian people



Mandate

A government acting on that expressed desire



Leadership

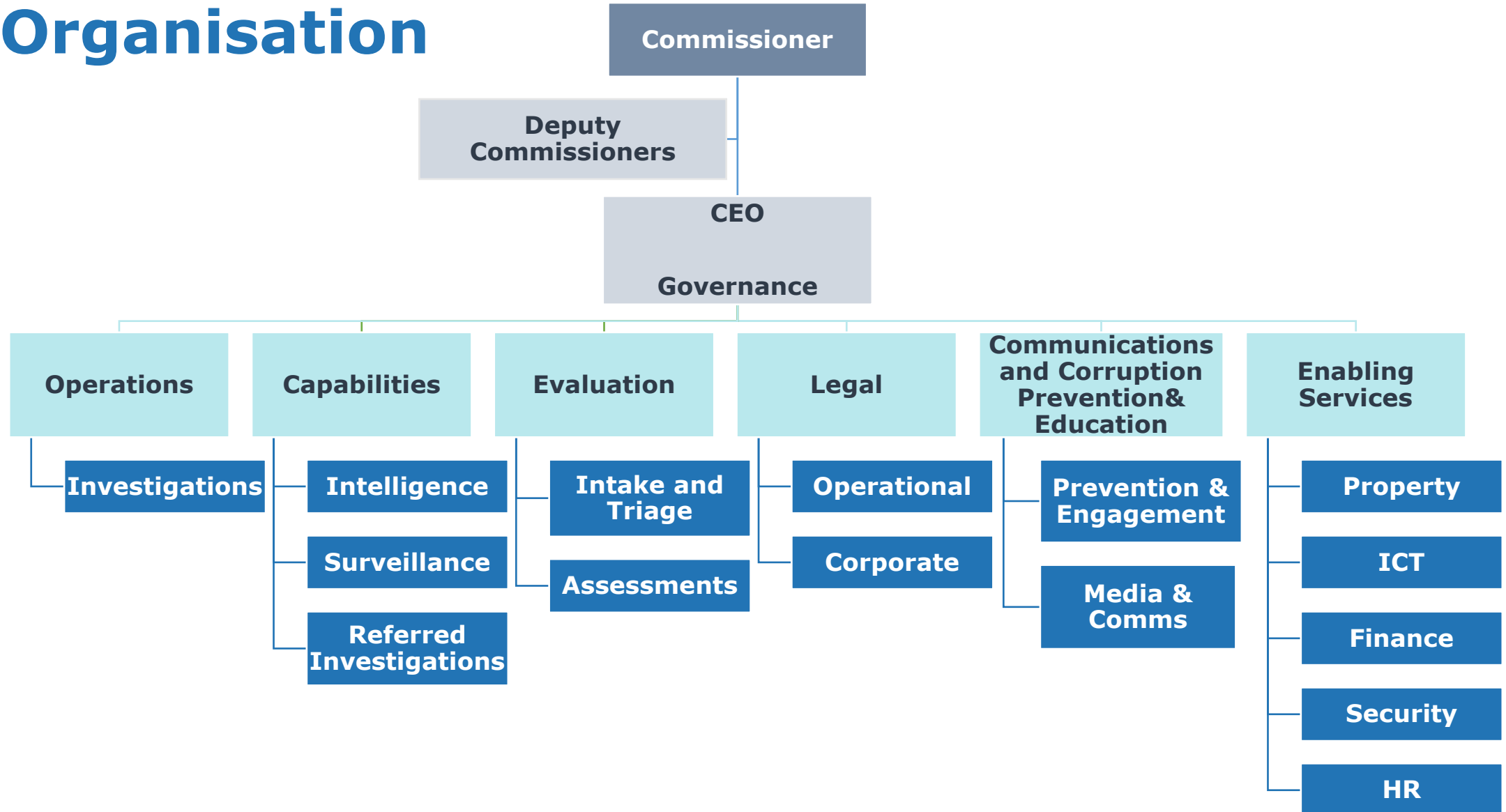
APS leadership embedding a pro-integrity culture at all levels

Purpose and Mission

Purpose: To provide independent assurance to the Australian community that corrupt conduct involving Commonwealth public officials is prevented, detected, investigated, and responded to appropriately.

Mission: To enhance integrity in the Commonwealth public sector, by **detering, detecting** and **preventing** corrupt conduct involving Commonwealth public officials, through **education, monitoring, investigation, reporting** and **referral**.

Organisation



A corruption issue: s9

The touchstone of the Commission's jurisdiction is a "corruption issue".

That is a question of whether a person has engaged, is engaging, or will engage in, corrupt conduct.

What is corrupt conduct?

Breach of
public trust

Abuse of office

Misuse of
information or
documents

An act that leads to a public official behaving other than
honestly and impartially

Breach of public trust: s8(1)(b)

- Public powers are conferred on public officials for the public benefit
- It will be a breach of public trust if a power is not exercised honestly for the purpose for which it is conferred
- ***The key feature of a breach of trust is the exercise of a power, or the performance of a function, for an improper or collateral purpose.***
- This could include the use official powers to advance a personal interest; or applying public resources for a purpose for which they were not appropriated.

Abuse of office: s8(1)(c)

- The concept of an abuse of office by a public official involves the official intentionally engaging in **improper** acts or omissions in their official capacity, to gain a benefit for themselves or another person, or to cause a detriment to another person.
- An abuse of office can be committed through the exercise of influence arising from the person's public office or the use of information obtained in their capacity as a public official.

Misuse of official information: s8(1)(d)

- Any conduct of a public official, or a former public official, that constitutes or involves the misuse of information or documents acquired in the persons capacity as a public official, is corrupt conduct
- That includes:
 - Unauthorised access
 - Unauthorised disclosure
 - Unauthorised use

Conduct affecting honesty or impartiality

- Any conduct of ***any person*** that **adversely affects**, or **could adversely affect**, directly or indirectly, the **honest or impartial performance of any *public official's* functions as a public official**.
- Includes a public official's own conduct if it has or could have the specified effect in relation to the official's own functions.

Serious or systemic

Serious

Something that is significant; something more than 'negligible' or 'trivial', but it does not have to be 'severe' or 'grave'

Systemic

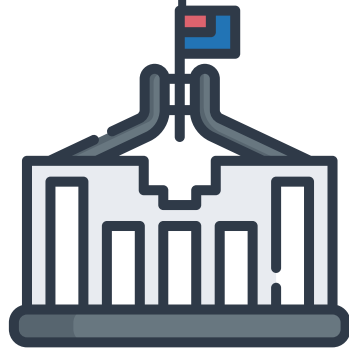
Something that is more than an isolated case and involves a pattern of behaviour, or something that affects or is embedded in a system

Some important qualifications

- The notion is concerned with probity in public administration.
- Mere maladministration is not corruption:
 - Generally, bad faith and/or personal benefit (for self or another) is necessary to make it corrupt.
- The Act does not legislate new standards of behaviour:
 - The conduct it characterises as corrupt conduct has always been regarded as improper.
 - Retrospective operation is therefore appropriate.

Jurisdiction of the NACC

Commonwealth
public officials



Parliamentarians



Staff members
of agencies

Staff members



An official
of the entity

An individual who
is employed by or
engaged in
assisting an agency
(including
consultants)

An individual
involved in
providing services
to or for an
agency under a
Commonwealth
contract

Referrals to the Commission



Voluntary

Anyone can submit a corruption report to the Commission or provide information about a corruption issue



Mandatory

If an agency head suspects serious or systemic corruption involving a staff member, they must report it to the Commission



Own motion

The Commission can investigate a corruption issue it becomes aware of on its own motion without a referral

Making a referral



Online

nacc.gov.au



Phone

1300 489 844



Post

GPO Box 605
Canberra ACT 2601

Whistleblower protections

Protection: Not subject to civil, criminal, or administrative liability (including disciplinary action) for making disclosure

Contractual rights: No contractual or other right or remedy can be enforced against whistleblowers

Reprisals: It is a criminal offence to take reprisals against whistleblowers

Exception: Making false or misleading statements to the NACC

Dealing with a corruption issue: s 41

- If it could be serious or systemic:
 - Investigation by Commission (s41(1)(a))
 - Joint investigation with another Commonwealth or State agency (s41(1)(b))
- Refer to another agency for investigation (s41(1)(c))
- Refer to another agency for consideration (s41(1)(d))
- Take no further action (s41(6))
- No duty to consider dealing with a referral (s41(7))

Assessment of referrals

Triage

- Does the referral concern a Commonwealth public official?
- Does the referral raise a corruption issue?

Assessment

- Serious or systemic?
- Should the Commission deal with the issue and if so, how?
 - Preliminary investigation?

Evaluation of referrals

Pathways and Prospects

Scale and gravity

Strategic Corruption
Priorities

Public interest

Will a NACC
investigation add value?

Will an inquiry
'clear the air'?

Investigatory powers



Require the production of documents and information



Search premises, people, intercept communications and use surveillance devices under warrant



Summon witnesses for examination at hearings

Investigation conclusion and reporting

- **Commission's role:** At the conclusion of an investigation, the Commission provides a report to the Attorney-General
- **Findings:** The report may include a finding that a person has engaged in 'corrupt conduct'. This is an administrative finding, not a finding of criminal guilt
- **Recommendations and referrals:** The Commission can also make recommendations, including to terminate the employment of an APS employee, under section 15(2) of the *Public Service Regulations 2023*; and refer matters to prosecutorial agencies

Judicial review

- **No duty** to consider whether to deal with a corruption issue, regardless of by whom referred: s 41(7)
 - **No obligation to give reasons** for not dealing with an issue.
 - Decisions whether or not or how to deal with a referral are **not amenable to judicial review.**
- A finding of corrupt conduct is **an administrative finding of fact:** s 149(3)
 - Briginshaw standard
 - Rules of procedural fairness apply: s 150
 - **Such a finding is amenable to judicial review.**

Independence and accountability

- Fixed term appointment, not renewable
- No one can direct the Commission what to investigate
 - Reinforced by s 41(7) and own motion powers
- Oversight by
 - Inspector
 - Parliamentary Joint Committee

Statistics – 1 July 2023 to 30 June 2024

3,189

referrals

(+ 361)

29

preliminary
investigations

(+ 4)

26

corruption
investigations

(+ 3)

7

investigations
from ACLEI

5 matters in
court

(+ 2)

3 convictions

1 committal

Emerging trends in public sector corruption

Procurement

Recruitment

**Public/private
interface**

**Preferring
family,
friends and
associates**

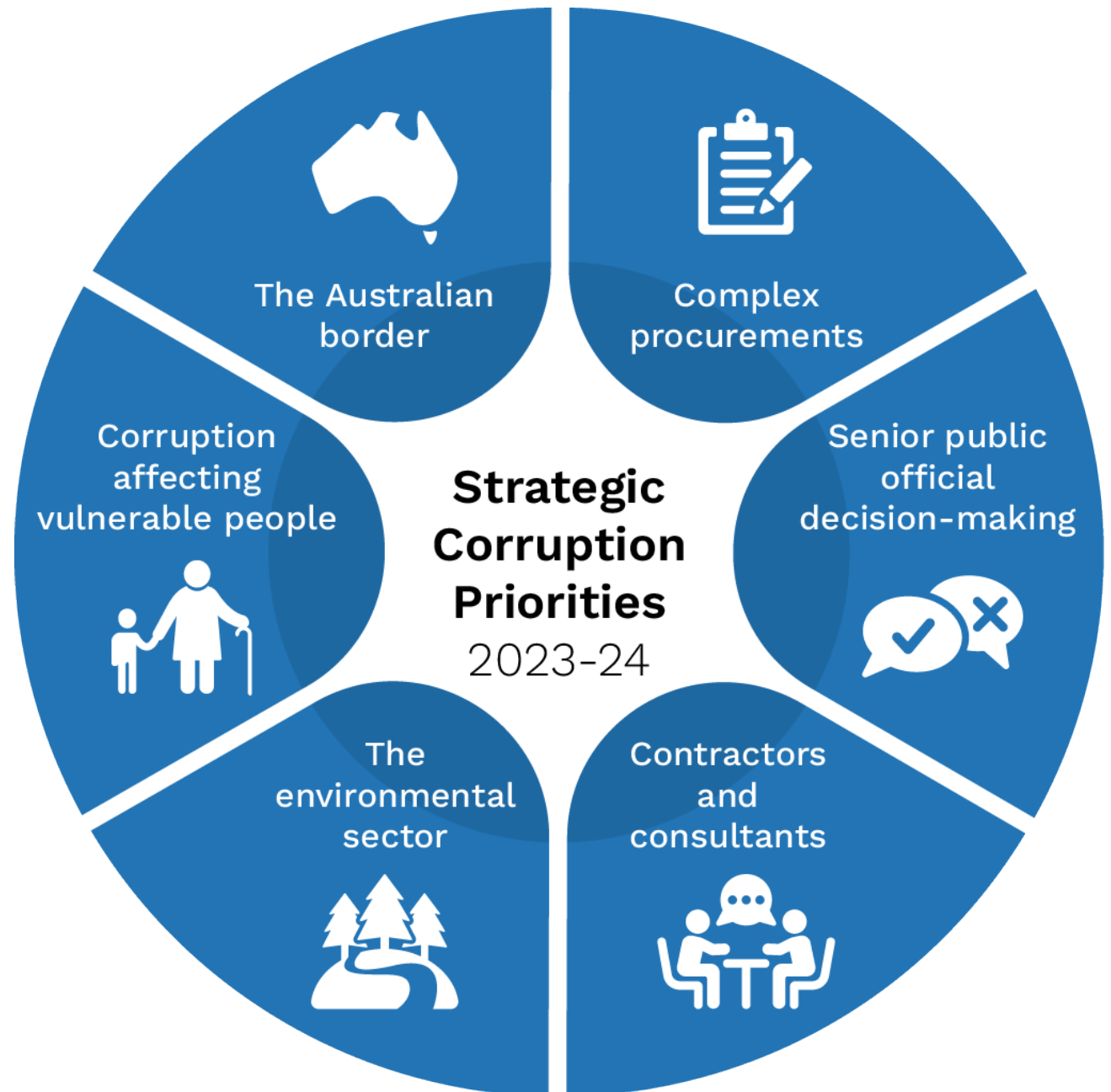
**Use of
insider
information**

**Compromised
decision
making**

**Conflict of
interests**

Priorities

To assist in prioritising our efforts logically, the Commission has adopted 6 Strategic Corruption Priorities to guide its work



Current investigations

- 6 relate to former or current **parliamentarians**
- 3 relate to former or current **parliamentary staffers**
- 4 relate to **contractors or consultants**
- 7 relate to **senior executive officials**
- 8 relate to **law enforcement officials**

- 8 relate to *procurement*
- 1 relates to *recruitment*
- 4 relate to the *border*
- 4 relate to *law enforcement misconduct*
- 3 relate to *grants*

- Most investigations do **not** result in a finding of corrupt conduct

Operation Kingscliff

Issue: Procuring appointment of relative without disclosing relationship

Corrupt conduct: Abuse of office to dishonestly obtain a benefit for another

Investigation:

- Departmental documentary record
- POI communications
- Compulsory examinations

Corruption risk: Recruitment - preference of associates, use of inside information

Operation Pelican

Issue: Soliciting a secret commission for awarding a Commonwealth contract.

Corrupt conduct: Abuse of office to dishonestly obtain a benefit for self

Investigation:

- Telecommunication intercepts
- Surveillance devices
- Controlled operation

Corruption risk: Procurement

Transparency v Secrecy

Referrals and Investigations

- Weekly statistics
- Subject matter or status not disclosed
 - Unless or until court or other public action

Hearings

- Generally in private; public in exceptional circumstances only
 - Unfair premature damage to reputations
 - To elicit information and evidence
 - Often facilitates evidence and disclosures

Reports

- Where there has been a public hearing
- If satisfied it is in the public interest to do so
 - Where there has been a finding of corrupt conduct
 - To clear the air of unsubstantiated allegations

Transparency v Secrecy

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Reports

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Corruption prevention strategies



Support potential targets to recognise and resist



Encourage and facilitate reporting



Grow a culture which does not tolerate corruption

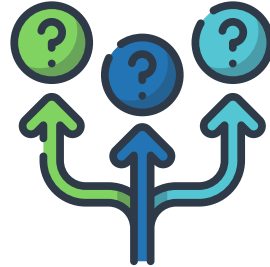


Conduct public inquiries

Corruption prevention themes



Conflicts
of interest



Ethical
decision
making



Issues
associated with
elections

The impact of organisational culture

How people respond to ethical dilemmas is determined more by organisational culture than by policy and protocol

Culture establishes
accepted bounds
and **decision**
points for behaviour

Culture provides
organisational norms
and boundaries for
value-based decisions



National Anti-Corruption Commission

The National Anti-Corruption Commission

nacc.gov.au

TABLE 1:

#	Type	Entity	Date
01	Presentation	Delegation from Palau	24/01/24
02	Panel Discussion	Transparency International Australia	15/02/24
03	Presentation	Australian Academy of Law	20/02/24
04	Presentation	The Mandarin	22/02/24
05	Presentation	Law Council of Australia	23/02/24
06	Presentation	Australian Public Service Commission	29/02/24
07	Presentation	Clayton Utz	29/02/24
08	Presentation	APS Academy	05/03/24
09	Presentation	Australian Prudential Regulation Authority	07/03/24
10	Presentation	ACT Law Society	14/03/24
11	Meeting	Corruption Prevention Community of Practice	15/03/24
12	Presentation	Department of Foreign Affairs and Trade	27/03/24
13	Presentation	APS Academy	09/04/24
14	Meeting	Delegation from Indonesia	10/04/24
15	Presentation	APS Academy	16/04/24
16	Presentation	Corruption Prevention Network NSW	17/04/24
17	Presentation	National Emergency Management Authority	19/04/24
18	Presentation	Corruption Prevention Network QLD	23/04/24
19	Presentation	Sheep Producers Australia	24/04/24
20	Presentation	Delegation from Samoa Public Service	02/05/24
21	Presentation	National Archives of Australia	08/05/24
22	Presentation	National Indigenous Australians Agency	13/05/24
23	Panel Discussion	NSW ICAC – Regional Outreach Wagga Wagga	13/05/24
24	Presentation	APS Academy	20/05/24
25	Presentation	Hong Kong ICAC – International Association of Anti-Corruption Authorities	23/05/24
26	Presentation	Australian Commission on Safety & Quality in Health Care	23/05/24
27	Presentation	National Emergency Management Authority	23/05/24
28	Presentation	Horticulture Innovation Australia	30/05/24
29	Workshop	APSC / Griffith University	30-31/05/24
30	Presentation	Attorney-General's Department	13/06/24
31	Presentation	NDIS Quality & Safeguards Commission	18/06/24
32	Presentation	APS Academy	18/06/24
33	Presentation	NSW Bar Association	26/06/24
34	Presentation	Department of Climate Change, Energy, the Environment & Water	04/07/24
35	Presentation	Department of Defence	08/07/24
36	Presentation	APS Academy	09/07/24
37	Presentation	Australian Institute of Administrative Law	18/07/24

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38	Presentation	Department of the House of Representatives	23/07/24
39	Presentation	Australian Graduate School of Management	25/07/24
40	Presentation	APSACC – Hosted by NT ICAC	29/07/24
41	Presentation	Parliamentary Workplace Support Service	30/07/24
42	Presentation	Department of Education	01/08/24
43	Presentation	Attorney-General’s Department	06/08/24
44	Presentation	APS Academy	06/08/24
45	Presentation	Australian National University	06/08/24
46	Presentation	UN Global Compact Network Australia	07/08/24
47	Presentation	Fiji Civil Service Delegation	15/08/24
48	Presentation	Australian Federal Police	19/08/24
49	Presentation	Asia-Pacific Integrity School	20/08/24
50	Presentation	APS Academy	20/08/24
51	Presentation	Department of Home Affairs	20/08/24
52	Presentation	Department of Infrastructure, Transport, Regional Development, Communications and the Arts	28/08/24
53	Presentation	Thomson Reuters	29/08/24
54	Presentation	Public Sector Network / Digital Transformation Agency	02/09/24
55	Presentation	Anti-Corruption and Civil Rights Commission of South Korea	03/09/24
56	Presentation	Department of Finance	03/09/24
57	Presentation	Department of Agriculture, Fisheries & Forestry	05/09/24
58	Presentation	Australian National University	09/09/24
59	Presentation	Australian National University	11/09/24
60	Presentation	Australian Public Service Commission	12/09/24
61	Presentation	Australian Centre for International Agricultural Research	12/09/24
62	Presentation	Delegation from the Republic of the Maldives	16/09/24
63	Presentation	High Commissioner of Fiji to Australia	17/09/24
64	Presentation	Department of Infrastructure, Transport, Regional Development, Communications and the Arts	18/09/24
65	Presentation	Corruption Prevention Network NSW	23/09/24
66	Presentation	APS Academy	23/09/24
67	Presentation	APS Academy	01/10/24
68	Presentation	Australian Public Service Commission	02/10/24
69	Meeting	Australian Public Service Commission	02/10/24
70	Presentation	Council of Australasian Tribunals	11/10/24
71	Presentation	Office of the Australian Information Commissioner	15/10/24
72	Presentation	Australian Federal Police	17/10/24

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73	Presentation	Attorney-General's Department	18/10/24
74	Presentation	New South Wales Police Force	18/10/24
75	Presentation	Norton Rose Fullbright	22/10/24
76	Presentation	APS Academy	22/10/24
77	Presentation	APS Academy	29/10/24
78	Presentation	Department of Defence – Integrity Conference	12/11/24
79	Panel Discussion	NSW ICAC Regional Outreach – Tamworth	14/11/24
80	Presentation	Australian/Pacific Development Program	15/11/24
81	Presentation	ACT Integrity Commission	15/11/24
82	Presentation	Governance Institute of Australia	15/11/24
83	Presentation	Department of Agriculture, Fisheries and Forestry	19/11/24
84	Presentation	Department of Employment & Workplace Relations	19/11/24
85	Presentation	Department of Climate Change, Energy, the Environment & Water	20/11/24
86	Panel Discussion	Department of Finance	21/11/24
87	Presentation	Department of Finance	25/11/24
88	Panel Discussion	Australian Government Legal Services	27/11/24
89	Presentation	University of Auckland/Melbourne Law School	28/11/24
90	Panel Discussion	Australian National Audit Office	06/12/24