

#### **ICAC PUBLIC INTEGRITY SURVEY 2021**

SOUTH AUSTRALIA



ICAC Public Integrity Survey 2021

South Australia

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I am pleased to present the analysis of the Commission's Public Integrity Survey 2021.

The Commission uses Public Integrity Surveys to ascertain public officers' perceptions and opinions about their experiences of corruption, the vulnerability of their work places to corruption, and reporting. Just over 7,000 responses to the survey were received. I would like to thank those public officers who provided their views.

Corruption poses a serious risk to public administration. The majority of participants believe their workplace to be vulnerable to corruption, and many indicated that they had personally encountered corruption. However, not all participants felt safe to report what they saw.

Many participants were fearful of negative repercussions should they report, including losing their job. Participants want to be able to report anonymously; protections for whistleblowers were seen to be ineffective.

When public officers speak up about potential corruption, they need to know that their report will be fairly and appropriately dealt with.

The perception that unfair and unjust conduct is tolerated in the workplace can lead to corruption by encouraging risk-taking to test responses and discouraging people from reporting wrongdoing. Many participants expressed the view that preferential treatment was commonplace in their workplace, and that corruption might be overlooked depending on who was involved.

The survey shows a significant disparity between the perceptions of senior leaders and other participants. Most senior leaders perceived their workplaces to have very little vulnerability to corruption and felt empowered to report it.

Senior leaders should not assume that because they would be ready to report suspicions, other public officers would feel the same. Senior leaders need to pay attention when staff flag potential corruption, and to appreciate how difficult reporting might be for some officers. If public officers believe that reporting is too hard, risky or futile, then corruption will remain undetected and unaddressed. Support for whistleblowers is vitally important.

Senior leaders should also be aware how their behaviour might be viewed by their staff. Many staff perceive that senior leaders misuse their authority and remain unaccountable. Workplaces where leaders do not provide ethical role modelling are vulnerable to corruption. Improved transparency, communication, and adherence to policies are important in promoting trust in leadership.

The survey was distributed in the last months of 2021, soon after significant amendments to the *Independent Commissioner Against Corruption Act 2012*, which narrowed the Commission's jurisdiction. Participants were not asked for their views of the amendments. Yet many public officers provided unsolicited comments expressing an apprehension that the changes had eroded the Commission's independence.

The Hon. Ann Vanstone QC

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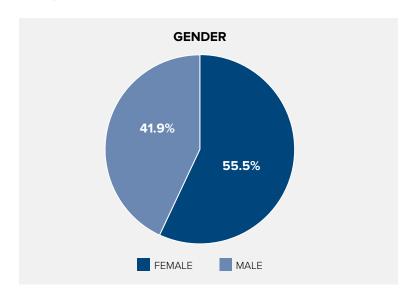
Commissioner

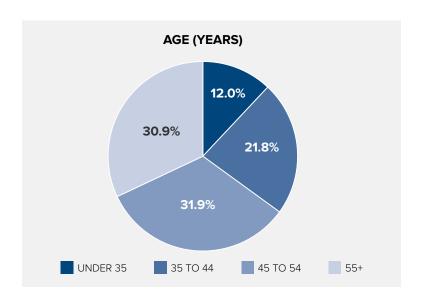
#### **THE SURVEY**

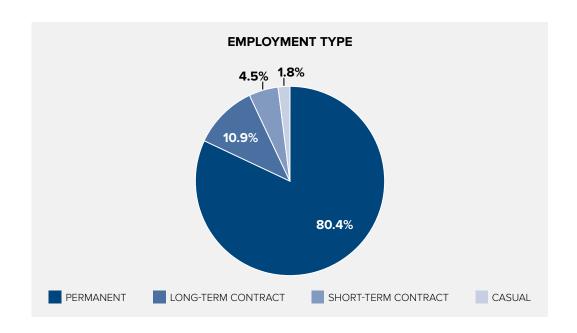
The survey was administered online in November and December 2021. Public officers working in state and local government agencies were invited to participate. The survey comprised both quantitative and qualitative questions, and focused on perceptions about workplace vulnerability to corruption, personal experiences of corruption, and reporting. Participation was voluntary, and no questions were mandatory.<sup>1</sup>

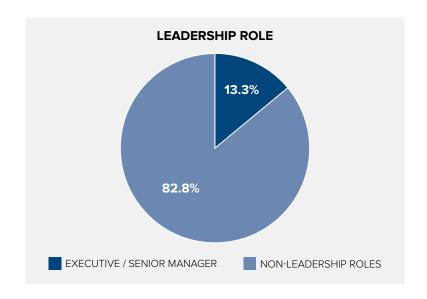
The Commission received 7,196 responses, representing approximately 5.4% of the state government workforce<sup>2</sup> and 10.4% of the local government workforce.<sup>3</sup> This report presents the findings from participants from both the state and local government sectors.

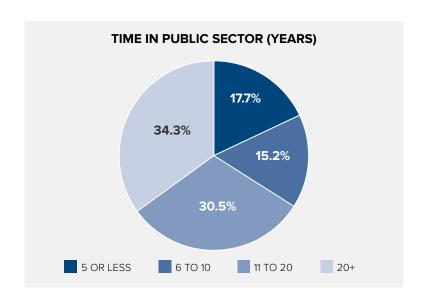
#### The sample













#### Agency breakdown

Participants were asked to identify their workplace from a list of agencies and agency groups. Smaller agencies were not included in order to protect participants' anonymity. The names of the departments and agencies were correct at the time the survey was conducted, but there have been some changes following the change of government in March 2022.

AGENCY	% OF SURVEY PARTICIPANTS		
Local government	15.5%		
Department for Health and Wellbeing (SA Health)	12.3%		
SA Police	9.4%		
Local Health Network	9.2%		
State Government – Other	8.3%		
Department for Education	7.0%		
Attorney-General's Department	5.6%		
TAFE SA	4.7%		
Department for Infrastructure and Transport	3.8%		
Department of Treasury and Finance	3.8%		
Department of Environment and Water	3.0%		
Department for Child Protection	2.5%		
Department for Correctional Services	2.3%		
South Australian Metropolitan/Country Fire Services	2.0%		
Courts Administration Authority	1.8%		
Department of Human Services <sup>4</sup>	1.5%		
Department of the Premier and Cabinet	1.4%		
Department of Primary Industries and Regions	1.3%		
SA Ambulance Service	1.3%		
Department for Innovation and Skills	0.7%		
Prefer not to say	2.5%		

#### Interpreting the results

The results reflect participants' perceptions rather than actual experiences of corruption. Nevertheless, beliefs are important as they shape behaviour. The perception that a workplace is vulnerable to corruption can undermine job satisfaction and reduce workplace performance.<sup>5</sup> The belief that workplace corruption is overlooked or tolerated can also increase the likelihood of corruption occurring.<sup>6</sup>

A total of 2,064 participants provided qualitative comments. The comments quoted in this report have not been corrected or altered in any way, except that some material has been redacted so that participants cannot be identified. Quotations have been carefully selected to ensure they are representative of the general views expressed by participants.

The sample is over-representative of public officers in senior leadership roles. As the analysis shows, senior leaders within public administration have significantly different perceptions and experiences of corruption compared with public officers in non-leadership roles. This bias should be taken into consideration when reading this report.

Public officers who have directly experienced corruption or who have strong views on the topic are more likely to have participated in the survey. As such, the responses might not represent the perceptions of all state or local government public officers.

Percentages may not total 100 due to rounding.

Not all questions were mandatory and analysis excludes responses where the participant skipped the question, or the participant answered 'not applicable/don't know.'

The survey questions are contained in the appendices.

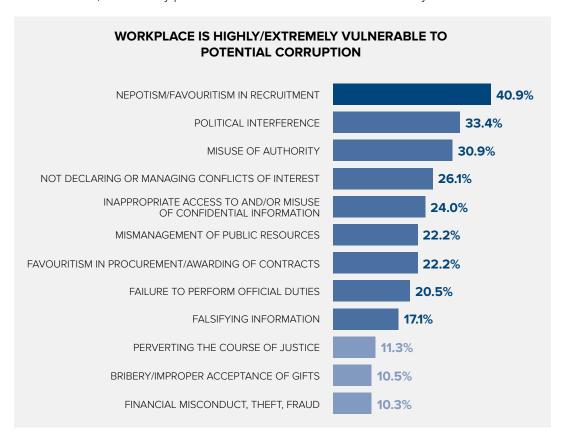
### VULNERABILITY TO POTENTIAL CORRUPTION

Participants were asked whether they thought their workplace was vulnerable to certain types of potential corruption.

Perceptions of corruption do not always align with incidents of corruption. The perception that a workplace is vulnerable to corruption can be influenced by recent media coverage,<sup>7</sup> participants' views about workplace culture,<sup>8</sup> and historical experiences.<sup>9</sup> However, this does not mean that perceptions about vulnerability should be dismissed.<sup>10</sup>

**59.1%** of participants thought that their workplace was highly or extremely vulnerable to at least one type of corruption.

Participants perceived that their workplace was most vulnerable to nepotism and favouritism, followed by political interference and misuse of authority.



Nepotism and favouritism in recruitment was also perceived as the highest area of vulnerability in the Commission's 2018 survey, and has consistently been identified as a major area of concern for public officers in other public integrity surveys.<sup>12</sup>

The perception that workplaces are vulnerable to corruption has increased overall when compared with the results of the Commission's 2018 survey.

	2021	2018	CHANGE
Nepotism/favouritism in recruitment	40.9%	34.4%	+6.5%
Political interference	33.4%	Not asked	in 2018
Misuse of authority	30.9%	20.9%	+10.0%
Not declaring or managing conflicts of interest	26.1%	24.0%	+2.1%
Inappropriate access to and/or misuse of confidential information	24.0%	22.9%	+1.1%
Favouritism in procurement/awarding of contracts	22.2%	11.2%	+11.0%
Mismanagement of public resources	22.2%	Not asked	in 2018
Failure to perform official duties	20.5%	18.8%	+1.7%
Falsifying information	17.1%	7.3%	+9.8%
Perverting the course of justice	11.3%	6.9%	+4.4%
Bribery/improper acceptance of gifts	10.5%	9.7%	+0.8%
Financial misconduct, theft, fraud	10.3%	7.2%	+3.1%

This does not necessarily mean that corruption has increased. It might indicate that awareness of corruption has increased.

In addition, while participants might perceive their workplace to be vulnerable to corruption, it does not necessarily mean that corruption is occurring. It is possible that in areas in which there is a high level of perceived vulnerability to corruption, there might also be strong controls against corruption occurring. This point was raised by several participants:



"I doubt any agency with more than one person could say not at all. There is always residual risk, but we have great policies, training and protocols and a culture of 'do the right thing' here."

"Whilst I have outlined that there is somewhat vulnerability to corruption within the organisation, the department has policies and procedures in place which all staff must be aware of and follow to mitigate the risks."

"All areas of any organisation are vulnerable to corruption - where there is a will there is away but I am confident that the systems and processes in place minimise the likelihood of this (and there has never been an incidence of corruption reported in this organisation)."

## EXPERIENCES OF CORRUPTION

Participants were asked if they had personally encountered corruption in their workplaces within the last three years.

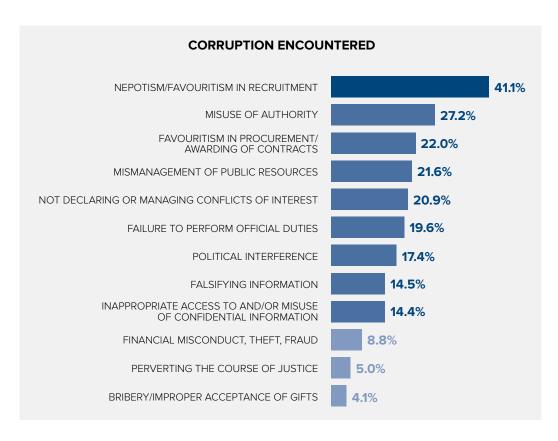
**22.8**% of participants indicated that they had personally encountered corruption in their current workplace within the last three years.

This figure may be misleading. The qualitative comments suggest that some participants responded in relation to older incidents, or on the basis of their general beliefs about corruption rather than direct experiences, and to incidents that might have occurred in other agencies.

Participants might also underestimate their experiences of corruption. They were provided with specific types of potential corrupt conduct, and asked if they had encountered any of these examples. When prompted in this way, the proportion of participants who claimed to have encountered potential corruption increased considerably.

**59.1**% of participants asserted that they had personally encountered corruption when presented with specific examples.

Participants reported that the most common type of corruption they had experienced was nepotism or favouritism in recruitment.



In 2018, participants were asked to indicate if they had personally encountered potential corruption or inappropriate behaviour in their workplace over the last five years. Due to the change of wording in 2021 to three rather than five years, a reliable comparison of perceived corruption encountered cannot be made.

### **SECONDARY EMPLOYMENT**

The Public Integrity Survey presented an opportunity to focus on specific corruption risk areas. For the 2021 survey, the Commission selected secondary employment as one area to further explore.

Secondary employment refers to any additional work, either paid or unpaid, which someone undertakes outside their main source of income.

**20.3**% of participants engaged in secondary employment or business interests outside their primary work role.

The majority of participants responded that they were aware of policies regarding secondary employment. Most also responded that they had sought permission or declared their secondary employment. Only 16.3% knew of work colleagues who had engaged in undeclared secondary employment.



Participants on casual or short-term contracts were more likely than participants on longer-term contracts or in permanent posts to engage in secondary employment.<sup>13</sup> They were also less aware of policies regarding secondary employment<sup>14</sup> or to agree that they were required to seek permission to engage in a second job.<sup>15</sup> Several qualitative comments also suggest that casual staff were not always aware of the need to declare secondary employment:



"An employee mentioned they work in a casual role in retail on weekends but has not declared. I did remind them of their obligation to declare / receive approval to do this not sure on action taken."

"I think there are staff I worked with that have secondary employment but more because their work is part time or casual and there is room for other employment and it is not a conflict but making ends meet. Once we know there is a need to declare it is okay. "

"Working for 2 jobs but not declaring happens a lot amongst casual... staff."

Participants aged 45 years and under<sup>16</sup> and those who have been in public administration for five years or less<sup>17</sup> were also more likely than other participants to engage in secondary employment. These categories of participants were also less likely to have followed policies and procedures relating to secondary employment, including declaring secondary employment. Younger participants<sup>18</sup> and those who have been in public administration<sup>19</sup> or in their current organisation for five years and less<sup>20</sup> were also significantly less likely to be aware of policies relating to secondary employment.

#### Problems with secondary employment

Participants observed that having a second job, regardless of whether it was declared, could have a negative impact on a public officer's primary employment. This included public officers:

- ▶ performing their second job during working hours
- ► working excessive hours so that they are unable to perform their primary job effectively
- ▶ using workplace resources to support their second job
- ▶ falsely claiming leave in order to spend time working at a second job.

For many participants, secondary employment was most problematic when it involved an undeclared and unmanaged conflict of interest. Responses included descriptions of colleagues gaining contracts from their workplace for their private business to provide services.



"Manager has a secondary business... This business has been used here."

"Some own businesses that supply goods and services to government departments where they have control over purchasing."

"Personnel either own a business or work for a business that supplies equipment or training services to the organisation."

"Owning a share in a [private company], while working with consumers who may need to be referred to such facilities."

"...at one time a staff member was also a member of a consulting firm undertaking the same work she was required to do as part of her job role."

#### Not declaring secondary employment

Some participants observed that their workplace did not take seriously the need to declare secondary employment:



"Personnel do not take secondary employment approval seriously and neither does the employer as evidenced by failings to remind personnel of the annual application approval process and inadequate recording systems."

"No facility for outright declaration of secondary employment provided. Not monitored, not asked."

"There has been no training in conflicts of interest. We are 'told how to fill out the form' so that it is 'approved."

For a few participants, declaring or limiting secondary employment was seen to be an unwarranted intrusion on their rights:



"I don't think that you should have to seek permission for secondary employment if the employment is not illegal. People should have the right to earn extra money and do what they wish in their own personal time as long as it does not affect your primary work place."

"If it is outside of our employment they really can't say no. I feel they should let us do as we please outside of work hours."

For others, following policies and procedures about secondary employment was seen to be too onerous, or they did not want to be denied permission to take on secondary employment:



"I am told [the agency] makes approval for most secondary employment so difficult. It is effectively being discouraged with those doing it not bothering to apply."

"I don't blame those who don't declare employment as the process if far more difficult and unfairly judged to do it the correct way."

"Many members engage in voluntary work outside of our organisation however the process for registering and listing all voluntary work is time consuming and confusing so many don't bother. This isn't monitored by supervisors in great detail."

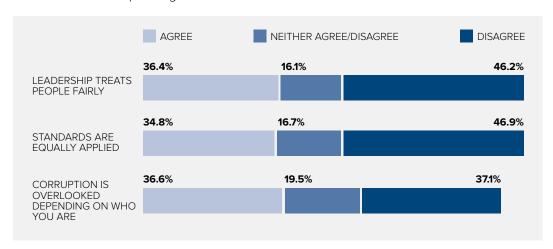
"Not inappropriate, more just people can't be bothered with the paper work and/or lack of awareness of requirements to declare"

### PREFERENTIAL TREATMENT

The survey also focused on perceptions of preferential treatment. Preferential treatment might occur when some public officers are given unfair access to benefits, opportunities or status whereas other public officers miss out.

The unfair distribution of opportunities can undermine the morale of employees and lead to staff dissatisfaction, a sense of alienation, and anxiety about job insecurity. The perception that a workplace tolerates unfair and unethical behaviour can also have a negative effect on organisational functioning, such as decreasing workplace performance and standards of service delivery. The perception that the workplace tolerates preferential treatment can lower an employee's sense of accountability and create a sense of cynicism, which can then lead to corrupt behaviour.

Almost half of participants believed that standards were not equally applied in their workplace and leaders did not treat people fairly. Over a third agreed that corruption is overlooked depending on who was involved.



### Nepotism and favouritism in recruitment and promotion

Participants were invited to provide qualitative comments on any personal experiences of undue preferential treatment. Most comments focused on nepotism and favouritism in recruitment and promotion.



"Recruitments are setup so that a preferred person will get the position."

"The hiring of an unqualified family member into a senior position"

"Friends and family members, even though they may be less qualified or have less experience"

"...people being tapped on the shoulder to be promoted instead of management undertaking due dililgence and following correct procedure in advertising or seeking expression of interest to fill a position."

Recruitment and promotion decisions within public administration should be based on merit, meaning that the successful applicant has the skills and knowledge deemed to be most suitable for a job.<sup>24</sup> Some participants described instances where they felt that recruitment and promotion decisions were based on favouritism rather than merit. These examples included position descriptions being tailored towards preferred candidates, candidates being selected despite not meeting the selection criteria, and candidates being provided with confidential information in order to confer an advantage during a selection interview:



"Duty statement changed to suit applicant."

"...some managers on the panel will 'school' favored candidates and heavily hint at interview questions prior, giving them an unfair advantage. Sometimes the panel is aware of who they will hire prior to the interviews, and the interviews are just 'for show'."

In most cases, merit-based selection involves a competitive selection process.

Participants described instances where posts were directly filled without being advertised, or where a candidate was perceived to be 'shoulder tapped' for the post. Many of these comments focused on perceived nepotism in senior appointments:



"Have a look at panels for leaderships jobs - stacked to get the person they want on the job even if conflict of interest."

"There have been numerous examples of 'shoulder tapping' individuals with personal relationships and being provided with senior very highly paid roles."

"Directorships created for a specific person, where lower employees have to formally apply for their own jobs if management change a person's job even just a little."

"Some management appointments don't seem to adhere to the appointment rules that apply to the rest of us."

"There has been appointment of people into very senior positions without any transparency or process..."

These findings do not necessarily mean that favouritism and nepotism is rife throughout public administration. Exemptions to merit-based selection processes are permitted in certain circumstances. <sup>25</sup> Many of the examples provided in the qualitative comments involved direct appointments, and it might be that these appointments were still based on merit.

People also often perceive any relationship between candidates and panel members as automatically constituting nepotism,<sup>26</sup> when it might be that the relationship does not entail a conflict of interest or the conflict has been identified and managed.

These findings might indicate that recruitment processes and outcomes need to be more transparent and better communicated. The failure to address perceptions of nepotism and favouritism within the workplace can lead to a sense of injustice, undermine workforce morale, and reduce productivity.<sup>27</sup> Some participants described feeling undervalued and overlooked.



"Popular staff are given positions and power and staff that work hard and are skilled and experienced are overlooked."

"Staff were made permanent who were working at my site for a small amount of time where they did not need to prove their abilities, where other staff who demonstrated high performance were overlooked."

"Career progression is stalled for some and accelerated for others."

"Nepotism in recruitment leading to unfairness to other employees, lower employees' morale Nepotism is one of the more destructive practices managers can imbue in their workplaces. Nepotism cuts off the ability to build teams authentically, promote top talent, develop organizational collaboration, expand shared knowledge and retain employees overall."

"This sort of hiring approach destroys morale and can lead to very poor appointments."

#### Inequitable availability of opportunities

Some participants believed that opportunities had been provided to favour people within their workplace, whereas others missed out. Double standards were seen to exist across a range of opportunities that are important to career advancement, including:

- professional development and training
- ▶ access to travel, secondments, and study leave
- ▶ working on high profile projects
- ▶ use of work vehicles and allocation of carparks
- ▶ the opportunity to temporarily fill roles with higher duties.

The qualitative comments also focused on the perception that opportunities are not equally available.



"The secondment policy is not followed and one off deals are made with certain individuals depending on who you are and who you know."

"There have been instances, such as short term secondments, where the person was selected and did not need to apply. I think secondments, regardless of their length, should be an application process to give everyone a fair go."

"Some are paid their full high wage with time off to study while others have had to pay for it all and use their holidays, flexi and unpaid time off."

"A certain manager would decline study leave for staff over and over again, but then go on week long training herself."

"This happens regularly with the same staff repeatedly getting opportunities but when others ask, they are refused."

Several participants observed that some colleagues were trusted to work autonomously, had their opinions heard, participated in decision-making and were fully informed of what was happening within their workplace, while they were treated without respect or trust.



"Certain staff are clearly treated with favour, given more authority and access to resources, more benefits with regard to travel, autonomy and influence, even in areas outside of their expertise..."

#### Inequitable workloads

Some participants reported that preferential treatment occurred within their workplace in relation to the allocation of workloads. Participants observed that some colleagues manipulated rosters so that they received favourable shifts, whereas others were given little choice in the hours they worked. Some participants also noted that favoured colleagues received more flexible working arrangements and lighter workloads, and lower work standards were accepted from them.



"Some have very low workloads, on the other hand some are given "strenuous" rosters or are overworked."

"Some employees appear to not work a full day and never get questioned."

"Rules applied to some not others regarding work hours, standards upheld, degree of work undertaken."

"Flexible working arrangements are not consistent across the organisation."

"There are clearly favourites within our team and it clearly shows when the work is allocated."

"During rostering, senior staff member do their own roster and pick what they like best..."

"Roster manipulation. Preferential duties and shifts being given to friends of those in supervisory positions."

## REPORTING CORRUPTION

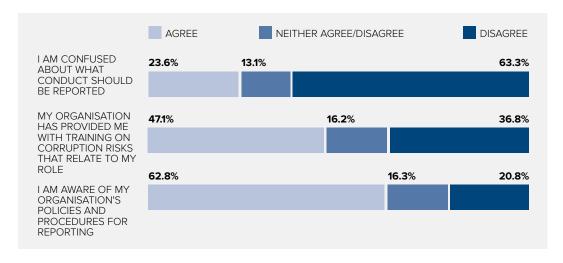
Preparing and equipping public officers to report corruption is essential to ensuring the integrity of public administration. If public officers do not know how to report corruption, are discouraged from reporting, or are too scared about repercussions, then corruption is likely to go undetected.

**61.4**% of participants agreed that they would report corrupt conduct to someone inside their organisation.

Almost 40% of participants disagreed that they would report corruption internally. In addition, the proportion of participants willing to report corruption internally decreased since the previous Public Integrity Survey. In 2018, 73.2% of participants agreed that they would be willing to report corrupt conduct internally.

## Awareness of reporting policies and procedures

While most participants said that they were aware of their organisation's policies for reporting and knew what conduct should be reported, less than half indicated that they had received training on corruption risks.



Awareness of policies and procedures for reporting corruption is similar to that in 2018, and knowledge of what should be reported has improved. However, participants were 13.3% less likely to agree that they had received training about corruption risks that are specific to their role relative to 2018.

	2021	2018	DIFFERENCE
I am aware of my organisation's policies and procedures for reporting	62.8%	65.0%	-2.2%
My organisation has provided me with training on corruption risks that relate to my role	47.1%	60.4%	-13.3%
I am confused about what conduct should be reported	23.6%	29.4%	-5.8%

This perceived lack of training was also reflected in the qualitative comments:



"Employees need to be educated on what constitutes corruption and they need to be educated on where and how to report, and what level of evidence is required to report."

"I think there needs to be more education around what actually constitutes corruption and what different levels there are. And also around reporting and how to do it and options."

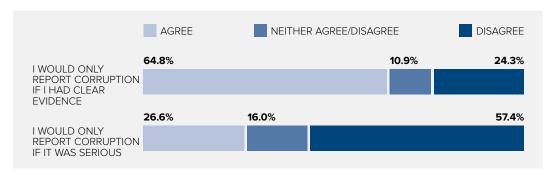
"...the Government also has a duty to educate public officers regarding corrupt conduct and the nuances. ie subtle elements of maladministration are not always obvious if you do not understand what can constitute corruption. Relying on an uninformed public officer to know and understand the nature of conflicts of interest results in an under reporting of conflicts and a lack of management of the conflicts."

"I think it would be helpful to make people more aware of what constitutes misconduct that is at a level which should be reported."

#### Reluctance to report

Detecting corruption in public administration can be like putting together a jigsaw puzzle. It is only through putting together multiple small pieces of the puzzle that a complete picture can be formed. It is important that public officers report all reasonable suspicions of corruption, no matter how minor the matter, rather than wait until they have clear evidence.

While approximately a quarter of participants indicated that they would be reluctant to report more minor instances of corrupt behaviour, most agreed that they needed clear evidence of corruption before they report.



The sense that corruption reports should be supported by clear evidence appeared in the qualitative comments.



"I would only report with specific evidence of issues. Many things are communicated verbally within a large organisation and witnessed with some distance. Therefore unless directly involved I would be hesitant to report details."

The qualitative comments suggest that public officers might first gauge the level of severity when deciding if they should report potential corruption.



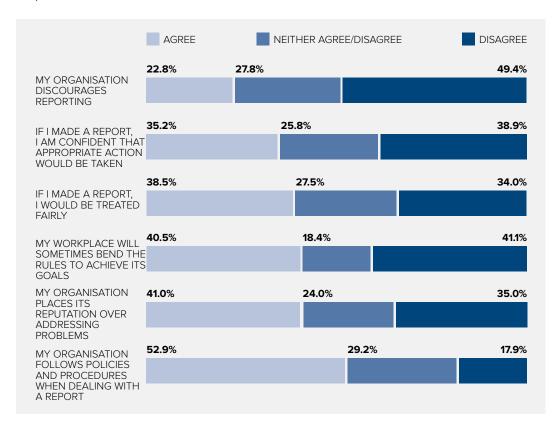
"It's hard to commit over crime in here, so it's seen as bending the rules, making it work, taking what's owed, that sort of thing."

"While I understand my obligation to report, I am reluctant to report unless the conduct was serious ... and I have evidence to back up any reported corruption."

"I always struggle to gauge what corruption is and includes. It sounds very bad, and I imagine it would come with serious punishments, however I can imagine smaller rule breaches that potential do not deserve a serious punishment, but should be stopped. I think some people may be scared to report potential breaches, if they are unsure if the breach is serious or not."

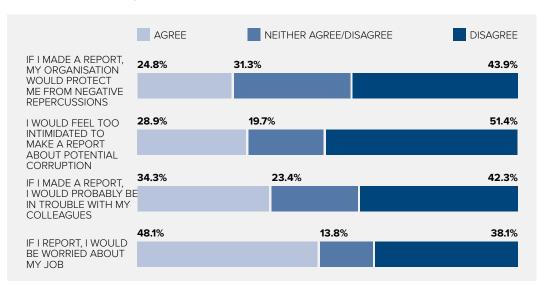
#### Putting policy into practice

A major barrier to reporting wrongdoing is the perception that nothing will be done.<sup>28</sup> The majority of participants said that their organisation does not discourage reporting and that their organisation follows policies and procedures when dealing with a report. However, only a third were confident that a report would be followed by appropriate action or that they would be treated fairly if they reported. Approximately four in ten participants believed that their workplace would sometimes bend the rules to achieve its goals and that their workplace places its reputation over addressing problems.



#### Confidence to report

Public officers might be deterred from making a report about corruption if they feel unsafe in doing so. There was some improvement in addressing barriers to reporting since the previous survey. Almost half of participants feared that if they reported they would be worried about their job, and a third believed that they would probably be in trouble with colleagues.



While the questions asked in the 2018 and 2021 surveys were not identical, where the questions about reporting corruption were comparable, perceptions of barriers to reporting were mixed. Those who participated in the 2021 survey were less likely than those who participated in the 2018 survey to be too intimidated to report corruption. Participants were also less likely to be worried about their job if they made a report. However, since 2018 participants are more worried about their job, more likely to believe that they would probably be in trouble with their colleagues and that their organisation would not protect them from repercussions.

	2021	2018	DIFFERENCE
If I reported, I would be worried about my job	48.1%	53.2%	-5.1%
If I made a report, I would probably be in trouble with my colleagues	34.3%	31.5%	+2.8
I would feel too intimidated to make a report about potential corruption	28.9%	42.8%	-13.9%
If I made a report, my organisation would protect me from negative repercussions	24.8%	35.7%	-10.9%

The qualitative comments also conveyed the sense of anxiety and unease experienced by many participants when considering making a report about corruption:



"Feel very vulnerable and intimidated at work. Not a positive environment to raise issues."

"I don't think there is a safe feeling around reporting corruption. I would be worried about reporting as I wouldn't want to jeopardise my position or the work relationships I have with people."

"...grass root workers... are usually intimidated into silence or their concerns are dismissed as irrelevant."

"Most people myself included would feel vulnerable if we made any formal complaints."

"People are generally too scared & stressed to follow through with formal reports."

Some participants described negative repercussions that either they or their colleagues have faced after making a report. These included being ostracised, bullied and harassed, losing career opportunities, and even losing their job:



"Have heard that people who report suspected corruption... have had their careers disadvantaged or derailed."

"I had to leave my Job because I was exposing the corruption..."

"I moved organisations as I did not see that raising issues of corruption would do anything other than put a target on me. That assumption was based on my knowledge of how other issues have been handled and the outcomes."

"It is widely understood in the Department that staff who challenge the behaviour I have described... are denied the same access to career opportunities."

"I have been victimised by Management for raising concerns over illegal decisions, bullying, harassment and corrupt use of finances."

#### Protecting whistleblowers

The survey did not explicitly ask about the adequacy of protections for whistleblowers. However, participants were asked if they would prefer the option to remain anonymous should they make a report about potential corruption.

**82.6**% of participants responded that they would prefer to have the option to remain anonymous if they made a report.

The qualitative comments also suggested that for many participants, a perceived lack of anonymity was a major barrier to reporting:



"I don't know if you can report corruption within my organisation anonymously. Even if anonymity is said to apply to reports of corruption in my organisation I do not trust that this would protect me from recriminations in my workplace if I reported corruption. I have discussed this issue with others in my workplace and they feel the same – it would not be worth reporting confidentiality may not be maintained."

"I have been tempted to report things before but fear that, regardless off anonymity, people will know who reported it. I can't afford to lose my job or be bullied out so I have not said anything and likely won't until I've found alternative employment."

"Anonymity is critical to enabling government employees to raise issues, particularly due to the significant number of staff on temporary contracts with little job security."

Comments about the need for greater protection for whistleblowers appeared frequently in the qualitative comments:



"There should be protections in place for those who report, and if there are already protections, that needs to be made known on a wider scale."

"Generally whistleblowers end up with negative consequences for their actions and the whistleblower legislation provides very limited protection."

"In pointing out concerns you may upset your organization and be covertly discriminated. Therefore it may not be in our best interest to stick your neck out. There are many examples of whistleblowers who have been persecuted."

"It doesn't matter how much the Department says they look after whistleblowers and encourage it, the true fact is they don't and can't."

"I also do not trust that there is sufficient whistleblower protection for those who do come forwards."

"There has been whistle blowers who have been disadvantaged and even not supported when they have reported corruption."

"There is not enough protection for whistle-blowers. Until long term protection for whistle-blowers occurs, people will not risk coming forward to report corruption do to the threat of persecution."

"There's not protection for anyone who reports anything, so few people do..."

#### Gender and reporting

There were significant gender differences in how participants perceive reporting. Female participants were significantly less aware than male participants of how to make an internal report about potential corruption.<sup>29</sup> Compared with male participants, they were significantly less likely to agree that they:

- ▶ had received training about corruption risks relating to their role
- ▶ were aware of policies and procedures for reporting
- ▶ understood what should be reported.30

Female participants also felt less safe about making a report. Compared with male participants, they were significantly more likely to agree that they:

- ▶ feel too intimidated to make a report
- ▶ would probably be in trouble with their colleagues if they reported
- ▶ would only report corrupt behaviour if it was serious
- ▶ would only report corrupt behaviour if they had sufficient evidence
- ▶ would be worried about their job if they reported
- ▶ would prefer the option to remain anonymous if they made a report.<sup>31</sup>

Female participants were significantly less likely to agree that they would be protected from repercussions if they made a report.<sup>32</sup>

Female participants also appear to have less faith in their workplace's commitment to support reporting and to take action once a report was made. Compared with male participants, female participants were significantly more likely to agree that their organisation:

- ▶ discourages reporting
- ▶ will sometimes bend the rules to reach its goals
- ▶ protects its reputation over addressing problems.<sup>33</sup>

Compared with male participants, female participants were also significantly less likely to agree that:

- ▶ if they reported they would be treated fairly
- ▶ their organisation would follow policies and procedures.<sup>34</sup>

Employment types affected awareness of reporting, and concern about negative repercussions. Compared with staff in permanent positions or on long term contracts, staff employed on a casual or short-term basis were more likely to:

- ▶ be confused about what should be reported
- agree that they had not received training about corruption risks related to their role
- ▶ disagree that they were aware of policies and procedures about reporting
- ▶ believe that they should only report if they had clear evidence
- ▶ be worried about their job if they report.<sup>35</sup>

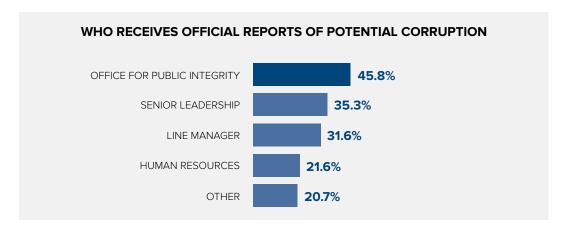
These results might reflect the gender differences in roles and employment conditions within the survey sample, and within public administration more generally. Female participants were less likely to be in permanent posts compared with male participants. Female participants were also less likely to have executive or senior management roles or to supervise staff, and they had spent less time in their current workplace and the public sector. It is likely that public officers in more precarious employment and those who do not occupy leadership roles are less aware of how to report potential corruption and are more likely to feel fearful should they do so.

#### Reporting experiences

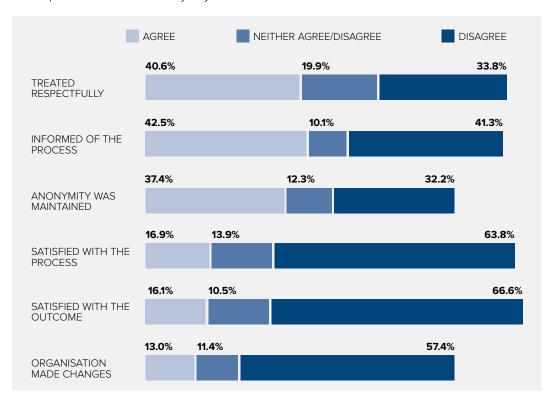
Participants were asked if they had made an official report of potential corruption in their workplace within the last three years.

**6.3**% of participants claimed to have made an official report of potential corruption within the last three years.<sup>40</sup>

Participants were most likely to report potential corruption to the Office for Public Integrity. The 'other' category included the Ombudsman, unions, regulators, the Office of the Commissioner for Public Sector Employment and boards of directors.



Many participants perceived that their report was not actioned, they were not informed of the process or not treated respectfully. In addition, while most participants preferred to remain anonymous should they report, approximately one third responded that their anonymity was not maintained.



Fewer than one in four participants expressed satisfaction with either the process used to handle their report or the outcome. While half felt that their report was actioned, less than a quarter believed that their organisation made changes as a result of their report.

The perception that reports of potential corruption do not produce meaningful change was also a theme in the qualitative comments:



"I have no faith in the management... to address corruption when they recently re-employed someone who was caught falsifying timesheets."

"It appears as if nothing is done about it so I think that puts people off making reports if they don't think anything will happen."

"Despite reports of inappropriate behaviour from senior leaders being made, it's common in the organisation that the senior leader will be protected and continue to manage large numbers of staff. It is also common that affected staff will leave the organisation as their only means of stopping the exposure to inappropriate behaviour — seeking a safer work environment."

"I am aware of a very serious fraud claim that has been made and nothing has happened."

"I feel that nothing will still be done."

"The management just laugh at you and do not listen or try to help with issues...
Many workers had to leave their jobs distressed."

"Often you see no outcomes to investigations and penalties can be pathetic."

"...nothing will be done and those who speak up, will then be targeted as we have seen first hand."

"The perpetrators have gotten away with it. Simple. They continue to be in leadership positions."

# DISPARITY BETWEEN SENIOR LEADERS AND OTHER STAFF

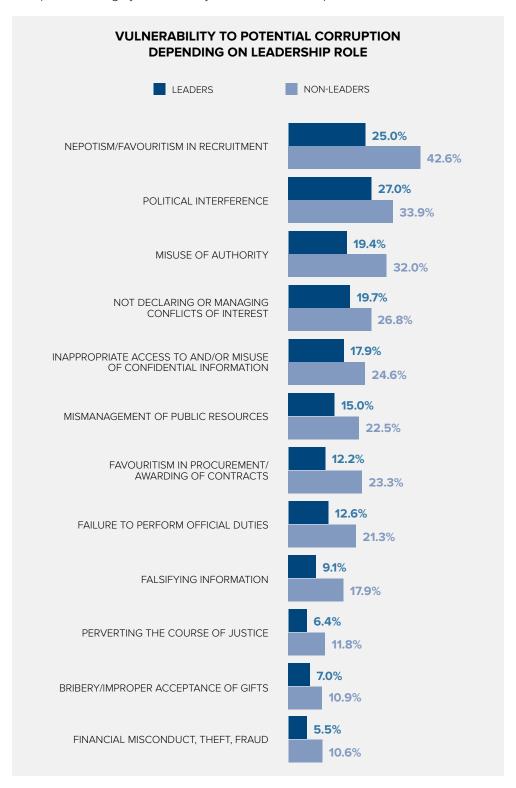
The survey results show a disparity between how public officers in senior leadership roles and non-leaders perceive, experience and respond to corruption. This disparity is important, as the integrity of public administration is reliant on leaders being armed with and putting in place strategies to mitigate corruption risks. They are also responsible for creating a workplace in which staff feel supported in reporting corruption, and taking appropriate action should corrupt behaviour be detected.

In addition, some participants believed that senior leaders were more likely to be perpetrators of corrupt or improper conduct. This included senior leaders being seen by some participants as abusing their authority, mismanaging public resources, and making decisions based on political expediency rather than the public interest.

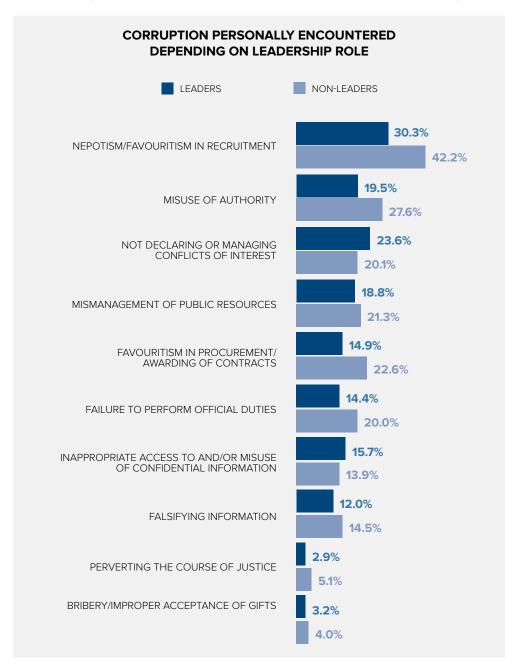
These results do not necessarily mean that senior leaders are engaging in corrupt or improper conduct. Many of the incidents described by participants could reflect poor communication or misunderstandings. However, perceptions of leadership are important. Workplaces which are seen to lack ethical leadership have more reports of corruption compared with those where leaders communicate, promotes and model ethical behaviour.<sup>41</sup>

#### Vulnerability to potential corruption

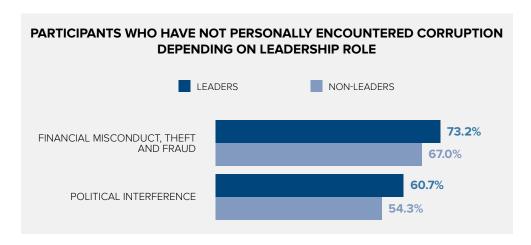
Senior leaders were significantly less likely than non-leaders to perceive that workplace was highly or extremely vulnerable to corruption.<sup>42</sup>



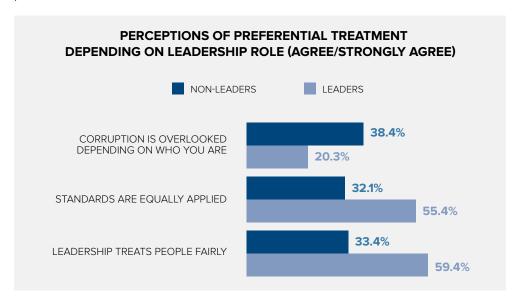
Senior leaders were also significantly less likely than non-leaders to respond that they had personally encountered corruption in the workplace within the last three years.<sup>43</sup>



Compared with non-leaders, public officers in leadership roles were significantly less likely to have personally encountered financial misconduct and political interference.<sup>44</sup>



Senior leaders were significantly less likely to perceive that their workplace allows for preferential treatment.<sup>45</sup>



### Perceptions about abuse of authority

Many participants in non-leadership roles provided qualitative comments that suggested that leaders sometimes abuse their authority. Some described senior leaders as lacking accountability:



"The manager ... has total control and appears to answer to no one. It is unknown if the manager has a manager. She is totally unapproachable. Her favouritism clouds her ability to see what is just and fair."

"Lack of accountability among Senior Management."

"Elected members do what they want and go largely untested on it, and when they are held to account - they do nothing..."

"Managers are not accountable for their actions at all levels."

"Senior management do not appear to be held accountable for their decision making."

Senior leaders were also seen to put their own personal interests above the public interest.



"Personal empire building – pushing out other staff, shutting down complaints from other staff, supporting projects that help build their own careers."

"Authority and power is used to achieve personal objectives - making their life easier and not that of the individuals performing the task."

"Top down corruption. A task that was relatively minor became a huge deal with a large amount or resources and personnel used on it because a senior manager wanted it that way for no apparent reason."

"Just the pure lack of competence by senior management only concerned about keeping their current contract or getting the next one. Hire people around them that are 'yes' people rather than a competent person. Making decisions that are easy for them rather than the correct decision. Pushing away a problem rather than dealing with it. Pure self interest."

"Senior managers who know the rules are able to underperform in a way that is almost impossible to address. It drains a lot of time and energy in the leadership group, and is a damaging demonstration to rest of the team." Participants were not explicitly asked about their perceptions and experiences of misconduct, as misconduct is no longer within the Commission's remit. However, many of the qualitative comments referred to instances of misconduct, especially bullying and harassment. Workplaces that are seen to tolerate unethical behaviour are vulnerable to corruption, 46 and workplace bullying and workplace corruption can overlap. 47

Some participants alleged that senior leaders did not always adhere to their own workplace code of conduct:



"Elected members need to follow their code of conduct and not try to bully staff to support their position when we have processes, procedures and legal obligations we need to adhere to."

"I have heard of serious breaches of conduct (not criminal) in senior management that has not been acted on and admonished."

"To be clear, I don't believe in all circumstances the CEO intends to commit corruption but some decisions post-proven serious misconduct are very questionable."

"Conversations have been had in front of my office and she [senior leader] openly says that she would do something that suits her regardless of the Code of Conduct."

"Mis-using the leadership role for own preferences that do not reflect the core values of code of ethics."

Some participants recounted experiencing or witnessing bullying and harassment at the hands of senior leaders:



- "I have seen members of junior ranks professionally crucified for small indescretions at the whim of management for personal reasons or fear their authority will be undermined..."
- "...the policy of employees who hold a higher rank than you telling you to do something just because they think their rank allows it even when its not the most appropriate or ethical thing to do."
- "...making use of the vested power in making undue requests from the junior staff."

"Failure to address serious, repeated, targeted senior level bullying..."

"Upper Management tend to lie and avoid responsibility for their failed policy and decision making. They use lower ranked staff as scape goats to blame for their decisions. They gag staff from speaking out or reporting failed examples of their management."

"Bullying juniors at work with their vested power of authority."

### Mismanagement of public resources

Senior leaders were also described by some participants as mismanaging public resources. Some participants described projects as having unrealistic timeframes, being underfunded and hampered by poor planning and inadequate or poor business cases:



"Senior manager directing funds/staff time towards their 'favourite/pet' projects (which are not always successful) to the detriment of other projects..."

"Mismanagement of public funds to support failed projects with poor/outdated business cases."

"I believe there are lots of projects commissioned over a brief period of time that have resulted in a massive spend of public funds for very minimal (if any) gain."

"Financial mismanagement. Rushed spending at the end of a budget cycle in order to spend before reallocation. Sometimes on unnecessary items."

### Political interference

Some participants asserted that senior leaders might be put under pressure to produce outcomes which are not in the public interest, and that such pressure might lead to corruption. Most participants did not recount experiences of direct political interference. Rather, they referred to instances where they considered decisions were made with an eye to how they would be received by 'political interests'. These descriptions suggest that senior leaders might consider future political ramifications when they make decisions:



"Additionally, although not explicit, there is an undercurrent that political expediency has and will influence operational elements."

"Management seek to overstate the economic benefits of an inward investment, to increase the chance that Cabinet... will endorse providing an incentive to elicit the investment."

"Creating policies in line with political parties to ensure continued political support."

"Decisions having been made for political expediency, rather than in the organisational interest, or the benefit of the general public for whom we are supposed to exist."

Some participants believed that political pressure could lead to senior leaders ignoring professional advice:



"There is currently a very strong political influence in what work is undertaken and prioritized even if it is not the most scientifically robust option."

"Programs/proposals that are directed/approved in response to political pressure despite evidence/data provided by the department that the program/ proposal is not the best solution."

"Complete undermine professional advice favoring political interests"

"Significant political pressure, where Government staff advice is ignored."

"Are very reluctant to challenge (based on evidence) political pressure, board pressure and executive pressure for a better outcome about for customers and long term strategy."

Some participants believed that senior leaders might become more concerned about securing political favour than providing frank and fearless advice:



"There is a general leaning to protection of image rather than upholding all requirements and principles correctly, and so there are cases of decisions being made which, from a distance, seem to have a curious rationale."

"Our senior management hide all sorts of things."

"Culture of declare and defend"

"There is such incompetence in Executive, that they are always just following the easiest path, trying not to upset their masters."

Some participants commented that the fear of losing political favour can result in corruption, including the falsification of official records:



"Persisting political pressure... results in ongoing "creative accounting" rather than acknowledging the extent of the issue. "

"Evidence fabricated and or falsified when providing premise for restructuring and downgrading departments and positions."

"Statistics get manipulated to provide activity statements."

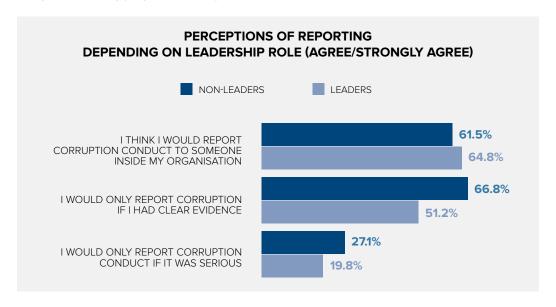
"Preferentially selecting figures or choosing to ignore new/better quality information, when it had become available..."

"Falsifying information in reports to Auditor General by manipulating practices to make it appear that we are meeting targets when we are not."

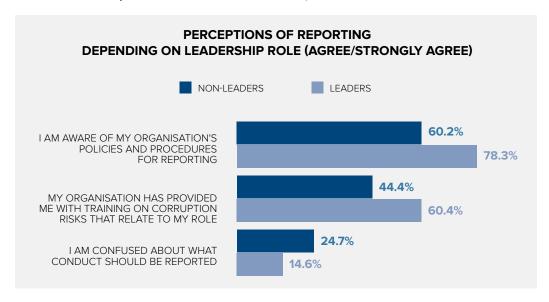
"Creating short cuts that fall outside of policies and procedures to complete tasks faster to appear to be meeting KPIs."

### Reporting corruption and senior leaders

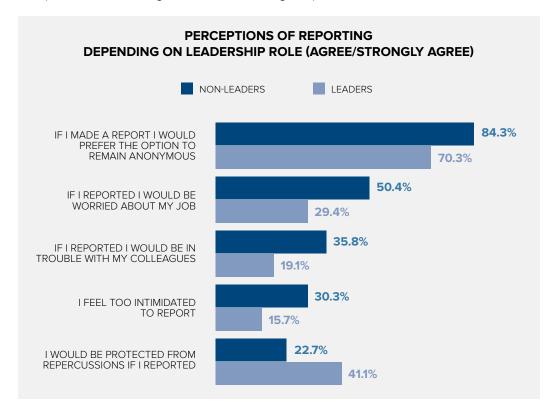
Public officers in senior leadership roles were more likely than those who were not to agree or strongly agree that they would report corruption.<sup>48</sup>



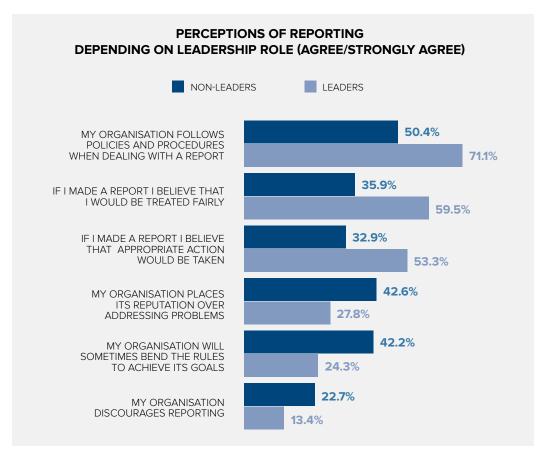
Public officers in leadership roles were significantly more likely than non-leaders to believe that they are aware of how to make a report.<sup>49</sup>



Compared with non-leaders, senior leaders appear to be less worried about repercussions that might follow from making a report.<sup>50</sup>

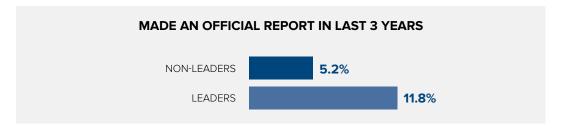


Senior leaders appear to have more confidence that reports about corruption will be appropriately handled.  $^{51}$ 

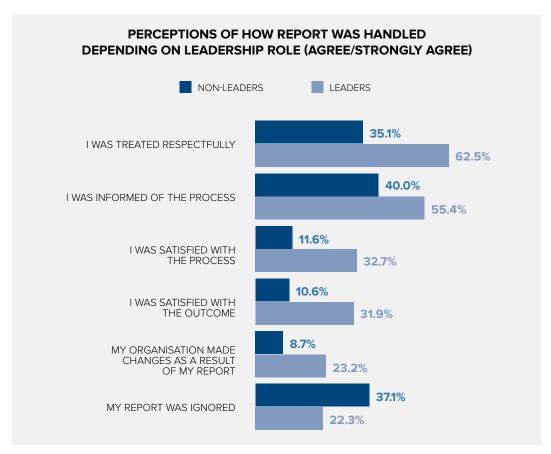


## Senior leaders' experiences of reporting

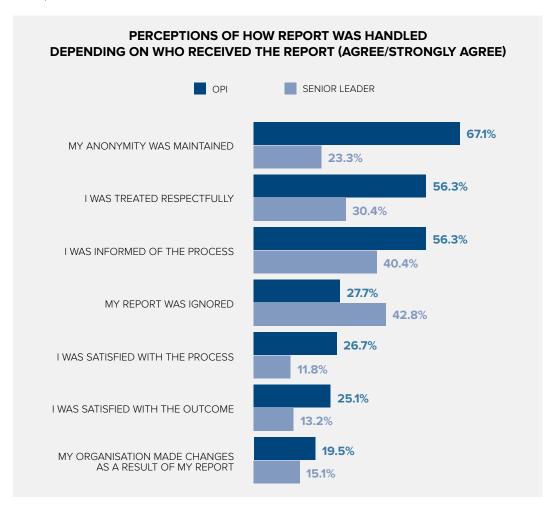
Participants were also asked if they had made an official report about corruption in their workplace within the last three years, and if so, how this report was handled.  $^{52}$  Senior leaders were significantly more likely than non-leaders to respond that they had made a previous report.  $^{53}$ 



Participants in senior leadership roles were more likely than those not in leadership roles to feel that their report was appropriately handled.<sup>54</sup>



The level of satisfaction with how a report was handled correlated with who received the report. The Office for Public Integrity scored highest and senior management lowest on every measure of satisfaction about how a report was handled. Participants felt that their workplace had failed to make changes regardless of who received their report.



Dissatisfaction with the way in which senior management handled reports was also expressed in the qualitative comments.



"Any issues raised by the team members are often ignored or not investigated. I believe this to be because there are too many layers of inadequately trained, disrespectful leaders. Our Team Manager is wonderful, however, I believe even he has not been able to effect any change to the unwieldly system, or manage any scenario that arises for himself or his staff."

"Several staff members have written and spoken to senior management but are afraid and scared of giving their names because or retaliation and not being protected."

"Management and leadership strongly frown upon employees 'making waves', are reluctant to make waves themselves, and appear to prefer to encourage unsafe work practices, staff theft and unscrupulousness rather than speaking out and making positive ethical change. When I have had conversations with management about theft, it has been dismissed and not action was taken."

"A lot of staff are too scared to speak up as a result of bullying from head management"

"As a manager I also did not feel supported by higher management/senior [leaders] in discussion concerns with staff or advising them of their rights of complaint."

A further theme was that senior leaders do not adequately address inappropriate conduct. This has important implications for preventing corruption. Employees perceive poor leadership as including hypocrisy, breaching trust, lacking moral responsibility, and failing to provide ethical role modelling.<sup>55</sup> Leadership which is seen to be unethical can create a workplace culture where corruption flourishes.<sup>56</sup>

The qualitative comments suggest that many participants felt that their workplace lacked ethical leadership. Some participants said that senior leaders sometimes tolerated poor behaviour:



"Some staff members' behaviours have been poor for so long that everyone just tolerates them or moves them around the department. There is not a consistent committment to managing poor behaviours, so people see bad behaviour as acceptable."

"I don't think people want to deal with situations, and so it is ignored."

"A number of staff continue to be employed despite no reasonable work capacity, management are fearful of addressing work performance."

"Staff not completing tasks as required in person specification and it being passed off to other staff instead of managing the person not performing."

"Staff who do not do their appointed daily duties & nothing is done about it, which results in other staff having to cover or worse clients suffer."

"There's too much lee way for staff who don't perform to abuse their positions, while other staff burn out in the process."

"Failure to perform duties is very common and managers don't know how to deal with staff who don't perform and are not performance managed. It is easier to turn a blind eye, too hard to deal with."

In addition, senior leaders were described as being able to "get away" with poor behaviour, whereas non-leaders were disciplined for the same behaviour.



"I am concerned about the divide between management/leaders and lower level roles. We seem to be held accountable for a lot whereas we have no evidence that our leaders are held to the same standards. I have concerns around the way inadequate performance in a high level role is managed."

"The standards expected of junior [staff] is very different to middle and Senior management. There is a large amount of accountability pushed down from management..."

"The untouchables, those who have power and seem to be able to do whatever they want and cover their tracks very well!"

"Employees at a higher level which are not performing their role adequately but remain in their position for many years. Whereas other employees which appear to be excelling at a lower level are not provided with opportunities to progress."

"Employees receive misconduct letters, I am not aware of any managers who have yelled, threatened staff to have received one."

"Abusive supervisors are never reprimanded and the worker who reports the abuse gets set off to counseling. There is supposed to be a no bullying policy but is never enforced. The victim gets the blame."

"Double standards when dealing with behaviour. Senior management look after each other."

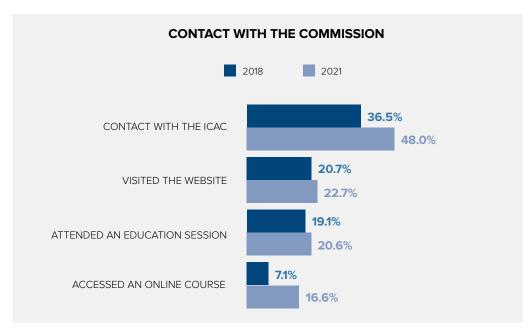
"Those in higher roles do not get investigated in the same way that lower paid staff are investigated."

# PERCEPTIONS OF THE COMMISSION

## **91.1%** of participants had heard of the Independent Commission Against Corruption.

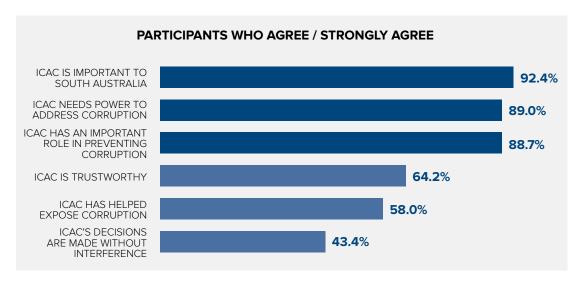
Awareness of the Commission has increased since the 2018 survey. In 2018, 79.7% of participants had heard of the Commission.

Since 2018, public officers have increasingly had contact with the Commission and accessed the Commission's resources. While COVID-19 has most likely increased the uptake of the Commission's online courses, the use of the Commission's website and education sessions has not increased substantially.



Participants generally perceived the Commission to be important, trustworthy, and requiring the necessary powers to prevent corruption. Some 58% of participants perceived that the Commission has helped expose corruption.

Some of the comments suggested that participants wanted to know more about the Commission's investigations. However, the Commission has limited powers to make public statements about investigations. Under the *Independent Commissioner Against Corruption Act 2012* and prior to recent amendments, the Commission could not make any public statement in connection with an investigation unless it was in the public interest to do so, and having regard to a number of factors including the risk of prejudicing someone's reputation.<sup>57</sup> In October 2021, the legislation was amended. The amendments have further reduced the Commission's powers to make public statements in relation to operational matters.



## Perception of the Commission's trustworthiness

There were only two comparable questions about perceptions of the Commission asked in the 2018 and 2021 surveys. The first related to perceptions of the Commission's trustworthiness. Since 2018, public officers' perceptions of the Commission's trustworthiness have improved by 2.7%. <sup>58</sup>

The qualitative comments provide an insight into the reasons why participants perceived the Commission to be trustworthy. Most participants described the Commission as being responsible for investigating reports of corruption. Many participants also described the Commission's investigations as being "independent", "unbiased", "objective", "impartial" and "without fear and favour":



"A non-biased organization tasked with investigating and ending corruption."

"A third party not involved in either side, to assess a possible cause of corruption independently and unbiased."

"Independent investigators who will look in to reports of corruption without bias or favourtism [sic]."

Participants also perceived the Commission's role as protecting the integrity of South Australia's public administration:



"To uphold the values of trust and service that we uphold as public servants."

"To protect the public interest, prevent breaches of trust and guide the conduct of public officials."

"To provide a framework for keeping government employees and elected officials honest and accountable."

"To ensure that public authorities act in the best interests of the community and are held to standards of integrity"

## Perception of the Commission's independence

The other question that was asked in both the 2018 and 2021 survey was about the Commission's independence. Since 2018, the percentage of survey participants who agreed that the Commission's decisions are made without interference has decreased by 11.1%.

The decrease might be explained by the perceptions of participants of amendments made to the ICAC Act in 2021. The survey did not ask about the amendments; however of the participants who made qualitative comments:

- ▶ 56.6% discussed the Commission
- ▶ 43.6% of those who discussed the Commission referred to the amendments.

For many participants, the amendments were politically motivated, and have undermined the independence of the Commission:



"It was the go to place for reporting and pursuing public sector issues of corruption. Though I believe recent change to the powers of the ICAC in SA protect politicians inappropriately."

"To act as an independent policing body against corruption - unless of course it's against a politician, in which case forget it - the changes in legislation fixed that."

"Recently [the ICAC] has changed here is SA - it has been watered down. So I am not sure now - it seems you can investigate anything that won't put a politician in hot water..."

The comments suggest that many participants did not support the changes. The amendments were perceived to have "reduced", "watered down", "stripped", "undermined", "depleted" and "diluted" the role of the Commission. Participants also used the survey as an opportunity to express their feelings of "concern", "dismay" and "disappointment" about the amendments:



"I think the recent removal of powers from ICAC is an abomination"

"I am angry at the recent decision made by our so called legislators to significantly reduce the authorities of ICAC to prevent further investigations into our Ministers and reduce the impact on the highest level of corruption by our governments. The parliament should be ashamed. What a complete disgrace."

"A strong ICAC is imperative to ensure public confidence in government and it is extremely disappointing that recent reforms have somewhat diminished the role"

## Misunderstandings of the Commission's role and powers

Some of the qualitative comments suggest that not all public officers have a good understanding of the Commission. Some described the Commission as being responsible for the prosecution of corruption cases, whereas the Commission does not prosecute. A few observed that the Commission makes anti-corruption policies and legislation, whereas the Commission can only make recommendations.

However, where participants appeared to be the most confused was in relation to the ICAC Act amendments:



"With recent changes, the role of ICAC is not as clearly defined as it once was."

"I am confused by the recent change in legislation."

"Unsure [of ICAC's role] due to the poorly designed and consulted legislative changes complicating reporting relationships."

"I understand the role has changed so am unclear now what needs to be reported to ICAC and what needs to be reported to OPI"

"I'm unclear particularly after the changes that were made by the parliament."

#### Criticisms

While the majority of participants provided positive views about the Commission, there were some criticisms. The Commission was criticised for focusing too much on small scale matters. Conversely, it was criticised for only pursuing serious cases of corruption:



"The very strong impression I have had of ICAC is that there is no interest in small cases and that it is considered sufficient for inappropriate behaviour to be quietly stopped without repercussions to the perpetrator. This encourages a culture of permissiveness."

"I think that care should be taken in emphasising the role of ICAC that the focus is not lost on small, day-to-day acts of maladministration, misconduct and nepotism that we are much more likely to encounter than large criminal enterprises."

"ALL public servants including politicians and CEO's should not be exempt or not investigated if they break the rules. Sometimes it seems as the little people in public service life gets investigated and the big wigs seem to escape this process."

"ICAC needs to look at high level corruption and not just go for seemingly easy low level matters to make them look competent."

At the time the survey was run, there was considerable media attention about the Select Committee on Damage, Harm or Adverse Outcomes resulting from ICAC Investigations. Some criticisms reflected matters raised in the Select Committee and subsequent media reporting:



"...some people falsely accused or accused on scant evidence have had their lives ruined - the process takes years and can be very destructive."

"Recent negative media attention has had a significant impact on people's ability to trust ICAC and their processes. I agree that their processes are too long and this has a significant impact on individuals mental health, particularly those who are the subject of the investigation."

The Commission was also criticised by several participants who described having made a report, only to have it dismissed or referred back to their own agency:



"As a private citizen dealing with Local Government and then lodging ICAC reports i find they are easily dismissed and its frustrating as some of the decisions of local government ... and how investigations ... are carried out is quite suspect"

"When I previously made a report, there was very little communication, I felt there was a very strong case with significant evidence, but was advised that the investigation was completed without any, or very little, communication with me to discuss other information or evidence I might have."

"The issue of misconduct or maladministration now being referred to Ombudsman is an excellent outcome. Previously, ICAC would get us to investigate ourselves, which just doesn't pass the 'pub test' of reasonableness."

"Department where there was no faith or trust in the first place to have the matter fairly investigated."

## CONCLUSIONS

Several key findings arise from this survey.

### Perceptions of corruption

Most participants believed that their workplace was vulnerable to at least one type of corruption, and participants perceived that their workplace is more vulnerable to corruption relative to 2018. Almost a third of participants believed that they had seen potential corruption in their workplace within the last three years. Nepotism and favouritism in recruitment continues to be identified as the highest corruption risk.

Secondary employment might pose potential corruption risks. Participants described colleagues misusing public resources to support a second job, including public officers gaining contracts from their workplace for their private business.

Many participants asserted that preferential treatment occurred within their workplace, and that corruption might be overlooked depending on who was involved. Participants believed that decisions concerning appointments, promotion, and opportunities for career advancement were sometimes based on favouritism rather than merit.

## Reporting corruption

Many participants, especially those in vulnerable positions, said they felt uncertain, unsafe and unsupported when reporting potential corruption, and said their workplace does not adequately address problems that are reported. A high proportion would not report corrupt conduct to someone inside their organisation. Fewer participants would be willing to report internally relative to 2018, and the proportion of participants who had officially reported corruption had decreased.

## Disparity between senior leaders and other public officers

Senior leaders were less likely than other public officers to perceive their workplace as being vulnerable to corruption and to have personally encountered corruption. This suggests a risk that senior leaders may not be fully aware of corruption risks within their workplace.

Senior leaders were more confident in making a report and believed that their report would be actioned. In contrast, participants in non-leadership roles felt confused about reporting, unsafe when making a report, and had little faith in how their report would be handled. Senior leaders need to be aware of how other public officers experience reporting. Senior leaders might falsely assume that because they are aware and comfortable with reporting corruption, other public officers within their workplace feel the same.

Many participants in non-leadership roles perceived their workplace to be at risk of abuse of authority, and believed that senior leaders lack accountability and put their own personal interests ahead of the public interest. They also perceived senior leaders to be vulnerable to political interference.

## Perceptions of the Commission

Since 2018, there has been a considerable increase in awareness regarding the Commission, and some increase in the uptake of Commission resources. There has also been some increase in trust in the Commission.

However, the perception that the Commission makes decisions that are free from interference has decreased. This likely reflects recent amendments to the ICAC Act. Many participants expressed their opposition to the changes and a belief that the changes were politically motivated. The changes also appear to be causing confusion and uncertainty about how and where to make reports concerning corruption, misconduct and maladministration.

## APPENDICES

## Appendix One: The survey

GENERAL DEMOGRAPHIC INFORMATION	
What is your gender?	Female Male Another term (please specify) Prefer not to say
What is your age?	20 years and under 21-34 years 35- 44 years 45- 54 years 55 years and above Prefer not to say
Where do you work?	Attorney-General's Department Courts Administration Authority Department for Child Protection Department for Correctional Services Department for Education (excluding TAFE SA) Department of Environment and Water Department for Health and Wellbeing (SA Health) Local Health Network Department of Human Services SA Department for Infrastructure and Transport Department of the Premier and Cabinet Department of Primary Industries and Regions Department for Innovation and Skills Department of Treasury and Finance SA Ambulance Service South Australian Metropolitan/Country Fire Services TAFE SA South Australian Police State Government — Other Local Government Prefer not to say
Which Local Health Network do you work for?	CALHN NALHN SALHN WCHN Other Prefer not to say
Where is your local council based?	Metropolitan Regional Rural and Remote Prefer not to say
Are you an elected member?	Yes No Don't know/unsure
How would you describe you current employment?	Permanent/ongoing contract Long-term contract (minimum one year) Short-term contract (less than one year) Casual Other (Please specify) Prefer not to say

Are you in an Executive or Senior Manager role?	Yes No Don't know/unsure Prefer not to say
Do you supervise other employees?	Yes No Don't know/unsure Prefer not to say
How many employees report to you?	1-5 6-10 21-50 Over 50
How long have you worked with your current organisation?	Less than 1 year 1-5 years 6-10 years 11-20 years More than 20 years
How long have you worked in the public sector or local government	Less than 1 year 1-5 years 610 years 11-20 years More than 20 years
REPORTING CORRUPTION WITHIN YOUR ORGAN	NISATION
Please rate how strongly you agree or disagree with the following statements:  I am confused about what conduct should be report I would only report corruption if I had clear evidence I would only report corrupt conduct if it was serious I think I would report corrupt conduct to someone inside my organisation If I report I would probably be in trouble with my colleagues If I reported I would be worried about my job I would feel too intimidated to report	Strongly agree Agree Neither agree nor disagree Disagree Don't know/unsure
Please rate how strongly you agree or disagree with the following statements:  If feel that my organisation discourages reporting  If I made a report, my organisation would protect me from negative repercussions  My organisation has provided me with training on corruption risks that relate to me role  I feel that my workplace will sometimes bend the rules to achieve its goals  I am aware of my organisation's policies and procedures for reporting  If I made a report I believe that I would be treated fairly  If I made a report I am confident that appropriate action would be taken  If I made a report I would prefer the option to remain anonymous  My organisation follows policies and procedures when dealing with a report  My organisation places its reputation over addressing problems	Strongly agree Agree Neither agree nor disagree Disagree Don't know/unsure

#### **VULNERABILITY TO CORRUPTION WITHIN YOUR ORGANISATION** Please rate how vulnerable you think your Not at all vulnerable organisation is to the following types of corruption: Somewhat vulnerable Moderately vulnerable Favouritism in procurement/awarding of Highly vulnerable contracts Extremely vulnerable Financial misconduct, theft, fraud Not applicable/don't know Mismanagement of public resources Falsifying information Political interference Inappropriate access to and/or misuse of confidential information Not declaring or managing conflicts of interest Bribery/improper acceptance of gifts Perverting the course of justice Nepotism/favouritism in recruitment Misuse of authority Failure to perform official duties Please provide details about any major areas of Not applicable vulnerability to corruption within your organisation Open-ended text box Have you personally encountered corruption in Yes your workplace within the last three years No Don't know/unsure Please indicate what type of corruption you have Yes personally encountered within the last three years No (tick all that apply): Don't applicable/don't know Favouritism in procurement/awarding of contracts Financial misconduct, theft, fraud Mismanagement of public resources Falsifying information Political interference Inappropriate access to and/or misuse of confidential information Not declaring or managing conflicts of interest Bribery/improper acceptance of gifts Perverting the course of justice Nepotism/favouritism in recruitment Misuse of authority Failure to perform official duties Please provide details about the nature of any Not applicable corruption that you have encountered or observed Open-ended text box within the last three years YOUR EXPERIENCES OF MAKING AN OFFICIAL REPORT ABOUT CORRUPTION Have you previously made an official report of Yes corruption within the last three years No Don't know/unsure For the most recent occasion where you reported Line manager corruption who did you report this to? Senior leadership (Tick all that apply) Human resources Office for Public Integrity Other (Please describe) Not certain/can't remember How would you describe the way in which this Strongly agree most recent report was handled? Please rate how Agree strong you agree or disagree with the following Neither agree nor disagree statements: Disagree Strongly disagree I was informed of the process that would occur Not applicable/don't know My anonymity was maintained I feel satisfied with the process My report was ignored I feel that I was treated respectfully My organisation made changes as a result of my report I feel satisfied with the outcome of my report

SECONDARY EMPLOYMENT	
Do you (or have you) engaged in secondary employment or business interests outside your primary work role?	Yes No Don't know/unsure
Were you required by your organisation to seek permission or declare your secondary employment or business interests?	Yes No Don't know/unsure
Are you aware of any instances in which others within your organisation have engaged in secondary employment or business interests that they have not declared	Yes No Don't know/unsure
Please describe any instances within your organisation or people taking on inappropriate secondary employment or business interests?	Not applicable Open-ended text box
APPLYING STANDARDS	
How strong do you agree or disagree with the following statements?  I feel that the leadership in my organisation treats all employees fairly I believe that standards are equally applied within my organisation Corrupt behaviour may be overlooked depending on who you are	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Not applicable/don't know
Please describe any instances within your organisation of serious preferential treatment	Not applicable Open-ended text box
THE INDEPENDENT COMMISSION AGAINST COR	RUPTION
Have you heard of South Australia's Independent Commission Against Corruption before receiving this survey?	Yes No Don't know/unsure
Have you previous had contact with the ICAC? (Tick all that apply)	No Yes, visited the website Yes, accessed resources Yes, an ICAC online course Yes, attended an education/training session Yes, other type of contact (please specify)
What do you understand as the role of the Independent Commission Against Corruption	Open-ended text box
Please rate how strong you agree or disagree with the following statements:  The ICAC has an important role in preventing corruption in South Australia It is important that South Australia has an ICAC I feel that the ICAC is trustworthy	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Not applicable/don't know
The ICAC has helped to expose corruption in South Australia I believe that the ICAC's decisions are made without interference It is important that ICAC has the power to effectively address high level corruption	

### Appendix Two: Statistical results and references

- 1 The breakdown of the sample does not include participants who indicated that they preferred not to answer the demographic questions or answered 'other'.
- 2 Workforce Information Report: 2020-2021 (Office of the Commissioner for Public Sector Workforce, Government of South Australia, 2021).
- 3 Employment and Earnings, Public Sector, Australia (Australian Bureau of Statistics, 11th November, 2021).
- 4 The Department of Human Services were accidently left off the list of agencies when the survey was first released. The survey was corrected once the oversight was picked up, but some participants from the Department of Human Services will have been categorised as working in an 'other' state government agency.
- Naresh Khatri and Eric W. Tsang, 'Antecedents and Consequences of Cronyism in Organizations' (2003) 43 Journal of Business Ethics 289-303.
- 6 Sadia Shaheen, Sajid Bashir and Abdul Karim Khan, 'Examining Organizational Cronyism as an Antecedent of Workplace Deviance in Public Sector Organizations' (2017) 46(3) Public Personnel Management 308-323; Kathie L. Pelletier and Michelle C. Bligh, 'The Aftermath of Organizational Corruption: Employee Attributions and Emotional Reactions' (2008) 80(4) Journal of Business Ethics 823-844.
- 7 Richard Rose and William Mishler, 'Bridging the Gap between the Experience and the Perception of Corruption' in Dieter Zinnbauer and Rebecca Dobson (eds), Global Corruption Report 2008: Corruption in the Water Sector (Cambridge University Press, 2008), 328-331.
- 8 Claudio W. Abramo, 'How Much Do Perceptions of Corruption Really Tell Us?" (2008) 2(1) Economics, 1-56
- William Mishler and Richard Rose, 'Seeing is Not Always Believing: Measuring Corruption Perceptions and Experiences' Paper prepared for the Elections, Public Opinions and Parties 2008 Annual Conference, (University of Manchester, Manchester, 2008). Accessed at <a href="http://www.u.arizona.edu/~mishler/corrupt08-18-08.pdf">http://www.u.arizona.edu/~mishler/corrupt08-18-08.pdf</a>.
- Nicholas Charron, 'Do Corruption Measures have a Perception Problem? Assessing the Relationship Between Experiences and Perceptions of Corruption among Citizens and Experts" (2016) 8(S1) European Political Science Review 147-171.
- 11 This question was asked in different way in 2018, and so the results cannot be compared from 2018 to 2021
- Australian Public Service Commission, Australian Public Sector Employee Census 2019 (Australian Public Service Commission, 2019) 20; Crime and Corruption Commission, Perceptions of Corruption and Public Integrity in Queensland Statement Government Departments (Crime and Corruption Commission, September 2021) 3; Crime and Corruption Commission, Queensland Public Sector Responses to Corruption Conduct Incidents in Recruitment and Selection Activities: Summary Audit Report (Crime and Corruption Commissions, 2017); Independent Broad-Based Anti-Corruption Commission, Perceptions of Corruption: Survey of Victorian State Government Employees (IBAC, 2017) 7-8; NSW ICAC, Community Attitude to Corruption and to the ICAC (NSW ICAC, 2013) 8.
- 13  $\chi^2$ (6, N=7014)=55.607, p<.001, v=.063.
- 14 χ<sup>2</sup>(6, N=7018)=28.627, p<.001, v=.045.
- 15  $\chi^2$ (6, N=1423)=40.964, p<.001, v=.120.
- 6 χ<sup>2</sup>(8, N=6939)=19.366, p<.05, v=.037.
- 17  $\chi^2(8, N=7017)=15.653, p<.05, v=.033.$
- Are you aware of policies within your organisation regarding secondary employment or business interests  $\chi^2(8, N=6943)=88.133$ , p<.001, v=.080; Were you required by your organisation to seek permission or declare your secondary employment or business interests  $\chi^2(8, N=1434)=20.429$ , p<.01, v=.084.
- Are you aware of policies within your organisation regarding secondary employment or business interests  $\chi^2(8, N=7023)=125.895$ , p<.001, v=.095; Were you required by your organisation to seek permission or declare your secondary employment or business interests  $\chi^2(8, N=1440)=54.936$ , p<.001, v=138
- 20 Are you aware of policies within your organisation regarding secondary employment or business interests  $\chi^2(8, N=7043)=49.221$ , p<.001, v=.059; Were you required by your organisation to seek permission or declare your secondary employment or business interests  $\chi^2(8, N=1441)$ , 21.520= p<.01, v=.086
- 21 Naresh Khatri and Eric W.K. Tsang, 'Antecedents and Consequences of Cronyism in Organizations' (2003) 43 Journal of Business Ethics 289-303.
- 22 Margaret Y. Padgett and Kathryn A. Morris, 'Keeping it 'All in the Family': Does Nepotism in the Hiring Process Really Benefit the Beneficiary?' (2005) 11(2) Journal of Leadership & Organizational Studies 34-45; Kathie L. Pelletier and Michelle C. Bligh 'The Aftermath of Organizational Corruption: Employee Attributions and Emotional Reactions" (2008) 80(4) Journal of Business Ethics 828-844.
- 23 Above n 4.
- 24 Section 46(1) of the Public Sector Act 2009, Section 107 of the Local Government Act.

- 25 Section 46(2) of the Public Sector Act 2009; Section 17 of the Public Sector Act 2020 Regulations.
- 26 Robert G. Jones and Tracy Stout, 'Policing Nepotism and Cronyism Without Losing the Value of Social Connection' (2015) 8(1) Industrial and Organizational Psychology 2-12.
- 27 Sadia Shaheen, Sajid Bashir, Abdul Karim Khan, 'Examining Organizational Cronyism as an Antecedent of Workplace Deviance in Public Sector Organizations' (2017) 46(3) Public Personnel Management, 308; Kernaghan, Kenneth 'Getting Engaged: Public-Service Merit and Motivation Revisited' (2011) 54(1) Canadian Public Administration 1; Naresh Khatri and Eric W.K. Tsang, Antecedents and Consequences of Cronyism in Organizations' (2003) 43 Journal of Business Ethics 289-303; Margaret Y. Padgett and Kathryn A. Morris, 'Keeping it 'All in the Family': Does Nepotism in the Hiring Process Really Benefit the Beneficiary?" (2005) 11(2) Journal of Leadership & Organizational Studies 34-45; Kathie L. Pelletier and Michelle C Bligh, The Aftermath of Organizational Corruption: Employee Attributions and Emotional Reactions (2008) 80(4) Journal of Business Ethics 823-844.
- 28 Lisa Zipparo, 'Encouraging Public Sector Employees to Report Workplace Corruption' 58(2) (1999) Australian Journal of Public Administration 83-93.
- 29 x<sup>2</sup>(4, N=6664)=34.198, p<.001, v=.072.
- 30 I have received training about corruption risks relating to my role  $\chi^2(4, N=6829)=101.176$ , p<.001; v=.122; I am aware of policies and procedures for reporting  $\chi^2(4, N=6774)=67.465$ , p<.001; v=.100; I am confused about what I should report  $\chi^2(4, N=6928)=42.346$ , p<.001; v=.078.
- 31 I would feel too intimidated to make a report  $\chi^2(4, N=6825)=125.202$ , p<.001, v=.135; If I reported, I would be probably in trouble with my colleagues  $\chi^2(4, N=6677)=20.916$ , p<.001, v=.056; I would only report corrupt behaviour if it was serious  $\chi^2(4, N=6875)=55.064$ , p<.001, v=.089; I would only report corruption if I had clear evidence  $\chi^2(4, N=6890)=13.914$ , p<.01, v=.045; If I reported, I would be worried about my job  $\chi^2(4, N=6827)=70.080$ , p<.001, v=.101; I would prefer the option to remain anonymous if I made a report  $\chi^2(4, N=6890)=70.903$ , p<.001, v=.101.
- 32 If I reported, I would be protected from negative repercussions χ²(4, N=6028)=21.327, p<.001, v=.059.
- 33 My organisation discourages reporting  $\chi^2(4, N=6764)=39.060$ , p<.001; v=.076; My organisation will sometimes bend the rules to reach its goals  $\chi^2(4, N=6780)=20.407$ , p<.001, v=.055; My organisation protects its reputation over addressing problems  $\chi^2(4, N=6640)=42.574$ , p<.001, v=.080.
- 34 If I made a report I believe that I would be treated fairly  $\chi^2(4, N=6329)=24.710$ , p<.001, v=.062; My organisation follows policies and procedures when dealing with a report  $\chi^2(4, N=5818)=15.918$ , p<.01, v=.052.
- 35 I am confused about what conduct should be reported  $\chi^2(12, N=6953)=57.265$ , p<.001, v=.052; My organisation has provided me with training on corruption risks that relate to my role  $\chi^2(12, N=6852)=63.935$ , p<.001, v=.056; I am aware of my organisation's policies and procedures for reporting  $\chi^2(12, N=6796)=43.316$ , p<.001, v=.046; I would only report corruption if I had clear evidence  $\chi^2(12, N=6912)=29.250$ , p<.01, v=.038; If I reported I would be worried about my job  $\chi^2(12, N=6846)=79.326$ , p<.001, v=.062.
- 36 Australian Public Service Commission, State of the Service Report (2019-2020) (Australian Government, 2020), Chapter 3, https://legacy.apsc.gov.au/sites/default/files/aps\_state\_of\_the\_ service\_report\_2019-20\_0.pdf.
- 37 χ<sup>2</sup>(3, N=6885)=14.458, p<.01, v=.046.
- 38 Executive or senior manager role:  $\chi^2(3, N=6776)=13.206$ , p<.001, v=.044; supervise employees  $\chi^2(1, N=6771)=70.640$ , p<.001, v=.102.
- 39 Time in current workplace  $\chi^2$ (4, N=6913)=23.299, p<.001, v=.058; time in public sector  $\chi^2$ (4, N=6887)=16.990, p<.01, v=.050.
- 40 In 2018, participants were asked if they had made an official report of corruption or inappropriate conduct over the last five years. The data from 2018 is not comparable to the data from 2021.
- 41 Mohsin Bashir and Shahidl Hassan, 'The Need for Ethical Leadership in Combating Corruption' 86(4) (2020) International Review of Administrative Sciences 673-690.
- 42 Nepotism/favouritism in recruitment  $\chi^2(5, N=226.105)=226.015, p<.001, v=.181;$  political interference  $\chi^2(5, N=6883)=113.748, p<.001, v=.129;$  misuse of authority  $\chi^2(5, N=6876)=177.884, p<.001, v=.161;$  not declaring or managing conflicts of interest  $\chi^2(5, N=6873)=112.897, p<.001, v=.128;$  inappropriate access to and/or misuse confidential information  $\chi^2(5, N=6871)=111.987, p<.001, v=.128;$  mismanagement of public resources  $\chi^2(5, N=6885)=148.809, p<.001, v=.147;$  favouritism in procurement/awarding of contracts  $\chi^2(5, N=6892)=208.221, p<.001, v=.174;$  failure to perform official duties  $\chi^2(5, N=6857)=141.498, p<.001, v=.144;$  falsifying information  $\chi^2(5, N=6881)=161.413, p<.001, v=.153;$  perverting the course of justice  $\chi^2(5, N=6874)=171.059, p<.001, v=.158;$  financial misconduct, theft, fraud  $\chi^2(5, N=6883)=152.442, p<.001, v=.149;$  bribery/improper acceptance of gifts  $\chi^2(5, N=6882)=123.846, p<.001, v=.134.$
- 43 Nepotism/favouritism in recruitment  $\chi^2(2, N=6677)=70.973$ , p<.001, v=.103; misuse of authority  $\chi^2(2, N=6629)=45.181$ , p<.001, v=.083; not declaring or managing conflicts of interest  $\chi^2(2, N=6622)=19.160$ , p<.001, v=.054; mismanagement of public resources  $\chi^2(2, N=6637)=18.831$ , p<.001, v=.053; favouritism in procurement/awarding of contracts  $\chi^2(2, N=6636)=54.759$ , p<.001, v=.091; failure to perform official duties  $\chi^2(2, 6583)=37.587$ , p<.001, v=.076; inappropriate access to and/or misuse of confidential information  $\chi^2(2, N=6614)=19.625$ , p<.001, v=.054; falsifying information  $\chi^2(2, N=6625)=25.214$ , p<.001, v=.062; perverting the course of justice  $\chi^2(2, N=6596)=30.402$ , p<.001, v=.068; bribery and inappropriate acceptance of gifts  $\chi^2(2, N=6601)=25.422$ , p<.001, v=.062.
- 44 Financial misconduct, theft, fraud  $\chi^2(2, N=6622)=16.445$ , p<.001, v=.050; political interference  $\chi^2(2, N=6616)=22.220$ , p<.001, v=.058.

- 45 Corruption is overlooked depending on who you are  $\chi^2(5, N=6904)=324.089$ , p<.001, v=.217; standards are equally applied  $\chi^2(5, N=6902)=252.618$ , p<.001, v=.191; leadership treats people fairly  $\chi^2(5, N=6905)=315.902$ , p<.001, v=.214.
- 46 Marie Hutchinson, Margaret H. Vickers, Lesley Wilkes and Debra Jackson "The Worse You Behave The More You Seem to be Rewarded": Bullying in Nursing as Organizational Corruption' (2009) 21 Employee Responsibilities and Rights Journal, 213-229.
- 47 Margaret H. Vickers 'Towards Reducing the Harm: Workplace Bullying as Workplace Corruption A Critical Review' (2014) 26, Employee Responsibilities and Rights Journal 95-113.
- 48 I would report corrupt conduct to someone inside my organisation  $\chi^2(4, N=6578)=16.306$ , p<.01, v=.050; I would only report corruption if I had clear evidence  $\chi^2(4, N=6803)=129.962$ , p<.001, v=.138; I would only report corrupt conduct if it was serious  $\chi^2(4, N=6788)=83.141$ , p<.001, v=.111.
- 49 I am aware of my organisation's policies and procedures for reporting  $\chi^2(4, N=6686)=197.402$ , p<.001, v=.172; my organisation has provided me with training on corruption risks that relate to my role  $\chi^2(4, N=6740)=113.623$ , p<.001, v=.130; I am confused about what conduct should be reported  $\chi^2(4, N=6842)=179.603$ , p<.001, v=.162.
- 50 If I made a report I would prefer the option to remain anonymous  $\chi^2(4, N=6800)=138.105$ , p<.001, v=.143; If I reported I would be worried about my job  $\chi^2(4, N=6736)=314.846$ , p<.001, v=.216; I would be protected from repercussions if I reported  $\chi^2(4, N=5952)=166.495$ , p<.001, v=.167; If I reported I would be in trouble with my colleagues  $\chi^2(4, N=6589)=291.106$ , p<.001, v=.210; I feel too intimidated to report  $\chi^2(4, N=6740)=332.160$ , p<.001, v=.222.
- 51 My organisation follows policies and procedures when dealing with a report  $\chi^2(4, N=5746)=199.237$ , p<.001, v=.186; If I made a report I believe that I would be treated fairly  $\chi^2(4, N=6252)=219.568$ , p.001, v.187; If I made a report I am confident that appropriate action would be taken  $\chi^2(4, N=6286)=165.158$ , p<.001, v.162; My organisation places its reputation over addressing problems; My organisation will sometimes bend the rules to achieve its goals  $\chi^2(4, N=6697)=185.981$ , p<.001, v=.167; my organisation discourages reporting ( $\chi^2(4, N=6677)=211.042$ , p<.001, v=.178.
- 52 In 2018, participants were asked if they had made an official report of corruption or inappropriate conduct within the last five years. As the questions refer to different timeframes the data from 2018 and 2021 has not been compared.
- 53 x<sup>2</sup>(2, N=6903)=61.832, p<.001, v=.095.
- 54 I was treated respectfully  $\chi^2$ (5, N=423)=33.097, p<.001, v=.280; I was informed of the process  $\chi^2$ (5, N=422)=19.269, p<0.01, v=.214; I was satisfied with the process  $\chi^2$ (5, N=421)=29.984, p<.001, v=.267; I was satisfied with the outcome  $\chi^2$ (5, N=421)=34.231, p<.001, v=.284; my organisation made changes as a result of my report  $\chi^2$ (5, N=421)=39.833, p<.001, v=.308; my report was ignored  $\chi^2$ (4, N=422)=20.377, p<.001, v=.220.
- 55 Kathie L. Pelletier and Michelle C. Bligh 'The Aftermath of Organizational Corruption: Employee Attributions and Emotional Reactions' 80 (2008) Journal of Business Ethics, 823-844.
- 56 Adam Graycar 'Corruption: Classification and Analysis' 34 (2015) Policy and Society 87-96, 90.
- 57 Section 25, the ICAC Act.
- 58 The way in which this question was framed is different for 2018 and 2021. In 2018, participants were asked to rate the ICAC's trustworthiness. In order to avoid phrasing all the questions in a positive way and therefore potentially biasing the results, in 2021 participants were asked to if they considered the ICAC to be untrustworthy.



