

Integrity Spotlight

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Advisory

There can be a considerable cost to public administration where recruitment processes lack integrity.

Red flags in recruitment

Why are robust recruitment processes important?

An agency's most valuable asset is its people, making recruitment one of its most important activities.

Recruitment processes that are fair and transparent:

- are less susceptible to corruption by applicants or public officers involved in the process
- ensure that agencies appoint the best people and that decisions are not improperly influenced
- instil confidence in the integrity of public administration
- support productive and cohesive workplaces

There can be a considerable cost to public administration where recruitment processes lack integrity.

Merit based recruitment

Appointments to any role in public administration should be made on merit. An applicant appointed on merit will have demonstrated the skills, experience and aptitude to perform the role. They will also have demonstrated that they are a person of integrity.

While all appointments should be merit based, not all recruitments will follow the same process. Sometimes a suitable applicant can be directly appointed to a role on merit, without a call for applications. It is important that direct appointments also follow a fair and robust process. Staff who understand their agency's recruitment practices, policies and procedures are more likely to have confidence that appointments are fair and free from bias.

How can recruitment processes be undermined?

Recruitment processes can be undermined or even corrupted where a public officer uses their influence to ensure someone known to them is appointed to a role within the agency. This can involve:

- providing an applicant with information that is not available to other candidates, including interview questions or model answers
- writing a position description to unfairly benefit an applicant
- limiting the field of potential applicants by advertising a vacancy for a very short period, to a very limited group, or not at all
- misusing direct appointment processes, short term contracts or casual pools to benefit an applicant
- tailoring interview questions or other testing to favour an applicant
- failing to declare and manage conflicts of interest.

Applicants can also take advantage of poor recruitment practices to gain a foothold into public administration. This might involve an applicant:

- claiming qualifications or work experience they do not possess
- providing false references
- not disclosing their criminal history or prior workplace misconduct

Someone who is prepared to obtain a position dishonestly might engage in corruption or other improper behaviour once they have been appointed.

In 2017 the Commission investigated a matter where a senior public officer who obtained her role by deception was subsequently convicted of corruption offences.¹

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¹ <https://www.icac.sa.gov.au/prosecution-outcomes/veronica-theriault>

Guarding against impropriety in recruitment

The integrity risks associated with recruitment can be reduced by implementing and adhering to robust policies and procedures. Recruitment policies and procedures should clearly set out:

- the agency's expectations and the processes to be followed
- roles and responsibilities of those involved
- training for selection panel members
- requirements in respect of record keeping, conflicts of interest and pre-employment screening

Planning

Good planning can help prevent opportunities for corruption and other impropriety in recruitment. A recruitment plan can be used to document the need to fill a position, key requirements of the position, the manner in which it will be filled and the roles and responsibilities of those involved in the recruitment process.

The recruitment plan should clearly outline each stage of the process. It should list tasks to be completed and who will complete them. This will help ensure that critical aspects of the process are not overlooked or misunderstood. The recruitment plan should be disseminated to staff involved in the recruitment.

Documentation

Recruitment planning, processes and decisions should be documented. This helps to hold those involved in the process to account, can reduce the risk of impropriety, and ensures that recruitment processes and associated decisions are capable of withstanding scrutiny.

A selection summary report can be used to summarise the applicants, their performance in the process, the panel's deliberations and their recommendation as to the most suitable applicant.

Other aspects of the recruitment process which should be clearly documented include conflict of interest declarations, interview notes and reference checks.

Managing conflicts of interest

Public officers involved in recruitment must identify, disclose and manage any conflicts of interest in order to address actual or perceived nepotism or cronyism.

All panel members should sign a conflicts of interest declaration, even if it is simply to declare that they have no conflict. A conflict of interest might require a panel member to withdraw from the recruitment process. If that is not possible, the conflict should be carefully managed in accordance with a documented plan.

While the selection panel will make recommendations about applicants' suitability, the decision to appoint a particular applicant should rest with the agency's principal officer or their delegate.

Inducting members of selection panels

Members of selection panels are often chosen because of their technical expertise. However, they may not have experience in recruitment.

It is important that those appointed to selection panels are properly inducted on their role, and are aware of recruitment policies and processes. They should understand the corruption risks which can arise and the strategies to mitigate them.

Screening

The Commission has seen applicants exploit deficiencies in screening processes to obtain employment as a public officer.

It is critical that agencies have a clear and consistent process to ensure that prospective employees have provided honest and accurate information about their qualifications and experience, and their criminal and disciplinary history.

Agencies should:

- require that prospective employees complete a pre-employment declaration which obliges them to detail any criminal history, unsatisfactory performance, prior misconduct findings or instances where they have resigned while under investigation. Where possible, this should be in the form of a statutory declaration signed by the prospective employee.
- verify a prospective employee's qualifications, particularly if a qualification is required for the role.
- conduct reference checks to verify a prospective employee's work history and conduct. At least two referees should be contacted, including the prospective employee's most recent manager or supervisor.
- ensure that prospective employees hold relevant clearances (National Police Certificate, Commonwealth security vetting, or clearances for working with children or vulnerable persons).

Public sector agencies should also check the prospective employee's details against the Eligibility for Re-employment Register.²

² <https://www.publicsector.sa.gov.au/hr-and-policy/re-employment-register>.

Resources


Independent Broad-based Anti-corruption Commission, [Corruption and Misconduct Risks Associated with Employment Practices in the Victorian Public Sector](#) (August 2018)

Independent Commission Against Corruption, [Identify, Disclose and Manage: Conflicts of Interest in Public Administration](#) (June 2021)

Independent Commission Against Corruption, [Alert - Recruitment in Local Government](#) (October 2022)

Office of the Commissioner for Public Sector Employment, [Guideline of the Commissioner for Public Sector Employment: Recruitment](#) (June 2020)

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