NSW
Police Integrity
Commission

Prevention Prompts

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Identifying and understanding workplace integrity hazards[1]

Identifying 'integrity hazards' (defined below) is a fundamental step in minimising corruption because these hazards reveal areas or opportunities to intervene to prevent corrupt conduct or serious misconduct (before it occurs). Organisations use Occupational Health and Safety (OHS) strategies to minimise workplace injuries by identifying work-related safety hazards (such as lifting heavy objects), assessing the risks of injury (for instance, back injury) arising from these hazards, determining strategies to treat the risk (for example, by reducing the size of the loads to be transported or by using a trolley to transport material) and communicating these hazards and treatment strategies. A similar hazard identification, treatment and communication process can be used to minimise corruption.[2]

The term 'integrity hazard' is used here to refer to anything that has the potential to harm or compromise the integrity of an employee. Integrity hazards can result from the nature of the work, work practices or procedures and are associated with risks of corruption occurring (or 'corruption risks'). For example, police highway patrol officers may encounter drivers, particularly where the driver's employment is at risk, who might try to avoid traffic infringement notices. Encountering such drivers is an integrity hazard associated with the nature of highway patrol work, irrespective of the particular individual who carries out the work. A potential corruption risk associated with this hazard would be a motorist offering a bribe and an officer accepting it.

This is the first in a series of three resources based on applying OHS strategies to the task of minimising corruption. It provides two sets of prompts to help: (1) not overlook any of significant integrity hazards in a police workplace and (2) develop a clear understanding and description of the types of corruption risks associated with an integrity hazard. While the first of these two sets of prompts has been developed for identifying the integrity hazards within individual NSW Police Force commands, these prompts can be adapted for use in different law enforcement agencies and other types of workplaces.

This resource should be used in conjunction with *Prevention Prompts No. 2*, which provides prompts to help select and clearly describe the most appropriate treatment strategies to minimise corruption risks and *Prevention Prompts No. 3*,

[1] The information in this *Prevention Prompts* is based on work undertaken in the PIC's Project Manta. The results of Project Manta have been published in two reports: *Project Manta Report 1 Identification and Communication of Command Misconduct Risks* and *Project Manta Report 2 Managing Command Misconduct Risks*. These reports can be found on the PIC's website: http://www.pic.nsw.gov.au/ResearchAndPreventionReports.aspx

[2] For more information on this approach to preventing corruption refer to the PIC's Research and Issues Paper entitled: *Preventing Corruption: Lessons from Occupational Health and Safety*, which can be found on the PIC's website: http://www.pic.nsw.gov.au/ResearchAndIssuesPapers.aspx

which focuses on helping employees to recognise and respond appropriately to the integrity hazards that they may face.

Identifying integrity hazards is the first step to minimising corruption risks and helping employees recognise the risks and equipping them to respond appropriately.

1. Twelve prompts to minimise the danger of overlooking significant integrity hazards

To assist you identify your significant workplace integrity hazards and associated corruption risks, systematically work through each of the following prompts.

1. What types of work are undertaken in your command that result from specific features of the command (for example, prevalent crime types within the command or community infrastructure and other facilities such as airports, dams, gaols, national parks, transport links, licensed premises, schools and hospitals)? For each work type, consider:

    a. the nature of the contact officers have with members of the public when undertaking this work, the types of discretion officers have and what decisions they make in their role that members of the community may wish to influence (e.g. whether to issue infringement notices)
    b. the types of temptations and opportunities for misuse or theft of resources, information or property
    c. what frustrations might result from the processes involved in carrying out this work that officers may seek to circumvent
    d. whether the complexity of the process might affect officers' understanding of and their ability to comply with the corporately endorsed procedures.

2. What types of work are undertaken in your command that are similar to work undertaken by officers in other commands (such as accessing confidential information, carrying out criminal investigations, handling drug exhibits)? For each work type, consider:

    a. the nature of the contact officers have with members of the public when undertaking this work, the types of discretion officers have and what decisions they make in their role that members of the community may wish to influence (e.g. whether to issue infringement notices)
    b. the types of temptations and opportunities for misuse or theft of resources, information or property
    c. what frustrations might result from the processes involved in carrying out this work that officers may seek to circumvent
    d. whether the complexity of the process might affect officers' understanding of and their ability to comply with the corporately endorsed procedures.

3. How do the physical size of the command and the number of police premises

affect the supervision of, communication with and support available for officers within the command?

4. Are any new buildings or relocation into new police premises proposed? If so, how might this affect duties performed and available supervision?

5. What is the impact of the staffing profile (e.g. level of experience and rank) on the nature and amount of supervision and support required?

6. What relationships between officers and members of the community might result in the potential for officers to experience conflict between their community ties and policing duties? (For example, do some officers live in the command that they police? Have some officers worked in the command for a long time and established close personal relationships with key community figures during that time?)

7. Are there resource limitations, performance targets or particular types of work in which officers might be tempted to take some form of inappropriate short cuts?

8. Are you aware of expectations held by different groups of residents that may affect the way that residents interact with officers (including the circumstances under which they may seek to influence decisions made by officers) as well as the types of complaints they make?

9. Are population growth in the community or changes in community demographics anticipated to affect crime types, resident expectations or demand on resources? If so, what would be the effects of these on the opportunities, frustrations or other vulnerabilities which may lead to corruption or other forms of serious police misconduct?

10. Are there any developments in technology envisaged that are likely to impact on the opportunities, frustrations or other vulnerabilities which may lead to corruption or other forms of serious police misconduct?

11. Are there any recent or foreshadowed changes in legislation, associated police powers and areas of discretion that are likely to impact on the opportunities, frustrations or other vulnerabilities which may lead to corruption or other forms of serious police misconduct?

12. What are the main off-duty corruption risks facing officers in this command?

2. Four prompts to assist you understand and more clearly specify the corruption risks associated with each significant integrity hazard

The better you understand the integrity hazards and their associated risks, the better you are able to determine appropriate strategies to manage them.

To assist you to understand and more clearly specify the nature of the corruption risks, for each integrity hazard that you identify answer the following set of four questions.

1. ***What is the broad risk area?*** (For example: 'unauthorised release of confidential information', 'improper associations', 'lack of supervision' or 'conflict of interests'.)

2. ***What is it that may compromise an officer's integrity?*** (For example, it may be the complexity of a policy that puts the officer's integrity at risk, the opportunity for theft, a community member wishing to influence an officer's use of discretion or frustrations with a process.)

3. ***At risk of what?*** What type of corrupt conduct or other forms of serious misconduct might officers engage in? (Some examples include taking inappropriate short cuts, theft, showing bias in applying the law, unauthorised release of confidential information.)

4. ***What types of officers or roles might face the risk?*** (For example, is it a risk that may be encountered by all officers in the command or only those undertaking a particular type of police work (e.g. detectives) or officers working in a particular location (e.g. at a particular police station) or only those with a particular length of service (e.g. probationary constables)?)

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