



Response to IOC Questions on Notice

January 2025

	Question	Response
1	How much money did IBAC request and receive through the Treasurer's Advance in the 2022/23 and 2023/24 reporting periods?	<i>Response provided in Tranche 1</i>
2	(i) Please provide a full copy of IBAC's 2024 People Matter Survey results.	<i>Response provided in Tranche 1</i>
	(ii) What action has IBAC taken, or is taking, in relation to areas for improvement it has identified in the 2024 People Matter Survey results—including with respect to negative behaviours, work-related stress (including workload), and senior leadership strategy and direction.	<i>Response provided in Tranche 1</i>
	(iii) What is the benefit of the Stopline reporting system that IBAC has introduced?	<i>Response provided in Tranche 1</i>
3	Has IBAC made progress, since the 2022 independent performance audit, in addressing the issues it was experiencing with recruiting staff? How many positions within IBAC are currently vacant?	<i>Response provided in Tranche 1</i>
4	How has IBAC responded to the Victorian Inspectorate's recommendations in its special report on IBAC's referral	IBAC supports the Inspectorate's recommendations and on 10 November 2023, the former IBAC CEO, Ms Baragwanath, wrote to the Victorian Inspectorate advising that all recommendations made to IBAC were acquitted.

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	Question	Response
	<p>and oversight of 'Emma's' complaints about Victoria Police?</p>	<p>IBAC advised the VI that, in line with the recommendations, it has revised its Referral Procedure, including adopting a referral checklist. The revised procedure includes detailed information for IBAC officers in relation to:</p> <ul style="list-style-type: none"> • the elements under section 73 of the IBAC Act that must be satisfied for a referral. • guidance for escalating concerns raised with IBAC by a complainant following referral of a complaint for investigation. • the meaning of “more appropriate” and the relevant considerations when assessing whether a referral is more appropriate, including where there is a clear and ongoing risk to the complainant, whether legislative obligations (i.e. s 227 of the Victoria Police Act) have been breached, and any alleged breach of a person’s human rights. <p>The procedure requires IBAC officers to consider whether a complaint meets the threshold for investigation by IBAC before it is recommended for referral. This includes consideration of whether:</p> <ul style="list-style-type: none"> • there are systemic issues emerging from the conduct • the conduct is serious • the health, safety or welfare of a complainant has been, or will be, affected by the conduct • the conduct involves a vulnerable member of the community. <p>The Referral Procedure also includes detailed guidance on when IBAC may consider withdrawing a referral of a complaint to an agency for investigation. Requests to withdraw a referral are also considered by IBAC’s Operations Assessment Committee for recommendation to a Delegate.</p> <p>All assessment staff received training on the new procedure and use of the checklist which has been used across all referrals, for both Victoria Police and public sector matters since December 2022. To ensure staff were proficient and confident in the new procedure following training, the checklist and its use formed part of quality assurance discussions between managers and staff during one-on-one meetings, there were a number of refresher sessions, and it was also discussed during regular team meetings.</p>

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		<p>The Referral Procedure also interacts with IBAC’s Active Monitoring Policy, which includes information to support IBAC officers in deciding whether a matter under Active Monitoring should be considered under section 79 of the IBAC Act for withdrawal of the referral.</p> <p>IBAC also has a <i>Complaints and notifications involving IBAC or IBAC Officers Policy and Procedure</i>, which addresses the issues raised in the VI report about referrals under section 71 of the IBAC Act. Where appropriate, other IBAC policies and procedures also include a section reminding IBAC officers of their obligations regarding complaints about IBAC or an IBAC officer.</p>
5	<p>Since the 2021/22 reporting period, how has IBAC improved the ways it demonstrates its productivity to the public, particularly its increasing efficiency with respect to the volume and complexity of its complaints workload?</p>	<p><i>Response provided in Tranche 1</i></p>
6	<p>How does IBAC measure and report on the impact of its PID Framework and Quality and Assurance Framework on the quality of its complaints assessments?</p>	<p><u>PID Framework</u> IBAC measures the implementation of the PID framework through a number of public interest disclosure events taking place throughout the year. In each event, IBAC seeks feedback from participants. IBAC also measures public interest disclosure matters through its Quality Assurance framework.</p> <p><u>Quality Assurance framework</u></p> <p>IBAC’s Quality Assurance Framework involves monthly audits of a sample of assessments, and, in relation to the PID Act, measures whether the assessment</p> <ul style="list-style-type: none"> • complies with legislative mandates in the IBAC and PID Act • was made by the appropriate IBAC delegate • has a documented evidence base and clear reasoning • is overall consistent with legislation and IBAC’s policies and procedures. <p>As mentioned in response to Question 5 (submitted in Tranche 1), IBAC has proposed a new BP3 quality measure - Average rating of sampled complaint or notification assessments that conform with quality standards (Target 80%) - to DTF as part of the 2025/26 Departmental Performance Statement process. IBAC intends to include this measure in its IBAC Annual Plan 2025/26 and report performance in its annual report for that year.</p>

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		<p>In addition, any trends that arise in the course of quality auditing, in relation to PID or any other aspect of assessments, are documented, as are actions to remediate those issues. This allows IBAC to monitor the success of its continuous improvement efforts.</p>
7	<p>Apart from IBAC's strategic focus areas, what factors inform IBAC's decision to monitor an ongoing Victoria Police investigation of a referred complaint or to review a completed Victoria Police investigation of a referred complaint?</p>	<p><i>Response provided in Tranche 1</i></p>
8	<p>Has IBAC, in conjunction with the Victorian Inspectorate, developed procedural guidelines on the holding of public examinations, including on the meaning and scope of 'unreasonable damage to a person's reputation, safety or wellbeing'?</p>	<p><i>Response provided in Tranche 1</i></p>
9	<p>How has IBAC's police work area risk-identification model informed and improved its oversight of Victoria Police?</p>	<p><i>Response provided in Tranche 1</i></p>
10	<p>What preparations has IBAC made with respect to its new compliance and reporting function in relation to Victoria Police's registration and management of human sources?</p>	<p><i>Response provided in Tranche 1</i></p>
11	<p>(i) What impact have IBAC's data dashboards had on its prevention, assessments, investigations, monitoring and review work?</p>	<p>IBAC has a range of data dashboards and risk systems that assist in identifying the trends, risks and issues occurring across IBAC's jurisdiction.</p> <p>The Allegations dashboards – which collate and visualise allegations received by IBAC about 1) local government, 2) the Victorian Public Sector, 3) Victoria Police and 4) all allegations.</p> <p>The Corruption risk systems – which allocate risk scores to describe the level of seriousness against common corruption risks for 1) Victoria Police general duties stations in regional Victoria or metropolitan Melbourne, 2) local councils across planning, procurement, grants, fraud and election risks and 3) the Victorian Public Sector departments and agencies (forthcoming). Other dashboards – which collate and visualise data from other sources to inform IBAC's prevention work.</p>

Question	Response
	<p>Our allegations dashboards utilise IBAC's Behaviours and Activities Model (BAM) to describe the character of misconduct and corruption allegations received about public sector organisations. By categorising and analysing behaviour and activity trends, IBAC can better tailor our work in prevention, investigations, monitoring and reviews, based on the specific types of risks observed in our allegations data.</p> <p>The Police Risk System uses various data inputs to assess the risk levels of both metropolitan and regional Victoria Police stations. It can be used to compare relative risk scores across police stations and may contribute to the decisions IBAC makes regarding the prioritisation of resources for investigations, reviews and other activities. Similarly, the Local Government Risk System can be used to compare relative risk scores across Victorian local councils and in reference to other small, large, regional, interface or metropolitan councils.</p>
<p>(ii) How does IBAC measure the effectiveness and impact of its data dashboards? Has IBAC, as planned, finalised the development of performance measures for the dashboards?</p>	<p>IBAC's interactive dashboards for internal use have been operational at IBAC since Q3 FY2021/22 and have been widely adopted.</p> <p>Internal feedback on the utility of the allegations dashboards is continually collected and will contribute to future refinements or the development of new internal dashboards as needed.</p> <p>An internal review is scheduled to take place once all dashboards and risk systems have been in place for at least 12 months and required enhancements will follow that review.</p>
<p>(iii) Has IBAC, as planned, introduced an interactive allegations dashboard for its website?</p>	<p>The Corruption and Misconduct Allegations Dashboard (CMAD) is a publicly accessible, interactive online tool that allows people to view and search for corruption and misconduct allegations across Victoria's public sector.</p> <p>It was publicly launched on 19 December 2024, capturing de-identified data from 1 July 2018 to 31 December 2023 on local government and Victorian public service departments and organisations. Misconduct allegations data relating to Victoria Police will be released as part of an update to the dashboard in early 2025.</p> <p>The dashboard aims to improve transparency by providing a clearer picture of public sector corruption risks and demonstrates IBAC's ongoing commitment to corruption prevention. The CMAD can be accessed on IBAC's website here: Public sector corruption and misconduct allegations IBAC.</p>

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	Question	Response
12	<p>The Committee notes IBAC’s views on the independent of funding arrangements for integrity agencies expressed in its 2022 joint report with the VO and VAGO, <i>Budget independence for Victoria’s Independent Officers of Parliament</i>. Does IBAC have a view on the new measures introduced in New South Wales through the <u>TD24-12 Charter of Independence for NSW integrity agencies?</u></p>	<p>IBAC welcomes NSW reforms towards greater budget independence for integrity agencies.</p> <p>While the NSW reforms represent a step toward budget independence for integrity agencies, they fall short of meeting the Victorian agencies' call for total budgetary autonomy. The reforms in NSW certainly provide more independence than before but still involve some government oversight in the budgeting process.</p> <p>The NSW multi-year funding boost announced in 2023 and setting up of contingency outside of the ERC process, access to full funding (unused during the year) and representation at the ERC for new initiatives are certainly a positive step towards resource stability, but it does not fully resolve the call for complete financial independence as outlined by Victorian agencies.</p>
13	<p>Noting the Commissioner’s statement during the public hearing on 11 November 2024 that ‘there’s no ... legal action delaying IBAC’s reports at present’, what factors might hold up IBAC’s public release of reports related to completed investigations by the agency? In your view, are any legal reforms needed in this area?</p>	<p>IBAC always seeks to complete investigations and publish special reports as efficiently as possible. The time it takes us to do this may be impacted by several factors, including the size and complexity of both the investigation and the natural justice process. It is also impacted by the complexity of legal issues arising in the course of an investigation.</p> <p>If IBAC intends to include in a special report an adverse comment or opinion about any person, IBAC must first provide the person a reasonable opportunity to respond and IBAC must fairly set out each element of the person’s response in the report. The time that people have to respond to a report depends on a number of factors, and can vary. The time it takes IBAC to fairly set out each element of a person’s response depends on a range of factors, including the complexity and size of the response, and the number of persons that have provided responses.</p> <p>We recognise the importance of the natural justice process to people and organisations who may be the subject of an adverse comment or opinion in a special report. We also acknowledge the extent to which related delays can adversely affect witnesses and the positive impact of special reports themselves.</p> <p>IBAC has recently implemented a range of operational improvements to help streamline the investigation and reporting process. These include the Investigations Framework and the External Communication and Reporting Framework, as set out in IBAC’s 2023-24 Annual report and IBAC’s 2024-25 Annual Plan.</p>

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	Question	Response
14	Please provide a copy of IBAC's External Communication and Reporting Framework once finalised.	<i>Response provided in Tranche 1</i>
15	Please respond to the Committee's questions in the table below with respect to IBAC's acceptance of and/or progress in implementing, outstanding IOC recommendations made to the agency.	Those recommendations where responses were not provided in Tranche 1 are set out below.

IOC Question 15 responses

<i>Inquiry into the performance of Victorian Integrity agencies 2019/20 report</i>		
Rec No:	Committee question/s	IBAC Response
1	What were the findings and recommendations of Risk Strategies's review of IBAC's Health, Safety and Wellbeing Strategy 2021–23? What action has IBAC taken in response to the review?	<i>Response provided in Tranche 1</i>
<i>Inquiry into the education and prevention functions of Victoria's integrity agencies</i>		
Rec No:	Committee questions	Response
1	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
2	Please provide a progress update and a time frame for full implementation if not fully implemented. As part of the progress update, please advise whether IBAC has developed a new Community Strategy?	<i>Response provided in Tranche 1</i>
4	Please provide a progress update and confirm that the recommendation has been fully implemented.	<i>Response provided in Tranche 1</i>
5	Please provide a progress update and a time frame for full implementation if not fully implemented.	<p>IBAC has considered this recommendation further and whether it is reasonable for IBAC to advise PID Coordinators on the technical approach they should use to securely receive, store and manage anonymous reports. PID co-ordinators sit within almost every public sector department and agency – each with their own IT systems and applications for the collection of reports. It is therefore not practical for IBAC to advise PID Coordinators how to receive and store reports of wrongdoing. In addition, it would not be appropriate, for IBAC to promote or endorse an IT product.</p> <p>IBAC continues to provide practical advice to PID Coordinators on their role and responsibilities through guidance material and eLearning modules, which can be accessed on its website.</p> <p>IBAC considered this recommendation to be closed.</p>
6	What were the findings of IBAC's review? Does IBAC intend to implement secure drop-box or equivalent technology to support anonymous reporting of corruption and misconduct, including by whistleblowers?	As part of IBAC's complainant experience project (initiating activities internally to enhance the way we interact with complainants), a roadmap of enhancements to the online complaint form have been identified. One of the options IBAC is still exploring with third-party providers is the ability for complainants to provide documents to support their complaint or notification. These discussions remain ongoing.
13 & 14	Please provide a progress update and a time frame for full implementation if not fully implemented. As part of the progress update, please provide an update on: (i) the development of IBAC's Organisational Integrity Maturity rating system; and (ii) the performance measures identifying activities, outputs, outcomes and impact that were due to be finalised in 2023/24.	<p>IBAC has regular discussions with other integrity agencies on corruption prevention and misconduct activities at the Prevention and Education Advisory Committee (PEAC) quarterly meetings and offline where relevant. Through this forum, integrity agencies regularly collaborate and share information on prevention and education activities, and approaches to data collection and measurement.</p> <p>(i) IBAC has progressed development of an organisational integrity maturity (OIM) framework to enable public sector agencies to understand and measure their integrity maturity and invited all state government departments to participate in a pilot from Dec 2024 – Mar 2025. IBAC will gather feedback on the tool from Victorian state government departments and other integrity agencies at the conclusion of the pilot. IBAC will then share and discuss the outcomes and next steps with other integrity agencies through PEAC and offline where relevant.</p> <p>(ii) IBAC consulted with PEAC as part of its performance measures refresh project which was completed in June 2024.</p> <p>The performance measures refresh project developed an organisational Performance Management System policy (internal) and refreshed and developed new internal and external prevention and education KPIs.</p> <p>As published in 2024/25 Annual Plan, new output measures include:</p> <ul style="list-style-type: none"> • number of police misconduct prevention initiatives delivered • number public sector corruption prevention initiatives delivered

		<ul style="list-style-type: none"> • average satisfaction with police misconduct prevention initiatives • average satisfaction with public sector corruption prevention initiatives <p>As published in 2024/25 Annual Plan, new outcome measures include:</p> <ul style="list-style-type: none"> • public sector attendees who intend to apply learnings after attending corruption prevention initiatives • police attendees who intend to apply learnings after attending police misconduct prevention initiatives • formal IBAC recommendations and requests made under the IBAC Act to Victoria Police that are accepted • formal IBAC recommendations made under the IBAC Act to public sector agencies that are accepted <p>In addition to the above outcome measures, IBAC has also developed the following new measures:</p> <ul style="list-style-type: none"> • confidence in public sector and local government corruption prevention information and education provided by IBAC • confidence in police misconduct prevention education and information provided by IBAC <p>This recommendation is fully implemented.</p>
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15 & 16	Noted in IBAC's 2022/23 annual report as having been implemented. Please confirm that the recommendations have been fully implemented.	<i>Response provided in Tranche 1</i>
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Performance of the Victorian integrity agencies 2020/21: focus on witness welfare report

Rec No:	Committee questions	Response
5	<p>Please provide a progress update and a time frame for full implementation if not fully implemented. As part of the progress update, please advise:</p> <p>(i) whether IBAC has updated its policies and procedures relating to confidentiality notices in line with the recommendation;</p> <p>(ii) whether IBAC has developed specific guidance on decision-making for variation requests to confidentiality notices;</p> <p>(iii) whether IBAC has completed the development of a process for recording authorisations to disclose information covered by a confidentiality notice;</p> <p>(iv) how IBAC has refined its processes for actions taken in response to concerns raised by a witness that a public examination will cause unreasonable damage to that person's reputation, safety or wellbeing; and</p> <p>(v) whether IBAC has completed the development of its register for tracking the agency's exercise of coercive powers.</p>	<p>IBAC has updated its Confidentiality Notice procedural guidance and internally published detailed processes for requests for disclosure variation, including implementing an application form for persons subject to a confidentiality notice who seek permission to disclose a specified matter to a third party, ensuring requests are appropriately recorded and assessed.</p> <p>IBAC has implemented system enhancements providing a template for recording all requests for confidentiality notice disclosure variation and capturing related decision considerations and activity.</p> <p>IBAC has also adopted a new witness welfare policy and established a small team of witness liaison officers. IBAC is further improving witness welfare practices including updating IBAC's summons information statement issued to persons who are required to attend for an examination, as well as updating correspondence that is sent to witnesses in relation to draft special reports.</p> <p>IBAC has introduced updated procedural requirements in relation to the required considerations arising from section 117(3B) of the IBAC Act specifically addressing the process for recording and responding to an application for a public examination to be held in private and/or concerns raised from a witness that the public examination will cause unreasonable damage to that person's reputation, safety or wellbeing. Systems updates are being implemented to capture these considerations and are expected to be implemented in February 2025.</p> <p>IBAC has completed and implemented a register to track the exercise of its coercive powers.</p> <p>Systems updates are being implemented to capture data relating to complaints received regarding reputational harm or damage in connection with IBAC's public examinations and are expected to be implemented in February 2025. Pending the system upgrades this data is being captured in a manual process.</p>
6	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
7	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>

The independent performance audits of the Independent Broad-based Anti-corruption Commission and the Victorian Inspectorate report

Rec No:	Committee questions	Response
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1.1.1	Information provided in IBAC's 2023/24 Annual report noted. Please confirm that the recommendation has been fully implemented.	<i>Response provided in Tranche 1</i>
1.1.3	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
1.1.5 & 1.1.6	Please provide a progress update and a time frame for full implementation if not fully implemented.	These recommendations are fully implemented.
1.1.8	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
1.3.2	Information provided in IBAC's 2023/24 Annual report noted. Please provide a time frame for completion.	<i>Response provided in Tranche 1</i>
1.4.2	Information provided in IBAC's 2023/24 Annual report noted. Please confirm that the recommendation has been fully implemented.	<i>Response provided in Tranche 1</i>
2.1.1	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
2.2.1	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
2.2.2	Information provided in IBAC's 2023/24 Annual report noted. Please provide a time frame for completion.	<i>Response provided in Tranche 1</i>
2.3.1	Please confirm that the recommendation has been fully implemented.	<i>Response provided in Tranche 1</i>
2.3.2	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
2.3.3	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
2.5.2	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
3.1.1	Please provide a progress update and a time frame for full implementation if not fully implemented.	Time attribution for IBAC Operations is fully implemented. Time attribution for other non-corporate areas is currently the subject of further consideration, including the undertaking of a cost-benefit analysis, to assess whether the Commission's new human resource system can cost efficiently, and effectively, capture time attribution tasks in the new system for all business areas.
3.3.2	Please confirm that the recommendation has been fully implemented.	A suitable singular human resource system to achieve the recommendation has not been identified. Current human resource systems and operational governance and reporting provide effective oversight of operational capacity and the impacts of anticipated workload. This recommendation has been fully implemented. Whilst a suitable singular human resource system to achieve the recommendation has not been identified, IBAC has implemented a new human resource system in October 2024, effectively capturing staff leave, start and end dates of temporary or fixed term staff and further relevant human resourcing features. IBAC also effectively captures operational effort through time attribution on a task/activity basis (see recommendation 3.1.1). IBAC has further implemented enhancements in operational governance and reporting, and aggregates these providing effective oversight of operational capacity and the impacts of anticipated workload. The recommendation is fully implemented.
3.3.3	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
3.6.1	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
4.3.1	Please confirm that the recommendation has been fully implemented.	The recommendation is fully implemented.

4.5.1	Please provide a progress update.	<i>Response provided in Tranche 1</i>
4.5.2	Please provide a progress update and a time frame for full implementation if not fully implemented.	<i>Response provided in Tranche 1</i>
4.5.3	Please provide a progress update. As part of the progress update, please advise how IBAC assessed the success of its People Strategy 2022 (i.e., the performance measures used).	<i>Response provided in Tranche 1</i>
4.6.1	Please provide a progress update.	<i>Response provided in Tranche 1</i>
Performance of the Victorian Integrity agencies 2021/22 Report		
Rec No:	Committee questions	Response
1	Please advise whether IBAC accepts the recommendation and, if so, provide a progress update and a time frame for full implementation if not fully implemented. The Committee notes that this recommendation was endorsed by the Victorian Auditor-General's Office in its Annual report 2023-24 (p. 27).	<i>Response provided in Tranche 1</i>
2	Please advise whether IBAC accepts the recommendation and, if so, provide a progress update and a time frame for full implementation if not fully implemented.	<p>IBAC is satisfied that where embargoed copies of reports have been provided to media outlets, that it has not breached the privileges of Parliament.</p> <p>IBAC will continue to consider whether embargoed copies of reports can be released on a case-by-case basis.</p> <p>IBAC considers that this recommendation is fully implemented.</p>
3	Please advise whether IBAC accepts the recommendation and, if so, provide a progress update and a time frame for full implementation if not fully implemented.	<p>IBAC accepts the recommendation 'in principle.'</p> <p>The decision to provide pre-released embargoed copies of special reports to media is made by the Commissioner on a case-by-case basis.</p> <p>While IBAC does not consider the development of a specific policy on embargoed copies of special reports necessary, IBAC will make explicit amendments to its Media Policy to reflect this position.</p>