

# **The Department of Communities and Justice (DCJ) Plan of Action.**

## **Response to recommendations made in *Investigation into the alleged corrupt practices of a headlease coordinator at the Department of Family and Community Services (Operation Cygnet)***

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### **PART A**

#### **The DCJ's response to corruption prevention recommendations**

Firstly please indicate the response to be taken for each recommendation made.

##### **Recommendation 1:**

That the NSW Department of Communities and Justice ("the DCJ") reviews the design of its headleasing repairs process so that responsibilities for key activities are clarified and sufficiently segregated.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

##### **Recommendation 2:**

That the DCJ develops and enforces a clear and comprehensive set of policies and procedures governing the headleasing process. The policies and procedures should include:

- a. assessing and negotiating the scope of repair work
- b. recordkeeping requirements
- c. sourcing and assessing quotations
- d. extending rental payments.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

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### **Recommendation 3:**

That the DCJ develops and provides guidelines to real estate agents/owners of headlease properties concerning the headleasing process, including information about each party's responsibilities regarding the repair process

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 4:**

That the DCJ provides real estate agents/owners with a copy of its statement of business ethics.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 5:**

That the DCJ changes its system for repair work to provide visibility over who is undertaking repair work, at what cost, for what property, and whether the work was performed.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 6:**

That the DCJ develops systems to record, monitor and analyse expenditure patterns on its headleased properties.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

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### **Recommendation 7:**

That the DCJ develops a set of benchmarks, taking into account regional variations, related to the time and cost of different categories of repair work.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 8:**

That the DCJ develops a system to ensure that rental payments cannot continue without senior authorisation after a headleased property is vacated. Any decision to extend rental payments should be subject to ongoing management review at set intervals.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 9:**

That the DCJ develops a comprehensive position description for headlease coordinators that reflects the key skills and capabilities required for the role.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 10:**

That the DCJ develops and periodically delivers training for all staff (including managers) involved in the headleasing process to equip them with the skills and knowledge required for the role.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

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### **Recommendation 11:**

That the DCJ considers proactive measures to help identify conflicts of interest and influence staff behaviour, such as requiring all headleasing staff to regularly complete declarations related to private work and conflicts of interest.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 12:**

That the DCJ reviews its policies and procedures relating to secondary employment and private work to ensure they require managers to actively monitor compliance with requirements.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 13:**

That the DCJ informs managers of existing employee secondary employment and private work approvals, including when reporting lines change.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

### **Recommendation 14:**

That the DCJ reviews its internal investigations processes to ensure:

- a. allegations are investigated by officers with sufficient skills and capabilities
- b. matters are not closed inappropriately and are followed up when referred to other areas
- c. investigation recommendations are implemented.

Please indicate the response the public authority will take in its plan of action:

- ☒ Implement the recommendation as described in the report
- ☐ Implement the intent of the recommendation in an alternative way
- ☐ Partially implement the recommendation
- ☐ Not implement the recommendation

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## PART B: The DCJ's Plan of Action

In this section, please provide details of DCJ's plan of action in relation to the recommendations and/or proposed actions described above.

### Recommendation 1

That the NSW Department of Communities and Justice ("the DCJ") reviews the design of its Headleasing repairs process so that responsibilities for key activities are clarified and sufficiently segregated.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Review all Headlease operational documentation relating to the end to end management of Headlease repairs in order to provide staff with a standardised process and ensure staged approvals are required for repairs. Ensure process is transparent and includes multiple layers of review.	<p>New and revised processes and procedures have been documented and implemented. These provide clear definitions of responsibilities for staged activities and clearly defined approval processes ensuring more than one person is involved with the assessment and approval of repair requests and decisions.</p> <p>New processes that support the handling of urgent and non-urgent repairs have been introduced with the need to complete detailed forms for increased visibility on what work is being done and associated costs. Forms are sectioned with defined responsibilities at each stage. Recommendations for the undertaking of high cost repairs must be reviewed by an asset team to ensure both the work and quoted costs are appropriate. Approval escalation is based on a cost scale where the higher the cost the more senior a staff member needs to be for approval.</p> <p>Requirements around staged approvals and separate quote review processes now prevent payments being made without the visibility by a number of staff. Repair</p>	Customer Service and Business Improvement	Completed

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		and quote details are now stored electronically and shared with relevant staff with full visibility of actions taken and those actions which remain.		
Completed	Staff capability and skills training in order to support knowledge development around changes.	In 2019 all staff involved in Headlease including direct managers received training on the new operational procedures. Training covered all aspects of managing repairs, in particular the new approval processes that are required prior to work being conducted and any payments being made.	Customer Service and Business Improvement	Completed
Completed	Through an IT solution, provide enhanced controls and safe guards in place that will ensure compliance with delegated approvals and oversight on all activities. Provide an environment that enforce delegated controls around approvals and payments.	<p>DCJ has completed Business Requirements Specifications for an IT solution. The solution will as a minimum:</p> <ul style="list-style-type: none"> <li>• Enforce approvals at various stages of repairs payments;</li> <li>• Enforce the capture of all required information before progression to next stage'</li> <li>• Automate workflows and approvals,</li> <li>• Provide controls and delegation that apply to approval of any payments to vendors'</li> <li>• Automatically record all financial transactions including all repair payments;</li> <li>• Record all approvals for payments,</li> <li>• Maintain a history of all user actions;</li> <li>• Prevent progression of payments without delegated approvals taking place;</li> <li>• Only allow payments being made past a lease end date with delegated senior approvals based on specified conditions. In addition include such approvals in reports for review;</li> <li>• Automate and calculate scheduled payments.</li> <li>• Automated controls over users to ensure staff work within approved parameters and delegations;</li> <li>• Provide oversight at all times to management on status of transactions;</li> </ul>	Customer Service and Business Improvement	Completed

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		<ul style="list-style-type: none"> <li>• Directly and automatically store information into the department's data storage systems;</li> <li>• Provide automated reminders/notifications to staff and management around time critical actions and escalate as required;</li> <li>• Manage and capture all actions and financial transactions including approvals and report on them;</li> <li>• Provide a comprehensive reporting platform for all applicable aspects of Headlease management. This will include automated reports and custom reports that include trends and exceptions.</li> </ul>		
In progress		Undertake a Request for Quote to the market to help determine the most appropriate technology solution to acquire for Headleasing and associated cost estimates.	Customer Service and Business Improvement	November 2020
Not yet commenced		Develop a business case to support the sourcing of funding to deliver the Headleasing IT solution.	Customer Service and Business Improvement	December 2020
Not yet commenced		Submit Business Case to the Digital Restart Fund (DRF) December cohort	Customer Service and Business Improvement	December 2020
Not yet commenced		Undertake a Request for Tender process (subject to securing DRF funding)	Customer Service and Business Improvement	February 2021 subject to funding being approved
Not yet commenced		Complete a project (as detailed above) to design, build and deliver the Headleasing IT solution (subject to securing DRF funding).	Customer Service and Business Improvement	March 2022 subject to funding being approved

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**Recommendation 2**

That the DCJ develops and enforces a clear and comprehensive set of policies and procedures governing the Headleasing process. The policies and procedures should include:

- assessing and negotiating the scope of repair work
- recordkeeping requirements
- sourcing and assessing quotations
- extending rental payments.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Provide staff with the tools needed to effectively manage Headleasing including a detailed set of policies and procedures.	<p>DCJ has implemented new and revised policies and procedures that provide clear direction on the end to end process for the management of Headleasing. These documents provide staff and management with direction on:</p> <ul style="list-style-type: none"><li>• The selection process for new Headlease properties;</li><li>• Recording decisions and approvals for various stages of the Headlease life cycle including the acquisition, management and handing back of Headlease properties;</li><li>• Managing the Headlease repairs process including the request for, and assessment of quotes;</li><li>• Instructions on the capturing, recording and storing of all information relating to a Headlease property;</li><li>• Communication and information sharing requirements between DCJ and the real estate agent/owner.</li></ul> <p>Clearly defined roles and responsibilities aid staff in understanding expectations against a timeline. Requests for approvals are stored and shared</p>	Customer Service and Business Improvement	Completed

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		electronically using TRIM where visibility of actions can be reviewed and monitored.		
Completed	Staff capability and skills training in order to support knowledge development around changes.  Bring staff skills levels to a baseline and ensure staff understand their responsibilities.	All staff involved in Headlease including managers and support staff received training on the procedural changes in 2019. Training covered management of Headlease properties from beginning to end, with particular attention on the process for handling repairs. Training also covered the various responsibilities and decision delegations of staff at various levels.	Customer Service and Business Improvement	Completed
In progress	Provide automated controls and delegated approvals to eliminate human error around rental payments and the ceasing of such payments.	Refer to IT solution in Recommendation 1.	Customer Service and Business Improvement	March 2022 subject to funding being approved

### Recommendation 3

That the DCJ develops and provides guidelines to real estate agents/owners of Headlease properties concerning the Headleasing process, including information about each party's responsibilities regarding the repair process.

Status	Strategy	Actions/Measures	Responsibility	Due Date
In Progress	Ensure Headlease partners including Real Estate agents and landlords understand how Headleasing operates, what approval stages are involved and the expectations of all parties involved.	Draft and implement Headleasing guidelines that will be made available to all real estate agents/owners of Headlease properties (including those that are current), which: <ul style="list-style-type: none"> <li>outline what the Headlease program is and how it operates;</li> <li>document the processes for entering into, renewing and exiting Headlease arrangements including rent payments;</li> </ul>	Customer Service and Business Improvement	December 2020.

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		<ul style="list-style-type: none"> <li>document the process for the undertaking of repairs both during and at the end of a lease; and</li> <li>document the roles and responsibilities of all parties in the Headlease process.</li> </ul> <p>The Guidelines will form part of a package that is emailed to agents and landlords at time of sign up and lease renewal. All correspondence will be stored electronically in TRIM as part of a package of information.</p>		
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#### Recommendation 4

That the DCJ provides real estate agents/owners with a copy of its statement of business ethics.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Ensure all business partners have a mutual understanding of public duty obligations while working with DCJ.	<p>Provide a copy of the <i>DCJ Statement of Business Ethics</i> to all new and existing partners in either digital or printed format, expressing the importance of the document and the reasons for it being provided.</p> <p>A procedural change was implemented on 1 October 2020 that requires all Headlease staff to issue the <i>Statement of Business Ethics</i> to each and every real estate agent/landlord at each new lease and lease renewal. Headlease Coordinators will be required to monitor that this action is undertaken on every new lease.</p> <p>All existing real estate agent and landlord partners were provided the <i>Statement of Business Ethics</i> via email on Friday 2 October.</p>	Customer Service and Business Improvement	Completed

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**Recommendation 5**

That the DCJ changes its system for repair work to provide visibility over who is undertaking repair work, at what cost, for what property, and whether the work was performed.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Ensure staff are equipped with the processes and tools to effectively manage and record all actions relating to the repairs process for Headlease properties.	<p>DCJ has completed the development and implementation of a new set of processes, procedures and forms that allow for the capture and recording of repair work details with staged delegated approvals. Details now captured and recorded on a single form include:</p> <ul style="list-style-type: none"><li>• Property details</li><li>• Agent/Landlord details</li><li>• Staff details</li><li>• Quotes details</li><li>• Cost</li><li>• Details of who has reviewed the quote</li><li>• Senior staff approval of quotes prior to payment</li><li>• Quote cost and works suitability review by the Land and Housing Corporation</li></ul> <p>These details in conjunction with property condition reports, photographs and quotes provide the basis for which decisions are based and a record of payment being approved or declined.</p> <p>All documents and information related to repairs and quotes are stored and made available through an online shared database. Actions and approvals are also visible to all on the database. Referral and escalation of matters are through email</p>	Customer Service and Business Improvement	Completed

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		communication. Staff are prevented from making payments without following due process and approvals. Any payments made without approval are captured in the Headlease Management report and escalated for action by District Directors.		
In progress	Capture further detail surrounding the Headlease repairs process and activities.	Enhance existing processes and forms to better capture more detailed information relating to the nature of the repair work required, who is undertaking the work, quotes and payments and the outcome of completed work for each instance where a repair is required to a Headlease property.	Customer Service and Business Improvement	October 2020.
In progress	Staff capability and skills training in order to support knowledge development around changes.	All staff involved in Headlease including direct managers received training on the procedural changes introduced in 2019. Further training will be provided once the changes are made to existing procedures.	Customer Service and Business Improvement	November 2020

#### Recommendation 6

That the DCJ develops systems to record, monitor and analyse expenditure patterns on its Headleased properties.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Ensure that reporting capability exists that can record and track all details relating to expenditure on Headlease properties, including rental payments and repair costs. Ensure a management oversight process is in place that monitors trends and any unusual patterns or transactions for easy identification.	DCJ has implemented procedural changes that ensure all repairs transactions are now processed through current IT systems allowing for the capture of detailed information on amounts and payee details. In addition user names on individual transactions are captured and can be cross matched against approvals. Frequent review and analyses of expenditure is performed centrally by the Customer Service and Business Improvement (CSBI) team.	Customer Service and Business Improvement	Completed

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		<p>We have introduced two new reports:</p> <p>The <b>Headlease Repairs Transaction report</b> provides details on all transactions made to third parties where they relate to repairs. The report is provided to all District Housing Directors and Headleasing teams. The report captures details, of who authorised payments and to whom the payments were made. In addition, details such as dollar amount, dates, and property details are also captured. Details in this report are then referenced against approvals for repair payments made using the repairs forms. Any discrepancies between the two are escalated for review.</p> <p>The <b>Headlease Management report</b> captures expenditure, trends and financial performance. The report is designed to provide both financial and operational management information to Districts. The report provides both high level program and individual District performance indicators against budgets. The report also provides high level financial projections and in conjunction with the Headlease Program report, provides progressive monthly financial performance against targets.</p> <p>CSBI produces and provides all reports to District staff and management on a monthly basis through email correspondence. In addition reports are stored in TRIM and available to all staff.</p>		
In progress	Ability to gain real time visibility across all Headlease activity and transactions.	Refer to IT solution in Recommendation 1.	Customer Service and Business Improvement.	March 2022 subject to funding being approved

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**Recommendation 7**

That the DCJ develops a set of benchmarks, taking into account regional variations, related to the time and cost of different categories of repair work

Status	Strategy	Actions/Measures	Responsibility	Due Date
In progress	Ensure staff have adequate guidance during repair quotation stages by ensuring they have access to information about average costs and time required to undertake general works on residential properties.	<p>Develop a guide with benchmarks for staff that will be used during review and negotiation of quotations of repair works. The benchmarks are to provide guidance on approximate costs and time required to perform most repairs caused by tenant damage to residential properties under Headlease.</p> <p>Develop and document procedural governance around the use of the benchmarks.</p> <p>Provide training for staff on the use of the benchmarks.</p> <p>CSBI will review requests for approval for payment to ensure values are within benchmarks and any variations are justified and approved using existing forms.</p>	Customer Service and Business Improvement.	March 2021.

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**Recommendation 8**

That the DCJ develops a system to ensure that rental payments cannot continue without senior authorisation after a Headleased property is vacated. Any decision to extend rental payments should be subject to ongoing management review at set intervals.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Not yet commenced	To ensure automated systems are in place that will eliminate human error when managing time dependent payments. Provide a secure and reliable mechanism of reminders and escalated approval requirements.	Refer to IT solution in Recommendation 1.	Customer Service and Business Improvement.	March 2022 subject to funding being approved

**Recommendation 9**

That the DCJ develops a comprehensive position description for Headlease coordinators that reflects the key skills and capabilities required for the role.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Provide a mechanism that sets minimum skill and capability requirements that will provide staff and management with a basis for role definition and recruitment direction.	A role description has been developed for a Headlease Coordinator. The Coordinator role has been set at a Clerk Grade 5/6 minimum. Some of the specific capabilities set out in the role description include: <ul style="list-style-type: none"><li>• Thorough understanding of Headlease policies, procedures and guidelines.</li><li>• Ability to monitor budgets and financial performance.</li><li>• Be able to communicate the rights and responsibilities of tenants and landlords in property maintenance issues in accordance with Department policies and procedures.</li></ul>	Customer Service and Business Improvement.	Completed

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		<ul style="list-style-type: none"> <li>• Represent the Department in an honest, ethical and professional way.</li> <li>• Recognise and report misconduct, illegal or inappropriate behavior.</li> </ul>		
In Progress	Ensure that all staff undertaking functions that relate to Headleasing operate within the requirements of the role description.	Engage with DCJ Districts to develop and implement a plan to ensure that at least 1 defined Headlease Coordinator role exists within each District who has oversight of the Program for their District. In some Districts, accommodating the new role will require changes to resourcing, management structures and job titles. Implement the transition plan for each District.	Customer Service and Business Improvement and DCJ Districts	December 2020.

#### Recommendation 10

That the DCJ develops and periodically delivers training for all staff (including managers) involved in the Headleasing process to equip them with the skills and knowledge required for the role.

Status	Strategy	Actions/Measures	Responsibility	Due Date
Completed	Ensure Headleasing staff have access to the skills and knowledge required to undertake a role in managing Headleasing in accordance with policies and procedures.	Initial training was provided in 2019 to coincide with the introduction of new and revised procedures, forms and reporting. The training was provided to all staff across all Districts who were engaged in the management of Headleases. An electronic copy of the training material was placed on the DCJ Intranet and available to all staff. Staff also have the ability to contact CSBI for advice and guidance and policy and procedural matters.	Customer Service and Business Improvement.	Completed
In progress	Ensure staff skill and knowledge levels are maintained and strengthened by ensuring they understand how to perform the role.	Develop an ongoing program to ensure that all staff engaged in managing Headleasing have the adequate training required to undertake the role. Training to be provided on a periodic basis or as changes are made	Customer Service and Business Improvement.	Ongoing from December 2020.

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		to existing processes. Training delivery will be a combination of face to face, virtual classroom, eLearning or a combination of the three. A record of staff who attend training will be retained.		
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#### Recommendation 11

That the DCJ considers proactive measures to help identify conflicts of interest and influence staff behaviour, such as requiring all Headleasing staff to regularly complete declarations related to private work and conflicts of interest.

Status	Strategy	Actions/Measures	Responsibility	Due Date
In progress	Mandate that non-senior executive employees working in Headleasing comply with the Secretary's Senior Executive Private interest Declaration (SEPID).	<p>Secretary approval is being sought to extend the Senior Executive Private Interest Declaration (SEPID) program to all Headleasing staff.</p> <p>For information, the SEPID program is an online, electronic form where staff declare their private interests such as: asset holdings; company holdings; positions held in public or private companies etc. The program also links to the Conflicts of Interest and Secondary Employment programs. The electronic form is automated and workflows to nominated delegated officers i.e. Director level and above for approval.</p> <p>The SAP system will prevent staff from sitting/being placed against a nominated headleasing position until a private interest declaration has been completed and approved by a delegated officer (director level and above).</p>	The Business Ethics & Compliance Unit	November 2020

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In progress	Communicate the mandated SEPID requirement to staff working in Headleasing space. This requirement will be communicated by either the Deputy Secretary or the Secretary.	<p>An email communication will be sent to all DCJ Headleasing staff notifying them of the mandatory requirement to participate in the SEPID program and who to contact for further information about the program, electronic form, troubleshooting etc.</p> <p>Communication email from the Secretary sent to affected headleasing staff.</p>	The Business Ethics & Compliance Unit	November 2020
In progress	Finalise the new Conflicts of Interest (COI) Policy and Procedure to all DCJ staff of the requirement to make an annual COI declaration (where required). This will be communicated to all DCJ staff by the Deputy Secretary, Corporate Services.	<p>DCJ harmonised Conflicts of Interest (COI) Policy and Procedure to be finalised and rolled out to the Department.</p> <p>The draft DCJ Policy and Procedure and is currently with the Union for consultation. The program requires an annual review of conflicts of interest or a new declaration where circumstances change. The COI program will be aligned to the annual SEPID rollout in November of each year. The policy places responsibility for the monitoring &amp; reporting of any management plan at Director level or above, with oversight for the program by the Business Ethics and Compliance Unit (BECU).</p> <p>Annual rollout of the COI Program requiring staff complete a COI where required.</p>	The Business Ethics & Compliance Unit	November 2020

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**Recommendation 12**

That the DCJ reviews its policies and procedures relating to secondary employment and private work to ensure they require managers to actively monitor compliance with requirements.

Status	Strategy	Actions/Measures	Responsibility	Due Date
In progress	Finalise and communicate the new Secondary Employment & Unpaid Work (SEUW) Policy and Procedure to all DCJ staff highlighting the requirement to submit an annual application (where required). This will be communicated to all DCJ by the Deputy Secretary, Corporate Services.	DCJ harmonised Secondary Employment and Unpaid Work (SEUW) Policy and Procedure has been finalised (approved) and will be rolled out to the Department.  The policy places responsibility for the monitoring & reporting of any management plan at Director level or above, with oversight for the program by the BECU.  Annual rollout of the SEUW Program requiring staff complete a SEUW application, where required.	The Business Ethics & Compliance Unit	November 2020
In progress	Inform all DCJ staff of the DCJ Secondary Employment & Unpaid (SEUW) Policy and Procedure. This will be communicated to all DCJ staff by the Deputy Secretary, Corporate Services.	Final communications to notify DCJ staff of the DCJ harmonised SEUW Policy and Procedure.  Communication email from the Deputy Secretary, Corporate Services will be sent to staff.	The Business Ethics & Compliance Unit	November 2020

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**Recommendation 13**

That the DCJ informs managers of existing employee secondary employment and private work approvals, including when reporting lines change.

Status	Strategy	Actions/Measures	Responsibility	Due Date
In progress	Incorporate into the DCJ Secondary Employment and Unpaid Work (SEUW) Policy and Procedure the requirement that delegated officers (Director level and above) vacating their position, to inform any new delegated officer of existing staff SEUW Agreements.	DCJ draft Secondary Employment and Unpaid Work (SEUW) Policy and Procedure to be updated to state that it is the responsibility of all delegated officers when they vacate a position to notify their replacement of any SEUW applications including any management plans they have implemented. It will be the role of the in-coming delegated officer to review and ensure that management plans are adhered to.  The above delegated officer requirement has been incorporated into the final DCJ SEUW Policy and Procedure.	The Business Ethics & Compliance Unit	November 2020

**Recommendation 14**

That the DCJ reviews its internal investigations processes to ensure:

- Allegations are investigated by officers with sufficient skills and capabilities
- Matters are not closed inappropriately and are followed up when referred to other areas investigation recommendations are implemented.

Status	Strategy	Actions/Measures	Responsibility	Due Date
In progress	Implementation of the reviewed Conduct and Professional Standards centralised operating model including staff being assigned to Case Manager and Investigator roles.	Employees assigned to Case Manager and Investigator roles; New structure to provide for improved case management of matters through centralized investigation, assessment, allocation and monitoring of conduct matters.	Conduct & Professional Standards	December 2020

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In progress	Staff capability and skill development in order to support transition to the new model.	All employees to attain Cert IV in Government Investigations and / or equivalent qualification;	Conduct & Professional Standards	June 2021
		Personal development plans for all employees to include ongoing learning and development strategies in case management and / or investigations	Conduct & Professional Standards	November 2020
In progress	Standardised operating model based on best practice	Development of standard operating procedures documenting protocols for the case management and investigation of matters	Conduct & Professional Standards	January 2021
		Development of standard operating documents, tools and templates to underpin approach to case management and investigation of matters	Conduct & Professional Standards	January 2021
In progress	Implementation of centralised conduct/case management records/systems	Development of internal database / system for recording of the progression/case management and outcomes of matters	Conduct & Professional Standards/IT and records management	December 2021
		Collaboration with IT to migrate former FACS and Justice records into centralised repository	Conduct & Professional Standards/IT and records management	March 2021
In progress	Stakeholder engagement strategy	Development of mechanisms/reporting to formally and regularly engage with stakeholders relevant to the status, progress and outcome of matters	Conduct & Professional Standards	January 2021
		Development of operating procedures to regularly engage with stakeholders in circumstances where action items are required.	Conduct & Professional Standards/IT and records management	January 2021

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