Illegal Work Targeting Strategy

2013 – 16

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This document was approved by Christopher Callanan, First Assistant Secretary, Compliance and Case Resolution Division on 3 January 2014

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Introduction

This Illegal Work Targeting Strategy is intended to complement the Compliance Strategy 2012-15 and the Compliance Field Prioritisation Matrix 2013-15. It was developed in close consultation with the compliance network and other internal stakeholders. It gives strategic guidance and support for compliance activity, targeted particularly towards employers and labour referrers of non-citizens working without permission in Australia.

The primary audience for this document is the executive and operational staff within and across the Compliance and Status Resolution Program. As the Department's response to illegal work requires coordinated cross-program decision-making, this document also has a wider audience, including operational staff and the executive from other programs.

A core theme of this Strategy is that state and territory compliance operations are best placed to understand their own compliance environment and to make judgements (within the overall compliance program framework) on where and whom to target, in addressing illegal work and non-compliance with the Migration Act. At the same time, the Strategy is based on encouraging voluntary compliance (acknowledging the majority of individuals and businesses will comply either on their own or with some assistance from the Department). Importantly, the Strategy links our capacity to escalate our response to the risk of non-compliance – by reinforcing and encouraging voluntary compliance with the rules through education, warnings and penalising where necessary. A key ingredient is understanding the limited effectiveness of an ad hoc approach to compliance and the risks associated with a reactive rather than proactive approach, including how to minimise the predictability of Departmental behaviour in the compliance sphere to maximise the effectiveness of finite resources in addressing deliberate non-compliance.

The Illegal Work Targeting Strategy provides the framework for linking our approach to compliance with our evidence or knowledge and to our operational activity, and working collaboratively across program areas, so we can make a real impact in addressing illegal work and migration non-compliance.

Christopher Callanan

First Assistant Secretary

Compliance and Case Resolution Division

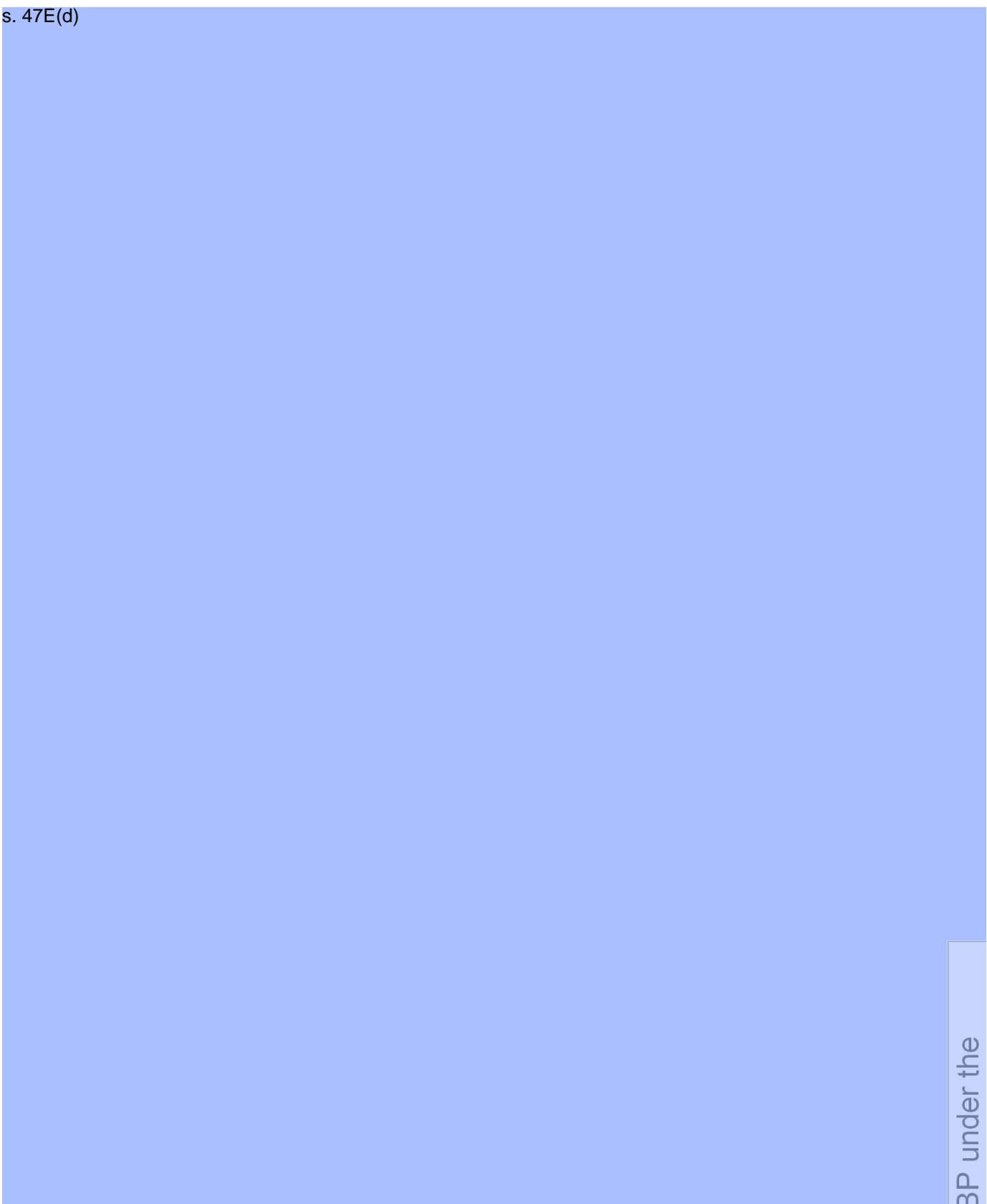January 2014

Illegal Work Targeting Strategy

This strategy identifies where the efforts to combat the harm caused by illegal work are best applied. This can be achieved through implementing risk managed approaches; and regularly reviewing, measuring and improving the effectiveness of illegal work targeting strategies (by applying good governance). This targeting strategy does not encompass all activities relating to illegal work, only activities in agreed areas for focus.

The strategy describes how aligning resources with illegal work priorities – within and across programs. It also ensures that resources and efforts to be used to the greatest effect in reducing the harm caused by illegal work.

Addressing work breaches of the Migration Act requires maintaining a focus on the employer, labour referrers and the illegal worker. This applies particularly to operations in the field. In terms of implementing a risk managed, intelligence led and co-ordinated approach to addressing non-compliance, the strategy logically starts with employers and labour referrers as the main focus. Addressing visa non-compliance by the illegal work is also important element of this strategy.

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Roles and responsibilities

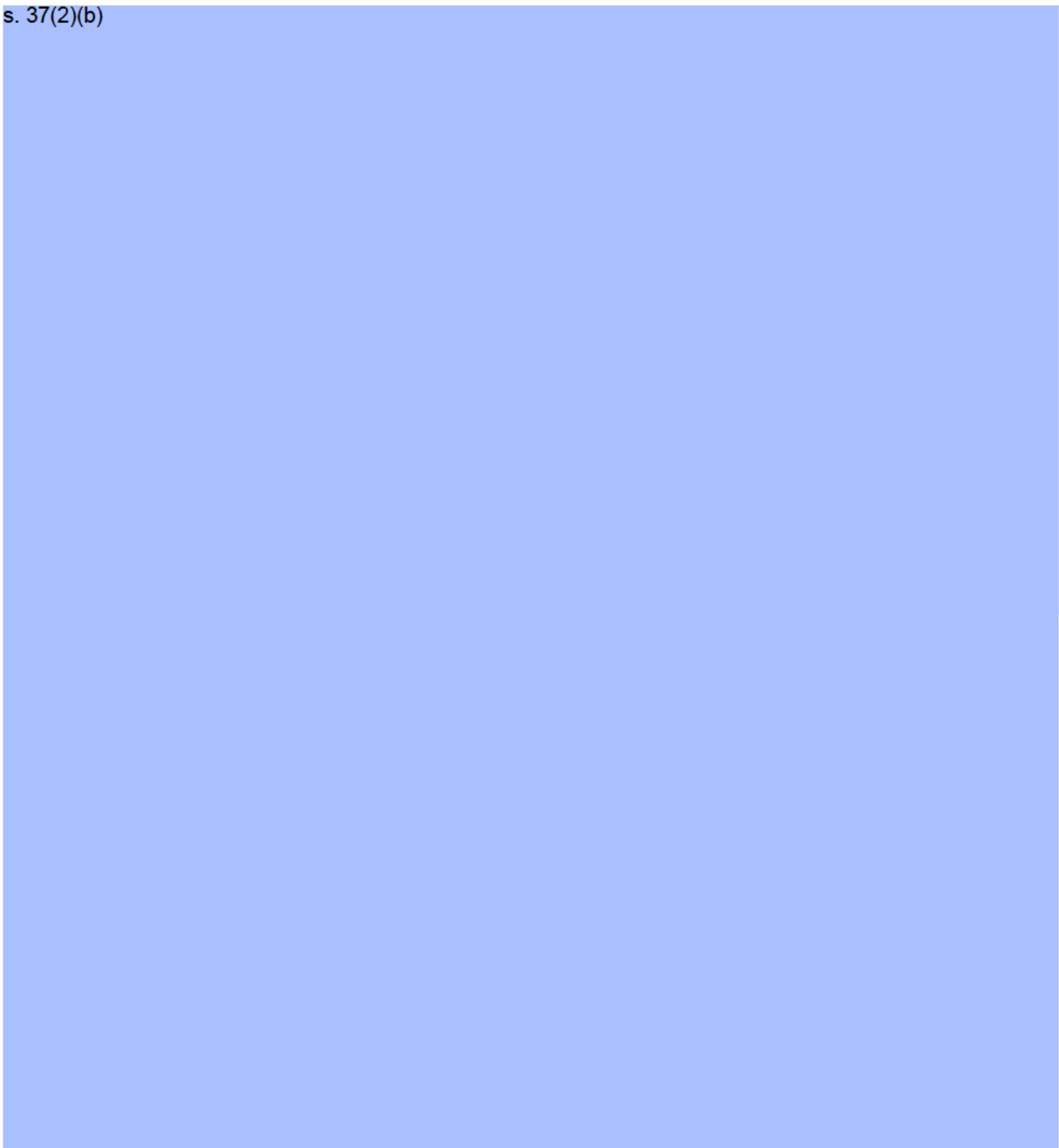The efficient and effective implementation of the Illegal Work Targeting Strategy and the Department's treatment of non-compliance require a unified approach. The table below specifies the areas with roles and responsibilities. It is an aid to coordination and communication between the areas accountable.

Treatment option		
Who is accountable for the treatment?	Who is responsible for the 'doing'?	Who are the related parties?

Information campaign

This is general information about legal workers; obligations of employers and how they can comply with the law

- Eg, through web content; video; brochures; VEVO promotion; articles for industry publications; paid advertising etc
- Directed at: industry bodies/associations; unions; local government; community groups; etc.

• AS, Compliance Status Resolution Branch, CCRD (for VEVO :– GM eBusiness)	• CSR Communications Section, CCRD • Outreach network • supported where appropriate by Employer Sanctions Taskforce, Victoria	• National Communications • eService Support section • Compliance field network • Business Monitoring (re 457 sponsors) • Compliance Policy, CCRD • National Employer Sanctions Support Team, CCRD

Employer awareness visit

This is a one-on-one conversation with a specific entity (business owner or responsible person) on responsibilities about legal non-citizen workers; may involve promotion/introduction to VEVO, and explanation of penalties for using illegal workers

• RM, Status Resolution East (Compliance lead)	• Compliance field network • Employer Sanctions Taskforce, Victoria • supported where appropriate by: Business Monitoring, Operational Integrity (re 457 sponsors)	• Outreach network • Business monitoring (re 457 sponsors), Operational Integrity • Compliance Policy, CCRD

Illegal worker warning notice

• RM, Status Resolution East (Compliance lead)	• Compliance field network • Employer Sanctions Taskforce, Victoria	• Business monitoring, Operational Integrity • Compliance Policy, CCRD

Who is accountable for the treatment?	Who is responsible for the 'doing'?	Who are the related parties?

Illegal work infringement notice

• RM, Status Resolution East (Compliance lead)	• Employer Sanctions Taskforce, Vic	• National Employer Sanctions Support Section • Compliance field network • Prosecution Support, Legal Framework • Business monitoring, Operational Integrity (re 457 sponsors) • CSR Communications • National Communications

Illegal work civil penalty

• AS, Strategic Framework Branch	• Employer Sanctions Taskforce, Vic • Prosecution Support, Legal Framework • National Employer Sanctions Support Section	• Compliance field network • Business monitoring, Operational Integrity (re 457 sponsors) • CSR Communications • National Communications

Illegal work criminal prosecution

• AS, Fraud Investigations & Prosecutions	• Investigations sections	• Employer Sanctions Taskforce, Vic • National Employer Sanctions Support Section • Prosecution Support, Legal Framework • Business monitoring, Operational Integrity (re 457 sponsors) • CSR Communications • National Communications • Compliance field network

Governance

Risks to the immigration compliance program do not remain static. Threats and vulnerabilities develop and change as treatments are applied. It is necessary to have robust mechanisms in place to regularly review, measure and improve the effectiveness of the illegal work targeting strategy. Governance of this Strategy will occur at two levels – the strategic and the operational.

Strategic governance

The First Assistant Secretary, Compliance and Case Resolution Division, is the owner of this Illegal Work Targeting Strategy 2013-16. The Compliance and Status Resolution Program Leadership Group will provide strategic oversight of the Illegal Work Targeting Strategy 2013-16. Strategic governance functions include:

Assurance

- Provide assurance that available resources and risk treatments target those areas that pose greatest harm.
- Generate approaches to achieving higher levels of compliance.

Collaboration and Coordination

- Promote a whole of Department approach to illegal work
- Enable the collaboration and coordination required to effectively and efficiently implement the strategy.
- Adjust structures, roles, policies and discuss resourcing as part of managing the strategy.
- Seek opportunities to work across government to address the problem of illegal work.

Capability Building

- Promote, and explore further, development of data analysis capabilities to better understand areas of potential risk and inform risk treatment design.
- Promote skill development appropriate to deliver identified treatments

Communication

- Ensure that successes are communicated in ways that encourage greater voluntary compliance (maximising the ripple effect in terms of public impact).

Evaluation

- Review/evaluate performance to gauge success and to build the evidence based on performance.
- Adjust priorities and targets based on analysis

Operational governance
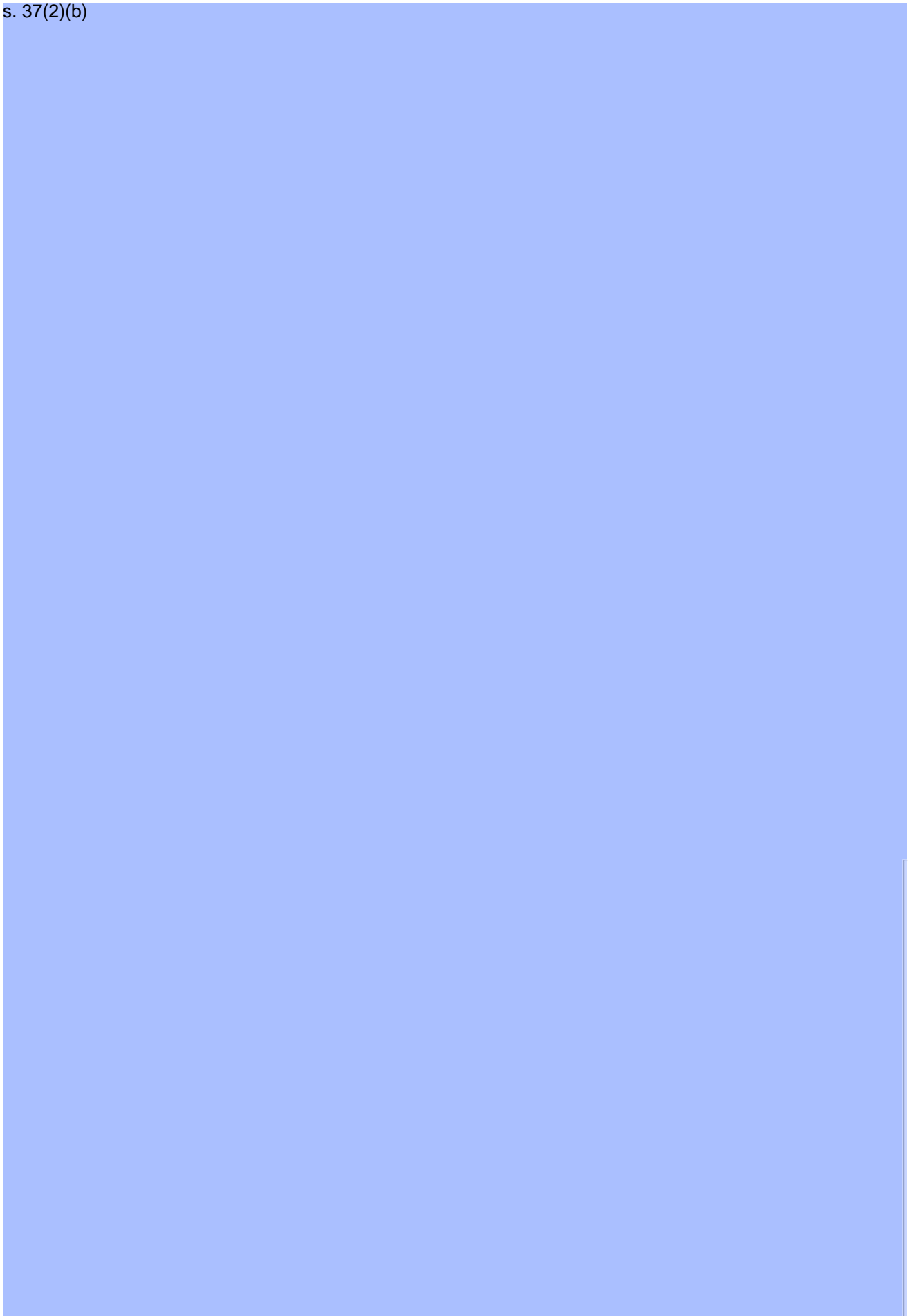
Relevant Global or Regional Managers and State/Territory managers will convene regular governance forums to guide implementation of business area specific aspects of this targeting strategy.

In addition, an Illegal Work Operational Governance Group will be convened monthly to monitor and review implementation of Illegal Work Targeting Strategy and employer sanctions reform implementation issues. The operational governance group will initially be chaired by Director, National Employer Sanctions Support Team with representation drawn from Status Resolution Compliance, National Investigations, Operational Integrity and CCRD.

Operational governance functions may include:

- Identification of the areas of illegal work that pose the greatest harm by making proactive, intelligence led assessments of risk
- Design coordinated employer sanctions and illegal work targeting implementation strategies and manage their delivery, taking into account available resourcing
- Communicate and oversee the implementation of the strategy at the program level
- Collect and record information and generate intelligence that helps identify and address non-compliance
- Report on progress of existing or pipeline cases for possible sanctions
- Monitor activity levels against targets identified in the Illegal Work Targeting Strategy

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Attachment – Glossary and reference documents

Glossary

AS	Assistant Secretary
CCRD	Compliance and Case Resolution Division
CSR	Compliance Status Resolution
Department	Department of Immigration and Border Protection
ESOT	Employer Sanctions Operations Taskforce, Compliance Victoria
GM	Global Manager
IWWN	Illegal Worker Warning Notice
RM	Regional Manager
VEVO	Visa Entitlement Verification Online system

Reference documents

Employer Sanctions Referral Trigger: - Trim reference ADD2013/1408570

Investigations Referral Assessment Tool: - Trim reference OPD2013/56960

Compliance Field Prioritisation Matrix 2013-15: Trim reference ADD2013/1172929

Compliance Strategy 2013-15:
http://dimanet.immi.gov.au/__data/assets/pdf_file/0007/456559/compliance-strategy-2012-15.pdf

Risk Management Framework: http://dimanet.immi.gov.au/__data/assets/pdf_file/0009/37872/risk-management-framework.pdf

Entity Behaviours Figure - *Engagement Strategies Associated with Deterring Illegal Workers* submitted to the Department by Hall and Partners Open Mind, October 2012: also included on page 9 of *A Sociological Investigation of Illegal Work in Australia*, A report submitted to the Department of Immigration and Citizenship by Hall & Partners | Open Mind - 30th November 2012:
http://www.immi.gov.au/media/publications/research/_pdf/sociological-investigation-illegal-work.pdf

Compliance Strategy

2012–15

Foreword

The Australian Government and the community expect to have confidence that our visa and citizenship programs are well-designed, managed and have integrity, and that foreign nationals comply with our laws. To meet this expectation, it is important that our programs are orderly and planned, based on law, and that people—including those in need of Australia's protection—have access to fair and merits-based processes to determine their eligibility to enter and remain in Australia. In practice, it means people who qualify for a visa, protection or citizenship can expect to receive it, and those who do not qualify, will not. People who do not qualify to remain in Australia will be treated humanely and with respect for their dignity, but are expected to cooperate in resolving their status and identity, including being prepared to depart Australia when required to do so.

In the department's *Strategic Intent 2012–15*, we reaffirmed our commitment to the department's purpose: to build Australia's future through the well-managed movement and settlement of people. Key to achieving this is ensuring we have high levels of compliance with Australia's migration and citizenship laws. This *Compliance Strategy 2012–15* outlines how we will support this.

Compliance means different things to different people. This program takes the view that, when we talk about compliance, we are talking about anything we do that can ensure people seeking to enter or stay in Australia uphold our migration and citizenship laws. This includes the more obvious view of compliance: ensuring that we detect those who have broken the rules and respond to them through education or enforcement. Compliance is even broader than that—it includes how we design our systems, our training, our business processes and our roles. It is how we design our policies, draft legislation and implement our programs to support us in properly managing the movement and settlement of people.

The compliance strategy was developed with input from a wide range of stakeholders, and I would like to thank everyone who had input into the development of the program. This program further strengthens our shared understanding and expertise in managing compliance risk. I look forward to working with you, and with our many partners, to further improve our already strong approach to compliance.

Martin Bowles
A/g Secretary

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Our strategic compliance philosophy

The department's overall objective is to have adherence to Australia's migration and citizenship laws. The department's compliance philosophy is the foundation of the compliance program. It aims to deliver open, fair, lawful, transparent and consistent compliance. It underpins our approach to promoting compliance and drives compliance activities across the department.

The compliance philosophy aims to achieve maximum voluntary adherence to Australia's migration and citizenship laws. This approach is based on the responsive compliance model—well accepted across Australian public administration and acknowledges that most of our clients will comply if they understand their responsibilities and the consequences of non-compliance.[1]

The compliance program should weigh heavily towards providing guidance, education, assistance and transparent information to enable clients to make informed decisions. At the same time, deliberate or high-risk non-compliance will be actively pursued through the use of detention, removal from Australia, the enforcement of penalties and litigation when necessary.

Our compliance principles

Our approach to compliance is based on the following principles:

- We optimise voluntary compliance within Australia's migration and citizenship program in a cost effective way.
- We promote voluntary compliance and informed choices through early and meaningful engagement; we clearly communicate to our clients our expectations, their responsibilities and the consequences of non-compliance.
- We are open, fair, lawful, transparent and consistent in our dealings.
- Our responses to non-compliance are proportional to the level of risk and evidence-based, and include the use of detention, the enforcement of penalties and litigation when necessary; we are strategic in identifying and proactive in addressing areas of risk to Australia's migration program.
- We develop strategic partnerships across the portfolio, with other agencies and the broader community to ensure compliance program effectiveness.

[1] See V Braithwaite, Compliance with migration law: Report for the Department of Immigration and Citizenship, 2010. Available online: http://www.immi.gov.au/media/publications/research/_pdf/compliance-migration-law.pdf

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Our strategic risk context

Managing compliance is influenced by international factors

- The global economic environment, particularly the relative strength of the Australian economy, influences the decisions foreign nationals make about coming to Australia.

- The global security environment influences the movement of people across borders and makes Australia an attractive destination.

- Global demographic and economic shifts result in greater numbers of people worldwide who are seeking to travel.

Managing compliance is influenced by domestic factors

- Our compliance approach reflects Australian law, government policies and priorities.

- The Australian labour market, particularly in times of low unemployment and skill shortages, drives demand for foreign workers.

- The Australian community's expectations that the migration program operates effectively and with integrity.

- Connections to family and cultural communities influence the decisions foreign nationals make about coming to and staying in Australia.

- International students are a major contributor to the Australian economy, to our universities' cultural fabric and to Australian tourism.

- Australia's health and welfare systems influence the decisions foreign nationals make about coming to and staying in Australia.

Managing compliance is influenced by organisational factors

- We work with partner agencies across government and community and industry groups.

- We rely on our people and their skills.

- We work within our budget and in line with our priorities.

- We carry out our role within a legislative framework.

- We use sound evidence to guide our decisions and actions.

The outcomes we seek from compliance

<table>
<tr><th></th><th></th><th>Outcome</th><th>How we achieve it</th><th>Indicator[2]</th></tr>
<tr>
<td rowspan="3">Adherence to Australia's migration and citizenship laws</td>
<td>A</td>
<td>Foreign nationals seeking to enter or stay in Australia are of good character</td>
<td>

We identify foreign nationals not of good character offshore and onshore
We make fair and lawful assessments
We remove foreign nationals in a timely way if their visa is cancelled

</td>
<td>Effective screening of visa applications offshore to prevent people of character concern from travelling to Australia through maintaining effective relationships with law enforcement and security partners, and enhanced application of identity technology.

People who have no right to remain in Australia are removed by the department at the earliest practicable opportunity.</td>
</tr>
<tr>
<td>B</td>
<td>Foreign nationals seeking to enter or stay in Australia comply with entry and stay requirements</td>
<td>

People understand their obligations
People comply with their visa conditions
People depart on their substantive visa
We identify those who do not comply
We respond to those who do not comply

</td>
<td>Prevention and deterrence strategies which increase voluntary compliance with visa conditions.

Enforcement strategies imposed that maintain the integrity of the department's programs by prosecuting serious breaches of immigration law.</td>
</tr>
<tr>
<td>C</td>
<td>Third parties[3] comply with their obligations under Australia's migration and citizenship laws</td>
<td>

Third parties understand their obligations
Third parties comply with their obligations
We identify those who do not comply
We respond to those who do not comply

</td>
<td>Increased engagement of peak employment bodies, employers, unions and labour suppliers, the provision of employment status information to employers through Visa Entitlement Verification Online (VEVO), and where appropriate the application of sanctions to limit the opportunity for illegal work in Australia.</td>
</tr>
</table>

[2] Indicators are drawn from the Portfolio Budget Statement 2012-13 and are subject to revision.
[3] 'Third parties' includes those with migration obligations (employer sponsors) and those involved in facilitating the migration process (migration agents).

The outcomes we seek from compliance *continued*

		Outcome	How we achieve it	Indicator[4]
Adherence to Australia's migration and citizenship laws	D	We support the resolution of foreign nationals' status	• We support resolution through engagement with clients and across the portfolio and encourage voluntary resolution of status • We use detention where necessary and appropriate to affect resolution of status	People in immigration detention are to have the length and conditions of their detention subject to regular reviews to ensure it is lawful and appropriate. The effective management of lawful non-citizens and resolution of their immigration status while they are in the community on a Bridging Visa E, does not lead to an unacceptable increase in non-compliance with Bridging Visa E conditions.
	E	Our program design and implementation promotes compliance	• Program areas are engaged in mitigating compliance risks through program design and implementation • We use our experience and understanding of non-compliance to inform program design and implementation	Prevention and deterrence strategies that increase voluntary compliance with visa conditions.
	F	Our compliance actions are effective, lawful and reasonable	• Our staff are well developed and supported in their high-risk decision making • We are subject to and engage with internal and external scrutiny	People in immigration detention are to have the length and conditions of their detention subject to regular reviews to ensure that it is lawful and appropriate. People who have no right to remain in Australia are removed by the department at the earliest practicable opportunity.

[4] Indicators are drawn from the Portfolio Budget Statement 2012-13 and are subject to revision.

Our strategic compliance risks

Outcome A   Foreign nationals seeking to enter or stay in Australia are of good character

What are the risks?	• People of national security concern or who are not of good character enter and stay in Australia	
	• People of national security concern or who are not of good character are granted Australian citizenship	

What drives these risks?	*Threats*	• People of national security concern or who are not of good character seek to circumvent or overcome our migration and citizenship processes
		• People seeking to enter or stay in Australia intentionally conceal their identity or history
		• Serious organised criminals seek to circumvent or overcome our migration and citizenship processes
	Vulnerabilities	• The information we rely on to make a decision is unavailable, inaccurate, unreliable or incorrect
		• Our resources and capabilities cannot mitigate all risks

How are we responding?	• We continue to strengthen our intelligence capability to make the best use of our resources, including a strong evidence base on which to make our decisions
	• We use our systems to facilitate character screening, border checks and to share intelligence among our partners in a timely manner
	• Staff members are well developed and supported in their high-risk decision making and have confidence and backing to question identity until satisfied

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Outcome B — Foreign nationals seeking to enter or stay in Australia comply with entry and stay requirements

What are the risks?		• Foreign nationals in Australia do not comply with their entry and stay requirements • Foreign nationals in Australia who do not comply with their entry and stay requirements are not identified or responded to
What drives these risks?	*Threats*	• Foreign nationals seeking to enter or stay in Australia do not intend to comply with their entry and stay requirements • Foreign nationals seeking to enter or stay in Australia are not deterred by the possible consequences of non-compliance • Our clients rely on inaccurate information from other sources
	Vulnerabilities	• Our clients' migration expectations are not actively managed from the time of first engagement • Our resources and capabilities cannot mitigate all risks
How are we responding?		• We provide applicants and the community with information in a range of languages and formats about our entry and stay program and the obligations of foreign nationals seeking to enter or stay in Australia • We respond to those who do not comply with appropriate compliance or status resolution actions • We require applicants to make a declaration under Australia's migration law that they understand and will comply with their entry and stay requirements

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Outcome C   Third parties comply with their obligations under Australia's migration and citizenship laws

What are the risks?		• Third parties do not comply with their obligations under Australia's migration laws • Third parties, including serious organised criminals, exploit foreign nationals
What drives these risks?	*Threats*	• Third parties, including serious organised criminals, seek to exploit foreign nationals • Third parties seek to circumvent or overcome our migration processes or to assist others to circumvent or overcome our migration processes • Third parties are not deterred by the possible consequences of non-compliance
	Vulnerabilities	• Our resources and capabilities cannot mitigate all risks • Foreign nationals do not know who is a legitimate third party involved in the migration and citizenship system
How are we responding?		• We continue to strengthen our intelligence capability to make the best use of our resources • We regulate the activities of migration agents and require certain third parties, such as sponsors, to make declarations under Australia's migration laws • We respond to those who do not comply with appropriate actions and sanctions

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Outcome D   We support the resolution of foreign nationals' status

What are the risks?	• We fail to resolve the status of detainees and compliance clients in a timely and effective way	
What drives these risks?	*Threats*	• Foreign nationals do not engage with us to resolve their status • Foreign nationals undermine our efforts to resolve their status, including by providing incorrect information
	Vulnerabilities	• Inability to remove foreign nationals due to ineffective return arrangements with some countries • The information we rely on to make a decision is unavailable, inaccurate, unreliable or incorrect • Our resources and capabilities cannot mitigate all risks • We rely strongly on information we receive from partner agencies both in Australia and overseas
How are we responding?	• Our staff are well developed and supported in their high-risk decision making • We regularly review the cases of those in immigration detention • We respond to those who do not comply with appropriate compliance or status resolution actions • Our quality assurance framework supports good decision making • We keep comprehensive records to support good decision making	

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Outcome E   Our program design and implementation promotes compliance

What are the risks?		• Our migration and visa settings are not effective in supporting compliance
What drives these risks?	*Threats*	• Our evidence base does not support incorporation of strong compliance perspectives in program design
		• Third parties and/or foreign nationals seek to exploit weaknesses in the design of migration and citizenship programs
	Vulnerabilities	• Policy design fails to build in adequate controls up front or is easily exploited
		• Our departmental systems, including our records, do not support compliance
		• Our consultation with stakeholders is not effective
How are we responding?		• We test the compliance effect of new policy settings early in the development and implementation phases
		• Our quality assurance framework supports the effective delivery of our compliance program
		• Our project planning includes provisions for governance, consultation and engagement with key stakeholders in all visa subclasses

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Outcome F   Our compliance actions are effective, lawful and reasonable

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What are the risks?

- Unlawful or inappropriate detention or removal of an Australian citizen, lawful foreign national or person owed Australia's protection

- Harm to an individual as a result of our compliance actions

- Failure of identity, age, health or other determination processes leading to the incorrect management of clients

What drives these risks?

Threats

- Third parties operating as our agents do not comply with their contractual requirements

- People coming into contact with us do not correctly identify themselves

Vulnerabilities

- The legal framework in which we operate is complex

- The information we rely on to make a decision is unavailable, inaccurate, unreliable or incorrect

- Our resources and capabilities are limited

- Records are not kept to the appropriate standards

How are we responding?

- Our staff are well developed and supported in their high-risk decision making

- We regularly review the cases of those in immigration detention and build in checks in the process for those clients in resolution pathways

- Our quality assurance framework supports the effective delivery of our programs

Our strategic compliance roles

Strategic	**Portfolio analysis** Develop whole-of-agency priorities based on an understanding of risks and tolerances We work in areas like risk, fraud and integrity, and policy and program management.	**Communication** Communicate our successes to encourage greater voluntary compliance We work in areas I ke national communications, compliance and case resolution, the outreach officer network, community liaison and external stakeholder relations.	**Assurance** Provide assurance around addressing priorities and the management of compliance risks We work in areas like program evaluation and review, detention review and program management.
Operational	**Risk identification** Identify the areas that pose the greatest harm by making proactive assessments of risk We work in areas like risk, fraud and integrity, policy design and implementation.	**Program design** Design policy and programs taking into account intelligence and our experience to minimise compliance risks We work in areas like compliance and case resolution, migration, refugee and humanitarian, citizenship, settlement and border. **Program delivery** Effectively communicate and manage the risk at the program level, with buy-in from stakeholders We work in areas like removals, compliance, case management, status resolution, investigations, detention review, character consideration, borders and overseas posts.	**Evaluation** Evaluate our performance to see if our strategies have been successful and to build our evidence base We work in areas like policy design, risk, fraud and integrity, compliance and case resolution, and governance and audit.
Supporting	**Intelligence** Collect intelligence that helps us better identify and respond to people who do not comply We work in areas like operational integrity, information collection, allegations and assessment, compliance, and risk, fraud and integrity.	**Data analysis** Make sense of our data to better understand areas of potential risk and inform program design We work in areas like program analysis, and risk, fraud and integrity.	

Monitoring and governing our risks

Strategic oversight

Executive Committee	The department's Executive Committee provides strategic, whole-of-organisation advice to the secretary and the department's senior leaders to ensure effective decision making, management and oversight of the department's operations and performance, including compliance.
Audit Committee	The department's Audit Committee provides independent assurance and assistance to the secretary and the Executive Committee on the department's internal audit program, risk management, quality assurance, fraud control framework, and its external accountability.
Risk, Fraud and Integrity Advisory Board	The Risk, Fraud and Integrity Advisory Board provides a formal mechanism for strategic discussion around key integrity issues, priorities, emerging risks and opportunities to address and manage program risks.

Operational oversight

Compliance and Case Resolution Division	The First Assistant Secretary, Compliance and Case Resolution, is the owner of the *Compliance Strategy 2012-15*.
Program Leadership Groups	A number of program leadership groups are involved in the monitoring and governing of the department's compliance risks. These include program leadership groups responsible for: • compliance and case resolution • immigration status resolution • migration and visa policy • refugee, humanitarian and international • irregular maritime arrivals.

Related documents

- **Department of Immigration and Citizenship Strategic Intent 2012-15.** Available on the department's intranet at: http://dimanet.immi.gov.au/__data/assets/pdf_file/0015/453021/strategic-intent-2012-15.pdf

- **Department of Immigration and Citizenship Strategic and Tactical Risk Map 2012-13.** Available on the department's intranet at http://dimanet.immi.gov.au/__data/assets/pdf_file/0006/184866/diac-strategic-tactical-risk-profile.pdf

- **Partnership agreements**

- **Compliance and Case Resolution Division and other divisional business plans.** Up to date plans are available on the department's intranet at: http://dimanet.immi.gov.au/about_DIMA/plans/division_business_plans

- **Community Status Resolution Service Framework and Principles.** The framework and principles are available on the department's intranet at: http://dimanet.immi.gov.au/DIMA_services/compliance/csrs/

- **Compliance Field Prioritisation Matrix.** The 2012-13 Matrix will be made available in TRIM and to officers once endorsed and cleared by relevant officers.

- **Control Framework for Detention Related Decision Making.** The framework is available on TRIM at ADD2011/1445049. This document is current as at 1 January 2012.

- **Case Management Handbook.** The handbook is available on Legend at: PAM3: Act – CCR – Case resolution – Case management handbook. All cleared policy guides that are waiting for upload into Legend can be found in TRIM at PCF2011/138.

- **Compliance Quality Assurance Framework.** The three parts of the Framework are available on TRIM at ADF2012/212 under ADD2012/90303 for Part 1: Governance, ADD2012/90308 for Part 2: Methodology and ADD2012/90313 for Part 3: Program 4.1 Assurance Plan.

- **Strategic Review of the Student Visa Program 2011.** The Knight review is available on the external website at http://www.immi.gov.au/students/_pdf/2011-knight-review.pdf.

The overall outcome of the Compliance Strategy 2012-15 is adherence to Australia's migration and citizenship laws

We do this because it is important that the Australian Government and people have confidence in our ability to build Australia's future through the well-managed movement and settlement of people

Our outcomes: We follow the international risk management standard in managing our risk

A Foreign nationals seeking to enter or stay in Australia are of good character	Risks to this outcome are generally given the highest rating and are represented in priority 1	**D** We support the resolution of foreign nationals' status	Risks to his outcome range between low and high (priority 2-4) depending on the severity of and mo ivation behind non-compliance
B Foreign nationals seeking to enter or stay in Australia comply with entry and stay requirements	Risks to this outcome range between low and high (priority 2-4) depending on the severity of and motivation behind non-compliance	**E** Our program design and implementation promotes compliance	This outcome is supported by feedback from compliance officers, helping us to design and implement better programs
C Third parties comply with their obligations under Australia's migra ion and citizenship laws	Risks to this outcome range between low and high (priority 2-4) depending on the severity of and motivation behind non-compliance	**F** Our compliance actions are effective, lawful and reasonable	This outcome underpins all of our actions as a department. It is of particular importance in our compliance work

To help the department achieve these outcomes, there were approximately s. 47E(d) undertaking Compliance field and related Compliance activities as at 31 May 2013

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Fraud Control Plan 2013-15

people our business

The Department of Immigration and Citizenship works in a rapidly changing global security environment to develop progressive technology and dynamic solutions to combat fraud.

The Fraud Control Plan 2013-15 outlines the department's strategies and operational responses to prevent, detect, investigate and prosecute fraud.

In 2012 the department reviewed its current fraud control measures and performance. The review recommended the department establish a new position of Chief Fraud Control Officer (CFCO). Establishing the role of the CFCO is an important initiative for the department to strengthen governance and oversight of fraud from a whole of department perspective.

The Fraud Control Plan lists action items highlighting the department's commitment to fraud control. These action items will progress the department's fraud control framework, which currently includes undertaking cyclical fraud risk assessments, education and awareness, fraud intelligence, reporting and recording.

In line with my responsibilities for developing an overall departmental fraud control strategy, I have prepared a fraud policy statement on the following page that summarises the department's overall approach and policy with respect to internal and external fraud control.

I encourage all staff to be familiar with the strategies associated with the Fraud Control Plan and understand your role in minimising, reporting and combating fraud within the department.

Martin Bowles, PSM
Secretary

Fraud control policy statement

Fraud against the Commonwealth is defined in the Commonwealth Fraud Control Guidelines (CFCGs) 2011 as 'dishonestly obtaining a benefit, or causing a loss, by deception or other means'.

All departmental staff are accountable for ensuring the existence and application of robust and sustainable fraud control within their area of responsibility.

The Department of Immigration and Citizenship (the department) has a fraud control framework that aims to reflect best practice in identifying and controlling fraud risks. This will be achieved by:

- actively preventing and detecting fraud through sound risk management practices and internal assurance processes

- maintaining and improving appropriate fraud controls and standards through a process of continuous refinement based on the outcomes of risk assessments and investigations protecting and promoting the proper use of Australian Government property (including money, and anything animate or inanimate capable of being the subject of ownership)

- maintaining efficient and effective arrangements to investigate fraud

- assuring confidentiality with regard to receiving and handling allegations

- training our employees in ethics, privacy and fraud awareness

- ensuring all employees are aware of their obligations to assist with investigations into potential fraud or code of conduct matters

- ensuring those engaged in fraud investigation and control activities have the required specialised training

- seeking civil, administrative or disciplinary sanctions as appropriate

- referring offenders to appropriate agencies where necessary

- recovering the proceeds of fraudulent activity

- being accountable and reporting to the Australian Government.

Summary of action items

Action item 1: Establish the position of Chief Fraud Control Officer (CFCO) by June 2013 to provide a corporate focus for fraud control in the department.

Action Item 2: Establish clear lines of accountability between the CFCO and other fraud control areas within the department that manage external and internal fraud. The CFCO to coordinate.

Action Item 3: Conduct a feasibility study on the development of a single internal department fraud recording and reporting mechanism. The CFCO to coordinate.

Action Item 4: Mandatory completion of the fraud awareness e-learning course by all staff every two years (in line with current practice for Code of Conduct and security essentials e-learning). The CFCO to administer, maintain and monitor completion rates.

Action item 5: Targeted face-to-face information sessions at forums to raise fraud awareness, and particularly staff's obligation to report and record fraud appropriately. For example, through overseas training courses and protection visa and refugee status assessment training. The CFCO to coordinate.

Action item 6: Continue to refine and monitor current measures and report on the effectiveness of the department's fraud awareness training arrangements. The CFCO will coordinate.

Action item 7: Ensure fraud control instructions, guidelines and frameworks are current and electronically available to all staff. The CFCO to coordinate.

Action Item 8: Develop a rolling two year strategy to promote fraud control in the department. This strategy will assist senior executive staff to promote fraud management practices and voluntary compliance across the department and its programs. The CFCO to coordinate.

Action item 9: Regularly review and revise policies and procedures on managing misconduct and responding to public interest disclosures. The People Strategy and Services Division to coordinate.

Action item 10: Undertake cyclical rolling fraud risk assessments as part of the department's business planning process, for both onshore and offshore offices. The Risk Fraud and Integrity Division to coordinate.

Action item 11: Conduct fraud risk assessments for onshore/offshore programs to ensure all risks are explored thoroughly by program managers. Risk assessments will be reviewed annually or earlier if major program changes occur. The Risk Fraud and Integrity Division to coordinate.

Action item 12: Escalate significant/emerging fraud risks to the Departmental Audit Committee, to enable audit planning to include potential systemic control weaknesses. The CFCO to coordinate.

Action item 13: Annually review the protocols regarding the escalation or transfer/referral of serious fraud investigations within the department and/or external agencies. The Risk Fraud and Integrity Division to coordinate.

Action item 14: Review qualifications of investigators to ensure professional standards of fraud control are maintained. The Risk Fraud and Integrity Division to coordinate.

Action item 15 Continue to undertake quality assurance reviews and evidence room audits in respect of departmental investigations to promote compliance by program investigations with the Australian Government Investigations Standards, Commonwealth Fraud Control Guidelines 2011 and Prosecution Policy of the Commonwealth. The Risk Fraud and Integrity Division to coordinate.

Action item 16: Continue to enhance the benefits from the use of analytics, data mining/matching techniques to support the provision of a more robust fraud and corruption detection capability. The Risk Fraud and Integrity Division to coordinate.

Action item 17: Provide the Australian Federal Police with the department's Fraud Control Plan to assist the AFP's role in providing appropriate investigative services to Commonwealth agencies. The CFCO to coordinate.

Action item 18: Continue to meet the department's strategic priority to strengthen identity management through increased use of biometrics and risk analytics to facilitate the entry of bona fide persons and disrupt the entry of male fide persons across Australia's borders. The Risk Fraud and Integrity Division to coordinate.

Action item 19: Regularly review and revise policies to ensure the integrity of the migration program. The Migration and Visa Policy Division to coordinate.

Action item 20: Regularly review and revise policies to ensure the integrity of the citizenship program. The Citizenship, Settlement and Multicultural Affairs Division to coordinate.

Action item 21: Regularly review and revise financial management policies and procedures to ensure financial fraud control across the department. The Financial Strategy and Services Division to coordinate.

Action item 22: Liaise with relevant program managers and stakeholders to develop the framework for handling and investigating fraud by third party providers and grant programs. The CFCO to coordinate.

Action item 23: Advise the Minister that a Fraud Control Plan has been prepared for the department for the period 2013–15. The CFCO to coordinate.

Action item 24: The Secretary to certify to the Minister in the department's annual report that the department has in place appropriate fraud prevention, detection, investigation, reporting and data collection procedures and processes to meet the specific needs of the department and complies with the Commonwealth Fraud Control Guidelines. The CFCO to coordinate.

Action item 25: Regularly review the action items listed in this Fraud Control Plan, together with the current fraud control framework. The CFCO to coordinate.

Action item 26: Continuously review the department's Fraud Risk Register to ensure the department captures, interrogates, analyses and reports fraud risks. The CFCO to coordinate.

Action item 27: Review the effectiveness of the internet facility for reporting fraud that was established in 2011 and is available 24 hours a day, 7 days a week. The CFCO to coordinate.

Action item 28: Continue to respond to the Australian Institute of Criminology's annual fraud questionnaire by 30 September each year. The CFCO to coordinate.

Action item 29: Continue development of the Fraud and Integrity Classification Model to ensure best practice for recording suspected and confirmed fraud and integrity issues across visa and citizenship programs. The Risk Fraud and Integrity Division to coordinate.

Introduction

The department's Fraud Control Plan 2013–15 serves a number of purposes that assist the department in preventing, detecting and deterring the risk of fraud. The plan outlines the structure of the department, provides a statement of the department's position on fraud control, documents identified fraud risks and outlines the department's fraud control framework.

1.1 Commonwealth Fraud Control Guidelines 2011

Fraud against the Commonwealth is defined as 'dishonestly obtaining a benefit, or causing a loss, by deception or other means'.

A benefit can be tangible or intangible. Tangible benefits include theft of government funds or property or obtaining a visa by providing fraudulent information. An intangible benefit includes fraudulently obtaining information.

Behaviours that may be defined as fraud are theft, providing false or misleading information to the Commonwealth, failing to provide information when there is an obligation to do so, bribery and corruption or abuse of office. The full definition of fraud is available in the guidelines on the Attorney-General's Department's website:
www.ag.gov.au/Fraudcontrol/Pages/CommonwealthFraudControlGuidelines2011.aspx

Fraud within the department generally falls within the following three categories or can be a combination of these categories:

- **Visa and citizenship fraud** is fraud by people seeking or assisting those who seek services to which they are not entitled and may include breaches of the *Migration Act 1958*, the *Australian Citizenship Act 2007* or the *Crimes Act 1914*.

- **Administrative fraud** can be committed by the department's employees or perpetrated by people or organisations outside the department. It includes breaches of the *Public Service Act 1999, APS Values and Conduct, Financial Management and Accountability (FMA) Act 1997* (and Regulations), *Criminal Code Act 1995, Crimes Act 1914, Privacy Act 1988* and the Protective Security Policy Framework 2010. It involves the inappropriate use of information technology and breaches of information, privacy and physical security.

- **Financial fraud** relates to the misuse of funds and services administered by the department. It includes gaining a financial or other benefit, theft, and the misuse of the tendering, procurement and contract management process and obligations. Financial fraud may include breaches of the *FMA Act, Criminal Code Act 1995* and the *Crimes Act 1914.*

The FMA Act and the CFCGs impose a number of obligations on agencies including the requirement to conduct fraud risk assessments, develop a fraud control plan that complies with the guidelines, and in appropriate circumstances, refer identified fraud to the Australian Federal Police or conduct its own investigations.

The Fraud Control Plan 2013–15, covers the two year period from January 2013 to January 2015 and forms part of the implementation of the department's fraud control strategy. The department's fraud control plan and framework are based on risk management and supported by internal assurance processes. Endorsed by senior

management the framework fosters continuous improvement of systems, processes and practices in the management of fraud.

1.2 Fraud control objectives

The scale and geographical spread of the department's operations and the nature of its business makes it difficult to detect and eliminate all fraud. Unique circumstances faced by the department, such as operating in certain overseas locations, can heighten the risk of fraud. Not all public and private sectors around the world operate within the department's set of public service values or with the same level of transparency, accountability and governance. In some cultures bribery, corruption and kickbacks may be actively solicited, extorted or offered. This is not only a challenge to the department's overseas staff, and locally engaged employees, but also for the department to ensure all staff are aware of fraud and their fraud control obligations. The department is committed to managing and criminalising bribery and corruption under the following legislation: the *Criminal Code Act 1995; Proceeds of Crime Act 2002*, and *Mutual Assistance in Criminal Matters Act 1987*.

Our strategic compliance philosophy

The department's overall objective is to manage Australia's migration and citizenship laws. The department's compliance philosophy is to deliver open, fair, lawful, transparent and consistent compliance. It underpins our approach to promoting compliance and drives compliance activities across the department.

The compliance philosophy aims to achieve maximum voluntary adherence to Australia's migration and citizenship laws. This approach is based on the responsive compliance model—well accepted across Australian public administration and acknowledges that most of our clients will comply if they understand their responsibilities and the consequences of non-compliance.

The compliance program should weigh heavily towards providing guidance, education, assistance and transparent information to enable clients to make informed decisions. At the same time, deliberate or high-risk non-compliance will be actively pursued through the use of detention, removal from Australia, the enforcement of penalties and litigation where necessary. The department's approach to compliance and treating of entities that are non-compliant is depicted on the following page.

Figure 1: The department's approach to compliance

1.3 Action items

The Fraud Control Plan 2011-13 listed 26 action items highlighting the department's commitment to control fraud. During 2011-12, a number of these action items have been completed, while others are in the process of being implemented. The ongoing action items from the 2011-13 plan are carried over to this Fraud Control Plan. New action and outstanding items will form the basis of detailed action plans for 2013-15.

Responsibility for development, implementation and review of action plans are allocated to specific positions.

Action items are listed throughout the Fraud Control Plan 2013-15. For ease of reference action items also listed at the front of the plan.

The department

The department is a policy, program and service delivery agency. Its purpose is to build Australia's future through the well-managed entry, stay and settlement of people. The department operates in a complex global environment of economic, political and social change.

About 8500 staff work in Australia and 1000 Australian-based and locally engaged employees are overseas delivering the department's services in 56 locations overseas.

A snapshot of the department's activity during 2011–12[1] includes:

- granting 13 759 humanitarian program visas

- helping 14 512 refugees through the Humanitarian Settlement Services program

- granting 4.4 million permanent and temporary visas

- approving over 114 000 people as Australian citizens by conferral, descent and resumption

- processing 31.6 million passenger and crew arrivals/departures

- locating 15 477 unlawful non-citizens

- conducting 10 785 removals and assisted departures.

By 2020, indications are that movements across Australia's borders will be approximately 50 million per year. Travel rates within the Asia Pacific region continue to rise faster than in any other region.

Australia is seen as an attractive destination, relatively prosperous, politically stable, safe and providing many avenues of opportunity.

2.1 Organisational structure

The department's top executive layer consists of the secretary and four deputy secretaries, each of whom is responsible for the delivery of all programs and services within one of four program groups:

The Client Services Group is responsible for delivering the department's key immigration and citizenship programs, through a network of offices across Australia and overseas. The group plays a critical role to ensure it meets its three goals: client service excellence, efficiency and integrity.

The Business Services Group provides specialist internal services to the department including: finance, property and contracts, human resources, learning and development, business planning and reporting, technology, communications, parliamentary and ministerial and governance and legal.

The Policy and Program Management Group integrates all policy areas into one group to:

- deliver policies that are based on quality research and clear evidence that are integrated across the department

- develop additional strategic policy, analysis and evaluation capabilities

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[1] *Annual Report 2011-12*

- develop and implement policies that affect changing international and domestic environments

- progress our visa simplification and deregulation agenda

- provide advice to the Australian Government that addresses short-term issues and long-term strategic policy, and is designed in consultation with key stakeholders

- actively manage programs to achieve desired government outcomes

- manage contractors that are providing services and support to people settling in Australia.

The Immigration Status Resolution Group brings together all immigration detention services and offshore regional processing matters; it:

- develops and maintains immigration detention facilities

- develops and maintains regional processing centres on Nauru and Manus Island, PNG

- manages the immigration detention contracts for detention services and health services

- coordinates detention operations nationally

- coordinates processing of irregular maritime arrivals (IMAs)

- coordinates and develops the placement of people into the community under residence determinations

- manages contractors that are providing services and support to clients living in the community under residence determinations

- ensures the delivery of services to clients is nationally integrated, of a high standard, efficient and consistent and meets government and program objectives

- implements policy for the management of people in immigration detention (IMA and compliance related) and identifying issues for new policy development.

2. 2 Governance

The Executive Committee is the department's principal governance committee, supported by four decision-making committees, all of which have a fraud control role:

- Departmental Audit Committee (DAC)

- Strategic Business Support Committee (SBSC)

- Resources and Finance Committee (RAFC)

- People and Values Committee (PVC).

The DAC was established in compliance with section 46 of the *FMA Act*. The DAC provides independent assurance and assistance to the Secretary on the department's risk, control and compliance framework and its financial responsibilities. The Secretary appoints committee members. To ensure independence the committee comprises:

- an external chair and external member

- a deputy Secretary as the deputy chair

- up to a maximum of four other Senior Executive officers, of whom at least one is to possess significant operational experience.

The DAC chair has a direct reporting line to the Secretary and provides a report to the Executive Committee, every six months, on operations and activities.

In relation to fraud control the DAC oversees the department's fraud control framework, procedures and reviews:

- the development of the Fraud Control Plan and framework

- periodic departmental fraud risk assessments

- whether Commonwealth fraud control reporting requirements have been met.

The SBSC co-chaired by the Deputy Secretaries of the Client Services and Business Services groups, makes tactical management decisions on behalf of the Secretary to ensure the effective, efficient implementation of the department's strategic objectives.

It is responsible for providing assurance to the Secretary that the rules, policy content and systems underpinning the department's business are compliant with legislation and subject to rigorous controls.

The RAFC is chaired by the Deputy Secretary of the Client Services Group and provides advice and recommendations to the Executive Committee, every month, on matters relating to strategic financial management and governance initiatives.

The primary functions of the committee include:

- considering budget implications for the department and advising the Executive
  Committee of options for meeting both external and internal budget appropriations

- reviewing and recommending financial implications and costing associated with major
  new policy proposals

- reviewing and recommending to the Executive Committee the proposed capital program
  for each financial year including estimates

- monitoring and consideration of advice on both departmental and administered financial
  performance and risks and recommend and review the implementation of actions
  undertaken to manage and mitigate financial pressure

- monitoring and reviewing the performance of contracts of significance within the
  department

- in conjunction with the DAC, monitoring progress on audit action plans.

The PVC considers and advises on the practices and policies of the department that affect employee health and well-being, values and/or ethical standards, to ensure that they:

- contribute to an ethical client-focused culture which underpins the strategic value
  statement: people our business

- are consistent with the APS Values and Code of Conduct

- are consistent with Australian Government objectives and DIAC's business directions.

The committee also contributes to the development of strategies to redress short-comings to improve the adoption and application of the department's values and/or integrity in decision-making. It is chaired by the Deputy Secretary Policy and Program Management Group. Members comprise a cross section of first assistant secretaries and four independent members, including representatives from the Ombudsman's Office and the Australian Public Service Commission.

2.3 Management of fraud review

During 2012, the department initiated an internal audit of the management of fraud within the department. The department engaged PricewaterhouseCoopers to review the department's current fraud control arrangements and consider how the department could improve its fraud control arrangements. The review confirmed that the department's fraud control arrangements are partially aligned with better practice. Opportunities for the department to further strengthen the consistency of fraud management including further improvement to meet the requirement of the department's fraud control objectives were identified.

The review recommended the management of fraud across the department would be improved by establishing a CFCO role with corporate responsibility and accountability for the management of fraud within the department.

The review also suggested other actions to build upon the maturity of the department by suggesting areas to align the fraud control arrangements with better practice and the CFCGs. Outcomes of the APSC Capability Review, also undertaken in 2012, support a focus on building the department's capability on risk and crisis management. Outcomes of the APSC Capability Review are discussed in further detail in Part 3.

2.4 Chief fraud control officer

In response to the review of the department's management of fraud control, the Executive Committee approved a new position of CFCO to provide corporate oversight of fraud control in DIAC. The new position is located in Governance and Legal Division.

The CFCO will have corporate responsibility for fraud control in cooperation with other divisions. The CFCO is an important initiative for the department to strengthen governance and oversight of fraud from a whole of department perspective.

A primary responsibility of the new CFCO will be to initiate the development of a single internal department fraud recording and reporting mechanism for all types of fraud.

> **Action item 1:** Establish the position of CFCO by June 2013 to provide a corporate focus for fraud control in the department.
>
> **Action Item 2**: Establish clear lines of accountability between the CFCO and other fraud control areas within the department that manage external and internal fraud. The CFCO to coordinate.
>
> **Action Item 3**: Conduct a feasibility study on the development of a single internal department fraud recording and reporting mechanism. The CFCO to coordinate.

2.5 Chief Executive Instructions and delegations

The Chief Executive Instructions 1, *Managing Risk and Internal Accountability*, provides direction to employees to ensure the proper use, management and accountability of public money, property and other departmental resources in accordance with financial management and accountability legislation.

The department's system controls include the segregation of duties and delegations so that different people hold different delegated authorities and can only access those parts of the process and systems for which they have responsibility. One person cannot process a transaction (for example create an account or make a payment) from start to finish. Departmental systems also enable the early identification of duplicate payments through data matching processes and reconciling accounts.
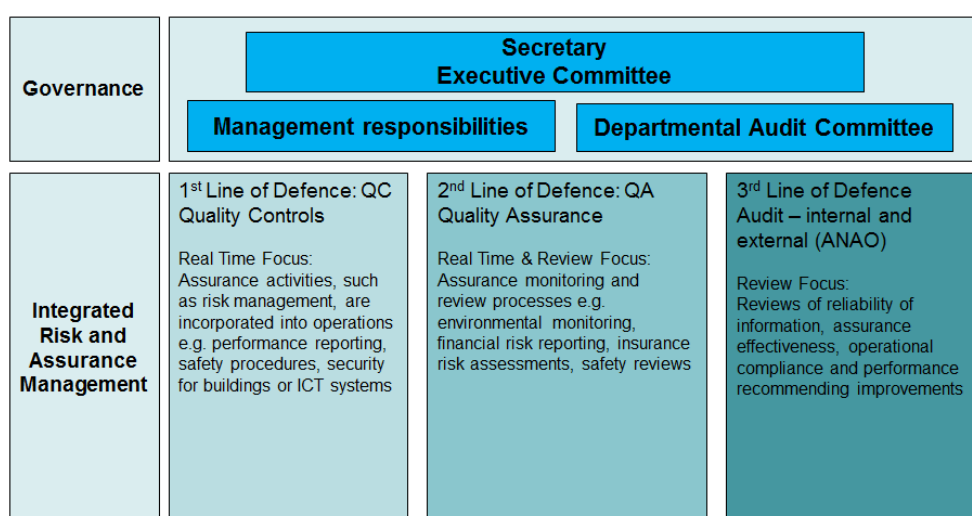
The department reviews delegations held against staff position numbers. In 2012, the Financial Strategy and Services Division completed a review of financial delegations and authorisations to provide assurance and reflect structural and legislative changes.

The division further supports the department through staff training regarding delegations, procurement and financial management in the public sector with a focus on the department's legislation, policy and procedures.

2.6 Controls, quality assurance and audit: the three lines of defence

The three lines of defence model is a well-established schema to demonstrate roles, responsibilities and accountabilities for risks and controls to achieve consistent and effective risk management and assurance across business areas.

Figure 2: Three lines of defence model

Governance	Secretary Executive Committee		
	Management responsibilities		Departmental Audit Committee
Integrated Risk and Assurance Management	1st Line of Defence: QC Quality Controls Real Time Focus: Assurance activities, such as risk management, are incorporated into operations e.g. performance reporting, safety procedures, security for buildings or ICT systems	2nd Line of Defence: QA Quality Assurance Real Time & Review Focus: Assurance monitoring and review processes e.g. environmental monitoring, financial risk reporting, insurance risk assessments, safety reviews	3rd Line of Defence Audit – internal and external (ANAO) Review Focus: Reviews of reliability of information, assurance effectiveness, operational compliance and performance recommending improvements

- The first line of defence is risk and control—business areas map and document the processes associated with their operational activities, often in the form of documented policies and procedures. Existing and emerging risks at the departmental and operational level are identified. Controls are embedded into systems and processes to mitigate risk by ensuring compliance and revealing control breakdowns, inadequate processes or unexpected events.

- The second line of defence is quality assurance—activities undertaken by the business areas on their own processes and systems that provide assurance that all key risks are identified, assessed and are well managed by the current controls in place. The regular testing of controls enables the continuous improvement of the quality of our services.

- The third line of defence is audit—reviews which are independent of the business area, and include internal audit, external audit and Management Initiated Reviews (MIRs). Audits and MIRs assess the level of compliance and performance of business areas against given criteria, and are an effective tool for identifying issues and root causes, promoting good practices across the organisation, and identifying opportunities for improvement. Audits and MIRs are tabled at the Departmental Audit Committee (DAC).

Quality Controls

The department's control environment ensures compliance with business requirements and objectives. Controls are in the form of legislation, policies, guidelines, instructions (such as the Procedures Advice Manual—PAM) and in-built system controls that stipulate how the department conducts its business.

Fraud awareness training

All staff are supported and made aware of their risk management and fraud control responsibilities within the department by:

- Training and educational material (including e-learning packages) that raises awareness of risk management and fraud control. The department's fraud awareness e-learning course is mandatory for all staff to complete every two years. This is in accordance with current practice for Code of Conduct and security essentials training.

- Maintenance of a risk management and fraud policy help desk to advise staff on applying the risk management framework to their work.

- Risk management, fraud awareness, and values and conduct courses incorporated into induction training for new staff, executive level, overseas training and other generic courses.

- A risk management reference suite, including the department's risk assessment toolkit, that aids in completing risk assessments for business planning, project management, procurement and contract management processes.

Public interest criteria

In 2011, a new Public Interest Criteria (PIC 4020) was introduced, whereby a visa under the *Migration Act 1958* can be refused where false or misleading information, or bogus documentation, is provided in association with a visa application. Subsequent applications for a visa may also not be granted if made within three years under certain circumstances.

PIC 4020 initially applied to all visas in the skilled visa stream and has been subsequently extended to student visas and temporary entry visas. Extending PIC 4020 to other visa sub-classes is under consideration.

The introduction of PIC 4020 has dramatically enhanced the department's measures to deal with visa program fraud.

Quality assurance

The Secretary's Instruction 8, *Quality Assurance*, provides direction to employees relating to the principles, responsibilities and implementation of the Quality Management Policy that supports the development and improvement of internal processes, systems and operational activities and the efficient and effective delivery of services.

Branch heads, section heads, team leaders and equivalent must:

1. identify which business processes require a quality assurance process, based on a comprehensive risk assessment
2. ensure the principles and methodology of the Quality Management Policy are adhered to when developing and reviewing quality assurance processes
3. ensure quality assurance reviews are completed regularly
4. acknowledge, reward and publicise good quality assurance management practices.

Senior management of business areas are required to report to the DAC biannually on the performance of their quality management systems, identified key risks, systemic issues and improvement opportunities, and action taken to address identified issues and implement improvement opportunities.

Internal audit

The department's internal audit function, which is managed by the Internal Audit section, provides the Secretary with assurance that departmental outputs and activities are operating effectively, efficiently and lawfully. The department has a rolling six month internal audit program, informed by the department's strategic and tactical risk profile.

An effective internal audit regime helps avoid exposure to internal fraudulent schemes by determining (through testing) whether the department has adequate internal controls and effective audits and oversight.

Action Item 4: Mandatory completion of the fraud awareness e-learning course by all staff every two years (in line with current practice for Code of Conduct and security essentials e-learning). The CFCO to administer, maintain and monitor completion rates.

Action item 5: Targeted face-to-face information sessions at forums to raise fraud awareness, and particularly staff's obligation to report and record fraud appropriately. For example, through overseas training courses and protection visa and refugee status assessment training. The CFCO to coordinate.

Action item 6: Continue to refine and monitor current measures and report on the effectiveness of the department's fraud awareness training arrangements. The CFCO will coordinate.

Action item 7: Ensure fraud control instructions, guidelines and frameworks are current and electronically available to all staff. The CFCO to coordinate.

Action Item 8: Develop a rolling two year strategy to promote fraud control in the department. This strategy will assist senior executive staff to promote fraud management practices and voluntary compliance across the department and its programs. The CFCO to coordinate.

Action item 9: Regularly review and revise policies and procedures on managing misconduct and responding to public interest disclosures. The People Strategy and Services Division to coordinate

Managing fraud risks

3.1 The department's risk framework

Risk management in the department is supported by the endorsed department's risk management framework, which is based on the international risk standard AS/NZS ISO 31000:2009.

The department's risk management framework articulates the department's approach to managing risks at all levels. It requires the department to identify, treat and monitor risks related to potential threats, harm, losses, failures and opportunities. Information is reported to members of the executive and governance committees to guide the management of risk at the strategic level.

The department's risk management framework aims to:

- promote risk management as an integral component of business delivery and good governance

- develop a consistent department-wide understanding of risk management (including a common risk language) and provide the methodology and tools to enable effective management of risk across the department

- implement an effective risk management framework that is tailored to meet the challenges of the department's internal and external environment

- foster an environment where all staff assume responsibility for managing risk and where management formally consider risks as part of the business-planning process

- ensure that significant risks facing the department have been identified, understood, documented and are being actively managed

- maintain the highest possible integrity for the services provided by the department.

Fraud risk assessments are a mandatory part of the department's business planning process. Fraud risk assessments consider the likelihood and consequences of fraud risks and set out treatment plans, they are mandatory for both internal and external fraud.

The department participates in Comcover's annual risk management benchmarking survey. The survey benchmarks the department's framework and capabilities against other participating Commonwealth agencies. In 2012, the department achieved an overall risk management score of 8.3 out of 10, with achievements in risk management policy and objectives, review and evaluation, and accountability and responsibility. The department's score was higher than both the average score of the 138 agencies that participated in the survey (6.6 out of 10), and the average score of the departments' peer group agencies (7.2 out of 10).

3.2 Capability review

In 2012, the department participated in the Australian Public Service Commission (APSC) Capability Review that focuses on leadership, strategy and delivery capabilities. The capability review identified six specific areas for management attention; one of which was specific to risk and crisis management.

The department, compared to most departments, carries an unusually wide range of responsibilities across areas of public service capability, including research, policy development, program management, service delivery, industry regulation and corporate services. It works under intense public scrutiny, maintaining high-volume business as usual activity such as visa processing and migrant settlement services, while responding to urgent and high profile events.

While the department takes pride in its capabilities in managing crises and mobilising resources quickly, some stakeholders perceive that the department is prone to regular crises that could have been recognised as risks and pre-empted or scaled-down.   Internally, it is widely recognised that

crises distract the department from delivering core business, consume staff time and resources, interrupt processes of change and improvement and disrupt longer term planning.

The review reported that the department's culture is heavily risk averse, with many routine decisions routinely escalated because there has been an excessive reliance on the risk-scanning intuition of a small number of senior people. The review team identified the following areas for improvement initiatives:

- maturing its approach to risk and crisis management to improve scanning of impacts to stakeholders, clarity in escalation and notification protocols, and capturing and sharing of lessons learned

- maturing the department's capability in scenario and contingency planning, drawing on lessons learned and expertise from the broader APS network[2].

In response to the capability review, the department initiated an action plan to implement activities focussed on building capability in areas identified by the review. The actions are aligned to the department's Strategic Intent 2012-15. Among these actions, the department has commenced to:

- establish a Strategic Policy and Innovation Division

- revise the IDEAL (Immigration Dilemmas, Ethics and Leadership) package

- issue the first of a series of 'lessons learnt' documents starting with procurement and contract management.

The department will also continue to focus on risk and crisis management by:

- revising risk and crisis processes and address cultural barriers to effective risk management

- establishing regular exchanges/secondments for executive and senior staff with central agencies.

3.3 Fraud risks in the department

The DIAC Fraud Control Plan and framework is based on accepted risk management standards, supplemented by robust internal assurance processes. These are outlined in Part 2.

The department's fraud risk assessments can be broadly categorised as follows:

- divisional fraud risk assessments, are embedded in the business planning process and are reviewed quarterly to ensure management, relevance and currency to business activities

- fraud risk assessments to be developed for programs, new policies and other new initiatives.

The Risk Fraud and Integrity Division centrally support and assist staff in understanding their risk and fraud risk management responsibilities and processes within the department. This service provides assistance with:

- identifying risks and fraud risks within divisions, programs and projects

- tailoring risk and fraud training to individual areas

- reviewing risk and fraud risk assessments to check for completeness and accuracy.

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[2] DIAC Capability Review

Fraud risk assessments can also be initiated by the department's executive as an independent assurance review or as a program or project assistance activity.

A status table of program based fraud risk assessments is routinely reviewed by the DAC. To ensure effective profiling and reporting of risk, the department has an established and centrally maintained fraud risk register (the register). The register, which is updated throughout the year, captures a description of the risk, its causes and its impacts, risk rating, existing controls and treatments.

In addition, the register assists the department to prepare it's response to the annual fraud reporting questionnaire by the Australian Institute of Criminology, which asks the department to identify suspected external and internal incidents of fraud.

3.4 The department's fraud risk profile

Fraud risk assessments are the principal tool used in the department to identify, evaluate and document treatments for individual fraud risks. The key fraud risk themes faced by the department are summarised below. Further detail is enclosed at Attachment A.

s. 47E(d)

Action item 10: Undertake cyclical rolling fraud risk assessments as part of the department's business planning process, for both onshore and offshore offices. The Risk Fraud and Integrity Division to coordinate.

Action item 11: Conduct fraud risk assessments for onshore/offshore programs to ensure all risks are explored thoroughly by program managers. Risk assessments will be reviewed annually or earlier if major program changes occur. The Risk Fraud and Integrity Division to coordinate.

Action item 12: Escalate significant/emerging fraud risks to the Departmental Audit Committee, to enable audit planning to include potential systemic control weaknesses. The CFCO to coordinate.

Approach and response to fraud control

4.1 The department's fraud control obligations

The department has statutory fraud control obligations. Under the *FMA Act* the Secretary is responsible for:

- promoting the efficient, effective and ethical use of Commonwealth resources

- implementing a fraud control plan and complying with the Commonwealth fraud control guidelines.

The secretary and the senior executive are required to develop and implement an overall strategy to deter, prevent and detect of fraud within the department.

Staff must complete fraud awareness, Code of Conduct and security essentials training. Behaving ethically, complying with financial delegations and ensuring contractors and service providers are familiar with relevant official procedures and guidelines relating to fraud control, reporting suspected incidents of fraud, assisting in fraud investigations and considering fraud control issues are in their daily duties.

4.2 Risk, Fraud and Integrity Division

Risk Fraud and Integrity Division (RFID) is responsible for detecting, measuring and recommending treatments to mitigate the various types of fraud encountered by the department both externally and internally. The Division works in partnership, across the department and globally, to deliver professional risk, fraud, intelligence, investigations and identity services to lead a risk-tiered approach to support the integrity of Australia's borders, migration and citizenship programs.

s. 47E(d)

s. 47E(d)

59

s. 47E(d)

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s. 37(2)(b)

Operational Integrity

The operational integrity network provides a range of pre- and post-decision integrity services to support the department's visa and citizenship programs. Among the operational integrity achievements during 2011-12 were:

- a significant increase in numbers of infringements issued to employers in breach of sponsorship obligations

- a major review of risk profiles for the student visa program
- an increased number of nationally coordinated campaigns and operations targeting fraud and integrity issues identified through risk analysis.

4.3 Immigration compliance and enforcement

The Compliance and Case Resolution Division (CCRD) works with clients to ensure adherence to Australian entry and stay requirements. The division identifies and responds to breaches of immigration law in Australia, including detecting and locating people who have no lawful authority to be in Australia or who are in breach of conditions that apply to their visa. The focus is on the 'status resolution' of clients, to obtain a substantive immigration outcome—either a visa for long term stay or departure (including, where necessary, removal) from Australia.

The goal of migration compliance administration is to create an environment where people voluntarily comply with their obligations and where levels of harm flowing from non-compliance are commensurate with community expectations, the total benefit to the community accruing from the migration program, and the costs and risks of the compliance activity itself.

The vast majority of visa holders voluntarily comply with their obligations.

Where clients do not comply, the department applies an escalating range of regulatory responses, including formal reviews, changing visa conditions, warnings, administrative penalties and where appropriate, prosecution or immigration detention and removal.

4.4 Migration and Visa Policy Division

The Migration and Visa Policy Division is responsible for policy and program management in relation to Australia's permanent migration and temporary entry.

The division responds to fraud by:

- policy and program development initiatives that strengthen integrity and assist in preventing fraud in permanent, work, study, tourism, working holidays or other specialised activity visas; and
- working in close collaboration with other areas in the department, and with other agencies, stakeholders and industry bodies to ensure the integrity of Australia's migration program and temporary entry.

Action item 19: Regularly review and revise policies to ensure the integrity of the migration program. The Migration and Visa Policy Division to coordinate.

4.5 Citizenship, Settlement and Multicultural Affairs Division

The Citizenship, Settlement and Multicultural Affairs Division aims to achieve a society that values Australian citizenship, appreciates cultural diversity and enables migrants to participate equitably.

The division detects and responds to fraud, such as:

- the provision of false information or documents by an applicant for Australian citizenship
- persons who claim to be Australian citizens.

The division works closely with other areas in the department, and with other Commonwealth and state/territory agencies to ensure the integrity of Australia's citizenship program.

> **Action item 20:** Regularly review and revise policies to ensure the integrity of the citizenship program. The Citizenship Settlement and Multicultural Affairs Division to coordinate.

4.6 Office of the Migration Agent Regulation Authority

The Office of the Migration Agent Regulation Authority (OMARA) is responsible for regulating registered migration agents. The CEO of the Office of the MARA reports directly to the Secretary and is supported by an independent Advisory Board. The Office of the MARA:

- ensures that only persons fit and proper to give immigration assistance and of integrity are registered
- monitors the conduct of registered migration agents and the adequacy of the Code of Conduct that governs their behaviour
- deals with complaints about registered migration agents
- ensures that registered migration agents undertake appropriate training and development.

4.7 People Strategy and Services Division

Through the department's individual staff performance and development assessment processes, induction training and mandatory Code of Conduct training, staff are made aware of Australian Public Service (APS) Values and Code of Conduct obligations. Staff and managers have the responsibility to ensure they familiarise themselves with the APS Values and undertake Code of Conduct training.

The People Strategy and Services Division is responsible for the prevention, detection (in consultation with other relevant business areas, such as the Financial Strategy and Services Division) and investigation of breaches of the APS Code of Conduct, as well as fraud and criminal behaviour by departmental employees within Australia and at overseas posts.

The management of Code of Conduct and internal fraud allegations generally fall into two categories, being fraud committed on:

- department programs
- any corporate functions (for example travel allowance, credit cards, petty cash).

The division provides a range of services and expertise to the department and its employees including:

- advice, assistance and management on issues related to misconduct, harassment, bullying and discrimination
- provision of a range of resources, policies, forms, internal/external publications and Immigration Dilemmas, Ethics, APS Values and Leadership (IDEAL) scenarios
- raising staff awareness of the departmental and APS Values, and Code of Conduct responsibilities.

Allegations of misconduct, including internal fraud, are investigated in accordance with departmental procedures and instructions. Options for action include:

- Criminal prosecution under the prosecution policy of the Commonwealth a person, including an employee, can be charged with an offence under legislation administered by the department, the Crimes Act 1914 or the Criminal Code Act 1995. The department may seek to recover the proceeds of fraud through the Proceeds of Crime Act 2002 in addition to court imposed fines and penalties, including repatriation orders and court costs.

- Code of Conduct matters under the *Public Service Act 1999* misconduct may result in loss of employment, reprimand, reduction in classification/salary, a fine and/or debt recovery.

The department is committed to maintaining the confidentiality and protection of staff under an established whistle-blower protection policy.

A secure IT case management system of investigations is maintained.

4.8 Financial Strategy and Services Division

The *FMA Act* and regulations provide the framework for the proper management of public money and public property within the Australian Public Service. The *FMA Act* and regulations define proper management and use to be the efficient, effective, economical and ethical use that is not inconsistent with the policies of the Commonwealth. The Financial Strategy and Services Division is responsible for the development and implementation of a number of policies and procedures related to the *FMA Act* and regulations.

> **Action item 21:** Regularly review and revise financial management policies and procedures to ensure financial integrity across the department. The Financial Strategy and Services Division to coordinate.

4.9 Protective security

Within the Technology Services Division, Protective Security and IT Security are responsible for implementing controls in relation to physical, personnel, information, telecommunications and IT security, including:

- a security awareness program aimed at educating all staff and contractors on their security responsibilities

- security essentials training, which all staff and contractors are required to attend on induction and every two years

- access to the Department Security Instruction (DSI) on the department's intranet, which contains all the relevant policy and requirements in relation to correct security practice

- promoting activities such as National Cyber Security Awareness week, hosted in conjunction with the Department of Broadband, Communication and Digital Economy to raise staff awareness of cyber security issues.

4.10 Privacy awareness

The department's privacy policy supports principles for effective fraud control. Departmental officers are aware of Information Privacy Principles (IPPs) and their privacy obligations. The department's e-learning course, Freedom of Information and Privacy, is designed to help departmental officers to understand their rights and responsibilities under the *Privacy Act 1988* and *Freedom of Information Act 1982*. Departmental staff are supported by help desk/privacy mailboxes maintained by the Freedom of Information and Privacy Policy section.

4.11 Contractors and grant programs

Under the department's existing fraud control framework, fraud allegations involving contractors or third parties for administered programs such as community grants and discretionary payments are reported to the relevant contract or program manager.

> **Action item 22:** Liaise with relevant program managers and stakeholders to develop the framework for handling and investigating fraud by third party providers and grant programs. The CFCO to coordinate.

4.12 Offshore Integrity Network

Global managers

The department's global managers, who are part of the department's senior leadership team, are responsible for the delivery of key business streams or client service channels for particular products and services to ensure consistent, efficient and effective service delivery both onshore and offshore.

As global managers' roles cross organisational lines they are in a unique position to combat fraud by providing a single accountability focus within the service delivery network.

A summary of global managers' roles and location can be accessed on the department's website: www.immi.gov.au/about/department/senior-staff/global-managers.htm.

s. 47E(d)

Regional directors

Regional directors coordinate and support management of the department's network of overseas offices by developing offshore program strategies and initiatives that ensure the department is positioned to meet its objectives and build relationships with governments and overseas agencies at a regional level.

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Fraud and resolution management

5.1 Reporting fraud

The department has established fraud reporting channels available to staff, including:

- the Workplace Relations and Conduct section (internal fraud and APS Code of Conduct issues)
- applicable program or contract manager
- state and territory office managers
- principal migration officers at overseas posts
- electronic reporting channels in the department's visa processing systems
- the agency security advisor
- a dob-in service for members of the public to advise the department about people working or living illegally in Australia.

The department recognises the importance of 'dob-ins' (community intelligence) provided about suspect activities to maintain the integrity of its programs. There are several ways you can make a report to the dob-in service 24/7, including telephone, face-to-face in a departmental office, fax and online reports.

5.2 Capturing fraud related information

The department is accountable for specific reporting requirements under the CFCGs, which include the portfolio minister, the Australian Federal Police and the Australian Institute of Criminology (AIC).

Recording and reporting mechanism

The department does not currently have a single fraud recording and reporting facility. It is envisaged that the CFCO will prioritise the development of a single internal department fraud recording and reporting mechanism for all types of fraud during 2013.

Development of a Fraud and Integrity Classification Model (FICM) is currently being scoped by RFID and Client Strategy and Performance Division, for inclusion in future systems releases. The FICM will use standardised, centralised and mutually exclusive terms to record fraud across visa and citizenship programs. In addition the FICM will meet Fraud Control Guidelines reporting requirements and enhance fraud research and analysis capability.

Fraud Control Helpdesk

To support and assist staff to understand their fraud control responsibilities and processes within the department, a Fraud Control Helpdesk has been established within the Risk, Fraud and Integrity Division. The helpdesk is available to provide formal and ad-hoc advice to all areas within the department.

Action item 23: Advise the Minister that a Fraud Control Plan has been prepared for the department for the period 2013–15. The CFCO to coordinate.

Action item 24: The Secretary to certify to the Minister in the department's annual report that the department has in place appropriate fraud prevention, detection, investigation, reporting and data collection procedures and processes to meet the specific needs of the department and complies with the Commonwealth Fraud Control Guidelines. The CFCO to coordinate.

Action item 25: Regularly review the action items listed in this Fraud Control Plan, together with the current fraud control framework. The CFCO to coordinate.

Action item 26: Continuously review the department's Fraud Risk Register to ensure the department captures, interrogates, analyses and reports fraud risks. The CFCO to coordinate.

Action item 27: Review the effectiveness of the internet facility for reporting fraud that was established in 2011 and is available 24 hours a day, 7 days a week. The CFCO to coordinate.
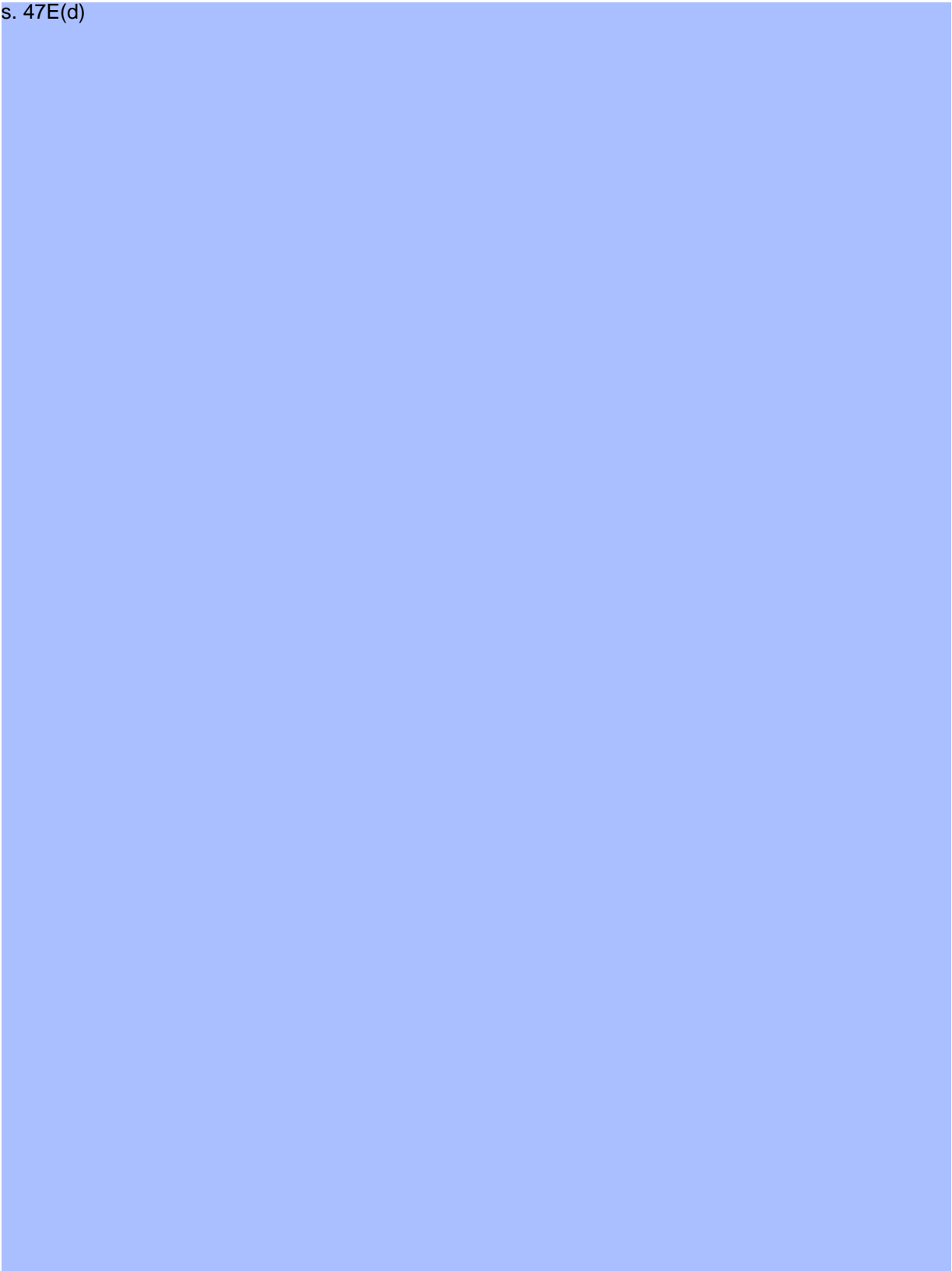
Action item 28: Continue to respond to the Australian Institute of Criminology's annual fraud questionnaire by 30 September each year. The CFCO to coordinate.

Action item 29: Continue development of the Fraud and Integrity Classification Model to ensure best practice for recording suspected and confirmed fraud and integrity issues across visa and citizenship programs. The Risk Fraud and Integrity Division to coordinate.
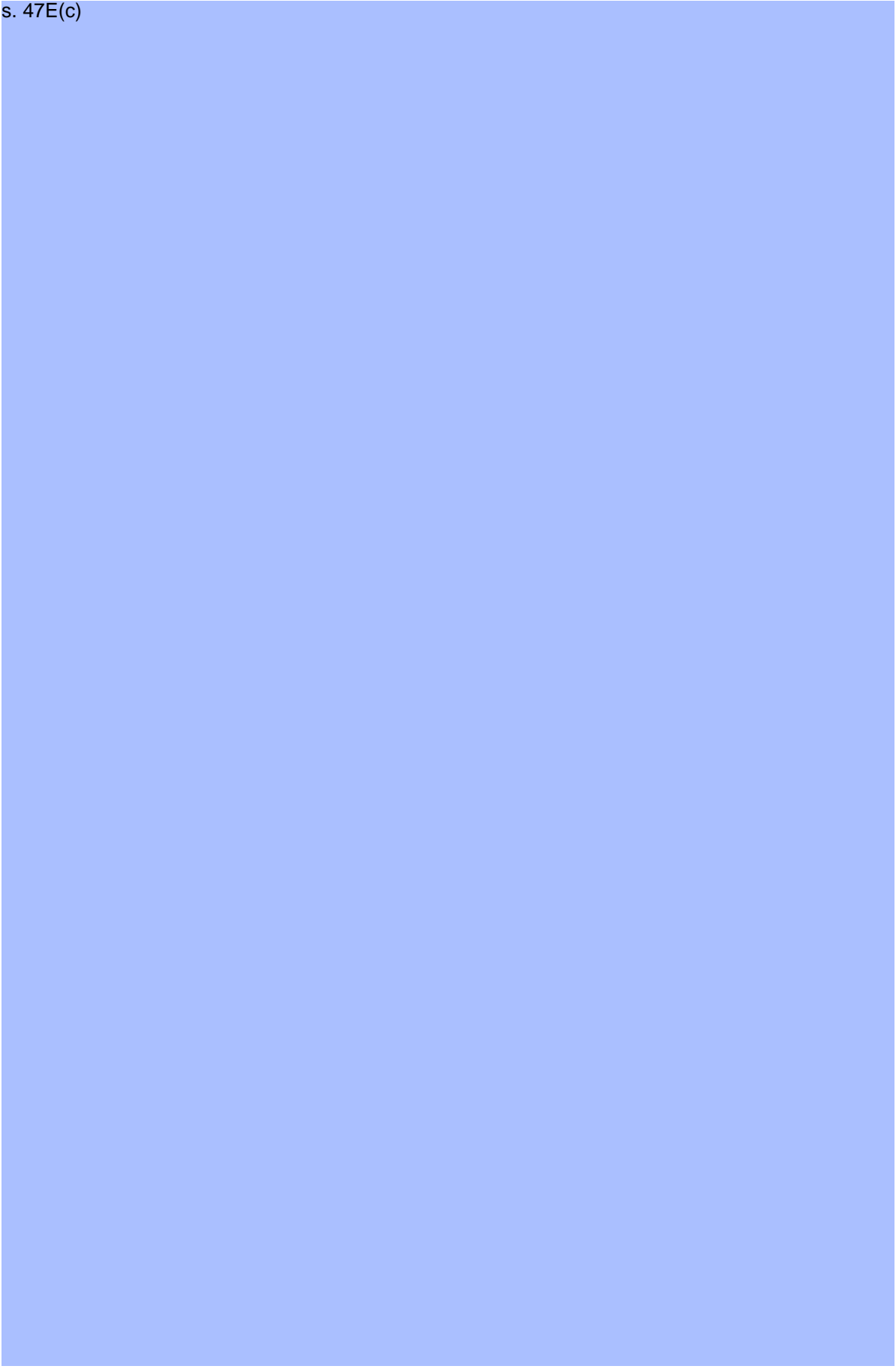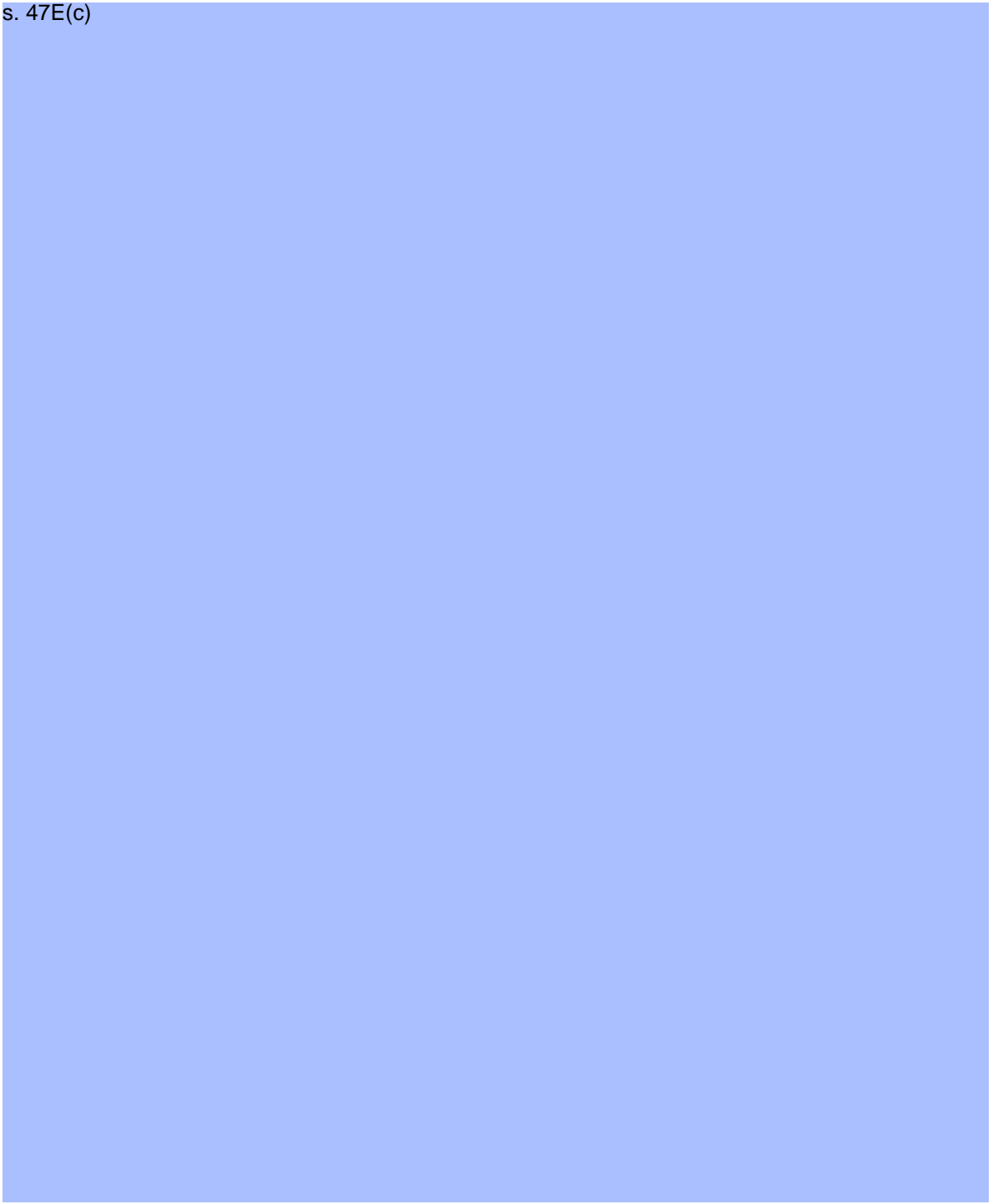
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The Strategic Intent documents how we will meet our commitment to build Australia's future through the well-managed movement and settlement of people.

We work in a complex environment and must maximise the benefits of our work during challenging times. Collaboration with other government agencies as well as the private and community sectors helps us to improve our delivery of the government's economic, social and national security policy priorities.

The department is both a policy development and service delivery agency. We should not underestimate the responsibilities and opportunities attached to this unique position.

The functions of the department cover a range of government priorities: to secure our borders in partnership with other agencies, to meet our obligations to help the world's most vulnerable people, and to meet the demand for skilled migrants to develop the Australian economy.

In practice, robust planning will underpin our success through prioritising resources, supporting our people and building an environment that encourages a culture of enquiry and innovation.

I look forward to working with you in shaping the department's and Australia's future.

Martin Bowles PSM
Secretary

Our purpose: Build Australia's future through the well-managed movement and settlement of people.

Our portfolio outcomes

Outcome 1
Managed migration through visas granted for permanent settlement, work, study, tourism, working holidays or other specialised activities in Australia, regulation, research and migration policy advice and program design.

Outcome 2
Protection, resettlement and temporary safe haven for refugees and people in humanitarian need through partnering with international agencies; assessing humanitarian visa applications; and refugee and humanitarian policy advice and program design.

Outcome 3
Lawful entry of people to Australia through border management services involving bona fide traveller facilitation; identity management; document verification; intelligence analysis; partnerships with international and domestic agencies; and border policy advice and program design.

Outcome 4
Lawful stay of visa holders and access to citizenship rights for eligible people through promotion of visa compliance responsibilities, status resolution, citizenship acquisition integrity, case management, removal and detention, and policy advice and program design.

Outcome 5
Equitable economic and social participation of migrants and refugees, supported through settlement services, including English language training; refugee settlement; case coordination; translation services; and settlement policy advice and program design.

Outcome 6
A cohesive, multicultural Australian society through promotion of cultural diversity and a unifying citizenship, decisions on citizenship status, and multicultural and citizenship policy advice and program design.

What we do: Deliver programs that contribute to the government's social, economic and national security priorities.

Social
- Contribute to Australia's future through well-managed migration.
- Promote Australian citizenship.
- Foster a multicultural Australia.
- Support migrants and refugees settling into Australia.
- Contribute to humanitarian policy initiatives domestically and internationally.
- Support informed public consideration of immigration issues.

Economic
- Maximise the economic and social benefits for Australia from all forms of temporary and permanent migration.
- Support improved productivity and participation in the labour market.
- Support the government's commitment to a demand driven skilled migration program.
- Pursue a visa simplification and deregulation program.

National Security
- Contribute to Australia's security through effective border management in collaboration with national security agendas.
- Prevent and deter unauthorised and irregular entry to Australia, including through participation in bilateral and multilateral initiatives.
- Ensure the integrity of our programs through measures that encourage high levels of compliance with Australia's migration and citizenship laws.

How we do it: We lead, plan and deliver efficient and effective government programs.

Leadership
- We communicate a clear, compelling and coherent purpose.
- We work effectively across boundaries and collaborate broadly.
- We demonstrate our commitment to continuous improvement and manage change effectively.
- We have a unifying culture that promotes enthusiasm and pride in our work.
- We have leaders who are visible.
- We act with integrity, confidence and self-awareness.
- We build the leadership skills of all staff.
- We have a transparent and consistent approach to individual performance management.
- We identify and nurture leadership talent and proactively conduct succession planning.
- We address and fill key capability gaps through our long term workforce planning.
- We support our staff.

Strategy
- We have a clear, coherent and achievable strategy.
- We align strategies and policies with other agencies to ensure consistency.
- We collaborate internally, across government and with external stakeholders.
- We are clear about what success looks like and when it has been achieved.
- Our policies and programs are client focused and based on strategic insight.
- We have a vision and strategy informed by sound and timely evidence and analysis.
- We identify future trends and consider available options in the strategy.
- We conduct evaluation of outcomes and include lessons learnt in the strategy development process.
- We involve partners and stakeholders at an early stage to learn from their experience.

Delivery
- We plan effectively and report on our performance.
- Delivery models achieve clear and well understood outcomes.
- Innovation is supported by appropriate structures, people capacity and enabling systems.
- We have agreed roles, responsibilities and accountabilities for the delivery of outcomes.
- We drive a performance culture that strives for excellence.
- We ensure we work with service partners with a shared commitment to delivery.
- We ensure effective control of the organisation's resources.
- We ensure effective program and project management.
- We ensure our priorities, programs, community interactions and service delivery are responsive to cultural and linguistic diversity.

Our values: We uphold the APS Values: Impartial, Committed to service, Accountable, Respectful and Ethical (ICARE)

Organisational priorities 2013–14

Priority focus areas in 2013–14 for the way we deliver our business are:

- **Leadership:** Building an integrated one DIAC approach to leadership at all levels of the department.
- **Capability:** Hardwiring organisational capability improvement into departmental governance and processes, including addressing the areas for reform identified by the Capability Review.
- **Cost consciousness:** Understanding the costs of our business and the costs and benefits of changes and improvements.
- **Empowerment:** Enhance our culture of trust where staff are empowered through good governance, leadership and training to make decisions and escalate issues appropriately.
- **Simplification:** Identify and analyse policies and processes that could be streamlined through innovative thinking and collaboration.

APSC Model of Capability

Our strategic themes