



ICAC

Independent Commission
Against Corruption
SOUTH AUSTRALIA



ICAC PUBLIC INTEGRITY SURVEY 2024

LOCAL GOVERNMENT INSIGHTS



**ICAC Public Integrity
Survey 2024**
Local Government
Integrity Insights

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Contents

- List of figures and tables** 2
- Commissioner’s foreword**..... 4
- The survey** 5
 - The sample6
- Perceptions of potential corruption and other impropriety**..... 8
- Compared to participants overall** 12
- Improper recruitment** 14
- Misuse of authority** 16
- Procurement and contract management**..... 18
- Influencing decision making** 19
 - Falsifying information 21
 - Frank and fearless advice 22
 - Development applications..... 23
 - Influencing elected members 24
- Use of discretionary powers** 25
 - Improper use of discretionary powers..... 26
 - Policies and procedures guiding discretionary powers..... 28
 - Power to make decisions..... 29
- Awareness of corruption risks** 30
 - Elected members and conflicts of interests 31
 - Downplaying corruption risks in regional and rural councils..... 32
 - Misuse of confidential information 32
- Awareness of reporting obligations** 34
 - “If you think something isn’t right, report it.” 35
 - “There is no wrong door”..... 37
- Willingness to report internally** 38
- Barriers to reporting internally** 39
 - Fear of victimisation 40
 - Organisational barriers to reporting..... 43
- Experiences of reporting** 46
 - Receiving reports 47
 - Handling of previous reports..... 49
- Perceptions of the Commission**..... 52
 - Accessing the Commission’s resources 53
 - Trustworthiness and fairness..... 57
- Conclusions** 58
- Appendices** 59
 - Appendix one: Combined integrity agency information sessions (2024)..... 59
 - Appendix two: The survey..... 60
 - Appendix three: Office for Public Integrity’s Integrity Flowchart..... 68
 - Appendix four: Statistical results and references 69

LIST OF FIGURES AND TABLES

Figures

FIGURE 1: Workplace is highly/extremely vulnerable to specific types of corruption or other impropriety	8
FIGURE 2: Perceptions of vulnerability to corruption and other impropriety (2018 to 2024)	9
FIGURE 3: Personally observed corruption or other impropriety (2021 and 2024)	9
FIGURE 4: Personally observed specific types of corruption or other impropriety	10
FIGURE 5: Personally observed specific types of corruption or other impropriety (2018 to 2024)	11
FIGURE 6: Workplace is highly/extremely vulnerable to corruption or other impropriety (local government participants and participants overall)	12
FIGURE 7: Personally observed corruption or other impropriety (local government participants and participants overall)	12
FIGURE 8: Personally observed political interference	12
FIGURE 9: Suspicions of corruption or other impropriety (local government participants and participants overall)	13
FIGURE 10: Perceived influences on decision making	19
FIGURE 11: Perceived influences on decision making (local government participants and participants overall)	20
FIGURE 12: Role allows for wide discretion to make decisions (elected members)	25
FIGURE 13: Role allows for wide discretion to make decisions (executives and senior managers)	26
FIGURE 14: Perceived use of discretionary powers	26
FIGURE 15: Perceived use of discretionary powers (local government participants and participants overall)	27
FIGURE 16: Workplace has provided training on corruption risks	30
FIGURE 17: Perceptions of reporting obligations (local government participants and participants overall)	34
FIGURE 18: I would only report suspected corruption if I had clear evidence	35
FIGURE 19: I would only report suspected corruption if it was serious	36
FIGURE 20: Willing to report internally	38
FIGURE 21: Aware of internal reporting policies and procedures and confused about what conduct should be reported	39

FIGURE 22: Aware of internal reporting policies and procedures (2018 to 2024)	39
FIGURE 23: Confused about what conduct should be reported (local government participants and participants overall)	40
FIGURE 24: Perceptions of repercussions for reporting	40
FIGURE 25: Perceptions of repercussions for reporting internally (2018 to 2024)	41
FIGURE 26: Perceptions of repercussions for reporting internally (local government participants and participants overall)	41
FIGURE 27: Perceptions of organisational barriers to reporting	43
FIGURE 28: Perceptions of organisational barriers to reporting (local government 2018 to 2024)	44
FIGURE 29: Perceptions of organisational barriers to reporting (local government participants and participants overall)	44
FIGURE 30: Reported suspected corruption or other impropriety in last three years	46
FIGURE 31: Who receives reports of suspected corruption or other impropriety (2021 and 2024)	47
FIGURE 32: Who receives reports of suspected corruption or other impropriety (local government participants and participants overall)	48
FIGURE 33: Perceptions of how the report was handled	49
FIGURE 34: Perceptions of how the report was handled (agreed/strongly agreed)	50
FIGURE 35: Perceptions of whether anonymity was maintained (2018 to 2024)	51
FIGURE 36: Participants who had heard of the Commission	52
FIGURE 37: Awareness of the Commission	52
FIGURE 38: Previous contact with the Commission (2021 and 2024)	53
FIGURE 39: Previous contact with the Commission (local government participants and participants overall)	54
FIGURE 40: Perceptions of the Commission	55
FIGURE 41: Perceptions of the Commission (local government participants and participants overall)	56

Tables

TABLE 1: Participants' demographics	7
TABLE 2: Perceptions of the Commission (2018 to 2024)	55
TABLE 3: Information sessions for local councils run by the Office for Public Integrity, Ombudsman SA, and the Independent Commission Against Corruption	59

COMMISSIONER'S FOREWORD

The Commission conducts regular Public Integrity Surveys to better understand public officers' perceptions of corruption and other impropriety. This report provides the results of the Commission's third Public Integrity Survey. It analyses the perceptions and experiences of public officers in the local government sector.

This is the first Public Integrity Survey to be published since I commenced as Commissioner in February this year. The survey upon which this report is based was conducted in the later part of 2024. I would like to thank everyone who took the time to participate. The survey received over 7000 responses, including 828 from public officers in the local government sector.

The 2024 survey focused specifically on risks relating to decision making, including the use of discretionary powers, and improper influence. Some survey participants described facing pressure to manipulate information to support a decision that was not in the public interest and being reluctant to provide frank and fearless advice to decision makers. Local council Chief Executive Officers and mayors are invested with considerable discretionary powers, and some participants expressed concern that those powers could be misused.

The Commission's previous public integrity surveys were conducted in 2018 and 2021, allowing the Commission to track changes in perceptions of integrity in public administration. There is a growing perception that the local government sector is susceptible to corruption and other improper conduct. This does not necessarily mean that local councils are experiencing more corrupt conduct. It may be that there is an increased awareness of corruption risks.

Importantly, and largely by coincidence, from August 2024 to December 2024, the Commission, in conjunction with the Office for Public Integrity (OPI) and Ombudsman SA (the Ombudsman) (together referred to as the integrity agencies) engaged in a significant education campaign with local government, conducting 19 information sessions throughout that period of time (Appendix one). It is possible that some of the results of this survey demonstrate the importance of the three integrity agencies engaging in such education sessions.

I hope that that not only do the results of this survey serve to provide valuable insights into current experiences in the local government sector, but that information is provided in this report which will assist to increase awareness about corruption risks and the operation of the integrity scheme in South Australia.



Emma Townsend

Commissioner

INDEPENDENT COMMISSION AGAINST CORRUPTION



THE SURVEY

The Commission uses Public Integrity Surveys to better understand public officers' perceptions of corruption and other improper conduct. This report provides the results of the Commission's third Public Integrity Survey in relation to the local government sector. Previous surveys were conducted in 2021 and 2018, allowing the Commission to track changes in perceptions of wrongdoing over time. The survey questions have been refined over time. Only data that is directly comparative has been reported. The survey was conducted online and was open for six weeks from mid-October to the end of November. All public officers employed in state and local government agencies were invited to respond, with participation being voluntary.

The survey asked a mix of quantitative and qualitative questions. Participants' comments quoted in this report have not been corrected or altered in any way, except for the redaction of some material to protect participants' anonymity.

The results reflect perceptions rather than experiences of corruption. Public officers who believe they have encountered corruption or have strong views on the topic are more likely to have participated. As such, the responses may not be representative of the perceptions of all local government public officers.

Participants were directed to focus on experiences in their own workplace in the last three years. Nevertheless, some participants' views may be shaped by experiences of acquaintances in other workplaces or by older experiences. Participants' views often reflect events occurring at the same time as the survey is being conducted, such as media reporting of corruption cases.¹ In this instance, the survey was conducted at the same time as the South Australian integrity agencies were conducting information sessions for local councils.

Councils and the communities they service are not homogenous. Participants were not asked to identify their individual council. This report provides an overview of participants' perceptions across the local government sector. However, the analysis cannot reflect views that are more specific to individual councils.

The survey questions are contained in Appendix two.

The sample

At June 2024, there were approximately 11,600 local government employees and 672 elected members in South Australia.² The survey received 727 responses from participants who identified as local council employees. This represents 6.2% of the local government sector workforce. In addition, 101 elected members responded, representing 15.0% of elected members.

The survey received a lower response rate from local government employees compared to 2021 and 2018. However, considerably more elected members responded in 2024.³

Participants' demographic characteristics are given in Table 1. For demographic questions, information was collected only as broad categories, and participants were given the option of responding 'I prefer not to say.' No survey questions were mandatory. Those measures recognise the sensitivity of the survey topics, and that some respondents may feel uncomfortable about providing personal information.

TABLE 1:
PARTICIPANTS' DEMOGRAPHICS

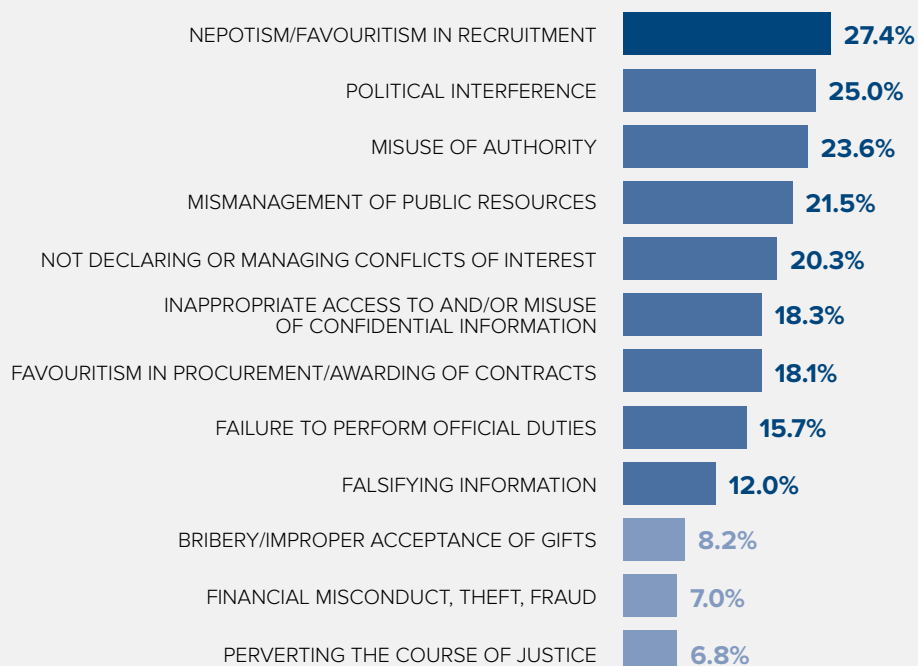
	PARTICIPANTS	%
Gender		
Female	473	56.3%
Male	342	40.7%
Prefer not to say/other	25	2.9%
Age		
34 years and under	128	15.3%
35 to 44 years	180	21.4%
45 to 54 years	270	32.1%
55 years and above	243	28.9%
Prefer not to say	19	2.2%
Employment type		
Permanent/ongoing contract	533	72.1%
Long-term contract	151	20.4%
Short-term contract	26	3.5%
Casual	18	2.4%
Prefer not to say/other	11	1.4%
Executive or Senior Manager role		
Yes	167	19.9%
No	636	75.7%
Unsure/don't know	8	1.0%
Prefer not to say	29	3.5%
Elected member		
Yes	101	12.0%
No	727	86.5%
Time in current organisation		
Less than one year	104	12.4%
1 to 5 years	353	42.0%
6 to 10 years	150	17.9%
11 to 20 years	153	18.2%
More than 20 years	68	8.1%
Prefer not to say	12	1.5%
Time in local government		
Less than 1 year	37	4.4%
1 to 5 years	175	20.8%
6 to 10 years	155	18.5%
11 to 20 years	260	31.0%
More than 20 years	202	24.0%
Prefer not to say	11	1.3%
Council location		
Metropolitan	440	52.4%
Regional	268	31.9%
Rural or remote	123	14.6%
Prefer not to say	9	1.1%

PERCEPTIONS OF POTENTIAL CORRUPTION AND OTHER IMPROPRIETY

Compared to both 2021 and 2018, local government participants were more likely to perceive their workplace to be vulnerable to corruption and other improper conduct and to have encountered impropriety. Integrity agencies in other jurisdictions have also reported an increased perception among local government employees that their workplace is susceptible to corruption.⁴

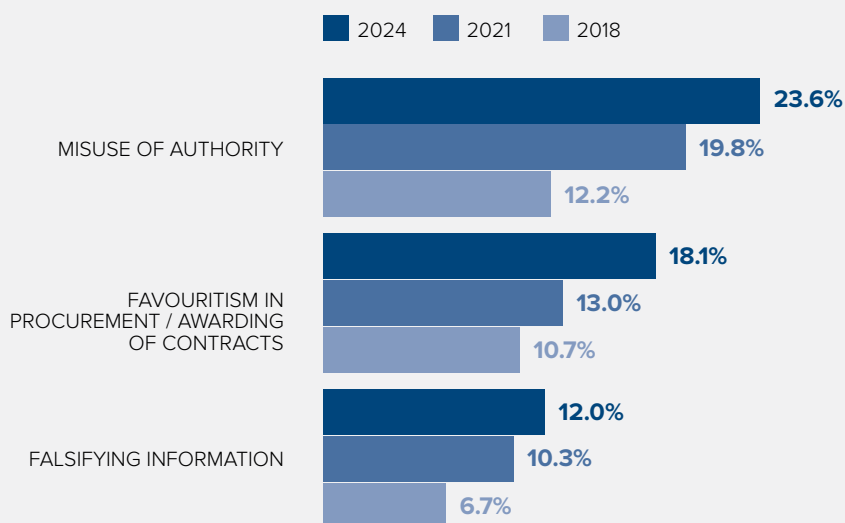
Participants were asked if their workplace was vulnerable to specific types of wrongdoing (Figure 1). Participants perceived their workplace to be most vulnerable to nepotism or favouritism in recruitment, followed by political interference, and misuse of authority.

FIGURE 1:
Workplace is highly/extremely vulnerable to specific types of corruption or other impropriety



Since 2018, the proportion of participants who believed their workplace is highly or extremely vulnerable to types of wrongdoing specified in the survey has increased, except for political interference where there has been little change (Figure 2). The highest increase in perceptions of vulnerability related to favouritism in procurement and the awarding of contracts, followed by misuse of authority and falsifying information.

FIGURE 2:
Perceptions of vulnerability to corruption and other impropriety (2018 to 2024)



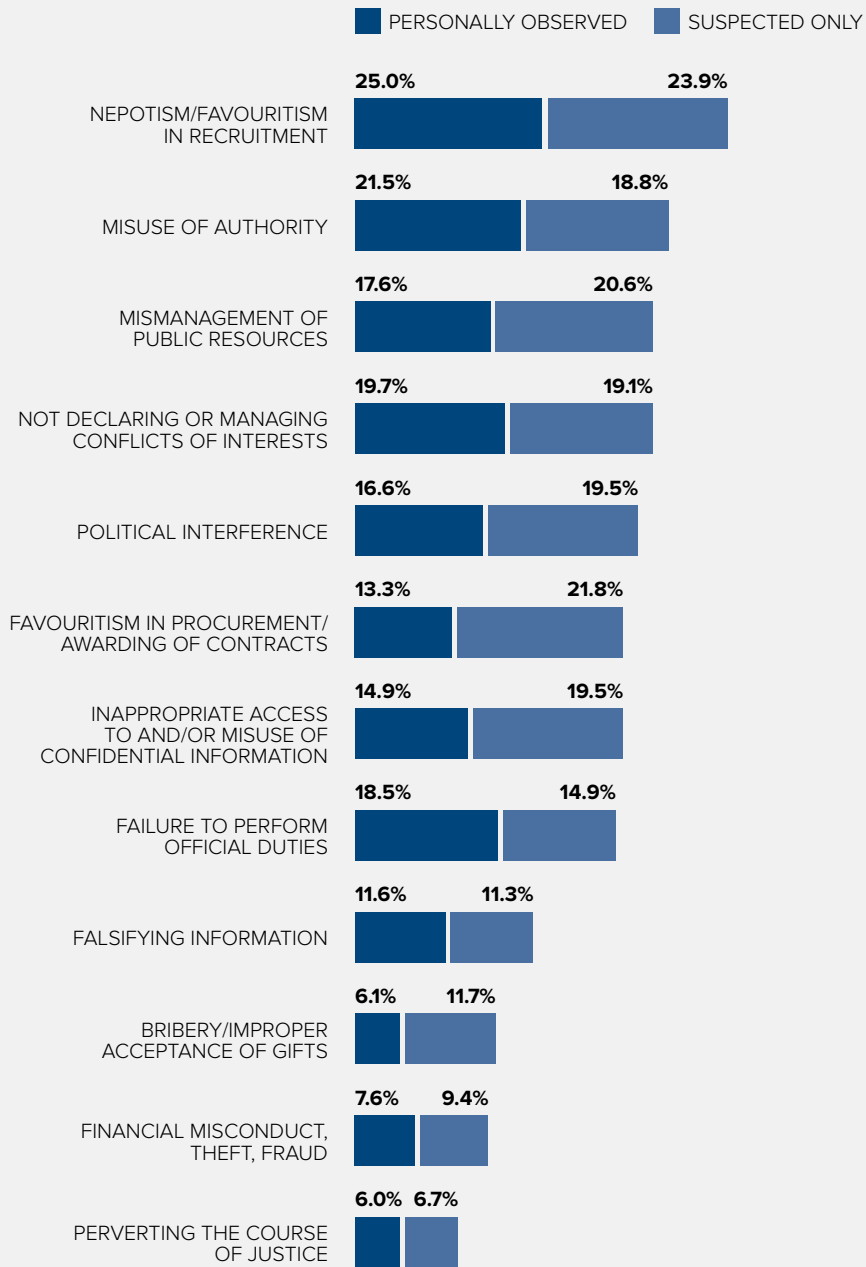
Almost a third of participants claimed to have personally observed potential corruption or other impropriety in their workplace in the last three years (Figure 3). This is a substantial increase since 2021.

FIGURE 3:
Personally observed corruption or other impropriety (2021 and 2024)



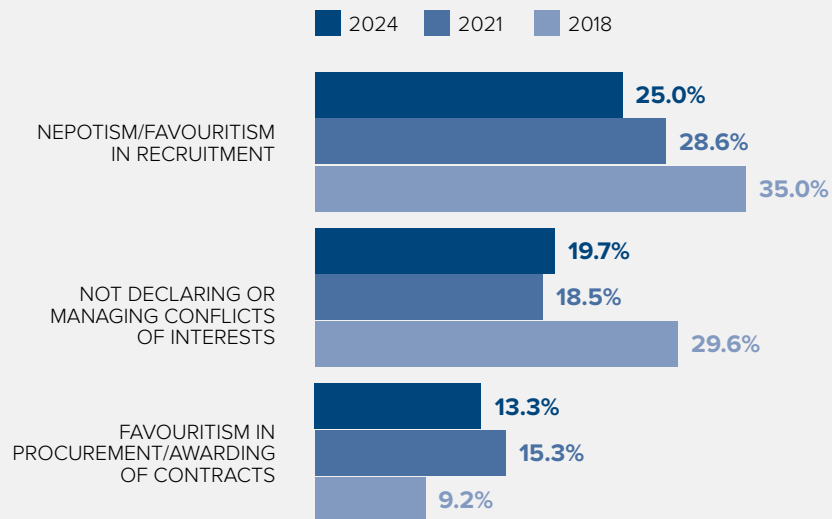
Nepotism and favouritism in recruitment, misuse of authority and mismanagement of public resources were identified as the most prevalent types of corruption risks suspected or encountered by participants (Figure 4).

FIGURE 4:
Personally observed specific types of corruption or other impropriety



Since 2018, participants were especially more likely to claim they have personally observed favouritism in procurement and the awarding of contracts. Fewer participants believed they have observed nepotism and favouritism in recruitment and improper conduct relating to conflicts of interests (Figure 5).

FIGURE 5:
Personally observed specific types of corruption or other impropriety (2018 to 2024)



COMPARED TO PARTICIPANTS OVERALL

Participants from the local government sector perceived their workplace to be less vulnerable to corruption and other improper conduct than participants overall (Figure 6).

FIGURE 6:
Workplace is highly/extremely vulnerable to corruption or other impropriety (local government participants and participants overall)



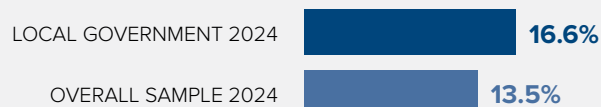
Local government participants were also less likely than participants overall to believe they have personally observed corruption or other improper conduct (Figure 7).

FIGURE 7:
Personally observed corruption or other impropriety (local government participants and participants overall)



Local government participants were less likely to believe they had personally observed each specific type of wrongdoing, except for political interference (Figure 8).

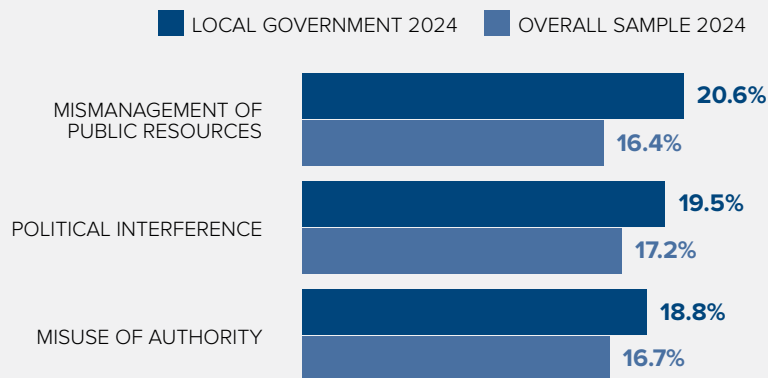
FIGURE 8:
Personally observed political interference



In 2024, participants were asked if they suspected corruption or other impropriety in their workplace in the last three years. This question had not been asked previously. Generally, fewer participants from the local government sector suspected wrongdoing compared to participants overall (Figure 9). However, local government participants were more likely to have suspected mismanagement of public resources, political interference and misuse of authority.

FIGURE 9:

**Suspensions of corruption or other impropriety
(local government participants and participants overall)**



IMPROPER RECRUITMENT

Improper favouritism in recruitment was seen to be the most prevalent corruption risk facing local councils. Other surveys, including the Commission's earlier public integrity surveys,⁵ have found that the local government sector is perceived to be highly vulnerable to nepotistic recruitment.⁶

A public officer who manipulates a recruitment to improperly benefit a candidate may have acted corruptly. A few participants referred to instances where they believed recruitment processes had been manipulated. Those participants described:

- ▶ a manager with a pre-existing relationship with a candidate remaining on the interview panel
- ▶ a recruitment into a new role before the creation of a position description
- ▶ a senior leader overturning the interview panel's decision
- ▶ being told by a senior leader before interviews commenced who should be given the role, and being directed to score that candidate highly
- ▶ a candidate being advantaged by the job description being written for a position that was only advertised internally
- ▶ feeling pressured by a senior leader to overlook the candidate they considered was the best fit for the role in favour of someone known to the senior leader

Depending on the particular circumstances, some of the above examples may or may not amount to potential corruption. Direct appointments, where an appointment is made without an open recruitment process, were perceived as being especially vulnerable to corruption. The *Local Government Act 1999* s 107(2)(a) requires that staff selection is based on merit and is fair and equitable. If conducted correctly, direct recruitments may adhere to these principles. However, some participants suggested that any appointment not opened to all suitable candidates attracted suspicion.

The Commission's report, *Robust Recruitment*, recommends that agencies ensure direct appointments are based on merit and follow the same robust processes as other recruitments. This allows for direct appointments to be defended if challenged.⁷

Recruitments involving internal candidates were also perceived to be especially vulnerable to improper conduct. Several participants believed internal recruitments were sometimes manipulated to improperly advantage a specific candidate.



"It is commonplace for an internal staff member to be directly appointed to a more senior role (promoted) without the position being advertised."

"Structuring recruitment for senior people to favour a preferred internal candidate."

"Internal recruitment where a senior manager has wanted a certain person to take on a position."

The Commission's report *The Inside Advantage: Managing Corruption Risks in Recruitment Processes Involving Internal Candidates* makes recommendations for protecting the integrity of internal recruitments.⁸ Recommendations included selection panel members following a process for declaring and managing conflicts of interests, agencies clearly ensuring internal candidates are not advantaged relative to other candidates, as well as an external independent member on selection panels for executive appointments where there are internal candidates.

Many participants suspected or believed they had observed nepotistic recruitment occurring in their workplace. This entailed an appointment based on a personal relationship rather than merit.



"Recruitment of staff - family members or close friends are being hired."

"Potentially the hiring manager and CEO preferably selecting executives they know over more appropriate candidates."

"Some new staff have been 'given' a job position because of who they know/ friends with."

Observations about nepotism extended to promotions and internal opportunities. Some participants believed workplace opportunities were based on personal relationships with senior leaders.



"Managers have favoured certain employees for promotions and desirable assignments based on their personal biases rather than merit."

"Favoured employees are getting promotions and special assignments and are being rostered only on the shifts at locations they like."

"...certain employees are given opportunities even though they have less qualifications or experience in that area."

Participants described negative workplace repercussions due to improper recruitment and promotion.



"I've seen failure to perform official duties due to not being sufficiently qualified or have the skills to do the role."

"There have been instances where individuals with personal connections were promoted despite lacking the necessary skills or experience, leading to decreased morale among other employees who felt that merit was not being recognized."

Often allegations of improper recruitment are not substantiated. Nevertheless, recruitments that raise suspicions can undermine workplace integrity. Employees who suspect favouritism is tolerated in their workplace, believe senior leaders cannot be trusted, and workplace decisions are not transparent, are more likely to engage in corrupt conduct themselves.⁹

MISUSE OF AUTHORITY

One in five participants believed they had personally encountered misuse of authority in their workplace in the last three years. For some, local councils were especially vulnerable to misuse of authority due to the degree of power invested in Chief Executive Officers (CEOs), mayors and elected members. Senior leaders were described as being able to control councils, act without transparency or accountability, and being immune from checks and balances. Consequently, a council's integrity is dependent on the personal integrity of a few powerful individuals.



"A good CEO is gold, a bad one is inviolate..."

"I am horrified at the freedoms and responsibilities afforded to our CEOs."

"Mayor having too much influence on decisions and direction of Council objectives and ambitions."

"The quality of oversight depends on the quality of Elected members."

Poor ethical leadership was seen to lead to toxic workplace culture. Some participants described bullying, intimidation and harassment being allowed to occur unchecked by leaders in their workplace. As a result, participants described negative impacts on their physical and mental health, and a high rate of staff resignations.



"Bullying staff and not addressing it when brought to their [senior leaders] attention and then firing staff who brought it to their attention."

"I've had to take multiple periods of leave to escape it [bullying] for my own mental health."

"Employees pushed out by setting them up to fail, bullying, not following processes and gas lighting."

The *Local Government Act 1999* s 59(1) defines the role of council members. Council members participate in council deliberations, review council's activities and policies to ensure their appropriateness and efficiency, have oversight of the CEO's performance, and represent the interests of residents and council ratepayers. Elected members do not have direct authority over the way in which a council employee performs their duties. Some participants described instances where they believed an elected member misused their position by overstepping their role in directing council employees.



“Have found myself in some situations that could be considered as directives from elected members rather than through senior management.”

“Council Members actually / attempting to direct or influence staff in contravention of the Local Government Act 1999.”

“Elected member authorising themselves to act on an operational matter that was not being handled as they thought appropriate.”

Elected members may misuse their authority if they do not adequately understand their role.



“Some of the current Councillor’s understanding of their role and/or adhering to the purview of their role has not been happening which is causing Council staff anxiety and stress.”

“Elected members (I have observed in general - and forgive the generalisation) have a poor understanding of the serious nature of the role and the various issues which could lead to maladministration, misconduct or worse.”

“Elected members trying to influence decisions made by administration staff in operational matters. This comes about through Elected Members not properly understanding their roles and responsibility in accordance with the Local Government Act.”

PROCUREMENT AND CONTRACT MANAGEMENT

Since 2018, there has been an increase in participants' perceptions that their workplace is vulnerable to favouritism in procurement and the awarding of contracts. Participants described various behaviours that may leave procurement and contract management susceptible to corruption. These included:

- ▶ failing to follow procurement policies and procedures
- ▶ approving exemptions for procurement thresholds
- ▶ failing to declare conflicts of interests
- ▶ not storing procurement and contracts records in the document management system
- ▶ a panel member speaking with contractors during a tender process
- ▶ use of variations to significantly increase the cost of a contract rather than returning to the market
- ▶ ignoring advice from a probity advisor
- ▶ invoices being paid without the supplier delivering contracted services
- ▶ suppliers overcharging for work

Some participants believed contracts had been awarded to suppliers with whom a member of the procurement team or an elected member had an undeclared conflict of interests. Several described having raised their suspicions with a senior leader, however no action was taken.

Suggestions made by participants for protecting procurement and contract management from improper conduct largely related to improving the management of conflicts in interests. Participants also suggested local councils consider mandatory annual training relating to corruption risks for public officers involved in procurements, and ensuring segregation of duties relating to the procurement and contract management life cycle.

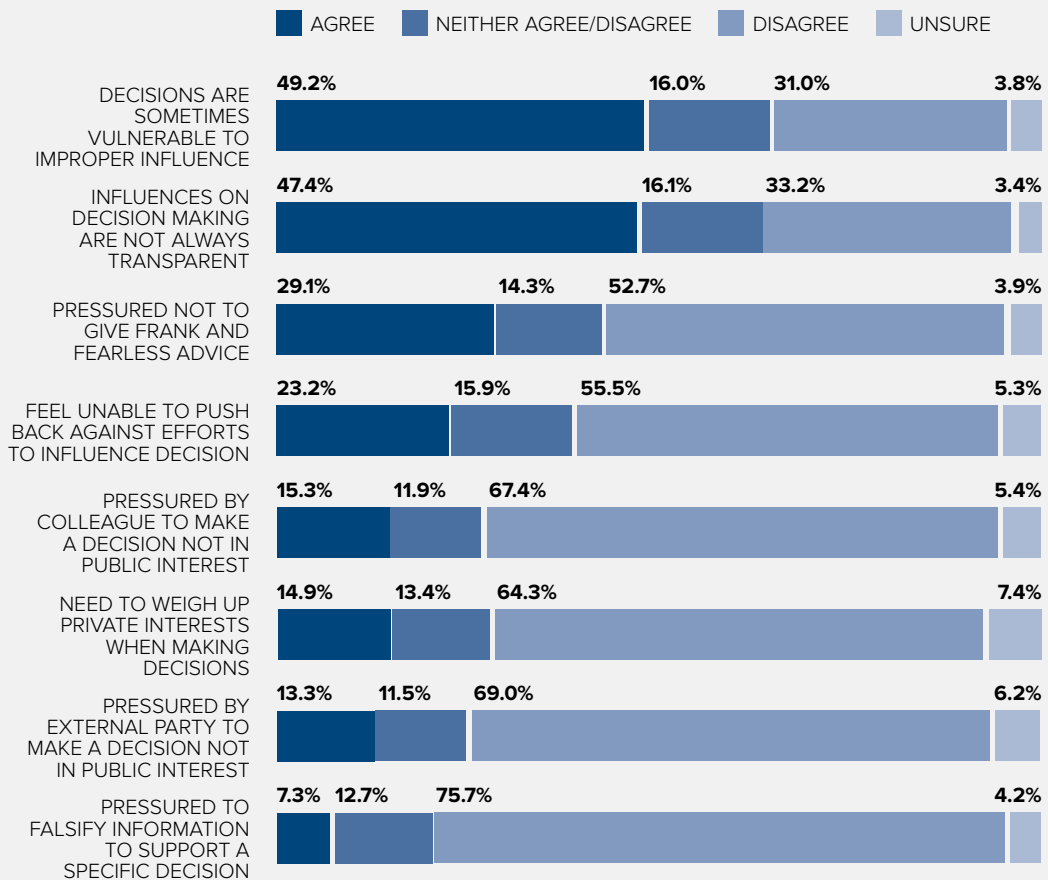
INFLUENCING DECISION MAKING

Public integrity surveys allow the Commission to focus on topics of specific interest. In 2024, participants were asked about improper influences on decisions they make in their role as public officers.

Public officers regularly make decisions that have consequences for the public interest. Public officers may be pressured to make a decision that benefits personal interests rather than the communities they serve. To protect against such pressure, decisions should be transparent, based on frank and fearless advice, and public officers should be accountable for their decisions. In circumstances where they face undue pressure, public officers should be empowered to push back.¹⁰

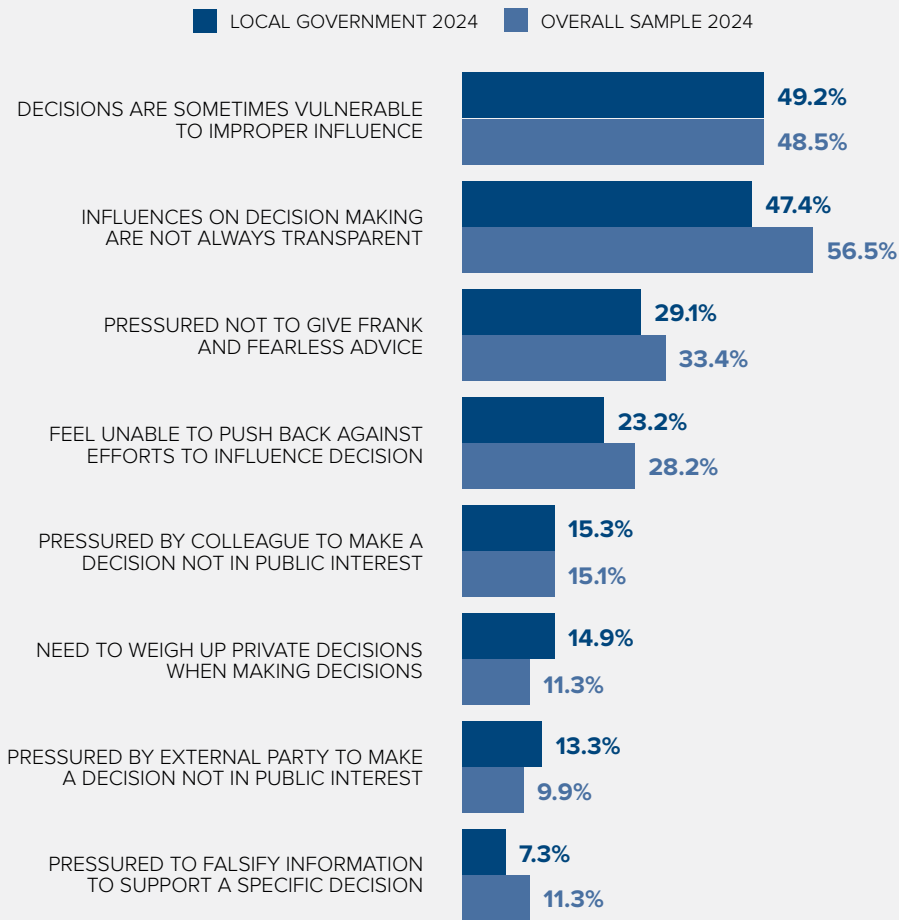
Almost half of participants believed decisions in their workplace were sometimes vulnerable to improper influence and that influences on decision making were not always transparent (Figure 10).

FIGURE 10:
Perceived influences on decision making



Participants from the local government sector generally considered their workplace to be less vulnerable to improper influences on decision making than participants overall (Figure 11). However, local government participants were more likely to perceive they faced pressure by external parties to make a decision that was not in the public interest and needed to weigh up private interests when making decisions.

FIGURE 11:
Perceived influences on decision making
(local government participants and participants overall)



Some participants described influence as being exerted by external agents, including individual residents, residents’ groups, contractors, developers and state politicians. However, efforts to improperly influence decisions were more commonly seen as coming from internal sources.

Falsifying information

Analysis of quantitative data shows only a small proportion of participants believed their workplace was vulnerable to information being falsified to support a decision. However, participants described in the open-ended responses, the manipulation of information provided to elected members.



“Administration concealing expenditure from elected members.”

“There are several instances where elected members have not been provided with full information and frank and fearless advice to make well informed decisions in the chamber.”

“Changing facts of reports before sending to audit committees and elected members.”

“Sanitising of information regarding strategic risks and administrative challenges provided to elected members.”

Several participants described being directed to manipulate information to support a specific outcome or reduce transparency and accountability.



“I have felt pressured to craft a few statements which omits certain information and/or outright gives an impression of information that is not at all correct, for the specific purpose of maintaining whatever cover story my local government has concocted regarding issues of public interest.”

“Direction to not provide balanced advice on major strategic matters to drive a particular outcome and prevent debate.”

“I have seen where I have been asked to change the data or the metrics to support the view that we want to show rather than what it actually is or to omit data and not provide a complete picture for those making higher up decisions.”

Some participants believed council administration may influence decisions by failing to conduct community consultations.



“Again I refer to lack of community consultation in big decisions or changes to a budget or service provision.”

“Not undertaking public consultation on key matters that affect community.”

“I rated mismanagement of public resources as somewhat vulnerable because council doesn’t consult with the community as much as they could, leading to decisions not necessarily being made with the public’s best interests at heart.”

Frank and fearless advice

An independent and impartial public service requires public officers to provide frank and fearless advice. Without such advice, senior leaders may lack the information needed to make decisions in the public interest. Community trust in the public sector will be lost if the public perceive that decisions are not well informed, truthful, consistent and fair.¹¹

Some participants described being reluctant, or feeling too intimidated, to provide frank and fearless advice. Others perceived that their advice was often ignored.



“If you provide frank and fearless advice to management you only put a target on yourself...”

“I am allowed to have a say, but it feels like no-one listens and nothing changes.”

“CEO and Mayor often do not want to hear about what is the required process or the fact that they do not have the legal capacity to make a decision.”

Elected members were sometimes seen as refusing to take on advice intended to inform impartial decision making that supports the public interest.



“...some Councillors frequently ignore evidence in making their decisions, make decisions that are not in the interests of the broader community, or enter consideration of a particular matter with a preconceived position. This can filter down to pressure on staff when preparing advice and recommendations.”

“Elected Members deciding on their position, for example on a development, well before the whole process has been completed.”

Female participants were more likely to agree they are unable to push back against pressure.¹² Younger participants were more likely to agree they have been pressured not to provide frank and fearless advice.¹³ Employees in those positions should feel supported to speak up if they experience improper pressure.

In contrast, senior leaders were less likely than other participants to believe they have experienced pressure to not provide frank and fearless advice, and that decisions are vulnerable to improper influence or lack of transparency.¹⁴ Male participants were less likely to agree that decisions are vulnerable to improper influence, or they have been pressured to make a decision that is not in the public interest.¹⁵

Development applications

Some participants observed that decisions relating to development applications were vulnerable to improper conduct.



“Local Government often makes final decisions in planning and development. There are potentially hundreds of millions of dollars at stake, specifically in greenfield development, it is clear that when sums like that are involved, corruption is never far away.”

Participants described a range of methods they believed were used by developers to influence council decisions. These included developers:

- ▶ cultivating a relationship with a council executive through the provision of benefits
- ▶ circumventing council processes by directly approaching the Minister
- ▶ influencing a council executive to apply pressure on an employee to accept an outcome that was profitable for a developer but not in the council’s best interest
- ▶ inappropriately discussing a development proposal with a member of the Council’s Assessment Panel
- ▶ accessing confidential information relating to development applications from council public officers

Elected members’ interactions with developers were seen as being especially vulnerable to potential corruption. This included elected members acting while holding conflicts of interests and entering into “under the table deals” to improperly benefit a developer.

Influencing elected members

Elected members were more likely than council staff to agree they have been pressured by an external party to make a decision that was not in the public interest¹⁶ and need to weigh up private interests when making decisions.¹⁷

A few elected members recalled being pressured by another elected member to vote in a certain way.



“A group of elected members deciding on a position well before a council meeting. This goes beyond elected members canvassing views, but deliberately deciding on how they, as a block, will vote. “

Some participants believed that elected members are particularly vulnerable to being pressured by state members or acting in the interests of their political affiliations rather than the public interest.



“Local state members campaigning for individuals and then when elected influencing/directing their decision making.”

“Pressure from other levels of government (officials and elected representatives) to not make decisions that are in the public interest, but not in the interests of other levels of government.”

“Political party interference, Local Govt EMs who are members of political parties.”

“Elected members trying to influence Council policy to suit their political agenda, including matters that are outside the remit of Local Government.”

“The political affiliations of local government councillors (elected members) with political parties can influence the strategic directions of council.”

USE OF DISCRETIONARY POWERS

A further topic of specific interest in the 2024 survey was the use of discretionary powers. Discretionary decisions involve a public officer using their judgement, rather than following pre-determined criteria. The use of discretionary powers allows public officers to ensure the efficient and effective management and performance of a public authority.¹⁸

The authority to make a discretionary decision comes from legislation or internal procedure, and a public officer must not exceed their authority when exercising discretionary powers.¹⁹ The use of discretionary powers should be made in good faith, and for a proper, intended and authorised purpose. The misuse of discretionary powers, such as a public officer overstepping delegated authority to make a decision for personal benefit, may constitute corruption.²⁰

Elected members and council senior leaders have extensive discretionary powers. However, many did not appear to realise this (Figures 12 and 13). Public officers in roles that permit the use of discretionary powers need to be aware of what those powers entail, and that they adhere to safeguards intended to protect discretionary powers being misused.

FIGURE 12:
Role allows for wide discretion to make decisions (elected members)

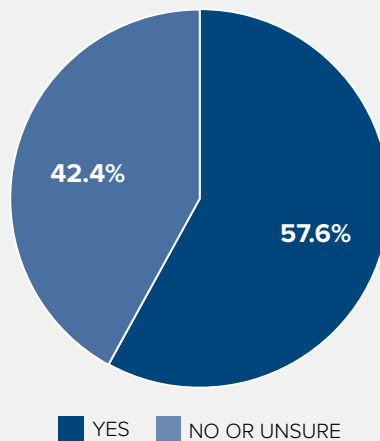
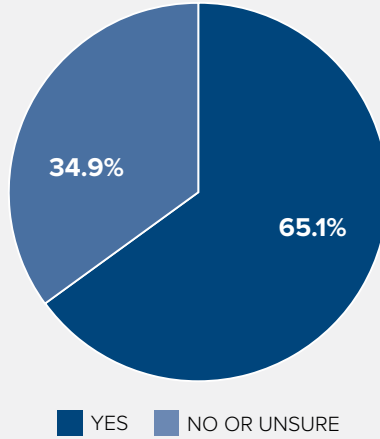


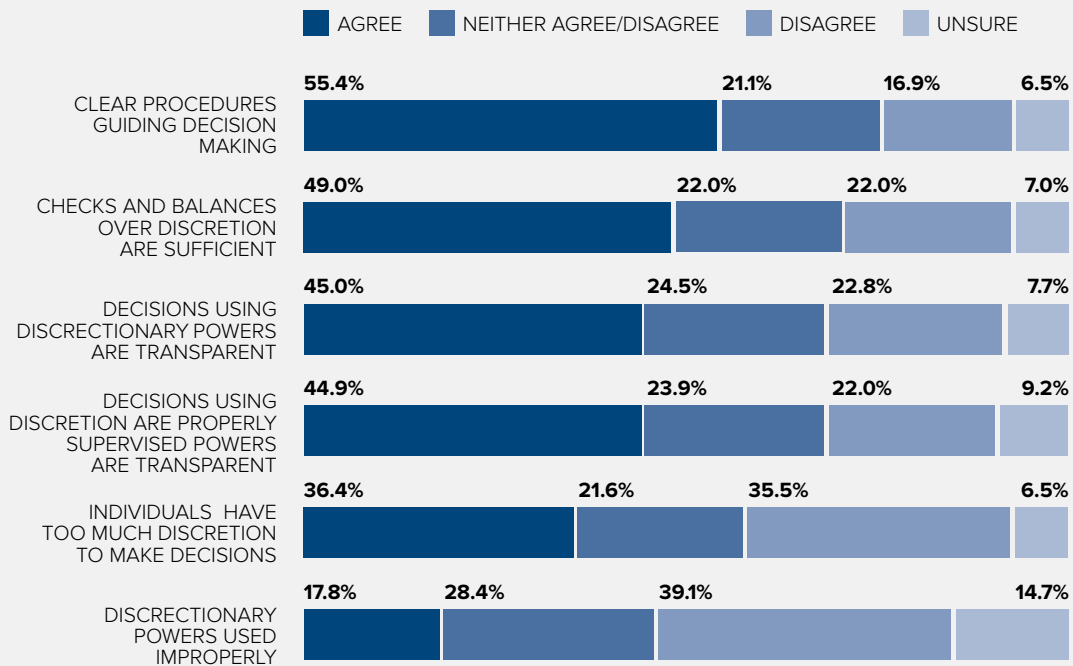
FIGURE 13:
Role allows for wide discretion to make decisions (executives and senior managers)



Improper use of discretionary powers

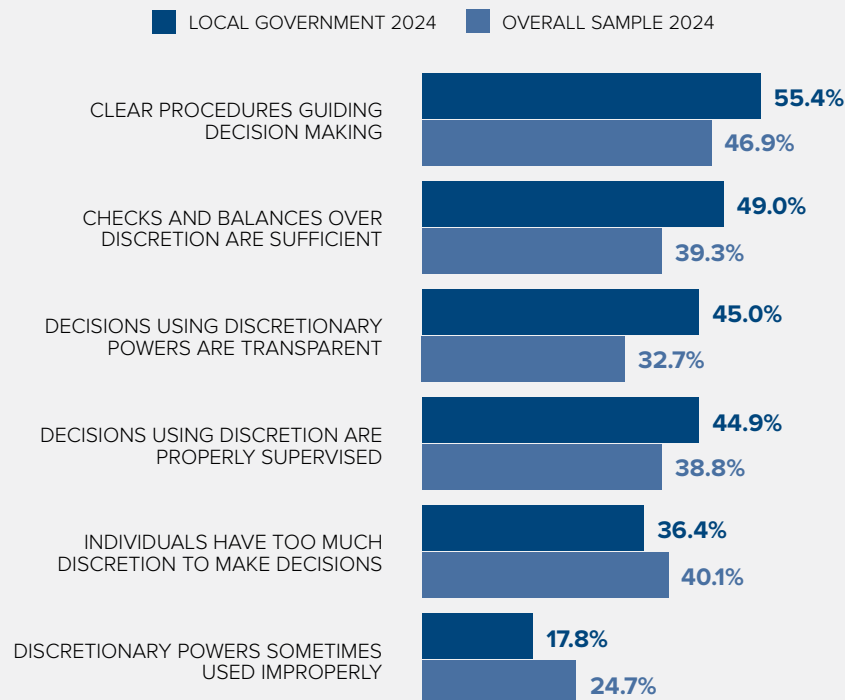
Less than one in five participants agreed that discretionary powers were being improperly used (Figure 14). Approximately half of participants responded that their workplace provides clear procedures to guide decision making, the use of discretionary power is transparent, appropriately supervised and subject to sufficient checks and balances.

FIGURE 14:
Perceived use of discretionary powers



Local government participants had greater confidence in the integrity of the exercise of discretionary powers compared to participants overall (Figure 15).

FIGURE 15:
Perceived use of discretionary powers
(local government participants and participants overall)



However, participants also provided examples of potential misuse of discretionary powers. These included:

- ▶ a CEO signing off a direct recruitment to improperly favour a preferred candidate
- ▶ a CEO allowing an exemption from procurement limits awarding a contract to a specific contractor with whom they have a relationship
- ▶ a council employee giving in to pressure by a ratepayer to overturn the recommendation of an investigating officer or to withdraw an expiation
- ▶ issue of expiations even though no breach had occurred
- ▶ administration staff not adhering to delegations

Several participants believed that discretionary powers were being misused when allocating discretionary funds. Councils use discretionary funds, grants and allowances to support individuals and organisations to provide activities that benefit the community. Several participants described the allocation of discretionary funds to individuals with whom a decision maker had an undeclared conflict of interests.

A few participants claimed that discretionary decisions are vulnerable to misuse by public officers involved in council subsidiaries. The *Local Government Act 1999* s 42 allows local councils, with Ministerial approval, to establish a subsidiary to provide services, carry out activities or perform functions of the councils.²¹ Participants suggested that subsidiaries were sometimes established to circumvent policies and procedures, and the operation of subsidiaries is not always transparent.



“At a Regional Subsidiary the CEO having too much discretion and the normal checks and balances removed or simply ignored so they can achieve a particular outcome. In particular removing agreed ‘hold points’ that required a Council to make a formal decision before moving forward.”

“Establishing internal structures that enable bypassing of normal processes of accountability and scrutiny, e.g. using subsidiaries.”

Policies and procedures guiding discretionary powers

While many participants perceived there were sufficient controls over the use of discretionary powers, not all agreed. Some participants observed that policies and procedures guiding the use of discretionary powers were inadequate.



“I am not convinced that there are clear decision-making frameworks in place that guide decision making for staff across the organisation.”

“I do not believe decisions are properly supervised.”

“...there are times when policies and procedures may not be as clear as they could be to ensure greater transparency and consistency and to ensure compliance/no overreach.”

A few participants believed that a lack of compliance, rather than insufficient policies and procedures, may undermine the integrity of discretionary decision making in their workplace.



“The issue mostly (at times) is not the actual process - it's the fact the process is either not followed or ‘debated’ from a side angle that inevitably leads to some benefit (conveniently) for someone.”

For some participants, the use of discretionary powers was not always transparent, accountable, or adequately recorded.



“...not having to justify their decision making or their leaders not knowing they have made the decision.”

“The final decisions are made by general managers and CEO however are not always transparent.”

“CEO providing ‘verbal’ approval for matters that require licences or leases to be in place.”

Power to make decisions

Limiting the use of discretion across an agency is sometimes seen as a control for corruption.²² However, the concentration of discretionary power in the hands of a few individuals may increase an organisation’s vulnerability to corruption,²³ or in the words of English historian Lord Acton, “absolute power corrupts absolutely.”²⁴

A third of participants agreed that individuals in their workplace have too much discretion to make decisions. Some participants believed that discretionary power is too centralised with senior leaders in their workplace, especially the CEO. This may lead to a lack of transparency, accountability and impartiality when exercising discretion.



“The issue in my current workplace is not the lack of controls over delegated decision making to staff, it is too much power in the CEO. Staff, with the skills and knowledge to make decisions, are not given appropriate discretionary power. The CEO centralises too much decision making. This lacks transparency (in terms of accountability to strategic direction) and also is inefficient.”

“I often feel that I am unable to make decisions at all anymore despite my experience, as every decision ends up going to the CEO to make a ‘call’ without the expert advice necessary for that decision.”

Senior leaders were more likely than other participants to disagree that some individuals in their workplace have too much discretion and that discretion may be used for improper reasons.²⁵ They were more likely to agree that discretionary decisions in their workplace are transparent, guided by clear procedures, properly supervised, and have sufficient checks and balances.²⁶

Senior leaders may be insufficiently aware of risks associated with the concentration of powers in the hands of a few public officers. Alternatively, public officers who do not hold wide discretionary powers may misconstrue the use of such powers. From the outside, it may not be possible to fully appreciate the checks and balances applied to discretionary decisions.²⁷ It is important to dispel misconceptions and ensure that there are clear guidelines on the use of discretionary powers, that guidelines are followed, and that there is clear communication about the rationale behind decisions.

AWARENESS OF CORRUPTION RISKS

The increase in participants' perceptions that their workplace is vulnerable to corruption does not necessarily mean that corrupt conduct has increased in local councils. Instead, this finding may reflect an increase in awareness of corruption risks. However, this awareness has more likely come from information sessions provided by the integrity agencies, rather than internal training.

Participants were asked if their workplace had provided them with training on corruption risks specific to their role. Almost two thirds agreed they had been provided with such training (Figure 16). This is a higher proportion than participants overall. However, the proportion of local government participants who agreed they had received training has dropped by 20% since 2018.

FIGURE 16:
Workplace has provided training on corruption risks



Some participants commented on the need for further training from their organisation, or suggested the internal training they had received was inadequate.



“Lack of education and training particularly people in managerial positions.”

“Training for ICAC occurred once and the only reminders are about gifts and the gift registry. There is a strong facade of ‘nothing to see here’...”

“My current organisation provides little to no training or awareness of ICAC, it is just not on the organisation's agenda. Previous organisations I have worked for have made it a large part of their day to day activities, their training and induction programs and mandatory knowledge for staff.”

The provision of internal training was also uneven. Participants on short term contracts were less likely, and senior leaders more likely, to agree that their organisation had provided training on corruption risks.²⁸

The survey was run at the same time as the South Australian integrity agencies were conducting information sessions for local councils. Those sessions included information about common corruption risks in local councils. For some participants, those sessions were the first time that they had heard of the Commission.



“We were made to do ICAC training a few weeks ago, that’s the first time I knew about it.”

Elected members and conflicts of interests

While participants’ awareness of vulnerability to corruption risks may have improved, there were some notable gaps in awareness. Comments from some participants who identified as council employees conveyed a sense of frustration that elected members are not always sufficiently aware of corruption risks relating to undeclared or unmanaged conflicts of interests.



“Elected members not properly declaring conflicts of interest. This area is only self regulated and at times others know of conflicts but can do little about it.”

“Sometimes elected members may not realise that they have a conflict of interest in a particular matter even though they have had extensive training in the matter.”

“Members also rarely declare conflicts and seem to act ignorant despite numerous training attempts from staff.”

The *Code of Conduct for Council Members* (2013) s 3.13 requires elected members to make unbiased decisions in the best interests of the whole community, and to declare conflicts of interests. Compared to council staff, elected members were more likely to respond that their council had provided training on corruption risks relating to their role.²⁹ However, conflicts of interests training for some elected members may be missing the mark.

Participants described elected members acting on conflicts of interests by:

- ▶ persuading the council to improve facilities near the elected members’ house
- ▶ supporting a business in which they have an interest
- ▶ failing to declare partnerships and stakeholdings on registers of interests
- ▶ influencing council grants to benefit personal associates
- ▶ influencing procurements to favour a personal associate
- ▶ accepting gifts from someone attempting to exert influence over a council decision

Downplaying corruption risks in regional and rural councils

The risk that corruption is not being recognised as such may be greater in regional and rural councils. The 2021 survey report concluded that public officers in regional and rural councils may downplay corruption risks arising from their council's location. The 2024 survey has produced similar results.

Analysis of the quantitative data found that participants from regional and rural councils were not especially aware of corruption risks such as nepotism and favouritism associated with working in a small, close-knit community. However, participants' qualitative responses suggested an awareness of corruption risks specific to regional and rural councils.



“Being a rural council, employment of friends & relatives has the potential to cause issues. People are employed on who they know and not necessarily because they are best for the role. This also can happen with promotions.”

“Conflict relating to procurement is also difficult in a small town as there are a lot of relationships that occur - family, friendships etc. Although conflicts occur, our procurement is based around contractor service - but certainly challenging.”

“Small regional townships are often closely related communities. Therefore, staff are often involved in-directly when contracts are being awarded to family and friends' businesses.”

Misuse of confidential information

An emerging risk that may be underestimated by public officers in local councils is the inappropriate access to and misuse of confidential information.³⁰ Local councils hold valuable information which could be improperly used if it is divulged to someone not authorised with access.³¹ An individual's safety and security may be put at risk if personal details are disclosed. Organised crime groups may cultivate relationships with council staff and elected members to gain access to confidential information that could be used for extortion or to facilitate identify fraud.³²

The misuse of confidential information, for instance the leaking of discussions on social media or to the community, may damage a council's reputation.³³ Improper access to confidential information relating to tenders, planning and development applications, or in-confidence council meetings may put council operations at risk. Corruption may occur if that information has been improperly disclosed to an unauthorised associate or in return for a bribe.³⁴ Foreign interests may also attempt to access secret or embarrassing information to influence local council decisions and weaken the integrity of local government.³⁵

Despite those risks, less than one in five participants considered their workplace to be vulnerable to misuse of confidential information, and fewer believed they had personally encountered misuse of confidential information. However, the need for local councils to pay attention to protecting confidential information was raised in the qualitative comments.

Several participants claimed that systems for protecting confidential information were lacking in their workplace.



“IT and Records Management issues have led to vulnerability of data and its accessibility.”

“Boundaries aren’t always clear on what information can be used and for what purposes.”

“LGAs do not adequately protect data, label it, or secure it. Items are handled based on trust of employees, who are often not reverified or even police checked prior to employment.

“Records management system is broadly accessible, and the main risk control appears to be the integrity of staff.”

Some participants considered elected members to be especially prone to inappropriately accessing and disclosing confidential information. Those participants described instances where an elected member had shared confidential information on social media or in discussions with constituents. Systems to ensure that elected members cannot improperly access and share information were also seen to be lacking.



“Despite declaring a conflict of interest or listing the profession on the register of interest, Elected Members are still able to access the confidential agenda papers and minutes of the meeting, allowing them to (for example) access commercially sensitive information which may relate to a business competitor of the elected member.”

AWARENESS OF REPORTING OBLIGATIONS

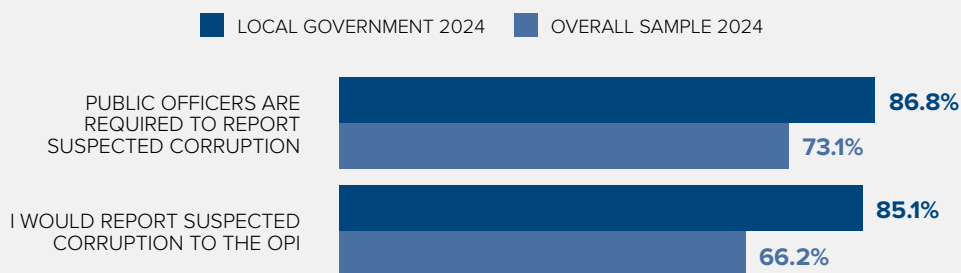
Reports made by public officers are the single most important source for detecting corruption.³⁶ Public officers from within an agency are best placed to notice potential corruption. Their first hand knowledge of their organisation and understanding of internal processes means they can recognise when those processes have been breached.³⁷

Public officers are obliged to report to the Office for Public Integrity any matter that is reasonably suspected of involving corruption in public administration. The Office for Public Integrity will assess such a report, and if a potential issue of corruption in public administration, which could be a subject of a prosecution, is identified, the matter will be referred to the Commission.

Under section 12D of the *Ombudsman Act 1972*, public officers may report to the Ombudsman any reasonable suspicion of misconduct or maladministration. While there is no mandatory obligation for a public officer to make a report, there is an expectation that such a matter should be reported. Such matters can also be reported to the Office for Public Integrity.

Most participants were aware of their reporting obligations (Figure 17). Almost three quarters claimed they would be willing to report suspected corruption to the Office for Public Integrity.

FIGURE 17:
Perceptions of reporting obligations
(local government participants and participants overall)



Local government participants were more likely than participants overall to be aware of their reporting obligations, and to state they would act on those obligations. Senior leaders and elected members were more likely to agree that they would report suspicions of corruption to the Office for Public Integrity than other participants.³⁸

“If you think something isn’t right, report it.”

While most participants were aware of their reporting obligations, perhaps unsurprisingly, some did not appreciate the distinction between types of conduct to be reported. The terms corruption, misconduct and maladministration have technical legal definitions and are to be referred to different integrity agencies. It is for this reason that the information sessions for local councils ran by the integrity agencies emphasised the message “if you think something isn’t right, report it.”

The Officer for Public Integrity Directions and Guidelines clarifies what conduct should be reported.³⁹ This includes a simple explanation for each term as follows:

- ▶ **Corruption:** involves certain criminal offences, including bribery or corruption of public officers; threats or reprisals against public officers; abuse of public office; offences relating to appointment of public office; offences against the Public Sector (Honesty and Accountability Act) 1995, the Public Corporations Act 1993 and the Lobbyist Act 2025.
- ▶ **Misconduct:** is an intentional and serious contravention of a code of conduct by a public office that constitutes a ground for disciplinary action.
- ▶ **Maladministration:** is the conduct of a public officer, or a practice, policy or procedure of a public authority, that results in an irregular and unauthorised use of public money or substantial mismanagement of public resources.

Public officers are required to report *reasonable* suspicions of corruption. They are not required to collect evidence to support their suspicions. Collecting evidence may alert a perpetrator to hide their conduct, and in some instances jeopardise a subsequent investigation.

The message that “if you think something isn’t right, report it” was emphasised at the recent information sessions for local councils. Those sessions may have reduced some of the confusion that may have surrounded reporting. The proportion of participants who believed a report must be accompanied by clear evidence has decreased from 2021 and is lower than for participants overall (Figure 18).

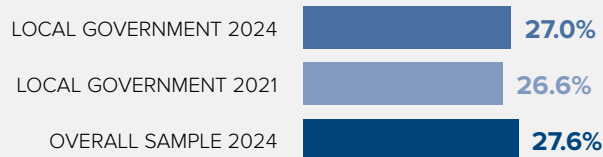
FIGURE 18:
I would only report suspected corruption if I had clear evidence



Corruption can be difficult to detect. People who commit crimes often go out of their way to ensure their crimes remain undetected. Sometimes corruption is uncovered when a report is received about a matter that appears at the first instance to be minor. Further investigation reveals more serious offending. A corruption investigation often involves piecing together multiple allegations. By themselves, each allegation may seem trivial or isolated. However, brought together, the pieces can reveal a complete picture of corrupt conduct. This is one of the reasons why there remains an expectation that misconduct and maladministration should be reported to either the Office for Public Integrity or the Ombudsman SA.

More than one in four participants claimed that they would only report corruption if their suspicions were serious (Figure 19). This proportion is similar to 2021 and the overall sample.

FIGURE 19:
I would only report suspected corruption if it was serious



Some participants commented that they would only report a serious matter as they would not want to cause inconvenience.



“I might think that something is inappropriate or corrupt, but I wouldn’t want to be seen as a ‘time waster’ as it might be deemed a minor issue.”

“I would need to feel on solid ground to report something as I don’t wish to simply throw stones on a ‘vibe’ or on a whim.”

“It is a very intimidating space. I would want to report, but be anxious about being incorrect and causing un-due stress and/or becoming a target of a party undertaking corruption.”

Public officers should be assured that reports will be appropriately assessed by the Office for Public Integrity before they are referred to the Commission. The Office for Public Integrity will only refer to the Commission if a potential issue of corruption in public administration, which could be the subject of a prosecution is identified. It is preferable to report something which may appear trivial on the face of it so that the Office for Public Integrity can consider it, rather than running a risk of corruption remaining undetected.

"There is no wrong door"

The information sessions for local councils run by the integrity agencies also emphasised the message "there is no wrong door." The Office for Public Integrity has produced a flowchart (Appendix three), which provides guidance on reporting pathways. However, public officers should have confidence that even if they report to the wrong agency, their report will still be referred to the appropriate agency.

Some participants expressed uncertainty about reporting pathways.



"I am unsure of whether I report corruption to ICAC and misconduct and maladministration to OPI, or whether all such behaviours should be reported to OPI who will assess/investigate and refer to ICAC as appropriate."

"Sometimes it is difficult to know whether to report direct to ICAC or to the Ombudsman or the Behaviour Standards Panel. There is sometimes a blurred line between integrity and behaviour that is unclear."

The message "there is no wrong door" should provide confidence to those public officers who are unsure where they should report suspected corruption, maladministration or misconduct.

WILLINGNESS TO REPORT INTERNALLY

Not all participants were willing to report suspected corruption or other improper conduct to someone inside their organisation. The proportion of local government participants willing to report internally has increased since 2021 (Figure 20). Participants from the local government sector were just as likely to report internally than participants overall.

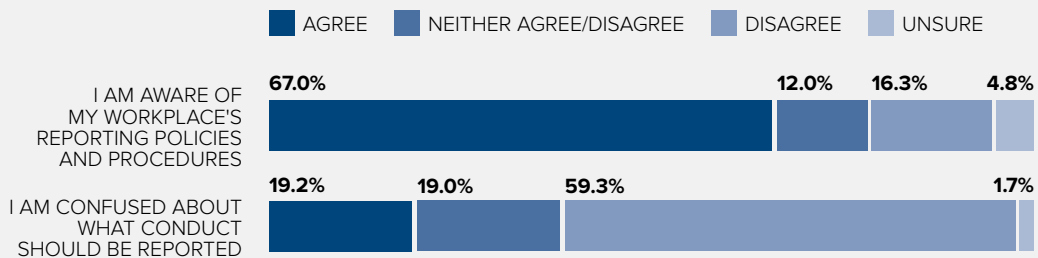
FIGURE 20:
Willing to report internally



BARRIERS TO REPORTING INTERNALLY

Public officers who lack information about mechanisms for reporting corruption or other improper conduct may be deterred from reporting internally.⁴⁰ The majority of participants responded that they understood internal reporting procedures (Figure 21). One in five agreed that they were confused about what conduct should be reported. Nevertheless, there was room for improvement.

FIGURE 21:
Aware of internal reporting policies and procedures and confused about what conduct should be reported



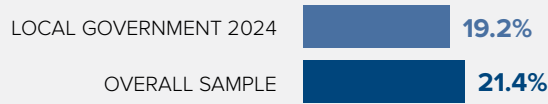
Since 2018, there has been a decrease in the proportion of participants who are aware of their council's reporting policies and procedures (Figure 22).

FIGURE 22:
Aware of internal reporting policies and procedures (2018 to 2024)



Local government participants were less confused about what conduct should be reported than participants overall (Figure 23).

FIGURE 23:
Confused about what conduct should be reported
(local government participants and participants overall)

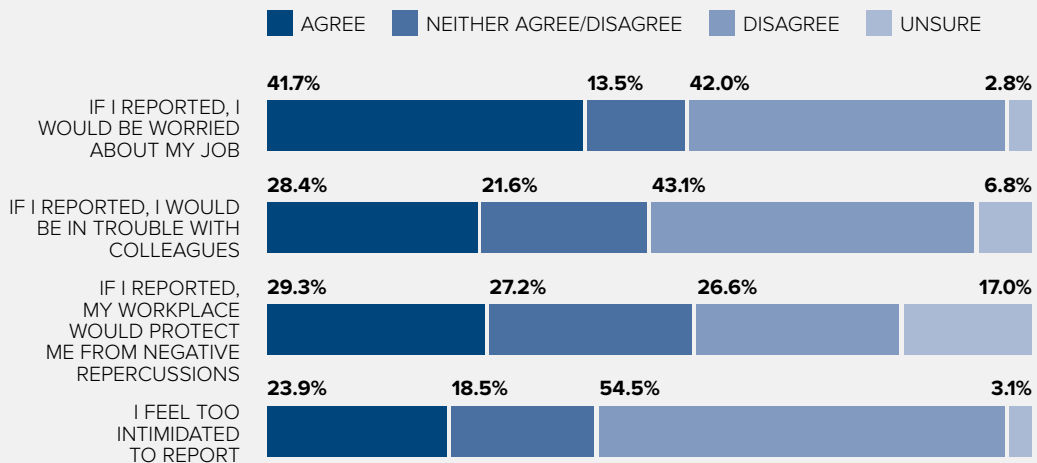


Participants in rural and regional councils, senior leaders, and elected members were more likely than other participants to be aware of reporting policies and procedures.⁴¹ Even so, more than one in six senior leaders (16.9%) did not know their workplace’s reporting policies and procedures. Female participants were more likely to agree they are confused about what to report, and less likely to agree they were aware of reporting policies and procedures.⁴²

Fear of victimisation

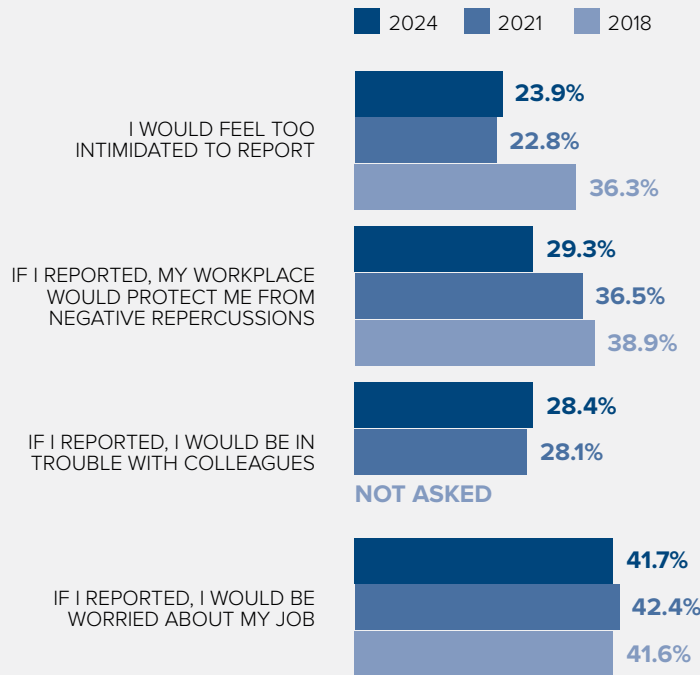
A major barrier to reporting suspected wrongdoing internally is fear of negative repercussions,⁴³ especially fear of losing employment.⁴⁴ Approximately 40% of participants agreed they would be worried about their job if they reported internally (Figure 24).

FIGURE 24:
Perceptions of repercussions for reporting



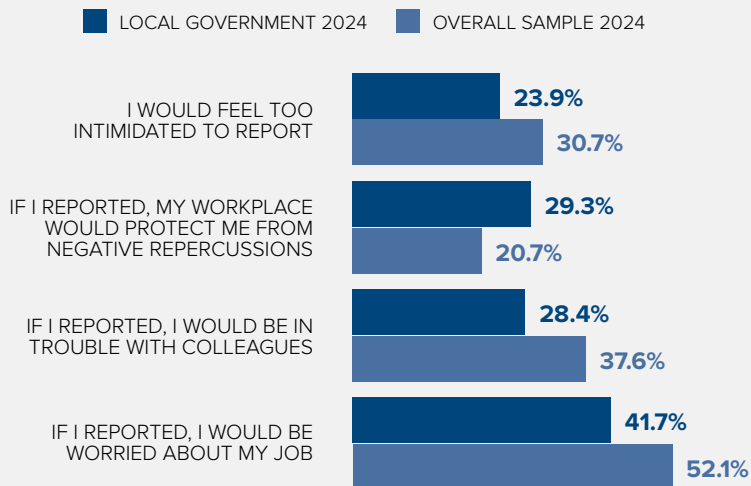
Since 2018, participants have become increasingly worried that reporters will not be protected from negative repercussions, although fewer participants agreed they would feel too intimidated to report internally (Figure 25).

FIGURE 25:
Perceptions of repercussions for reporting internally (2018 to 2024)



Local government participants were generally less worried about being victimised for reporting compared to participants overall (Figure 26).

FIGURE 26:
Perceptions of repercussions for reporting internally (local government participants and participants overall)



Female and older participants were more worried about their job if they reported internally and were more likely to feel too intimidated to report.⁴⁵ Older participants were less likely to believe they would be protected from negative repercussions.⁴⁶ Some participants in precarious employment or facing economic hardship expressed fear at losing their job if they reported.



“On a contract, so unsure if it would be renewed if I reported anything. Nothing I have seen at my workplace makes me believe this is a definite possibility, but you never know. You need to be a permanent staff member to feel confident in making reports of any level of seriousness.”

“As a casual you are extremely vulnerable in making any reports.”

“In this current economic situation I am concerned about my future at work.”

Some participants explained they would be victimised if they reported someone in a more powerful position.



“Highly problematic to report improper conduct when it could be about a senior leader or the head of your organisation.”

“I think that a lot of people would be scared to report if they felt the person they are reporting about had a position of power over them.”

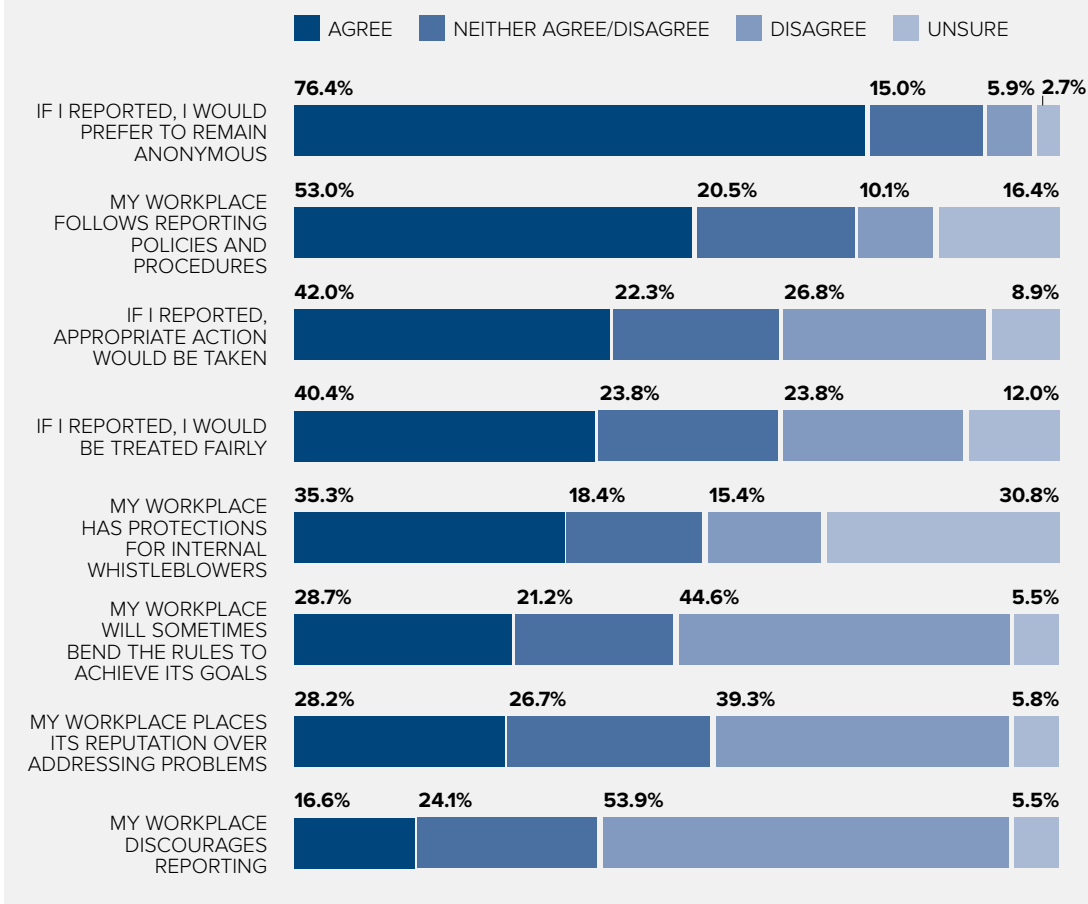
Participants in powerful positions were more comfortable reporting. Senior leaders and elected members were less worried about their job if they reported, less likely to feel too intimidated to report, and more likely to believe they would be protected from negative repercussions. Senior leaders were less likely to believe they would be in trouble with their colleagues if they reported.⁴⁷

Organisational barriers to reporting

Poor organisational culture can deter public officers from reporting potential corruption and other improper conduct internally. Employees in workplaces where staff are treated respectfully and fairly, and supervisors act in a way that engenders trust, are more likely to report suspected wrongdoing.⁴⁸

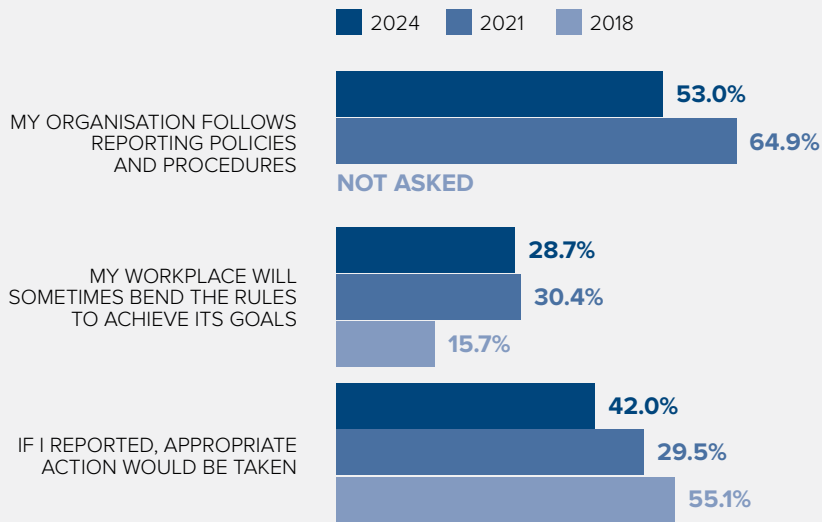
Conversely, employees in organisations where corruption is perceived to be tolerated, and those who have little confidence that reporting will result in change, are often reluctant to report.⁴⁹ Many participants identified organisational barriers to reporting (Figure 27).

FIGURE 27:
Perceptions of organisational barriers to reporting



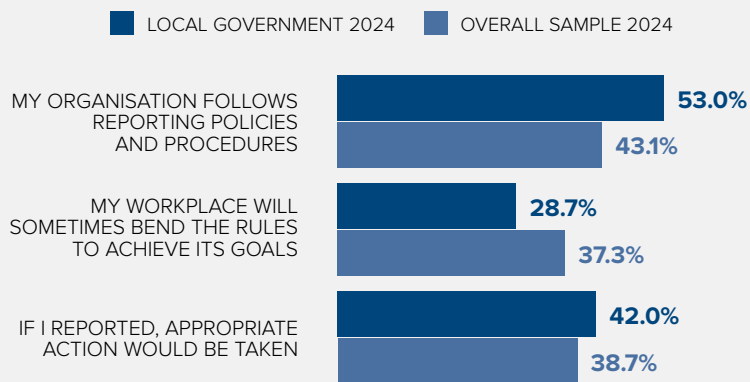
Participants’ faith in their council’s support for reporting has declined since 2018 (Figure 28). Participants were less confident that appropriate action would be taken if they reported internally and their council would follow due process when dealing with a report. Compared to 2018, an increased proportion of participants believe their workplace will sometimes bend the rules to achieve its goals.

FIGURE 28:
Perceptions of organisational barriers to reporting
(local government 2018 to 2024)



Local government participants believed their workplace provides a better reporting environment than participants overall (Figure 29).

FIGURE 29:
Perceptions of organisational barriers to reporting
(local government participants and participants overall)



Being able to report anonymously was important to participants. Only a third of local government participants believed their workplace protects whistleblowers. Fear of being identified as a reporter was a theme in participants' comments.



"Most local government offices are very poor at protecting whistleblowers. They are normally met by bullying and intimidation which is totally inappropriate. Some people are fearful for their own health and wellbeing."

"My workplace is so small it would be apparent who reported anything."

"I would prefer to remain anonymous if the person I was reporting was my superior."

In particular, female participants preferred to report anonymously.⁵⁰ Being able to report anonymously was less important to senior leaders and elected members, who were also more likely to agree their workplace protects whistleblowers.⁵¹

Since 2018, an increasing proportion of participants believe their workplace does not comply with reporting policies and procedures. Some participants observed that policies and procedures are manipulated to suit the agenda of senior leaders. The handling of reports was perceived to 'protect' those in power, lack transparency, and too often result in failure to take meaningful action.



"Abusive behaviour and bullying from Mayor [redacted] is covered up!!"

"HR are biased to however upper management wish to proceed. We all know not to bother with complaints against the 'protected species' which has resulted in many people leaving my workplace."

"I have reported matters that have been seriously mismanaged to protect the offenders."

"Management will protect other managers over staff who report issues."

Senior leaders were more likely to disagree that their workplace discourages reporting and will sometimes bend the rules to achieve its goals, and were more likely to agree they would be treated fairly if they report.⁵² Senior leaders and elected members were more likely to be confident that action would follow if they reported.⁵³ Elected members had greater faith in their council following policies and procedures.⁵⁴

Council location correlated with participants' perceptions of organisational barriers to reporting. Participants in metropolitan councils were more likely to agree their workplace discourages reporting and protects its reputation over addressing problems.⁵⁵ They were less confident that action would be taken if they reported and their workplace follows reporting policies and procedures.⁵⁶ Participants in regional or remote councils were less likely to agree their workplace protects whistleblowers.⁵⁷

EXPERIENCES OF REPORTING

Participants were asked if they had previously reported suspected corruption or other impropriety in their workplace in the last three years. A small proportion of local council participants responded that they had previously reported (Figure 30). This is a higher incidence of reporting than in 2021, although it is lower than the overall sample.

FIGURE 30:
Reported suspected corruption or other impropriety in last three years



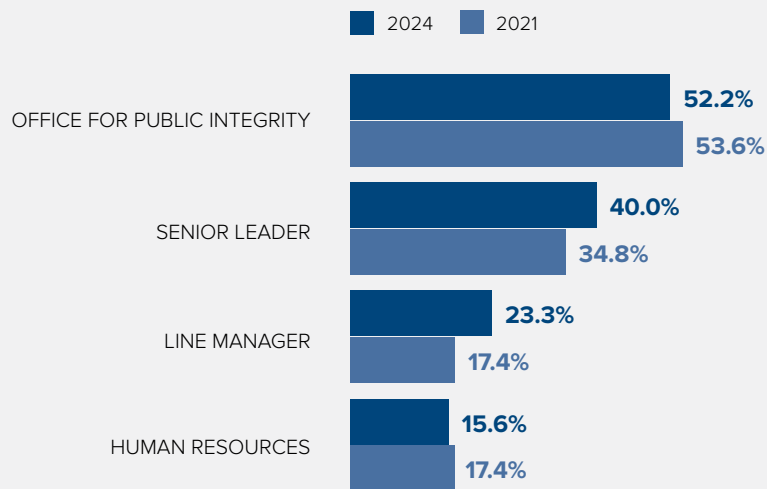
Male participants and senior leaders were more likely than other local government participants to have made a report.⁵⁸ Participants in metropolitan councils were less likely to have reported.⁵⁹

Participants were invited to describe the nature of reported allegations. Most allegations related to undeclared or unmanaged conflicts of interests, especially in procurement, followed by serious misconduct, maladministration, and misuse of public assets or resources.

Receiving reports

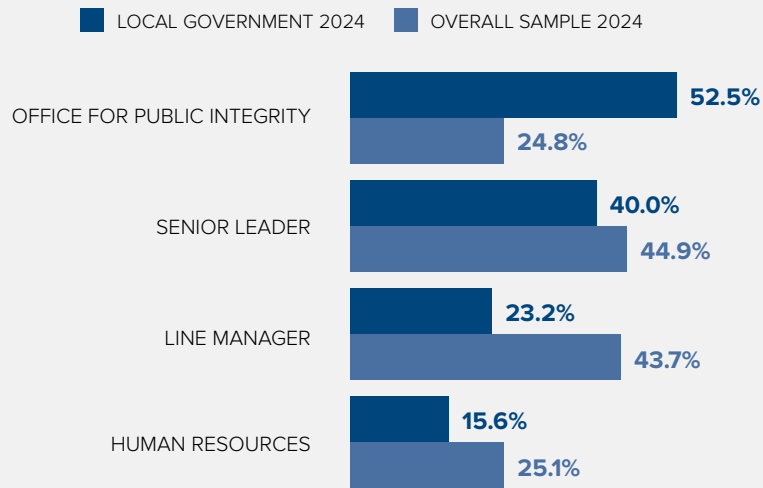
Participants who had previously reported were asked questions about their most recent report. Most reports were made to the Office for Public Integrity (Figure 31). Compared to 2021, participants were more likely to state they had reported to a senior leader or line manager.

FIGURE 31:
Who receives reports of suspected corruption or other impropriety (2021 and 2024)



Participants from the local government sector were more likely than participants overall to report to the Office for Public Integrity (Figure 32). This partly reflects the propensity for elected members to report to the Office for Public Integrity.⁶⁰ It may also reflect the recent intensive training provided to local councils by the integrity agencies.

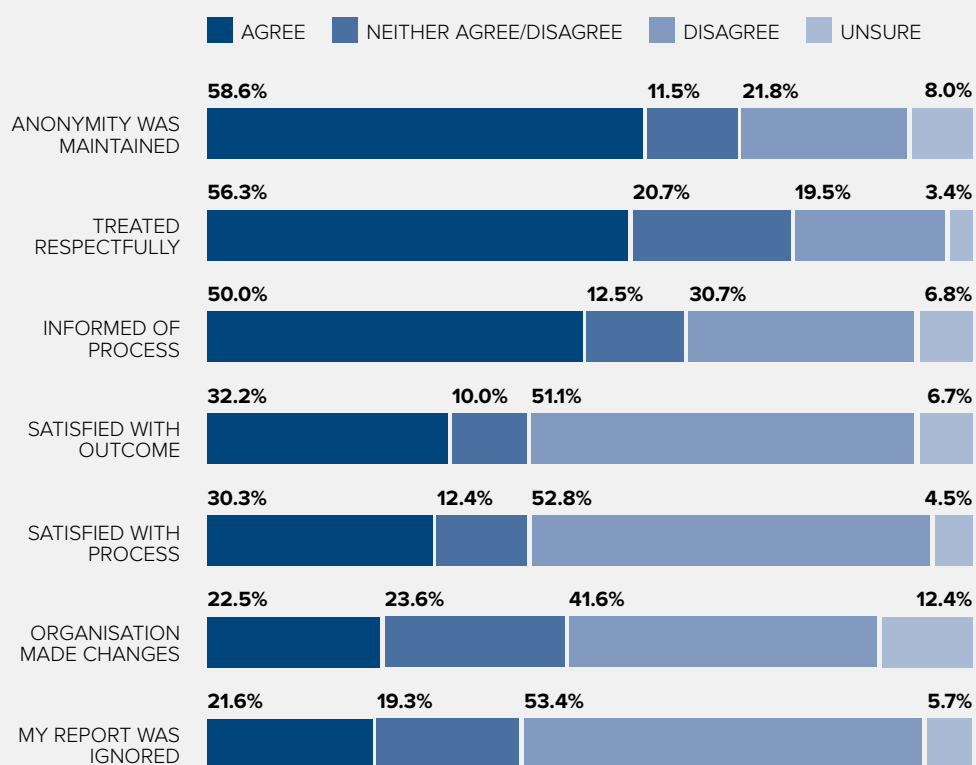
FIGURE 32:
Who receives reports of suspected corruption or other impropriety (local government participants and participants overall)



Handling of previous reports

Approximately half of the participants who responded that they had previously reported were satisfied with how their report had been handled (Figure 33).

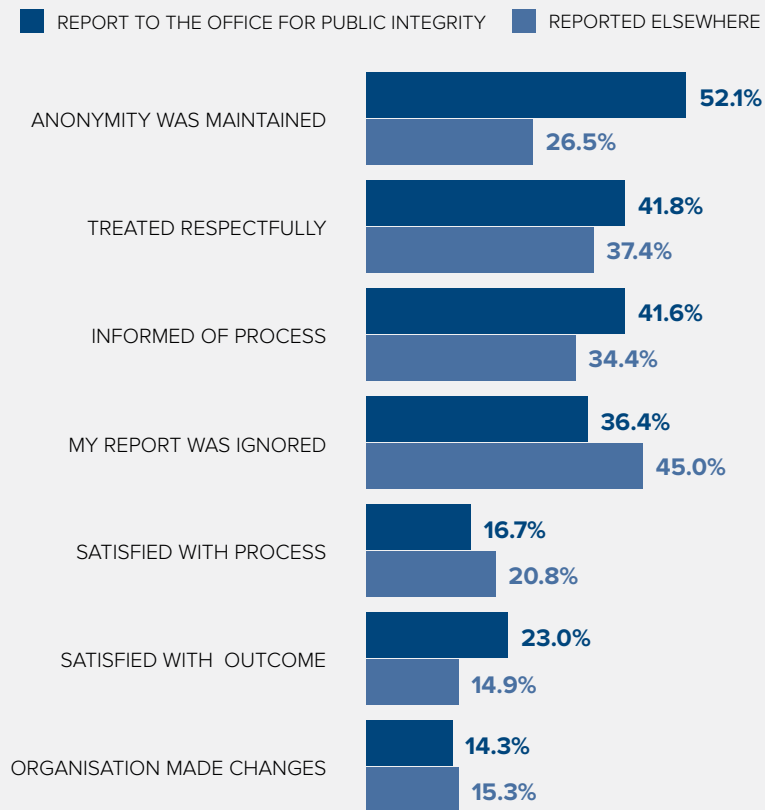
FIGURE 33:
Perceptions of how the report was handled



Participants who responded that they reported to the Office for Public Integrity were more positive about the handling of their report compared to participants who reported elsewhere (Figure 34).

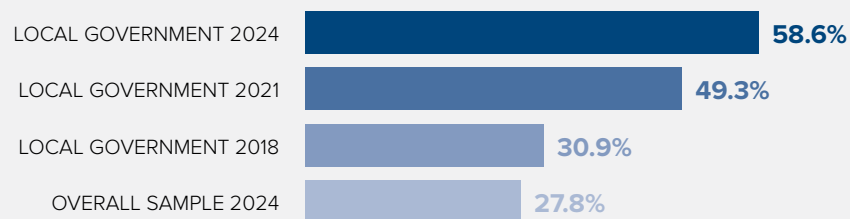
FIGURE 34:

Perceptions of how the report was handled (agreed/strongly agreed)



Anonymity is important to reporters. Compared to 2018 and 2021, participants were more likely to believe their anonymity had been maintained (Figure 35). Local government participants expressed more favourable opinions about all aspects of how their report was handled compared to participants overall, especially in relation to the protection of anonymity. Those who reported to an integrity agency were significantly more likely to believe their anonymity was maintained than those who reported internally.⁶¹

FIGURE 35:
Perceptions of whether anonymity was maintained (2018 to 2024)

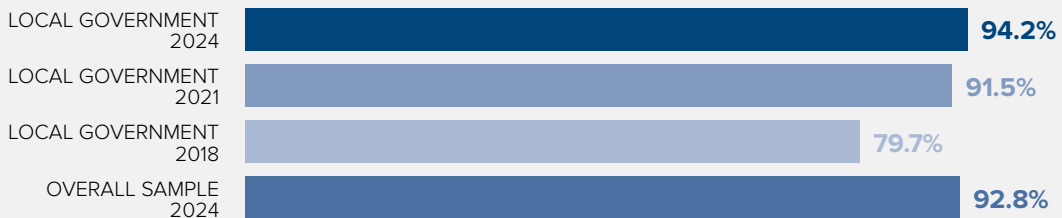


Not all aspects of report handling were perceived favourably. Less than a third of participants who had made a report were satisfied with either the process or outcome. Participants' dissatisfaction largely focused on their organisation's failure to adequately investigate allegations or to make changes.

PERCEPTIONS OF THE COMMISSION

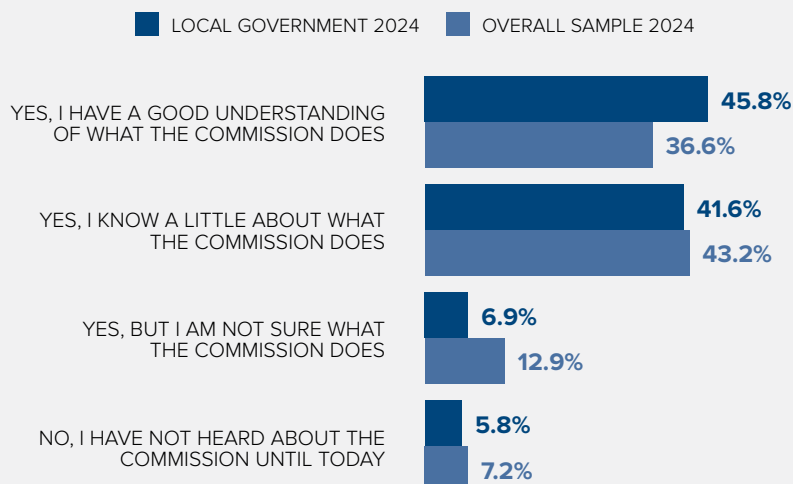
A high proportion of local government participants had heard of the Commission (Figure 36). That proportion has increased with each iteration of the survey. Local government participants also were more likely to have heard of the Commission than participants overall.

FIGURE 36:
Participants who had heard of the Commission



A greater proportion of local government participants than participants overall agreed that they had a good understanding of the Commission (Figure 37). This finding may reflect the timing of the survey, which was run at the same time as the integrity agencies were running combined information sessions for local councils.

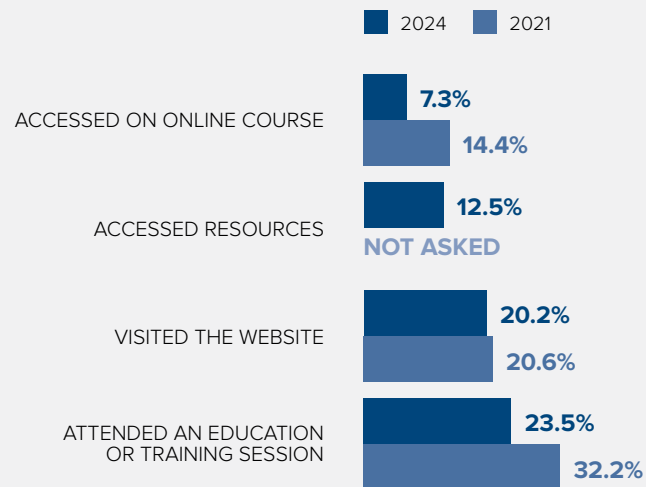
FIGURE 37:
Awareness of the Commission



Accessing the Commission's resources

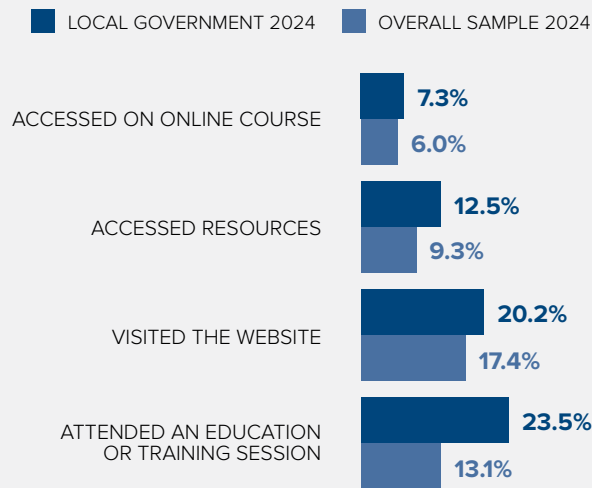
The Commission provides considerable resources to assist local councils. However, many participants were not aware of the Commission's resources, and the use of Commission's resources has decreased since 2021 (Figure 38). Senior leaders and elected members were more likely to have contact with the Commission than other staff.⁶²

FIGURE 38:
Previous contact with the Commission (2021 and 2024)

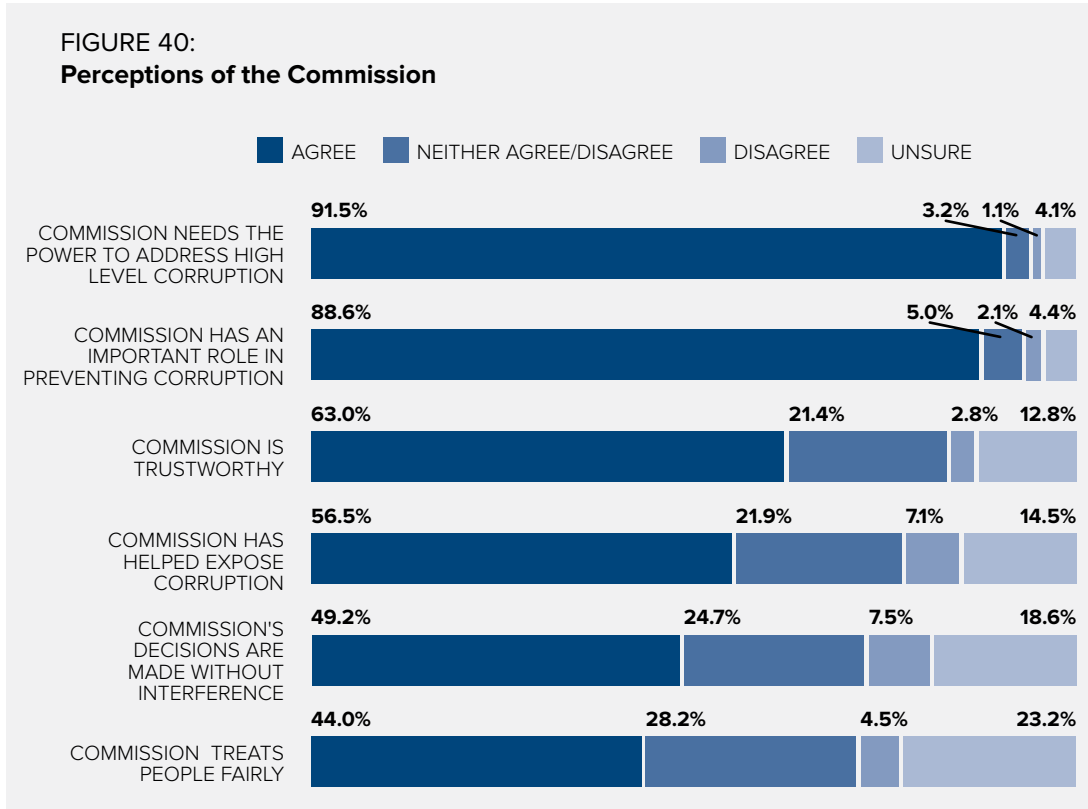


Local government participants claimed to have made greater use of the Commission’s resources than participants overall (Figure 39). In particular, local government participants were more likely to have attended an education or training session conducted by the Commission.

FIGURE 39:
Previous contact with the Commission
(local government participants and participants overall)



Participants were asked about their perceptions of the Commission. Most believed the Commission should have the necessary powers to address corruption and plays an important role in preventing corruption (Figure 40).



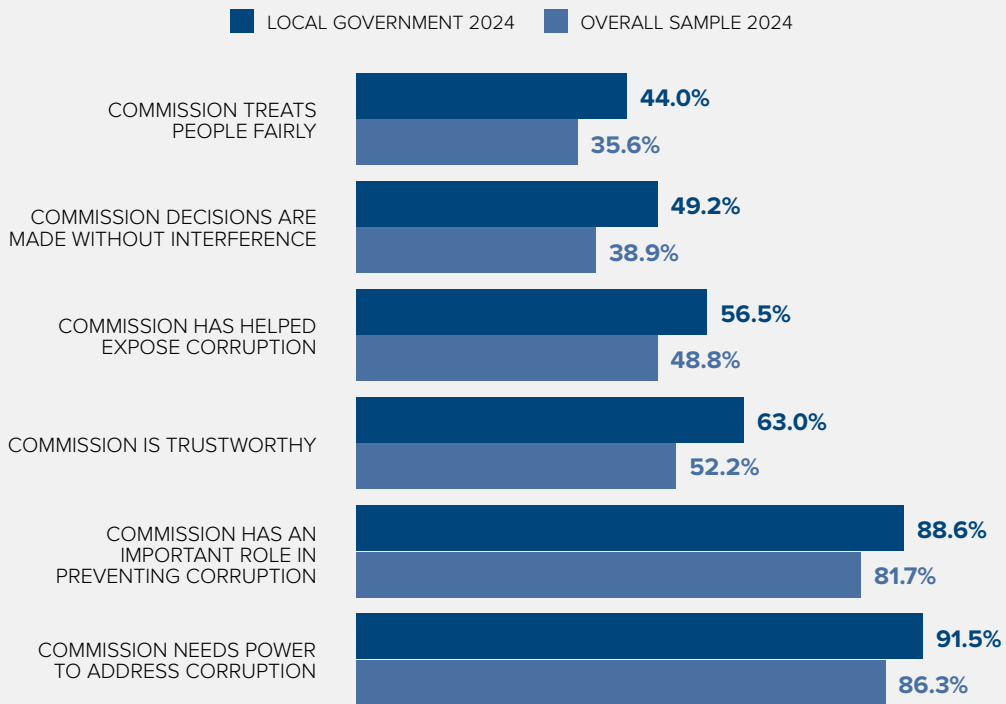
Perceptions of the Commission were generally less positive in 2024 than in 2018 (Table 2).

**TABLE 2:
PERCEPTIONS OF THE COMMISSION (2018 TO 2024)**

	2018	2021	2024
Commission treats people fairly	48.6%	Not asked	44.0%
Commission's decisions are made without interference	54.4%	46.3%	49.2%
Commission has helped expose corruption	Not asked	58.0%	56.5%
Commission is trustworthy	61.5%	64.2%	63.0%
Commission has an important role in preventing corruption	93.4%	92.6%	88.6%
Commissions needs the power to address high level corruption	96.0%	91.4%	91.5%

Compared to participants overall, those from the local government sector have more favourable views of the Commission (Figure 41).

FIGURE 41:
Perceptions of the Commission
(local government participants and participants overall)



Trustworthiness and fairness

Almost two thirds of participants perceived the Commission to be trustworthy. Less than half believed that the Commission treats people fairly. Perceptions of trustworthiness and fairness have remained relatively stable since 2018. While it is pleasing to see that many participants regarded the Commission as being trustworthy, it is evident that there is room for improvement with respect to perceptions around the Commission's treatment of people.

Participants' perceptions of trustworthiness and fairness were largely connected to observations that the Commission's work lacks transparency.



"Trust is not high in ICAC given some high-profile cases that did not end well despite the person being publicly exposed during the investigation. This damages the persons reputation despite no findings against them and erodes trust in ICAC."

"I can't really say if the Commission has exposed corruption or can be trusted or has enough power because we never know what they've been up to."

"...more needs to be done to build public trust in your commission that decisions are made for the best interests of the public and to support 'the little guy'."

Transparency for the Commission is a balancing act. Where the Commission can be open about its work, and such openness may be of assistance to public integrity, it will be. However, there is often good reason why the Commissioner either cannot or does not publicly promote aspects of its work.

CONCLUSIONS

There is an increasing perception that the local government sector is susceptible to corruption and other impropriety. This may reflect the coincidence of the survey with the delivery of information sessions by the integrity agencies to local councils. The training may have also increased participants' knowledge and awareness of the work of the Commission.

Nepotism and favouritism in recruitment continues to be the main type of improper conduct observed by participants. Other perennial corruption risks relate to elected members. Participants continue to perceive that elected members sometimes overstep their role, and do not sufficiently understand conflicts of interests. These perceptions were clearly a source of frustration for many council staff.

The survey highlighted emerging risks for local councils. There has been an increase in participants' perceptions that they encountered wrongdoing in relation to favouritism in procurement and the awarding of contracts. Corruption risks relating to misuse of confidential information may be underestimated.

The survey asked participants questions about the integrity of decision making in their workplaces. Senior leaders in local government, especially CEOs, mayors and elected members, were observed to have a high degree of discretionary power to make decisions. Decision making that lacks transparency, accountability, and appropriate checks and balances, may be vulnerable to misuse of authority. The use of discretionary powers in local councils may not always be sufficiently guided by policies and procedures.

Public officers in the local government sector may experience influence to make decisions that are not in the public interest. Such pressure may come from a wide variety of sources, including developers and state politicians. The manipulation of information by council administrators to elected members to improperly influence decisions was seen to be especially problematic.

The integrity of public administration is reliant on public officers reporting reasonable suspicions of corruption in public administration. It is also reliant on the reporting of suspected misconduct and maladministration to either the Office for Public Integrity or the Ombudsman SA, and there is an expectation that this should occur. I encourage all public officers to comply with your reporting obligations and to have the confidence to utilise the reporting systems that are available to you. If desired, reports can be made anonymously. Sensitive information will be handled discretely by the integrity agencies. Integrity in public administration is maintained when any kind of improper conduct is brought to light.

APPENDICES

Appendix one: Combined integrity agency information sessions (2024)

TABLE 3:
**INFORMATION SESSIONS FOR LOCAL COUNCILS RUN BY THE OFFICE FOR PUBLIC INTEGRITY,
OMBUDSMAN SA, AND THE INDEPENDENT COMMISSION AGAINST CORRUPTION**

MONTH	LOCAL COUNCIL
August	City of Charles Sturt
September	Victor Harbor Council
September	Alexandrina Council
September	Kangaroo Island Council (elected members)
September	Kangaroo Island Council
September	Kangaroo Island Council
October	Cambelltown City Council
October	City of West Torrens
October	City of Holdfast Bay
October	Onkaparinga Council
October	City of Unley
November	City of Burnside
November	Adelaide Plains Council
November	Barossa Council
November	Cooper Pedy Council
November	Norwood, Payneham and St Peters Council
November	Prospect Council
November	City of Salisbury

Appendix two: The survey

SECTION A: GENERAL DEMOGRAPHIC INFORMATION	
What is your gender?	Female Male I identify my gender as (please specify) I prefer not to say
What is your age?	20 years and under 21 years to 34 years 35 to 44 years 45 to 54 years 55 years and above I prefer not to say
Where do you work? (Remember, you cannot be identified)	Adelaide Venue Management Corporation Attorney-General's Department Courts Administration Authority Department for Child Protection Department for Correctional Services Department for Education (excluding TAFE SA) Department of Environment and Water Department for Health and Wellbeing (SA Health) Department of Human Services Department for Infrastructure and Transport Department of the Premier and Cabinet Department of Primary Industries and Regions Department for State Development Department of Treasury and Finance Local Health Network SA Ambulance Service SA Housing Authority SA Water South Australian Metropolitan Fire Service/Country Fire Service South Australian Police TAFE SA State Government – Other Local Government I prefer not to say
Where is your council based?	Metropolitan Regional Rural or remote I prefer not to say
Are you an elected member?	Yes No I prefer not to say
How would you describe your current employment?	Permanent/ongoing contract Long-term contract (more than one year) Short-term contract (less than one year) Casual I prefer not to say Other (please specify)

Are you in an Executive or Senior Manager role?	Yes No I prefer not to say Don't know/unsure
How long have you worked in your current organisation?	Less than 1 year 1 to 5 years 6 to 10 years 11 to 20 years More than 20 years I prefer not to say
How long have you worked in the public sector or local government?	1 to 5 years 6 to 10 years 11 to 20 years More than 20 years I prefer not to say
SECTION B: VULNERABILITY TO CORRUPTION AND OTHER IMPROPER CONDUCT	
Overall, how vulnerable do you believe your workplace is to corruption or other improper conduct?	Not at all vulnerable Somewhat vulnerable Moderately vulnerable Highly vulnerable Extremely vulnerable Unsure/not applicable
Please rate how vulnerable do you think your workplace is to the following types of corruption and other improper conduct Favouritism in procurement/awarding of contracts Financial misconduct, theft, fraud Political interference Inappropriate access and/or misuse of confidential information Mismanagement of public resources Falsifying information Not declaring or managing conflicts of interests Perverting the course of justice Bribery/improper acceptance of gifts Nepotism/favouritism in recruitment Misuse of authority Failure to perform official duties	Not at all vulnerable Somewhat vulnerable Moderately vulnerable Highly vulnerable Extremely vulnerable Unsure/not applicable
If applicable, please provide details about any major areas of vulnerability to corruption or other improper conduct in your workplace.	Not applicable Open ended text

SECTION C: PERSONAL EXPERIENCES OF POTENTIAL CORRUPTION AND OTHER IMPROPER CONDUCT	
Have you personally encountered potential corruption or other improper conduct in your workplace in the last three years?	Yes No Unsure/don't know I prefer not to say
Please rate how vulnerable do you think your workplace is to the following types of corruption and other improper conduct <ul style="list-style-type: none"> Favouritism in procurement/awarding of contracts Financial misconduct, theft, fraud Political interference Inappropriate access and/or misuse of confidential information Mismanagement of public resources Falsifying information Not declaring or managing conflicts of interests Perverting the course of justice Bribery/improper acceptance of gifts Nepotism/favouritism in recruitment Misuse of authority Failure to perform official duties 	Personally observed Suspected Neither suspected nor observed Unsure/don't know
If applicable, please provide details about the nature of any potential corruption or other improper conduct you have encountered or suspected in your workplace in the last three years.	Not applicable Open ended text

SECTION D: INFLUENCING DECISION MAKING	
Does your role require making decisions that may have consequences for the public interest?	Yes No Unsure/don't know I prefer not to say
<p>Please rate how strong you agree or disagree with the following statements</p> <p>I believe that decisions in my workplace are sometimes vulnerable to improper influence</p> <p>Influences on decision making in my workplace are not always transparent</p> <p>I have felt pressure to not provide frank and fearless advice</p> <p>I have felt pressure to falsify information to support a specific decision or outcome</p> <p>I have felt pressured by a work colleague to make a decision that is not in the public interest</p> <p>I have felt pressured by an external party to make a decision that is not in the public interest</p> <p>I sometimes need to weigh up private interests when making decisions</p> <p>I sometimes feel unable to push back against efforts to influence my decisions</p>	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Unsure/not applicable
If applicable, please describe any circumstances where you have felt pressure to make a decision that was not in the public interest.	Not applicable Open ended text

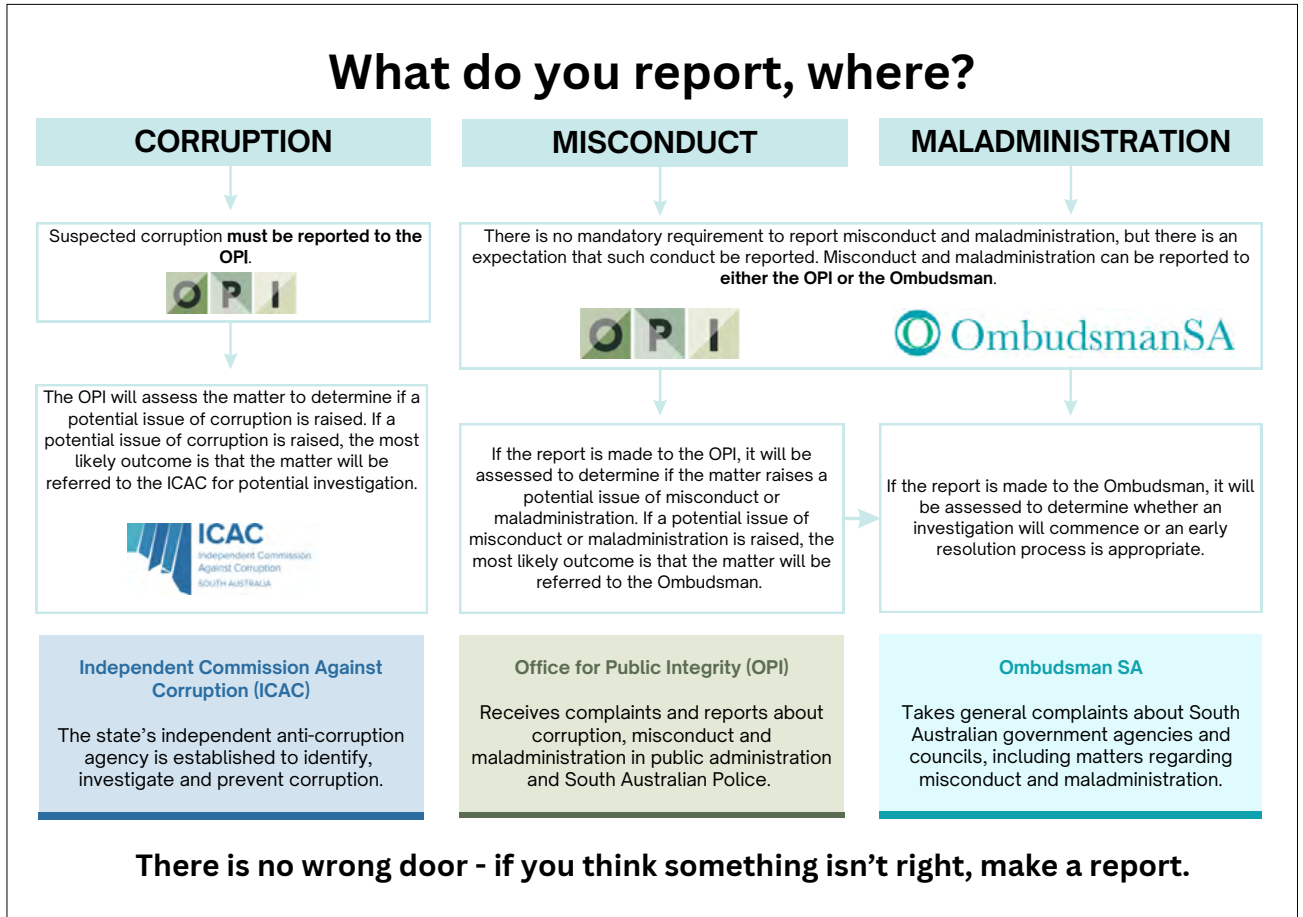
SECTION E: DISCRETION IN DECISION MAKING	
Does your role give you wide discretion to make decisions	Yes No Unsure/don't know I prefer not to say
<p>Please rate how strongly you agree or disagree with the following statements</p> <p>Some individuals in my workplace have too much discretion to make decisions</p> <p>I believe that discretionary decisions in my workplace are well justified</p> <p>Decisions made using discretion in my workplace are properly supervised</p> <p>I believe that decisions made using discretion in my workplace are not appropriately documented</p> <p>Discretionary powers are used in my workplace only to serve an authorised purpose</p> <p>Decisions made using discretionary powers in my workplace are transparent</p> <p>I feel that there are sufficient checks and balances over the use of discretion in my workplace</p> <p>Discretionary powers have sometimes been used in my workplace for improper reasons</p> <p>My workplace does not have clear procedures guiding decision making by staff</p> <p>Leadership in my workplace ensures discretionary powers are exercised appropriately</p>	<p>Agree</p> <p>Neither agree nor disagree</p> <p>Disagree</p> <p>Strongly disagree</p> <p>Unsure/not applicable</p>
If applicable, please describe any circumstances where the discretion to make decisions may have been misused in your workplace.	Not applicable Open ended text

SECTION F: INTERNAL REPORTING OF POTENTIAL CORRUPTION OR OTHER IMPROPER CONDUCT	
<p>Please rate how strongly you agree or disagree with the following statements</p> <ul style="list-style-type: none"> I am confused about what conduct should be reported I would only report suspected corruption if I had clear evidence I would only report suspected corruption if it was serious I think I would report suspected corruption to someone inside my workplace If I reported, I would probably be in trouble with my colleagues If I reported, I would be worried about my job I would feel too intimidated to report 	<ul style="list-style-type: none"> Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Unsure/don't know
<p>Please rate how strongly you agree or disagree with the following statements</p> <ul style="list-style-type: none"> I feel that my workplace discourages reporting If I reported, my workplace would protect me from negative repercussions My workplace has provided me with training on corruption risks that relate to my role I feel that my workplace will sometimes bend the rules to achieve its goals I am aware of my workplace's policies and procedures for reporting If I reported, I believe that I would be treated fairly If I reported, I am confident that appropriate action would be taken If I reported, I would prefer to remain anonymous My workplace follows policies and procedures when dealing with a report My workplace places its reputation over addressing problems My workplace provides whistleblower protections for staff who report internally 	<ul style="list-style-type: none"> Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Unsure/don't know
<p>Do you have any further comments about reporting in your workplace?</p>	<ul style="list-style-type: none"> Not applicable Open ended text

SECTION G: PREVIOUS REPORTING	
Have you previously made a report of suspected corruption or other improper conduct in your workplace in the last three years?	Yes No I prefer not to say Unsure/don't know
For the most recent occasion where you reported suspected corruption or other improper conduct in your workplace, who did you report this to?	My line manager Senior leadership Human resources A colleague in my workplace The Office for Public Integrity/ Independent Commission Against Corruption South Australian Police Other Unsure/ can't remember
Please explain why you chose to report to that particular person or agency.	I prefer not to say Open ended text
What were the nature of the allegations?	I prefer not to say Open ended text
In relation to your most recent report, please rate how strongly you agree or disagree with the following statements I was informed of the process that would occur My anonymity was maintained My report was ignored I feel that I was treated respectfully My organisation made changes as a result of my report I feel satisfied with the outcome of my report	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Unsure/ not applicable
Do you have any further comments about how your report was handled?	Not applicable Open ended text

SECTION H: SOUTH AUSTRALIA'S INDEPENDENT COMMISSION AGAINST CORRUPTION	
Have you heard of South Australia's Independent Commissioner Against Corruption before receiving this survey?	Yes, I have a good understanding of what the Commission does Yes, I know a little about what the Commission does Yes, but I am not sure what the Commission does No, I have not heard of the Commission until today
What do you understand as the role of the Independent Commission Against Corruption?	Open ended text
Have you had previous contact with the Commission?	No Yes, visited the website Yes, accessed resources Yes, accessed an ICAC online course Yes, attended an education/ training session Yes, other type of contact (please specify)
Please rate how strongly you agree or disagree with the following statements The ICAC has an important role in preventing corruption in South Australia I feel that the ICAC is trustworthy The ICAC has helped to expose corruption in South Australia It is important that the ICAC has the power to effectively address high level corruption I believe that the ICAC's decisions are made without interference The ICAC treats people fairly	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Unsure/ don't know
Please rate how strongly you agree or disagree with the following statements I think all South Australian public officers are required to report suspected corruption to the Office for Public Integrity If I encountered or suspected corruption I would report it to the Office for Public Integrity	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Unsure/ don't know
Do you have any further comments you would like to make regarding the points raised in this survey?	

Appendix three: Office for Public Integrity’s Integrity Flowchart



Appendix four: Statistical results and references

- 1 Claudio W. Abramo, 'How Much Do Perceptions of Corruption Really Tell Us?' (2008) 86(4) *International Review of Administrative Sciences* 673.
- 2 Bureau of Statistics, Public Sector Employment and Earnings: 2023-24 Financial Year (7 November 2024).
- 3 In 2018, 1097 participants identified as local government employees and 17 as Elected Members. In 2021, 952 participants identified as local government employees and 33 as Elected Members.
- 4 Crime and Corruption Commission, Queensland, Perceptions of Corruption and Integrity in Local Government: Findings from the Survey of Local Government Employees (July 2020); Independent Broad-based Anti-Corruption Commission, Perceptions of Corruption 2022: Local Government (9 December 2022).
- 5 Independent Commission Against Corruption, South Australia, Local Government Integrity Insights: A Third Report from the ICAC Public Integrity Survey 2018 (12 September 2018); Independent Commission Against Corruption, South Australia, ICAC Public Integrity Survey 2021: Local Government Integrity Insights (June 2021).
- 6 Independent Broad-based Anti-Corruption Commission, Corruption and Misconduct Risks for Local Government (25 September 2023), Crime and Corruption Commission, Queensland. Perceptions of Corruption and Integrity in Local Government: Findings from a Survey of Local Government Employees (2020) 2.
- 7 Independent Commission Against Corruption, South Australia, Robust Recruitment (August 2023) 4.
- 8 Independent Commission Against Corruption, South Australia, The Inside Advantage: Managing Corruption Risks in Recruitment Processes Involving Internal Candidates (27 August 2024) 4.
- 9 Ali Shahab, Farrukh Shahzad, Iftikhar Hussain, Pu Yongjian, Muhammad Mahroof Khan, and Zafar Iqbal, 'The Outcomes of Organisational Cronyism: A Social Exchange Theory Perspective' (2022) 13 *Organizational Psychology* 1; Said Shaheen, Sajid Bashir, Abdul Karim Khan, 'Examining Organizational Cronyism as an Antecedent of Workplace Deviance in Public Sector Organizations' (2017) 26(3) *Public Personnel Management* 308; Nicole Andreoli and Joel Lefkowitz, 'Individual and Organizational Antecedents of Misconduct in Organizations' 85 (2009) *Journal of Business Ethics* 309; Kathy L. Pelletier and Michelle C Bligh, 'The Aftermath of Organizational Corruption: Employee Attributions and Emotional Reactions' (2008) 80(4) *Journal of Business Ethics* 823.
- 10 Crime and Corruption Commission, Queensland, Discretionary Decision-Making Powers: Identifying Potential Corruption Risks. Prevention in Focus (March 2020).
- 11 Independent Commission Against Corruption, South Australia, Integrity Spotlight: Lessons from the Royal Commission into the Robodebt Scheme (November 2023).
- 12 Female participants were more likely than male participants to feel unable to push back ($\chi^2(5, n=719)=19.209, p<.01, v=.002$).
- 13 $r=.084, p<.05, n=711$).
- 14 Senior leaders were more likely than non-leaders to disagree that decisions are vulnerable to improper influence ($\chi^2(5, n=714)=11.612, p<.05, v=.128$), decisions were not always transparent ($\chi^2(5, n=713)=23.864, p<.01, v=.183$), and they have experienced pressure not to be frank and fearless ($\chi^2(5, n=712)=11.790, p<.05, v=.129$).
- 15 Male participants were more likely than female participants to disagree that decisions are vulnerable to improper influence ($\chi^2(5, n=722)=18.111, p<.01, v=.158$), they had been pressured by a colleague ($\chi^2(5, n=721)=14.898, p<.05, v=.144$), and pressured by external party ($\chi^2(5, n=718)=15.986, p<.01, v=.149$).
- 16 $\chi^2(5, n=729)=23.583, p<.01, v=.180$.
- 17 $\chi^2(5, n=731)=35.591, p<.01, v=.221$.
- 18 Kristine Zinck Pedersen and Anja Svejgaard Pors, 'Discretionary Responses in Frontline Encounters: Balancing Standardization with the Ethics of Office' (2022) 31(1) *Journal of Public Administration Research and Theory* 80.
- 19 Ombudsman Western Australia, Guidelines: Exercise of Discretion in Administrative Decision Making (April 2019).
- 20 Crime and Corruption Commission, Queensland, Discretionary Decision-Making Powers: Identifying Potential Corruption Risks. Prevention in Focus (March 2020).
- 21 Office of Local Government, Subsidiaries – Ministerial Approval, Guidance Paper No. 3 (October 2023).
- 22 Gary S Becker and George J Stigler, 'Law Enforcement, Malfeasance, and Compensation of Enforcers' (1974) 3 *Journal of Legal Studies* 1.
- 23 Illoong Kwon, 'Motivation, Discretion, and Corruption' (2014) 24(3) *Journal of Public Administration Research and Theory* 765; Noore Alam Siddiquee and Habib Zafarullah, 'Absolute Power, Absolute Venality: The Politics of Corruption and Anti-Corruption in Malaysia' (2022) 24(1) *Public Integrity* 1.
- 24 Lord John Acton, Letter to Bishop Mandell Creighton (1887).

- 25 Senior leaders were more likely to disagree that some individuals have too much discretion ($\chi^2(5, n=691)=19.979, p<.001, v=.170$) and discretion is used for improper reasons ($\chi^2(5, n=691)=21.994, p<.001, v=.178$).
- 26 Senior leaders were more likely than other participants to agree that there are clear procedures for decision making ($\chi^2(5, n=691)=15.478, p<.01, v=.150$), use of discretion is properly supervised ($\chi^2(5, n=691)=29.252, p<.001, v=.206$), transparent ($\chi^2(5, n=690)=34.191, p<.001, v=.223$), and has sufficient checks and balances ($\chi^2(5, n=691)=43.137, p<.001, v=.250$).
- 27 See also Michael Jackson and Rodney Smith, 'Inside Moves and Outside Views: An Australian Case Study of Elite and Public Perceptions of Political Corruption' (1996) 9(1) *Governance* 23.
- 28 Participants on short term contracts were less likely than other participants ($\chi^2(5, n=694)=49.361, p<.05, v=.120$) to agree and senior leaders more likely to agree ($\chi^2(5, n=668)=28.582, p<.001, v=.207$) that their organisation provided training on corruption risks specific to their role. $\chi^2(5, n=687)=24.056, p<.001, v=.187$.
- 30 Independent Broad-based Anti-Corruption Commission, Corruption and Misconduct Risks for Local Government (25 September 2023).
- 31 Independent Commission Against Corruption, South Australia, Integrity Spotlight: Confidentiality and Misuse of Information (January 2023).
- 32 Independent Broad-based Anti-Corruption Commission, Organised Crime Group Cultivation of Victorian Public Sector Employees (14 September 2015).
- 33 Local Government Inspectorate, Potential for Damage from Information Leaks (Spring 2019).
- 34 Independent Broad-based Anti-Corruption Commission, Unauthorised Access and Disclosure of Information Held by Local Government (9 December 2021).
- 35 Department of Home Affairs, Local Government and Countering Foreign Interference, [Local government and countering foreign interference](#), accessed April 2025.
- 36 Petter Gottschalk and Christy Smith, 'Detection of White-Collar Corruption in Public Procurement in Norway: The Role of Whistleblower' (2016) 9(4) (2016) *International Journal of Procurement Management* 427; Association of Certified Fraud Examiners, Occupational Fraud 2024: A Report to the Nations (2024), 23.
- 37 Marlene Winfield, *Minding Your Own Business: Self-Regulation and Whistleblowing in British Companies* (Social Audit, London 1994).
- 38 $\chi^2(10, n=684)=42.665, p<.001, v=.177$.
- 39 Office for Public Integrity, Directions and Guidelines: For Public Officers (7 August 2023); Office for Public Integrity; Office for Public Integrity, About Public Administration, [About Public Administration | Office for Public Integrity](#) accessed April 2025.
- 40 Lisa Zipparo 'Factors Which Deter Public Officials from Reporting Corruption' (1998) 30 *Crime, Law and Social Change* 273.
- 41 Elected members ($\chi^2(5, n=685)=25.022, p<.001, v=.191$), participants in rural and regional councils ($\chi^2(10, n=686)=26.416, p<.05, v=.139$) and senior leaders ($\chi^2(5, n=666)=32.631, p<.001, v=.222$) were more likely than other participants to agree they were aware of their workplace's reporting policies and procedures.
- 42 Female participants were more likely than male participants to agree that they are confused about what to report ($\chi^2(5, n=673)=13.70, p<.05, v=.143$), and less likely to be aware of reporting policies and procedures ($\chi^2(5, n=673)=12.259, p<.05, v=.135$).
- 43 Gjal de Graaf, 'A Report on Reporting: Why Peers Report Integrity and Law Violations in Public Organizations' (2010) 70(5) *Public Administration Review* 767; John P Keenan, 'Whistleblowing and the First-Level Manager: Determinants of Feeling Obligated to Blow the Whistle' (1995) 10 *Journal of Social Behavior and Personality* 571.
- 44 Felipe Clemente, Luis de Sousa Racquel Rego and Patricia Calca, 'Why are Individuals Unwilling to Report Corruption? An Inquiry into Perception-Based Definitions of Corruption and Employment-Related Factors' (2024) 83(4) *Australian Journal of Public Administration* 625.
- 45 Female participants were more likely than male participants to agree they would be worried about their job if they reported ($\chi^2(5, n=682)=16.327, p<.01, v=.155$) and they would be too intimidated to report ($\chi^2(5, n=682)=37.838, p<.001, v=.236$).
- 46 There was a positive correlation between age and likely to agree that if they reported, they would be more worried about their job ($r=.155, p<.001, n=703$), to feel too intimidated to report ($r=.148, p<.001, n=703$) and a negative correlation between age and agreement they would be protected from negative repercussions ($r=.095, p<.05, n=696$).
- 47 Senior leaders were less likely than non-leaders to agree that if they reported, they would be worried about their job ($\chi^2(5, n=675)=20.117, p<.001, v=.173$) in trouble with colleagues ($\chi^2(5, n=675)=13.789, p<.05, v=.143$), feel too intimidated to report ($\chi^2(5, n=675)=26.785, p<.001, v=.199$). Senior leaders were more likely to agree they would be protected from negative repercussions if they reported ($\chi^2(5, n=675)=13.789, p<.05, v=.143$). Elected members were less likely than other participants to agree that if they reported, they would be worried about their job ($\chi^2(5, n=694)=60.293, p<.001, v=.295$), they would feel too intimidated to report ($\chi^2(5, n=694)=57.445, p<.001, v=.288$), they would be protected from negative repercussions ($\chi^2(5, n=688)=13.747, p<.05, v=.141$).

- 48 Cecilia Florencia Lavena, 'Whistle-Blowing: Individual and Organizational Determinants of the Decision to Report Wrongdoing in the Federal Government' (2016) 36(1) *The American Review of Public Administration* 113.
- 49 Ting Gong and Hanyu Xiao, 'Socially Embedded Anti-Corruption Governance: Evidence from Hong Kong' (2017) 37(3) *Public Administration and Development* 176.
- 50 $\chi^2(5, n=673)=23.846, p<.001, v=.188$.
- 51 Senior leaders were less likely than other participants to agree they would prefer to remain anonymous if they reported ($\chi^2(5, n=668)=15.659, p<.001, v=.153$) and more likely to agree their workplace protects whistleblowers ($\chi^2(5, n=667)=50.509, p<.001, v=.275$). Elected members were less likely than other participants to agree they would prefer to remain anonymous if they reported ($\chi^2(5, n=687)=44.161, p<.001, v=.254$) and more likely to agree their workplace protects whistleblowers ($\chi^2(5, 686)=12.676, p<.05, v=.136$).
- 52 Senior leaders were more likely than non-leaders to disagree that their workplace discourages reporting ($\chi^2(5, n=670)=15.521, p<.01, v=.152$) and their workplace will sometimes bend the rules ($\chi^2(5, n=666)=15.617, p<.01, v=.153$). Senior leaders were more likely than non-leaders to agree they would be treated fairly if they reported ($\chi^2(5, n=666)=35.198, p<.01, v=.230$).
- 53 Senior leaders ($\chi^2(5, n=668)=18.527, p<.01, v=.167$) and elected members ($\chi^2(5, n=?)=15.784, p<.01, v=.152$) were more likely than other participants to agree they would be confident that action would follow if they reported.
- 54 Elected members had greater faith in their council following policies and procedures ($\chi^2(5, n=685)=25.022, p<.001, v=.191$).
- 55 Participants in metropolitan councils were more likely than other participants to agree that their workplace discourages reporting ($\chi^2(10, n=690)=22.920, p<.05, v=.129$) and protects its reputation over addressing problems ($\chi^2(10, n=687)=19.312, p<.05, v=.119$).
- 56 Participants in metropolitan councils were less likely to agree that they would be confident that action would follow if they reported ($\chi^2(10, n=688)=23.647, p<.01, v=.131$) and their workplace follows reporting policies and procedures ($\chi^2(10, n=687)=28.199, p<.01, v=.143$).
- 57 $\chi^2(10, n=687)=35.605, p<.001, v=.161$.
- 58 Male participants ($\chi^2(3, n=679)=8.174, p<.05, v=.110$), elected members ($\chi^2(3, n=691)=32.058, p<.01, v=.215$) and senior leaders ($\chi^2(3, n=673)=18.698, p<.01, v=.171$) were more likely than other participants to have made a report.
- 59 $\chi^2(6, n=693)=18.261, p<.01, v=.162$.
- 60 Elected members were more likely than non-elected members to have made a report ($\chi^2(3, n=691)=32.058, p<.01, v=.215$).
- 61 $\chi^2(5, n=76)=17.639, p<.01, v=.482$.
- 62 Senior leaders were more likely than non-leaders respond that they have had previous contact with the Commission ($\chi^2(1, n=670)=38.880, p<.001, v=.241$), have visited the Commission's website ($\chi^2(1, n=670)=16.410, p<.001, v=.157$), accessed the Commission's resources ($\chi^2(1, n=670)=32.022, p<.001, v=.219$), and attended an education or training session ($\chi^2(1, n=670)=31.671, p<.001, v=.217$). Elected members are more likely than other participants to respond that they have had contact with the Commission ($\chi^2(1, n=689)=6.960, p<.01, v=.101$) and have attended an education or training session ($\chi^2(1, n=689)=4.849, p<.05, v=.084$).



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