



**ICAC**

Independent Commission  
Against Corruption  
SOUTH AUSTRALIA



# **ICAC UNIVERSITY INTEGRITY SURVEY 2023**

SOUTH AUSTRALIA



**ICAC University Integrity  
Survey 2023**  
South Australia

Published June 2024

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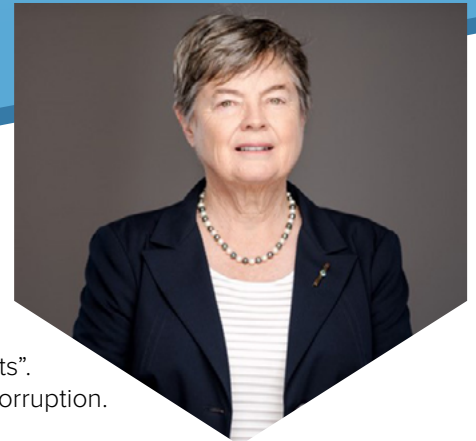
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South Australia's three public universities are among the state's most important institutions. They operate at the forefront of the state's economic opportunities, and serve to advance the knowledge, productivity and wellbeing of individuals and communities alike. Their output is one of our most lucrative "exports". Their importance underscores the need for them to be free from corruption.

The Commission's first university integrity survey was conducted in 2020. At that time, the Office for Public Integrity had received few reports about suspected corruption within the university sector. The number of referrals to the Commission about the university sector has remained low. In contrast, integrity agencies in other jurisdictions have investigated irregular recruitments, procurement frauds, falsifications of research data, improper awarding of student grades and timesheet fraud in their universities.

It is not clear why reporting of potential corruption is lower in South Australia. It is unlikely that South Australian universities are immune from corruption risks.

The environment in which universities operate is conducive to corruption. Universities are hierarchical organisations with entrenched power imbalances, making them vulnerable to abuse of power and authority, especially in publishing and recruitment. The heavy reliance on full fee paying students raises the prospect of the improper awarding of grades, if not unmeritorious enrolments. Academics work in highly competitive environments with incentive structures that reward those attracting research funding and prestige. Such environments are known corruption fomenters. Opportunities for research fraud and misuse of grant funding tend to appear.

Academics are increasingly encouraged to engage in outside professional activities and to commercialise their research, intensifying the risk of conflicts of interests and misuse of resources. South Australian universities are developing projects relating to defence, national security, and critical infrastructure, making them targets of increasingly sophisticated cyber attacks; or trusted insiders tempted to compromise sensitive information.

In the coming years, the South Australian higher education sector will go through a period of significant transformation. The merger of the University of Adelaide and the University of South Australia will produce Australia's largest higher education institution. Times of restructure or any disruption are known for generating corruption opportunities because leadership focus may be lost and lines of accountability stretched.

I hope this report reminds the universities that the provision of the product which they generate is susceptible to exploitation, and they should do all they can to protect themselves against the potential for corruption.

A handwritten signature in black ink that reads "Ann Vanstone". The signature is written in a cursive, flowing style.

The Hon. Ann Vanstone KC

Commissioner  
**INDEPENDENT COMMISSION AGAINST CORRUPTION**

Staff employed at the University of Adelaide, University of South Australia and Flinders University were invited to participate in an online survey of their perceptions and experiences of potential corruption and other improper conduct in their workplaces. The survey opened in late September 2023 and closed mid October.

This is the Commission's second university integrity survey, following that conducted in 2020. The Commission also conducts public integrity surveys of public officers in South Australia public administration. However, corruption risks in the higher education sector are specific. For this reason, university public officials are surveyed separately.

Where possible, comparisons have been made between this university survey and the one conducted in 2020. However comparisons are limited. In October 2021, changes to the *Independent Commission Against Corruption Act 2012* limited the Commission's jurisdiction to corruption, whereas it previously also included maladministration and misconduct. For this reason, questions relating to maladministration and misconduct asked in 2020 were not replicated.

Both surveys explored common corruption risks for the sector. They also explored areas of specific focus. The 2020 survey focused on the sharing of passwords and login details, and the verification of qualifications. The current survey focuses on research integrity, records management and outside professional activities.

Participation in the survey was voluntary and no questions were mandatory. Percentages may not total 100 due to rounding. The survey questions are provided in an Appendix to this report. The comments quotes in this report have not been corrected or altered, except that some material has been redacted so that participants cannot be identified.

## Respondents

The universities provided the Commission with contact lists of 13,734 staff, 2,527 of whom completed the survey. This represents a response rate of 18.4%.

Not all staff on the contact lists received the survey; for instance some email addresses had been deactivated as the staff member had left employment. Some emails elicited out of office replies indicating that the staff member was on leave.

*Tables 1 and 2* provide a breakdown of respondents' demographics and roles. Flinders University staff had the highest response rate (20.2%), followed by the University of Adelaide (18.9%) and the University of South Australia (15.8%).

<b>TABLE 1: RESPONDENTS' DEMOGRAPHICS</b>	<b>RESPONDENTS</b>	<b>%</b>
<b>University</b>		
University of Adelaide	990	39.2%
University of South Australia	834	33.0%
Flinders University	652	25.8%
Prefer not to say	51	2.1%
<b>Gender</b>		
Female	1475	58.4%
Male	942	37.3%
Does not identify as male/female	18	0.7%
Prefer not to say	92	3.6%
<b>Age</b>		
34 years and under	406	16.0%
35 to 44 years	607	24.0%
45 to 54 years	751	29.7%
55 years and above	657	26.0%
Prefer not to say	106	4.2%
<b>Employment type</b>		
Permanent	1611	63.8%
Long-term contract	510	20.2%
Short-term contract	111	4.4%
Casual	237	9.4%
Other/unsure	8	0.3%
Prefer not to say	50	2.0%
<b>Time with the university</b>		
Less than one year	261	10.4%
1 to 5 years	823	32.6%
6 to 10 years	539	21.3%
11 to 20 years	566	22.4%
More than 20 years	282	11.2%
Prefer not to say	56	2.2%
<b>Time in higher education sector</b>		
Less than one year	133	5.3%
1 to 5 years	522	20.7%
6 to 10 years	521	20.6%
11 to 20 years	744	29.6%
More than 20 years	548	21.7%
Prefer not to say	59	2.3%



<b>TABLE 2: RESPONDENTS' ROLES<sup>1</sup></b>	<b>RESPONDENTS</b>	<b>%</b>
<b>Role</b>		
Academic	1 155	45.7%
Non-academic	1 121	44.4%
Senior manager/executive	171	6.7%
Other/unsure	14	0.6%
Prefer not to say	66	2.6%
<b>Academic role</b>		
Research focused	329	13.0%
Teaching focused	391	15.5%
Balanced	415	16.4%
Other/unsure	4	0.2%
Prefer not to say	15	0.6%
<b>Academic level</b>		
Level A to C	696	27.5%
Level D and above	284	11.2%
Adjunct/emeritus	14	0.6%
Other/unsure	129	5.1%
Prefer not to say	34	1.3%
<b>Non-academic level</b>		
HE01 to HE06	673	26.6%
HE07 to HE010	422	16.7%
Other/unsure	10	0.4%
Prefer not to say	15	0.6%

The sample is representative of the gender breakdown of the universities' staff. Academics with combined teaching and research roles (balanced roles) and those appointed in senior positions (Level D and above) are overrepresented in the sample. Those in teaching focused roles are underrepresented.<sup>2</sup>

## Interpreting the results

The survey asked respondents their perceptions and experiences of corruption. While perceptions are subjective, they are important to understand, particularly as perceptions may shape behaviour. Staff who believe their workplace provides moral leadership, where standards are clear and consistently enforced, and staff feel aligned with workplace values are more likely to act with integrity. Conversely, staff who perceive their workplace tolerates corrupt conduct are more likely to engage in corruption themselves.<sup>3</sup>

A person's past understanding of corruption often reflects factors other than direct experiences, such as past experiences or those of others.<sup>4</sup> To avoid these distortions, respondents were asked about their experiences in their workplace in the last three years. Respondents are also motivated to respond to surveys if they have strong views, whether positive or negative, about the topic. People who are more ambivalent are less likely to respond.<sup>5</sup>

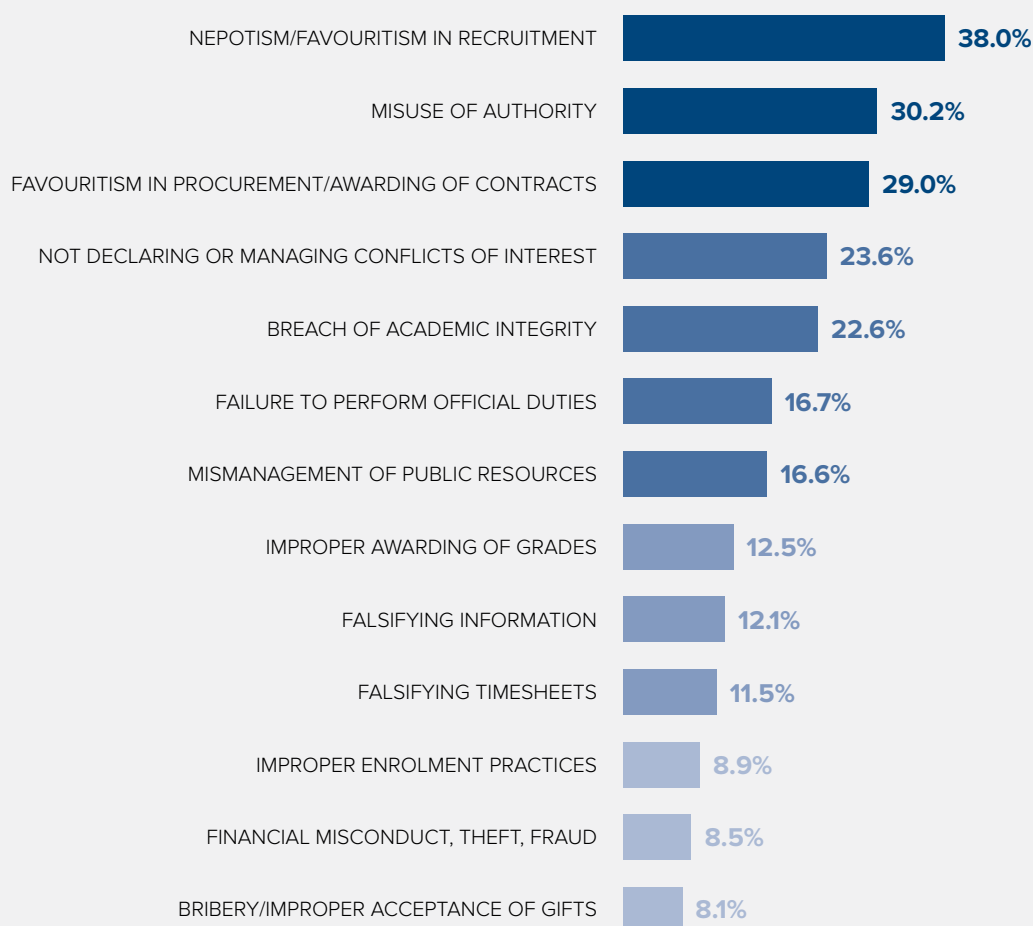
Perceptions of corruption may be shaped by current events.<sup>6</sup> On 17 October 2023, the Parliament approved a proposal to merge the University of Adelaide and the University of South Australia, with legislation to facilitate the amalgamation enacted on 16 November 2023. No doubt, these events have influenced survey responses. The survey did not present questions about the merger. Nevertheless, some staff provided their views about it in open questions.

# PERCEPTIONS OF CORRUPTION AND OTHER IMPROPRIETY

Participants were asked about their workplace’s vulnerability to corruption or other improper conduct (*Figure 1*). One in five respondents (21.5%) believed their workplace was highly or extremely vulnerable to impropriety.

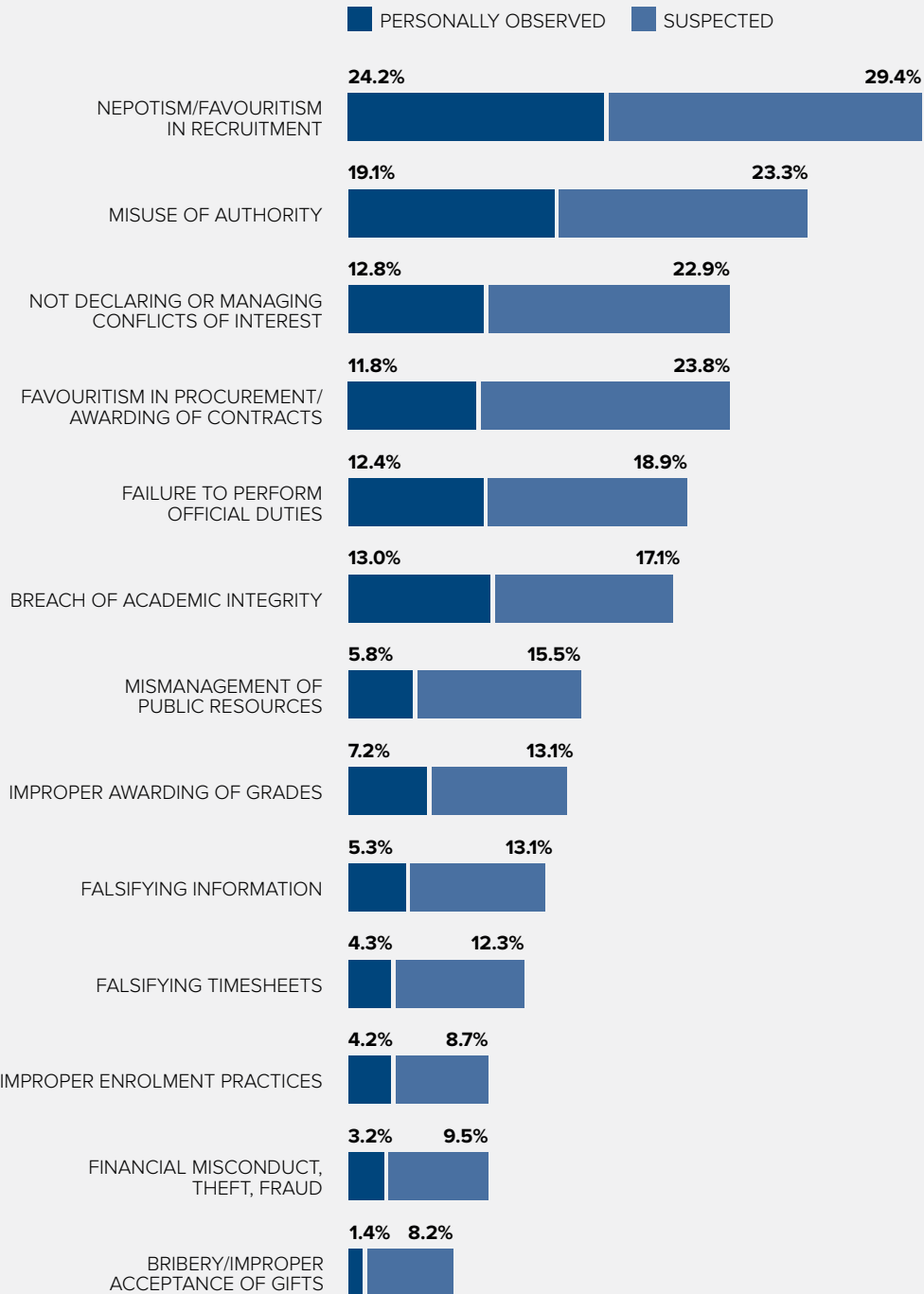
Respondents perceived that their university was most vulnerable to nepotism or favouritism in recruitment, followed by misuse of authority, and favouritism in procurement and/or the awarding of contracts.

**FIGURE 1:**  
**Workplace is highly or extremely vulnerable to corruption or other improper conduct**



Respondents were asked if they had personally observed or suspected corruption or other impropriety in their workplace in the last three years (*Figure 2*). The most commonly reported types of improper conduct were nepotism and favouritism in recruitment, breaches of academic integrity and misuse of authority. These findings are generally similar to those reported in 2020.<sup>7</sup>

**FIGURE 2:**  
**Perceived encounters with corruption or other impropriety**



## Nepotism and favouritism in recruitment

Nepotism and favouritism in recruitment was perceived as the greatest corruption risk facing the universities (*Figure 2*). Other work conducted by the Commission, including the 2020 university integrity survey, show that public officers believe improper recruitment is a major corruption risk.<sup>8</sup>

Impropriety in recruitment typically involves an existing staff member misusing their position to unfairly advantage a particular candidate. That favouritism may take the form of manipulating the selection criteria, excluding a more competitive candidate from the shortlist, or inappropriately sharing interview questions.

Perceptions of cronyism and nepotism can create a culture of staff disgruntlement and signal that poor integrity standards are tolerated.<sup>9</sup> Disgruntled staff are more likely to engage in corrupt conduct.<sup>10</sup> Candidates who have been dishonestly favoured may also engage in further improper conduct once they have secured employment.<sup>11</sup>

Some respondents described an existing staff member deliberately manipulating the recruitment process to favour a particular candidate. That candidate was described as a friend, family member, or other associate of a public officer involved in the recruitment process, and the conflict of interests had not been declared or appropriately managed.



“Recruitment of staff (previous co-workers) demonstrated favouritism through wording of the selection criteria and during the interview.”

“I was part of a recent recruitment committee, a candidate was pushed by a head of school to be included in the selection process after the deadline ...”

“Panel members are frequently not allowed to assess applicants and are instead only provided a shortlist from the hiring person. I have personally witnessed the shortlist of persons with a personal relationship with the hiring person.”

Other respondents perceived favouritism as a function of the need to appoint staff quickly, or to bypass overly bureaucratic processes.



“Friends of existing employees brought into the university on casual contracts, without a proper recruitment process (often not even advertised outside of the local School) – often as a result of shortsightedness and need for more permanent and ongoing positions (not appropriately staffed, then needing to find someone quickly to mark assessments).”

“There are numerous instances where relatives are appointed to roles in the University ... this can be caused by delays and an overly bureaucratic recruitment process that means short term contracts can be used by some staff to step around merit processes to enable appointments.”

“Researchers are under significant pressure to meet deadlines and deliver project outcomes. This may mean (for instance) that a researcher may employ a family member as [a research assistant] just because of the time it takes to get a contract request processed and hire someone.”

Some respondents commented that senior appointments are especially vulnerable to proper processes being circumvented.



“There have been multiple occasions where staff across the University have been directly appointed into senior level/executive positions, without a merit selection recruitment process.”

“Specifically in senior staff positions, highly-paid roles get created and people appointed without a transparent selection process.”

Where multiple recruitments were made by a single senior executive or within an executive unit, respondents perceived a pattern that suggested potential corruption. Such perceptions can harm trust in the integrity of senior leadership.

Recruitment based on factors other than merit may erode workplace culture and performance. Some respondents believed candidates who lack the necessary skills and experience had been engaged at the expense of more capable applicants.



“An interview panel member not declaring the conflict of interest. An applicant with no qualification and experience for the role got shortlisted and selected. A second applicant with years of experience in the area got knocked out.”

“I have also witnessed on multiple occasions college managers employing their friends outside the university into roles that could have been offered to more suitable candidates.”

“I have observed instances where these academics have unfairly awarded their own personal connections job opportunities, and redefined rules to suit these connections, despite these connections underperforming in their time at the university.”

The perception that recruitment is vulnerable to corruption may reflect misunderstandings of recruitment processes. Most respondents who claimed to have witnessed improper recruitment described employment opportunities that had not been externally advertised. However, recruitments that are not externally advertised may still be merit based. The universities’ policies and procedures allow for direct appointments, internally advertised positions, and conversions in certain circumstances.<sup>12</sup> However, if recruitment processes and outcomes are not understood, transparent and defensible, staff may perceive such appointments have been based on favouritism rather than merit.

## Misuse of authority

The second most commonly perceived corruption risk was misuse of authority (*Figure 2*). Universities are hierarchical institutions, and power imbalances may lead to misuse of authority. For many respondents, misuse of authority lay at the heart of improper behaviour.

Respondents described misuse of authority as taking the form of nepotism in senior executive appointments, applying pressure to teaching staff to alter grades, and senior researchers publishing the work of junior colleagues without attribution. These perceptions are examined in detail elsewhere in this report.

Respondents also perceived that misuse of authority manifests as bullying and harassment. As legislative changes to the *ICAC Act (2012)* removed misconduct from the Commission's jurisdiction, the 2023 survey did not ask questions regarding bullying and harassment. Nevertheless, respondents provided comments about their perceived experiences of bullying and harassment.

Some described bullying and harassment being overlooked by senior management as the perpetrator was in a position of influence.



“Some researchers are well-known to treat their teams poorly and misuse their authority to make unreasonable work demands but remain in place because they bring in a lot of grant money.”

“Senior researchers (prof level) continually treating people really badly (bullying) yet the uni turns a blind eye ... likely because the senior researchers in question bring in so much money.”

“Senior leadership not being responsive to reported cases of poor performance, nepotism and mismanagement by their Directors, it gets swept under the carpet when it comes to directors and their bullying.”

The poor behaviour of high performing staff may be tolerated as they are considered useful to the organisation. However, such behaviour can cause considerable emotional harm and drain staff morale, time and energy.<sup>13</sup> Universities' unique incentive structures, where academics are expected to attract grants and publish, creates corruption risks. The highly competitive nature of academia may tempt high performing individuals to engage in dishonest conduct to advance their careers.<sup>14</sup>

Some respondents focused on the perceived exploitation of casual staff. This included casual staff being paid incorrect rates, being asked to work prior to a contract being finalised, and being required to work longer hours than they are paid for.



“Improper payment of casual staff through choosing cheaper code.”

“Unreasonable expectations by increasing the workload but decreasing the hours of casual staff.”

“Exploitation of casual staff by allocating insufficient time to complete contracted tasks.”

“The University’s academic casual contracts are built on the expectation of unpaid labour from casual staff – it is an open secret.”

Casual staff employed on hourly rates make up the majority of universities’ teaching workforce.<sup>15</sup> Staff who lack a sense of loyalty to their employer, or are mistreated or lack secure employment may be motivated to act corruptly.<sup>16</sup> Casual staff who have frequent face-to-face contact with students may be well placed to extort students. The Western Australian Corruption and Crime Commission found a sessional tutor at Curtin University had sought sexual favours from international students. The tutor had been employed without appropriate checks and safeguards, and had not been provided with adequate training and supervision. A lack of support had left the international students vulnerable to exploitation.<sup>17</sup>

Systematic underpayment of casual staff is potentially misconduct, maladministration or corruption. Several Australian universities have been found to have underpaid casual staff.<sup>18</sup> The Fair Work Ombudsman has called for universities to address poor governance and management supervision, inadequate payroll systems, and decentralised human resource functions that allow for non-compliance with workplace agreements.<sup>19</sup>

Perceptions of misuse of authority were connected to the way decisions were made and communicated to staff. Several respondents drew on the proposed merger of the University of Adelaide and the University of South Australia as an example of senior executives making decisions without adequate consultation or transparency.



Some respondents across all three universities said that decision making was overly concentrated among a few senior executives. Those respondents perceived that senior executives do not understand how their staff work, their decisions lack transparency, they do not engage in meaningful consultation, and they have little accountability.



“Concentration of authority into senior executive roles has progressed over a number of years and was accelerated through COVID. In my view the concentration of decision-making into those roles creates both operational waste and also increases the potential for misuse of authority. Internal processes are disproportionately directed, influenced and decided by the COO.”

“Senior management appears to continue to operate in a bubble with no understanding or appreciation of the impact of its behaviour as a group and as individuals. Senior management needs to be more trustworthy and transparent. It needs to behave in a more respectful manner towards staff and not treat staff with disdain.”

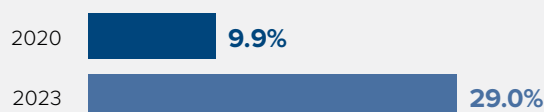
A workplace where senior leaders have considerable discretion to make decisions involving large amounts of public funds, where decisions lack transparency, or are deemed to be made on a mistaken or dishonest basis, may be vulnerable to corruption.<sup>20</sup> Conversely, ethical leadership can assist to prevent corruption.<sup>21</sup>

## Procurement

A worrying finding when compared with respondents from the 2020 survey, is that a higher proportion of recent respondents perceived procurement to be vulnerable to corruption (*Figure 3*).

FIGURE 3:

### Workplace is highly or extremely vulnerable to corruption in procurement



The risk posed to universities by corrupt procurement should not be underestimated. Other integrity agencies have investigated numerous instances of corrupt conduct in procurement and contract management.<sup>22</sup> A common theme in those investigations is that a lack of internal controls can provide an opportunity for a corrupt public officer to defraud their university.

The New South Wales Independent Commission Against Corruption found a manager at the University of Sydney had engaged in serious corrupt conduct by improperly favouring a supplier to provide ICT contractors. That university paid an inflated price for unsatisfactory ICT services.<sup>23</sup> Another New South Wales investigation found a University of Newcastle information technology manager facilitated the payment of false invoices by several universities to a private company owned by the manager's friend.<sup>24</sup>

There were several themes in respondents' assertions about procurement. Some believed a supplier had improperly won a contract due to an undeclared or unmanaged conflict of interests. Other respondents alleged a favoured contractor was improperly allowed to rewrite a bid; a company owned by a staff member's associate was directly procured; and an evaluation panel was manipulated to advantage a favoured supplier.

Respondents also focused on the use of preferred suppliers. Some respondents believed preferred suppliers did not always offer value for money.



"Having sole suppliers leads to higher prices and slow service ... The only obvious beneficiary of having a sole supplier is the sole supplier."

"Procurement processes often involve preferred providers and it is not clear the extra costs bring commensurate benefits."

"The University ... have 'preferred suppliers' which must be used for services, this leads to significant price gouging and the University overpaying for services."

There are potential benefits to using a preferred supplier, particularly for goods and services that are regularly purchased. The use of a preferred supplier may reduce costs, allow for efficiencies, and improve the quality of goods and services provided. Preferred suppliers have also been used as protection against procurements being unduly influenced.<sup>25</sup>

However, preferred supplier schemes are not immune from corruption risks. Other integrity agencies have reported on corrupt public sector employees improperly assisting a supplier to gain a position on a panel, and subsequently favouring that supplier to win contracts in return for kickbacks.<sup>26</sup> This includes an investigation of corrupt procurement at the University of Sydney.<sup>27</sup> A red flag for potential procurement is the failure of a preferred supplier to provide better value for money compared with other suppliers.

## Academic integrity

The Commission's 2020 university integrity survey received comments about unmerited student enrolments, particularly in relation to the admission of international students who may lack the capacity to pass, and academics perceiving pressure to improperly adjust student grades.<sup>28</sup>

There were fewer statements about these issues in 2023, possibly reflecting the decrease in international student enrolments due to the COVID-19 pandemic. Nevertheless, some respondents believed they had encountered academic integrity issues arising from improper enrolment and grading practices. Respondents described feeling pressured to improperly pass students, especially international students.

An emerging risk identified by respondents was the failure of academic staff to respond to students misusing artificial intelligence technologies. Approximately one in five respondents (22.6%) believed their university was highly or extremely vulnerable to breaches of academic integrity (*Figure 1*).

While a breach of academic integrity by a student may not be corruption, university staff who do not act on such breaches may be engaging in corrupt conduct. The New South Wales Independent Commission Against Corruption found two university staff members had engaged in corrupt conduct by not adequately investigating plagiarism reports, their aim being to protect the reputation of the university's offshore program.<sup>29</sup>

The rise of contract cheating, which involves a student engaging a third party to complete an assignment they then dishonestly represent as their own work, has increased the incidence of breaches of academic integrity. Such breaches are increasingly difficult to detect. This problem has intensified with students' use of artificial intelligence.<sup>30</sup> Some respondents explained that support and policies are insufficient to deal with these new challenges.



“Academic integrity breaches are increasingly harder to detect and universities are not funded in such a way to allow for dedicated staff to investigate suspected AI breaches – especially where contract cheating or use of artificial intelligence is suspected.”

“Academic Integrity is handled poorly by some individuals – they do not follow the policies – the policies are able to be interpreted in a number of ways and some individuals use this as the argument to not address AI breaches – I recognise that AI is a very complex entity but we do have policies & guides.”

Respondents explained the high level of evidence required to show a breach of academic integrity deters staff from reporting, especially for matters involving students' use of artificial intelligence.



“The University staff in many cases do not have the ability to deal with this in an absolute manner due to the conservative nature of the review process for suspected academic integrity cases. The process tends to err on the side of requiring absolute proof as opposed to circumstantial but compelling proof (e.g. text written in a manner consistent with AI text generators at a much higher grammatical level than the student has previously produced).”

“I have almost given up pursuing cases because the onus and a heavy one at that, is thrown back on academics to establish what are almost criminal levels of cheating, which is nigh impossible. Now with the sudden and dramatic rise of forms of AI, the problem is even worse.”

“I have reported academic integrity cases and been told that they will not be investigated because we cannot prove AI use.”

Staff in low level academic<sup>31</sup> and administrative positions,<sup>32</sup> and casual staff,<sup>33</sup> were more likely to respond that they had encountered improper conduct in relation to academic integrity. Those staff are at the coalface of teaching, marking and handling breaches of academic integrity. Some respondents explained the heavy administrative burden of following academic integrity policies and procedures meant that breaches are being overlooked. It may be that senior leaders are unaware that staff feel they are not receiving sufficient support, and policies and procedures relating to student integrity are onerous.



“The workload associated with reporting academic integrity issues (in coursework assignments) is significant so I suspect some academics don't always action proper process because it's just too hard/burdensome.”

“It is so onerous to report breaches of academic integrity and with insufficient time, resources and support for staff, cases go unreported.”

Many respondents perceived that academic standards are dropping; students are able to cheat and plagiarise without consequences; and reports of breaches of academic integrity are deterred. The Commission acknowledges that preventing and addressing breaches of academic integrity has become increasingly difficult. However, it is essential universities do not allow a sense of despondency to take hold. Staff need to believe their workplace is determined to uphold standards and protect integrity. A workplace culture where indifference towards integrity has become normalised is vulnerable to corruption.<sup>34</sup>

Appropriate training can reduce risks of corruption occurring in a workplace.<sup>35</sup> Approximately one third of respondents (34.6%) believed they had been provided with training on corruption risks specific to their role, representing a decrease since 2020 (Figure 4).

**FIGURE 4:**  
**University has provided training on corruption risks specific to role (agreed/strongly agreed)**



The provision of training is uneven. Academic staff,<sup>36</sup> particularly those in teaching-focused roles,<sup>37</sup> staff on short-term contracts or in casual positions,<sup>38</sup> and women<sup>39</sup> were less likely to agree they had been provided with training on corruption risks. Those in leadership<sup>40</sup> and high-level administrative roles<sup>41</sup> were more likely to have received training.

Some respondents commented they wanted further training on corruption risks. However, they often do not have the time to attend.



“Where training exists, many staff do not have time to do it. Compulsory training is strongly resented because it always comes on top of existing duties. In practice additional requirements beyond teaching and research eats into research time.”

“The current approach to deal with this issue at University is to introduce more policies and training that just creates additional burdens for staff. This is done at the same time as increasing performance standards and metrics. It needs to be recognised that it takes time to engage with these processes and to do them properly, but this time is not allowed.”

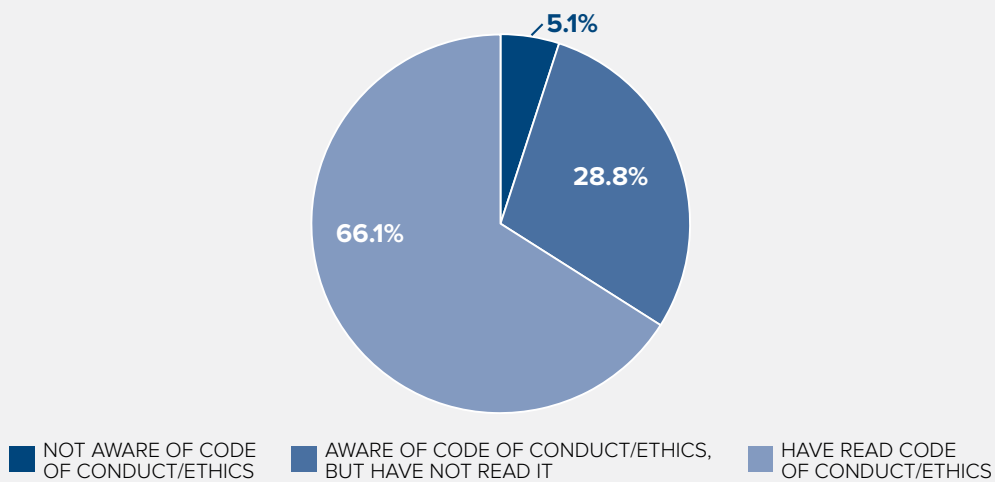
Respondents who had received training on corruption risks were more likely to perceive that their workplace is highly or extremely vulnerable to corruption.<sup>42</sup> It is essential all university public officers understand corruption risks in their workplace. Such an understanding will assist universities to detect and prevent corruption.

# CODE OF CONDUCT AND CODE OF ETHICS

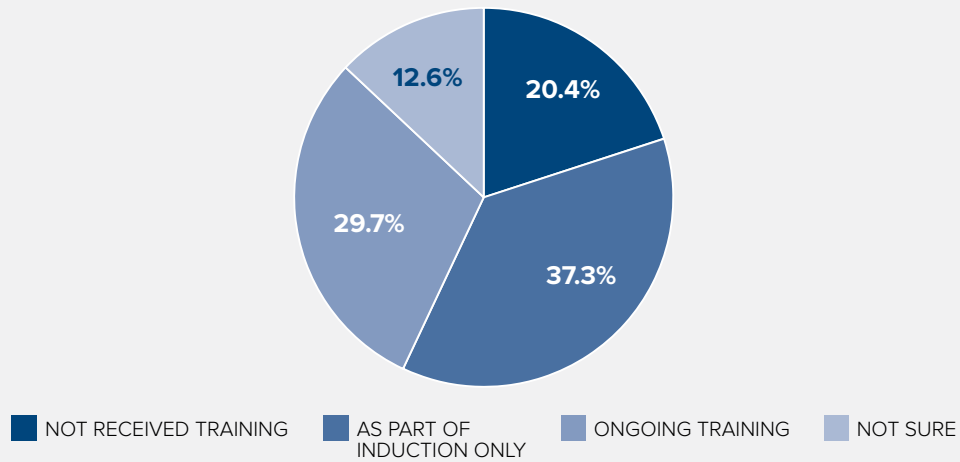
Non-compliance with an organisation's Code of Conduct or Code of Ethics may be misconduct, which falls outside of the Commission's jurisdiction. However, misconduct is often a precursor to corruption.<sup>43</sup> Workplaces where staff are not aware of expectations of behaviour, and where poor conduct has become entrenched are vulnerable to corruption. An important preventive measure is ensuring staff are aware of, and complying with, their workplace's Code of Conduct or Code of Ethics.<sup>44</sup>

Most respondents were aware of their university's Code of Conduct or Code of Ethics (*Figure 5*). However, less than a third (29.7%) claimed they had received ongoing training on their university's Code of Conduct or Code of Ethics (*Figure 6*).

**FIGURE 5:**  
**Awareness of Code of Conduct or Code of Ethics**

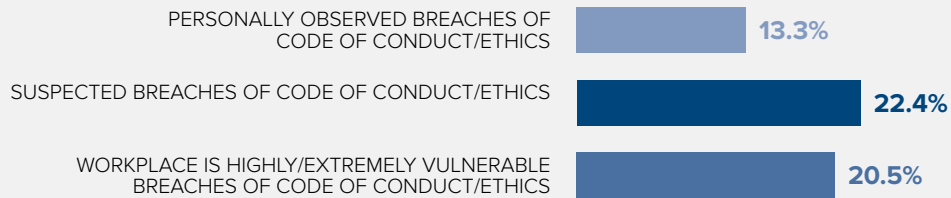


**FIGURE 6:**  
**Provided with training on Code of Conduct or Code of Ethics**



One in five (20.5%) respondents rated their workplace as being highly or extremely vulnerable to breaches of their university’s Code of Conduct or Code of Ethics (Figure 7).

**FIGURE 7:**  
**Perceptions and experiences of breaches of Code of Conduct or Code of Ethics**



Academics in teaching roles, lower level administrative positions and casual staff were more likely than other staff to be unsure if their university is vulnerable to breaches of Code of Conduct or Code of Ethics,<sup>45</sup> and to be unsure if they have encountered such breaches.<sup>46</sup> Staff in these groups were those most likely not to have read or received training on their university’s Code of Conduct or Code of Ethics.<sup>47</sup>

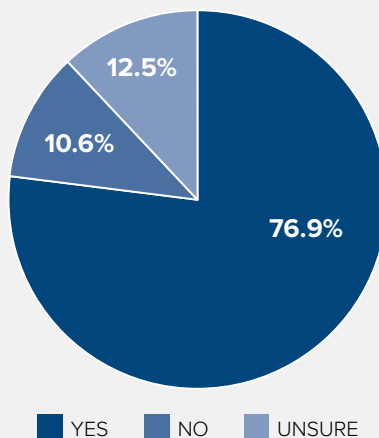
Researchers employed at universities frequently win publicly funded research grants from both South Australian and Commonwealth governments, in addition to private grant funding. Universities are accountable for the use and management of these funds.

Another ethically fraught area is academic authorship.<sup>48</sup> A lack of transparency in authorship guidelines and power imbalances in research teams may result in researchers gaining academic authorship in situations where they made no intellectual contribution to the published research.<sup>49</sup> This deceptive misuse of authorship then contributes to researchers building a possibly fraudulent track record enabling them to win grant funding. At its worst, this can amount to corruption.

The Commission's 2020 university integrity survey received a considerable number of answers alleging breaches of research integrity, and breaches of research integrity have been investigated by integrity agencies.<sup>50</sup> For these reasons, the Commission focused on research integrity for the current survey.

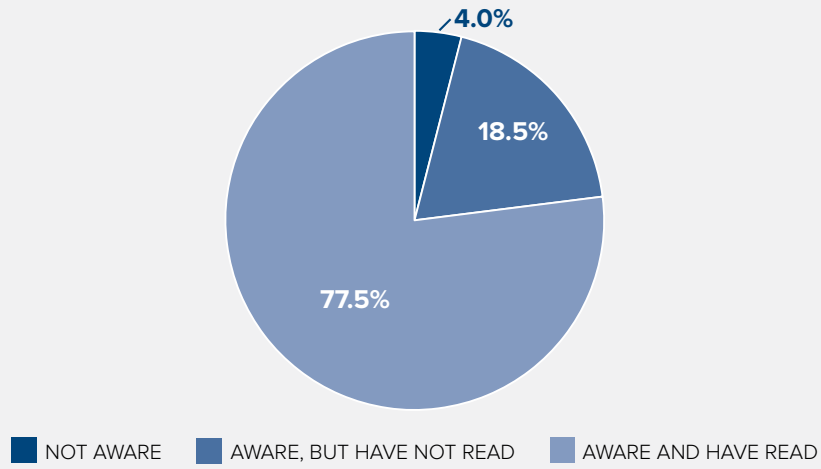
Approximately half of the survey respondents indicated they had a research role (48.7%). Those respondents were asked questions relating to perceptions of research integrity. Most respondents with a research role claimed to have been provided with sufficient information (76.9%), to be aware of their university's policies and procedures (77.5%), and to have received training (75.9%) in relation to research integrity (Figures 8, 9 and 10).

**FIGURE 8:**  
**University provides sufficient information regarding research integrity**

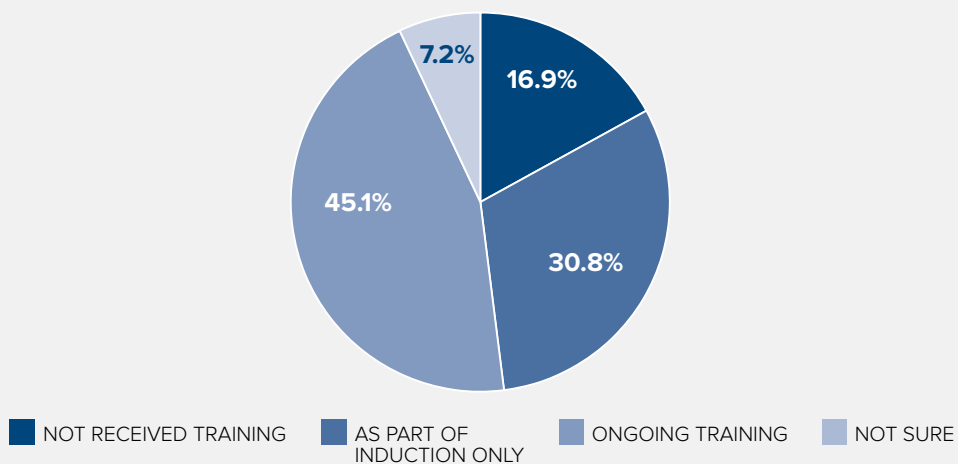




**FIGURE 9:**  
**Awareness of research integrity policies and procedures**



**FIGURE 10:**  
**Provided with training on research integrity**



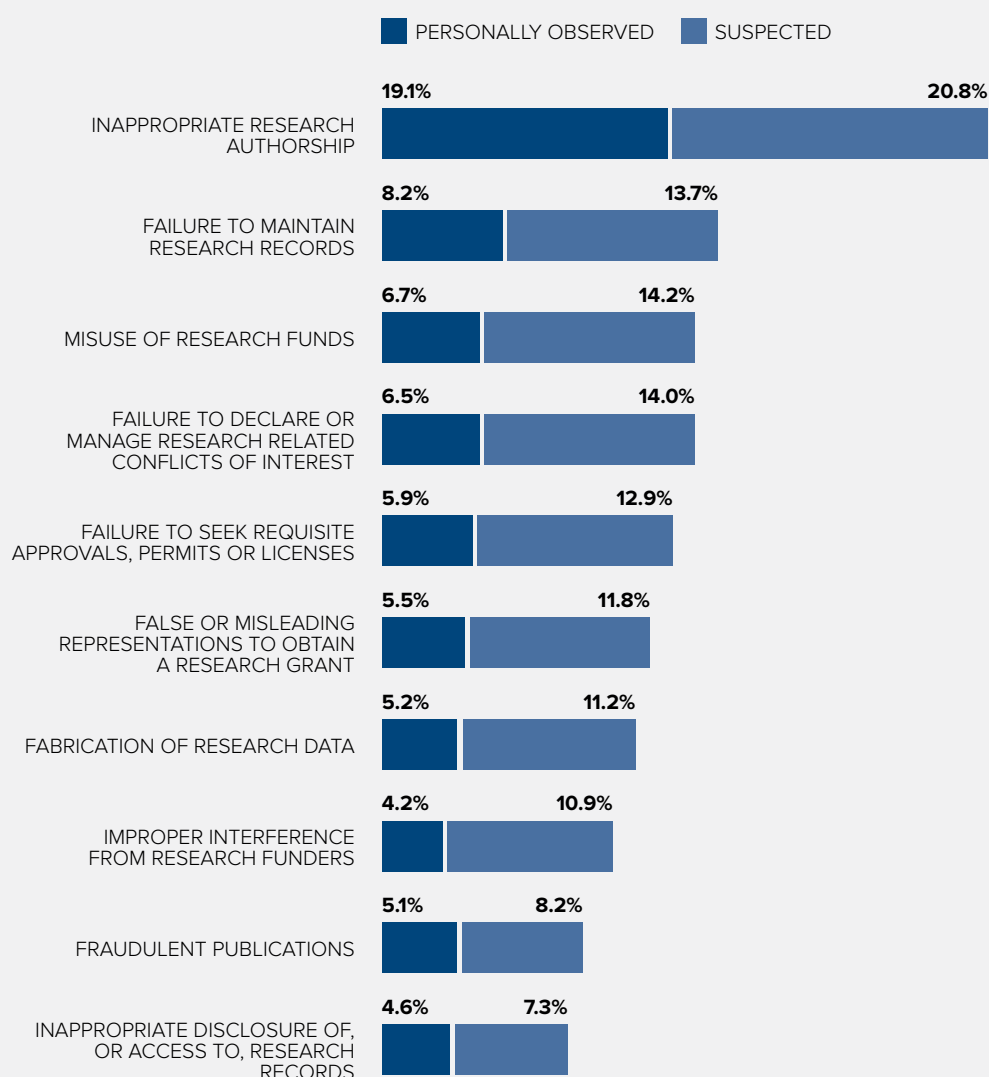
Approximately one fifth of respondents with research roles (19.5%) had non-academic roles. Some of those staff believed they had not received sufficient information (10.0%) or training (32.5%) about research integrity. Non-academics with internal research roles, in units that provide support to research, or in research governance roles may be positions to observe improper behaviour. They require an understanding of conduct that could pose integrity risks to their university.

Respondents involved in research were asked their views on their university’s level of vulnerability to corruption and other impropriety in relation to research integrity (Figure 11), and whether they had suspected or personally encountered these (Figure 12). Inappropriate research authorship was perceived as the area of research integrity most vulnerable to corruption or other impropriety.

**FIGURE 11:**  
**Workplace is highly or extremely vulnerable to corruption or other impropriety in research integrity**



**FIGURE 12:**  
**Perceived breaches of research integrity**



The ‘publish or perish’ culture of university research, where researchers are expected to achieve high targets for publications and grants, was described as the main driver of research integrity breaches.



“The bigger issue is that research funding and publications across the sector is built entirely on lies and deception. Research outputs define one’s careers, so researchers will do whatever they can to secure grants and papers.”

“Unwarranted authorship on papers is a widespread issue in universities. It is clearly evident in both junior and senior CVs with unrealistic publication frequencies, yet is rewarded in funding allocations ...”

Respondents believed the pressure to publish had resulted in researchers fraudulently claiming authorship, and not crediting others with authorship to which they were entitled. This was underpinned by a power dynamic whereby more senior researchers benefited from unfair practices.



“Authorship of research articles often given to ‘senior’ academics in cases where they have not completed the minimum work required to be listed as an author (following University guideline).”

“Opposite often the case for junior researchers / HDR students where they are not included as author despite having made a substantial contribution.”

“Issues with authorship in particular are the worst ... ECRs [early career researchers] are bullied by senior researchers and managers to be ghost writers or are last in a publication. Some academics PhD supervisors pressure and bully their students to ensure their name is on publications on which they haven’t contributed a single word.”

Junior academics, such as early career researchers, are particularly vulnerable to having their research exploited. Junior academics were less likely than their senior colleagues to have read policies and procedures relating to research integrity.<sup>51</sup> They were more likely to be unsure if their university was vulnerable to corrupt conduct or other impropriety in relation to research integrity.<sup>52</sup>

The publish or perish culture was seen as creating an environment where researchers would fabricate data to win and maintain grants, appease a research funder, and to publish in a highly-ranked journal.



“I have suspected intentional misrepresentation of research results in grant applications, even some I have been named in, but did not have evidence.”

“Multiple junior staff who had reported to senior staff that they suspected a student’s potential fraudulent research data and yet the senior staff still wanted to accept the data and results.”

“Data collected cherry picked to suit the stakeholder.”

“Manipulation/ falsification of data to gain publication acceptance.”

“I was also aware that some statistical analyses were improperly carried out and reported in order to ensure continued funding for a project.”

For some respondents, the need to obtain grants left researchers vulnerable to being exploited by funders.



“I have seen colleagues pressured by those who funded their research to allow organisations to design elements of the evaluation or even conduct data collection themselves, the need to maintain ‘good’ relationships with bodies who will fund another research project can make it extremely difficult to say no to requests that are not in line with proper research conduct or to accurately report negative aspects of findings.”

The other main driver for breaches of research integrity was the desire to misappropriate research funds for personal gain. This may also involve a researcher failing to declare a conflict of interests.



“I witnessed a colleague failing to disclose conflict of interest and used grant resources for a personal business.”

“I suspect a staff member who undertakes private consulting does so on university time and does not declare conflicts of interest.”

“A professor obtaining grant money for one thing and spending it on something else.”

## Reporting and investigating potential breaches of research integrity

There is no external regulatory authority able to receive or investigate potential research misconduct. University researchers are required to comply with The Australian Code for the *Responsible Conduct of Research* (2018). On request, the Australian Research Integrity Committee (ARIC) can review the process by which an institution eligible to receive funding from the Australian Research Council (ARC) or the National Health and Medical Research Council (AHMRC) has managed and/or investigated a potential breach of the Code. However, the ARIC cannot review the alleged conduct or merits of findings unless they reflect an error in an institution's processes, or the sanctions applied.

Breaches of the Code by academic researchers are left to their home institutions to investigate. It has been observed that uncovering research misconduct has the potential to damage an institution's reputation with repercussions on revenue. Accordingly, institutions may be disinclined to appropriately investigate and deal with potential breaches of research integrity.<sup>53</sup>

Some respondents described reporting potential research misconduct to their university. Several respondents who reported junior colleagues or students believed their institution acted swiftly and appropriately. However, other respondents described their report as being ignored and the reporter being victimised, especially if the subject of the report was a senior researcher.



"It's not worth reporting, based on past experience the reporting person ends worse off."

"The report was against a professor. The path of least resistance was taken. No action was taken to protect me or respond to my report."

"Following from that complaint the person in question used every avenue available for purposes of harassment, intimidation, and revenge including allegations of bullying, misconduct, ethics etc."

"The report was not actioned as it was advised it was not worth the trouble to myself at that time of my career or the career of the person being reported."

"The University covered up the incident to protect the individual involved in order to appease a senior Professor involved in the case."

In some instances, breaches of research integrity, such as the use of public funding for purposes other than those for which it was intended, or the use of fraudulent research to gain funding, may amount to corrupt conduct. For example, in Queensland, two former university researchers were convicted of fraud after an investigation by the Crime and Corruption Commission. The researchers had published fabricated data and won funding based on this data.<sup>54</sup>

University investigators may not have clear understandings of the distinction between research misconduct and corrupt research conduct. A report of research misconduct, if investigated thoroughly, may reveal potential corrupt conduct. However, if an investigation is not robust corruption may continue undetected.

The second focus of the 2023 survey was records management. Universities are operating in increasingly sensitive environments. They hold large amounts of personally identifiable information about students, employees, and those involved in research and commercial activities, often for long periods of time.<sup>55</sup> South Australian university researchers are working on projects involving defence, national security and critical infrastructure. Australian universities have already faced mass data breaches;<sup>56</sup> and risks of attacks by trusted insiders are likely to intensify.

Systems must be in place to protect sensitive information and detect breaches should they occur. However, the survey results suggest universities are complacent about protecting information integrity.

Less than half of respondents (44.6%) claimed to have received sufficient information regarding records management (*Figure 13*), and a similar proportion had read their university's record management policies and procedures (*Figure 14*). One third (32.7%) responded that they had not been provided with training in records management (*Figure 15*).

**FIGURE 13:**  
**University provides sufficient information regarding records management**

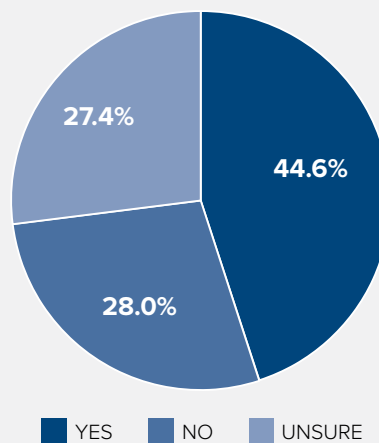




FIGURE 14:  
**Awareness of records management policies and procedures**

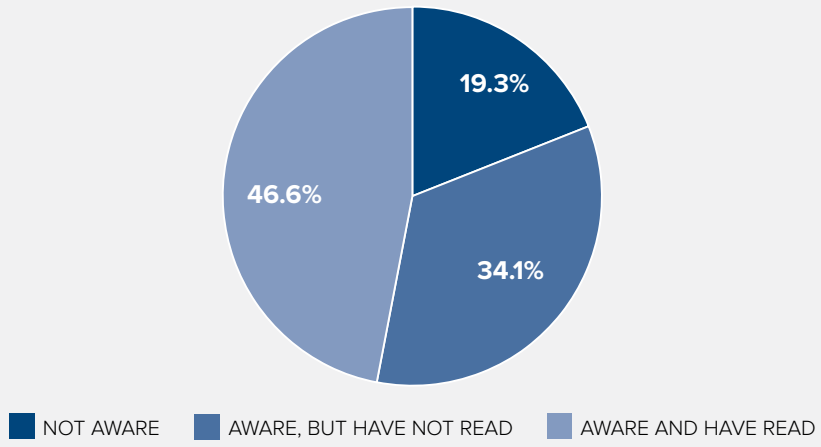
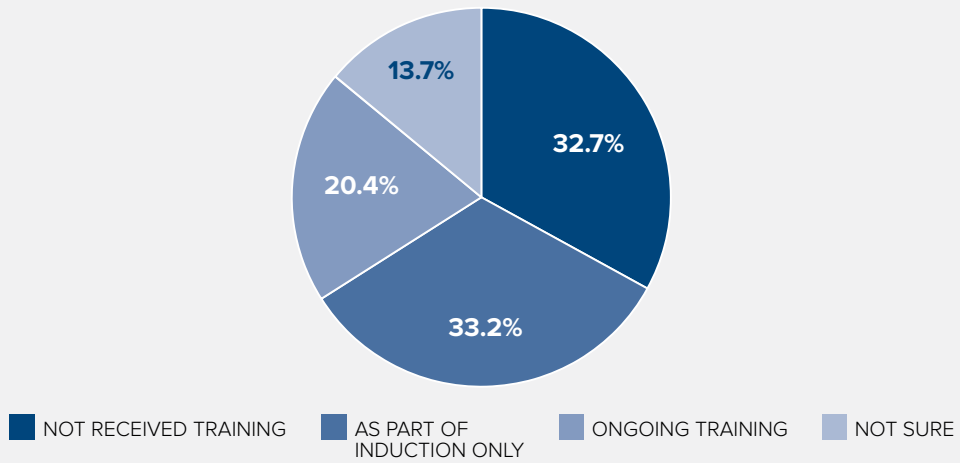


FIGURE 15:  
**Provided with training on records management**



Academic staff were less likely than non-academics to be aware of records management policies and procedures.<sup>57</sup> Records being kept outside the university's electronic records management system were seen to be the greatest corruption risks in relation to this area.



“Records management system not widely understood or used by university staff. Lack of consistency of information storage methods and locations. Minimal records of past event decisions kept. Personal employee information accessible by all team members, no secure location for information to be saved.”

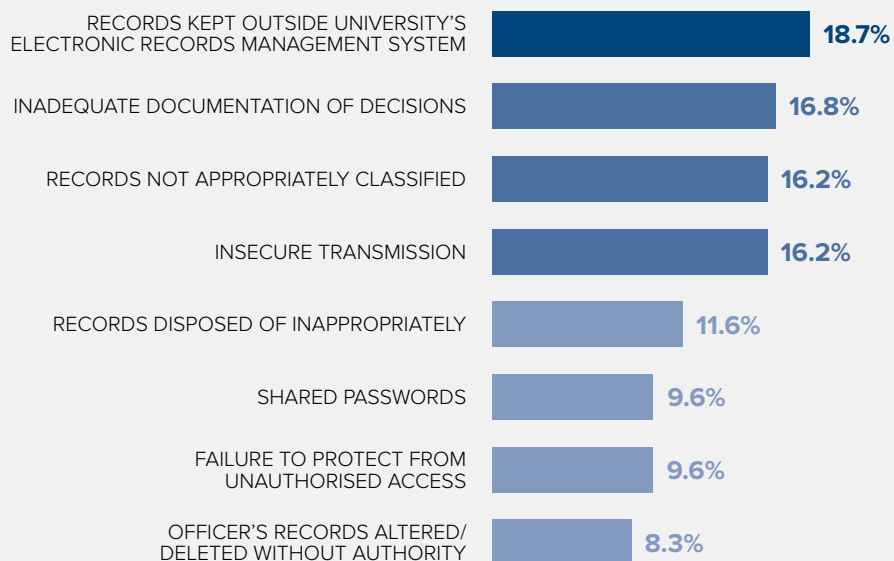
“I believe there is a lack of knowledge in the importance of sound records management within a majority of the university divisions. Or it could be that it gets down to ‘Who is responsible?’ – I have never seen a clear line of accountability for records management plus the process has been so complicated it creates avoidance.”

“In my opinion, no-one is really aware of what records need to be kept and what does not, what is official and what is not.”

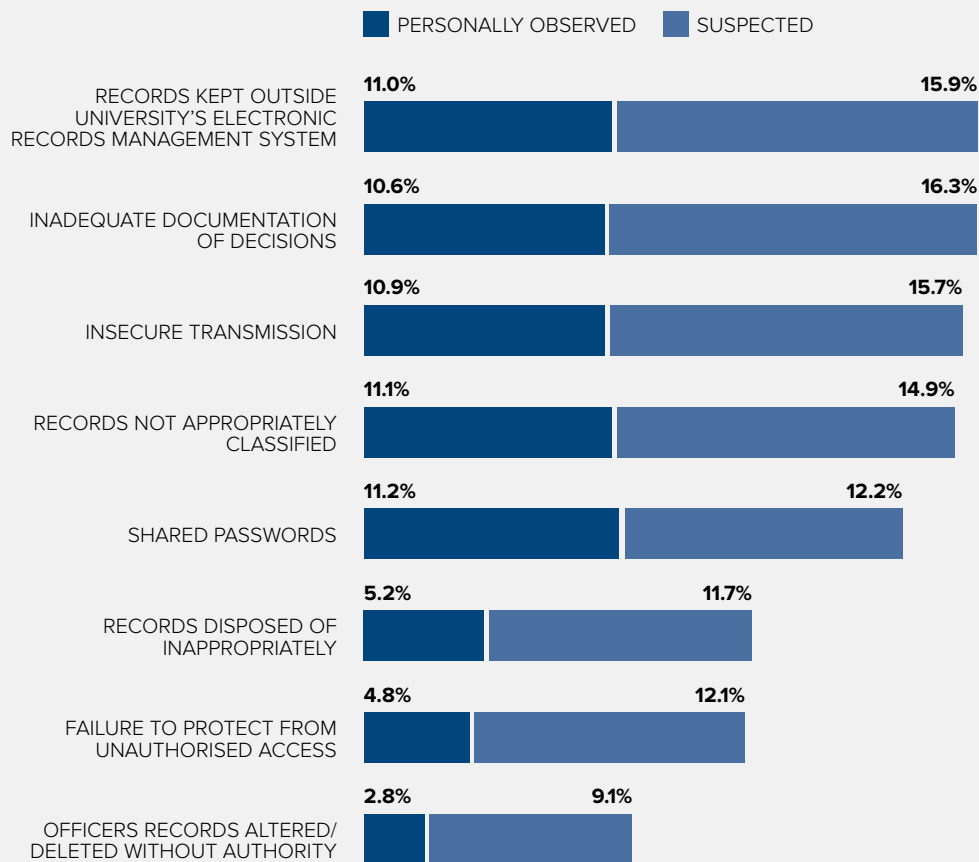
“While we undertake the state’s records management training, I’m not aware of [University] records management training that we could/should be doing.”

Respondents were asked if they considered their university to be vulnerable to corruption or other impropriety in records management (*Figure 16*), and if they had encountered or suspected any improper conduct (*Figure 17*).

**FIGURE 16:**  
**Workplace is highly or extremely vulnerable to corruption or other impropriety in records management**



**FIGURE 17:**  
**Perceived improper records management**



Universities have complex and multifaceted functions including teaching, research, business and administration functions. Where business areas operate separately, effective records management is especially challenging.<sup>58</sup> As a result, some staff do not have access to necessary records management systems, and staff have a high degree of discretion. The qualitative comments reflected these challenges.



“Not everyone has access or uses the record system which cause a lot of important documents to be stored on Desk drives or Shared drives.”

“I constantly see data that must sit on a secure server under an MOU being copied to Hard Drives for use. On multiple occasions, I have advised staff that the manner they are using confidential information is not appropriate and usually told that is widely done.”

“We have a large amount of contract data & associated information stored in share drives. Unclear if this information should or should not be kept there and the rules about who should have access is not made available – very easy for the information to be passed to parties that should not have the information.”

Other respondents described decisions not being documented, insecure transmission of information and inappropriate sharing of passwords.



“No records of business decisions relating to decisions that have cost implications.”

“System passwords are sometimes shared, sensitive information is shared via email and teams chats, nothing from my area is entered into the university’s official electronic record keeping system, there is rarely proper documentation of decisions relating to university business.”

“We send forms and excel sheets by email which are downloaded and held on personal computers and then sent onwards to other people who do the same. Whether those are deleted or not is up to individuals and really I doubt people do as you don’t want to lose things accidentally. It couldn’t be a less secure system.”

“Passwords being shared and stored in plain text documentation. Thousands of students data stored in non password protected excel documents.”

University staff, particularly academic staff, often engage in outside professional activities. Such activities include being engaged as consultants, members of expert advisory committees, or members of advocacy or lobby organisations. Universities are increasingly seeking to build closer relations with industry partners and often support spin off companies to maximise the commercial potential of university research.<sup>59</sup>

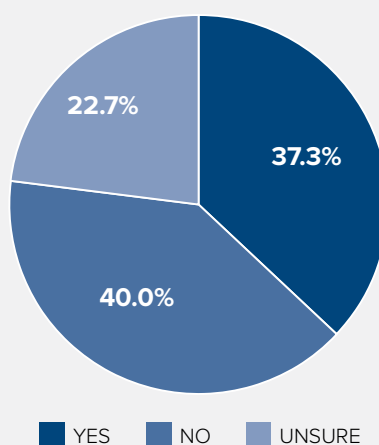
The promotion of outside professional activities offers benefits as it enables academic staff to maintain and update their scholarly practice and skills, and commercialise research, and allows universities to offer workplace learning opportunities to students. However, it also poses risks.

There is a tension between universities' public purpose and the generation of commercial income from outside professional activities. The desire of university staff to benefit financially from commercially profitable work may lead to corruption. This risk is heightened when conflicts of interests are not effectively managed.<sup>60</sup>

Approximately one in four respondents (25.7%) claimed to be involved in an outside professional activity in the last three years. Another 10.2% were unsure if they had engaged in such activities.

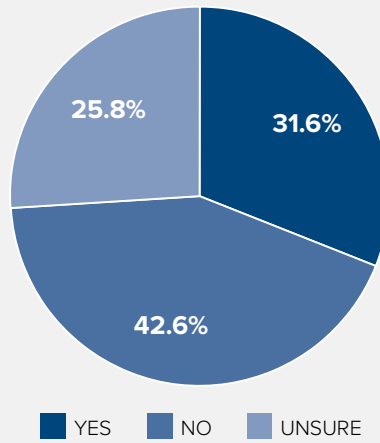
Each university has policies in relation to outside professional activities. Those policies cover activities that are not allowed by the universities, such as the use of university resources to support activities undertaken in a private capacity and activities that give rise to situations of conflicts of interests.<sup>61</sup> Of those respondents who claimed they were engaged in outside professional activities, many (62.7%) were not aware or unsure of outside professional activities that were disallowed by their university (*Figure 18*).

**FIGURE 18:**  
**Aware of disallowed outside professional activities**



Many respondents who engage in outside professional activities (42.6%) considered their university had not provided sufficient information on such activities (Figure 19). Almost a third (29.4%) were not aware of their university’s policies (Figure 20), and half (49.7%) had either not received any training regarding outside professional activities (Figure 21).

**FIGURE 19:**  
**University provides sufficient information regarding outside professional activities**



**FIGURE 20:**  
**Awareness of outside professional activities policies and procedures**

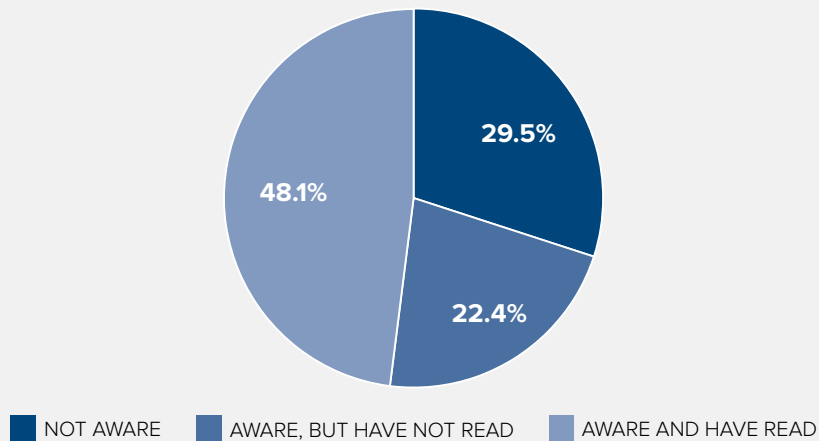
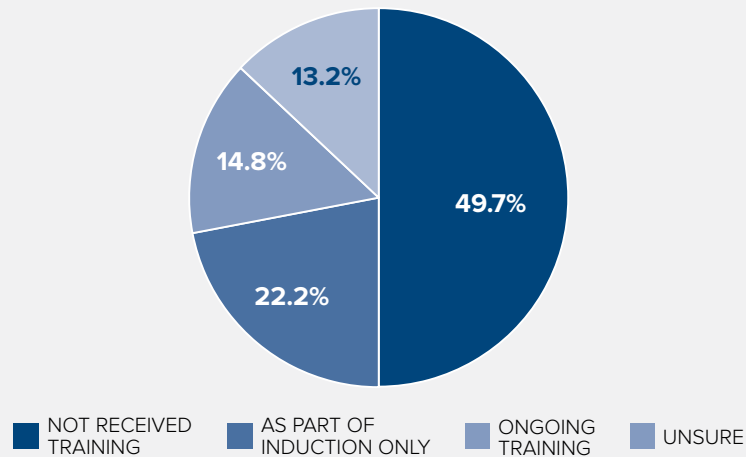


FIGURE 21:  
Training on policies and procedures relating to outside professional activities



Several respondents commented on the need to improve staff knowledge of policies and procedures relating to outside professional activities.



“The information that staff need to know to undertake legitimate outside professional activities need to be presented to staff in a more systematic, coherent and succinct manner ...”

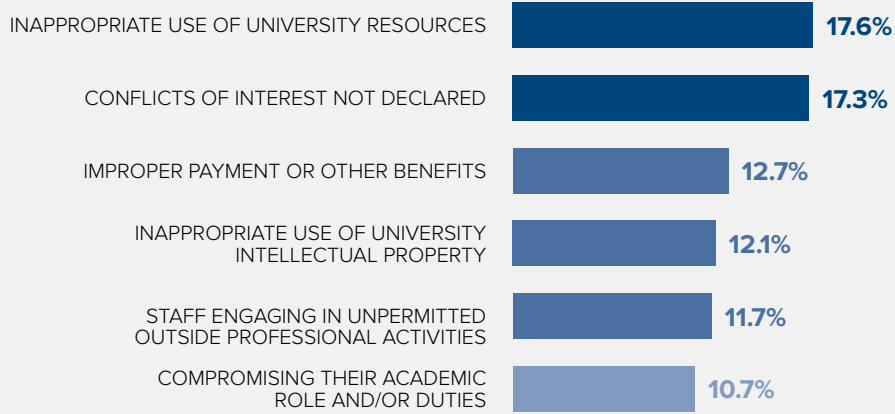
“The issue to my mind here is that the processes and procedures, which are entirely reasonable, are not well know or ‘made live’ institutionally. Staff would be made aware of the relevant policy on induction but it is not regularly discussed and staff could be quite unaware of their obligations.”

“I am aware of a instance where staff set up an external consultancy group that was directly related to the University roles. This was managed in the end, but it does highlight the lack of awareness.”

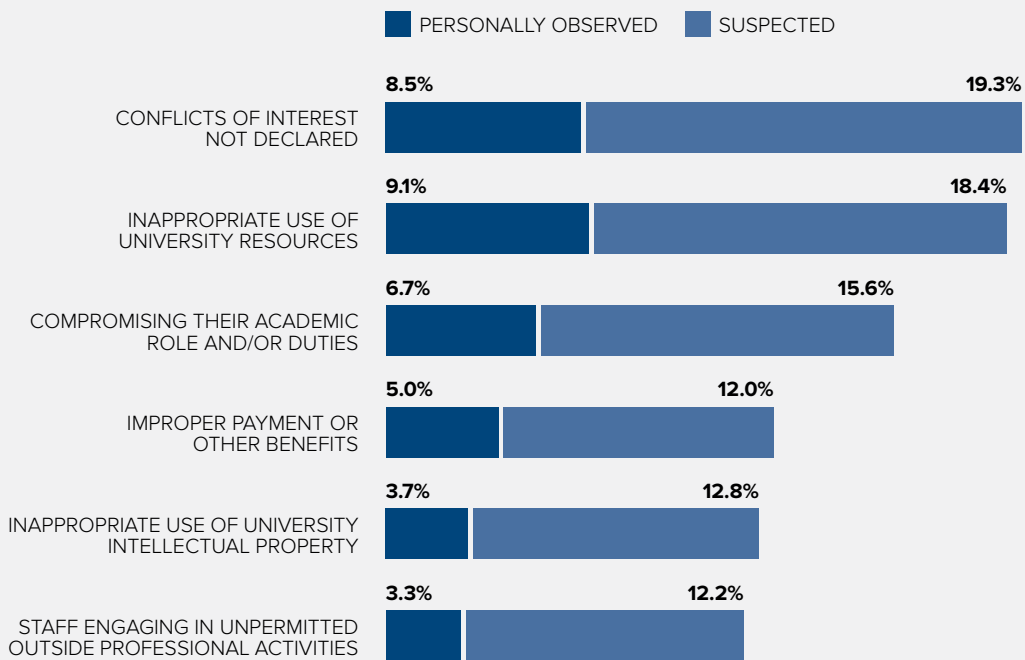
“Think there needs to be better communication about this to clarify what professional consultancies and activities are covered and what are not – awareness raising really need to be considered.”

Most respondents who engaged in outside professional activities did not consider their university to be highly or extremely vulnerable to corruption or other improper conduct related to outside professional activities (*Figures 22 and 23*). It may be that universities are managing corruption risks in relation to outside professional activities well. However, considering less than half had received sufficient information or training about such activities, it is more likely corruption risks are underestimated.

**FIGURE 22:**  
**Workplace is highly or extremely vulnerable to improper conduct in relation to outside professional activities**



**FIGURE 23:**  
**Perceived improper engagement in outside professional activities**





For respondents who have engaged in outside professional activities, the greatest risk posed by such activities was the failure to disclose and appropriately manage conflicts of interests (*Figure 23*). Respondents' comments suggested those risks are not well understood by staff or controlled by their university.



"There are people who either run businesses which are directly related to their work ... Some genuinely are unaware of conflict of interest, others don't care."

"I was made aware of a staff member who had an outside business which was suspected of using [university] IP as part of the business offering. The business and staff member were reported but there was no clear follow up."

"There is a policy regarding outside professional activities but it boils down to ticking a box that conflicts of interests are managed. Mostly a box-ticking exercise as nobody really wants to look into this."

Respondents also perceived outside professional activities may be vulnerable to misuse of university resources (*Figure 22*). This included misuse of university facilities, time and intellectual property.



"I have colleagues that regularly use university software for private consultancy work."

"Full time staff undertaking outside professional consultancy during working hours."

"I have seen staff supply university IP, such as teaching materials, to friends or former colleagues at other institutions. Some have also given permission for other people to use (i.e. publish) content even though they do not have authority to grant copyright permissions."

"I have second-hand knowledge of a research assistant being asked/forced by their supervisor to perform work out of hours for their supervisor's outside professional activities."

Some respondents suggested their university did not take a clear and consistent approach to the governance of outside professional activities. Several described their university as allowing staff to perform outside professional activities during their usual working hours and being rewarded for undertaking such activities. Others described not having their involvement in outside professional activities included in their workload or receiving any other benefit.



“Making startups, patenting, consulting are NEVER part of ... KPIs.”

“I am among many other staff who consistently work significant unpaid overtime, often doing consultancy work that is well beyond the scope of my employment for no reward.”

“Work outside of university limited for some but not all staff. Policy not uniformly applied and allows for favouritism of some staff over others in workload and flexibility.”

In most other areas of public service, external professional activities that promote the objectives of the organisation, such as networking, knowledge exchange, and knowledge production with external partners, are included in an employee’s workload and are remunerated through salary. Such an approach provides clarity and consistency, and may prevent perceptions of workload being unfairly distributed.

This approach may also avert the belief that staff are entitled to additional benefits for activities for which they are already paid. This sense of entitlement was apparent in some responses.



“The current system is basically a restraint of trade where the uni expects us to be entrepreneurial and do things outside of the uni – yet restricts any form of income reimbursement coming back to staff.”

“It is difficult to ensure that these things are not taking place, despite training and reinforcement of these, particularly because some academics seem to think that they have the right to do what they want at any time.”

“I have been involved with a researcher who did not declare working outside the University for 5 years and then sought payment for this ‘extra’ work via a payment from a grant. This was resolved internally when explained to the researcher but he was unaware of the policy.”

The belief that employees are entitled to benefits beyond their salary can erode workplace integrity.<sup>62</sup> A sense of entitlement can lead to an employee accepting, or soliciting, gratuities or other special treatment. Those who misuse their status as public officers to obtain personal benefits may be engaging in corruption. Employees who resent being denied additional benefits they feel entitled to may rationalise corrupt conduct.<sup>63</sup>

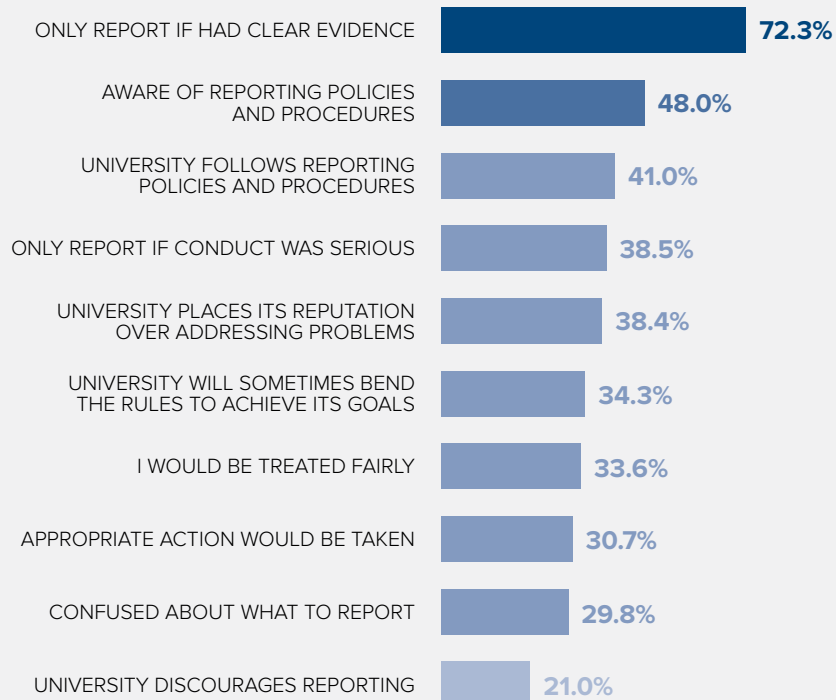
Respondents were asked their perceptions about reporting corruption or other improper conduct. Approximately two thirds of respondents (64.3%) stated they would be willing to make reports to someone inside their organisation. Fewer respondents claimed they would report compared with 2020 (*Figure 24*).

**FIGURE 24:**  
**Would be willing to report suspected corruption or other impropriety internally**



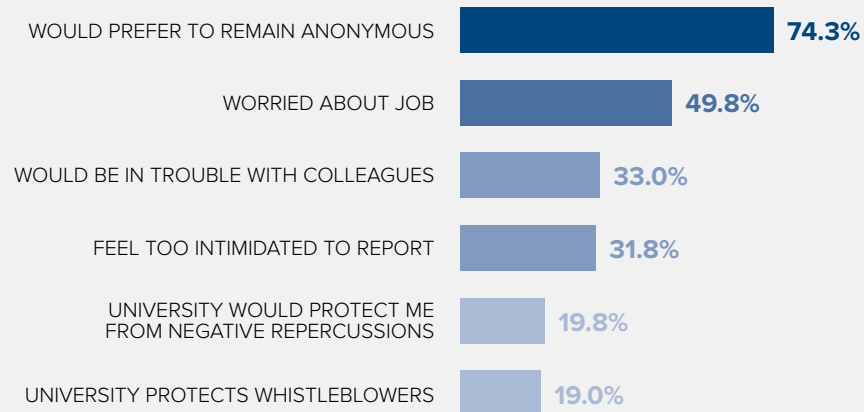
Respondents' perceptions of reporting suggest there might be a culture of discouraging university staff from speaking up. Almost half of respondents (48.0%) were unaware of reporting policies and procedures. The majority did not agree their university follows reporting policies and procedures, or that appropriate action would be taken if they did report (*Figure 25*).

**FIGURE 25:**  
**Perceptions of reporting (agreed/strongly agreed)**



Many staff seemed worried they may face negative consequences if they spoke up about corrupt or other improper conduct (*Figure 26*). Almost a third (31.8%) agreed they would be too intimidated to report. Less than one in five (19.8%) believed their university would protect them from negative repercussions should they report. A similar proportion agreed their university protects whistleblowers (19.0%).

**FIGURE 26:**  
**Fear of negative repercussions for reporting (agreed/strongly agreed)**



Since 2020, the universities' reporting culture has weakened (*Table 3*). Respondents have become more worried about the negative effects of reporting, and perceive their university is increasingly discouraging reporting.

<b>TABLE 3: PERCEPTIONS OF REPORTING (2020 AND 2023)</b>	<b>2020</b>	<b>2023</b>	<b>DIFFERENCE</b>
Only report if had clear evidence	47.8%	72.3%	24.5%
University will sometimes bend the rules to achieve its goals	17.5%	34.3%	-16.8%
Would be in trouble with colleagues	21.5%	33.0%	11.5%
University discourages reporting	10.9%	21.0%	10.1%
Worried about job	44.2%	49.8%	5.6%
University places its reputation over addressing problems	35.4%	38.4%	3.0%
Would prefer to remain anonymous	75.3%	74.3%	-1.0%
Confused about what to report	31.1%	29.8%	-1.3%
University would protect me from negative repercussions	25.2%	19.8%	-5.4%
Appropriate action would be taken	39.7%	30.7%	-9.0%

## Need for clear evidence

One of the main barriers to reporting suspicions of corruption or other improper conduct is the belief the report must be accompanied by evidence. Almost three quarters of respondents (72.3%) in 2023 agreed they would only report if they had clear evidence. This is up from 47.8% of respondents in 2020 (*Table 3*).

The belief that public officers should only report if they have sufficient evidence is particularly entrenched in the university sector. In 2021, 64.8% of respondents to the Commission's Public Integrity Survey agreed they would only report if they had clear evidence.<sup>64</sup>

Some respondents recounted their experiences of making a report. Several described being required to support their report with evidence.



"I had discussed with actual manager of the concerned staff and there was a consensus and enough evidence to escalate the report to HR."

"They could not do anything to help because there is no hard evidence."

The expectation that staff collect sufficient evidence to prove their claim may have serious ramifications. Many will not be in a position to source evidence, or may act improperly, for instance by stealing documents or recording conversations in an effort to find proof. Seeking evidence may expose potential reporters to negative repercussions such as victimisation. It may compromise any future investigation.

This expectation is likely to deter people from speaking up. If it is true that university staff are being told they must support a report with evidence, this points to a culture that does not want to listen or address potential wrongdoing.

Reporters must report reasonable suspicions to the Office for Public Integrity. They are not required to collect evidence to support their report. Yet, some respondents believed they needed sufficient evidence before they could report.



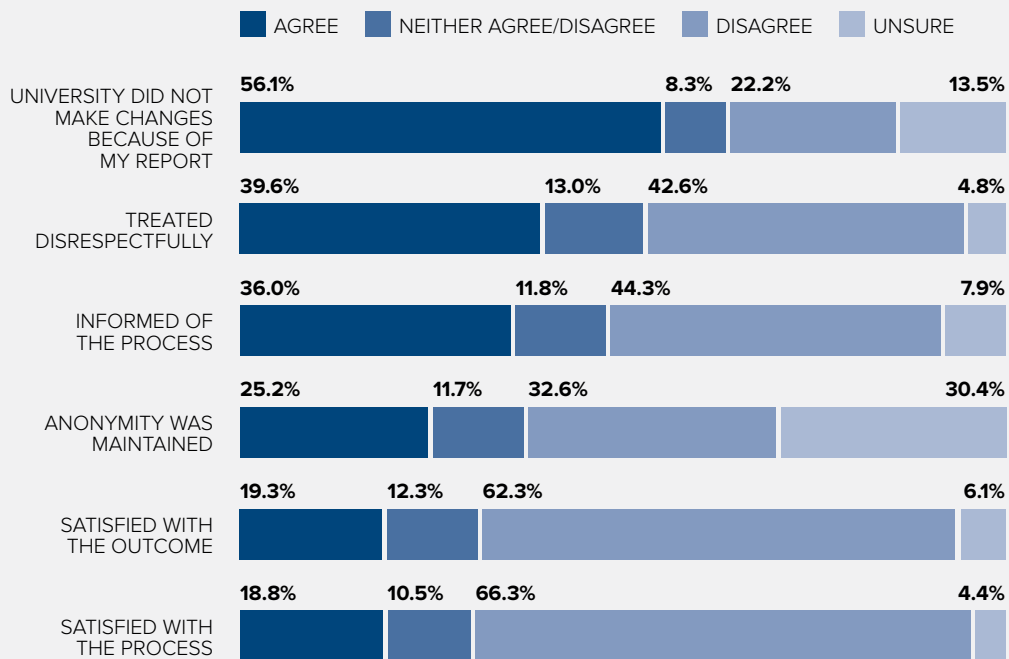
"When I raised it, I was told I was more than welcome to raise it with ICAC and it just became too hard to get the evidence to prove the problems existed."

# PREVIOUS REPORTS OF CORRUPTION OR OTHER IMPROPER CONDUCT

Some respondents (N=233, 9.2%) claimed to have made a report about suspected corruption or other improper conduct at their current university. Many of those respondents were dissatisfied with the process for handling their report and the outcome (Figure 27).

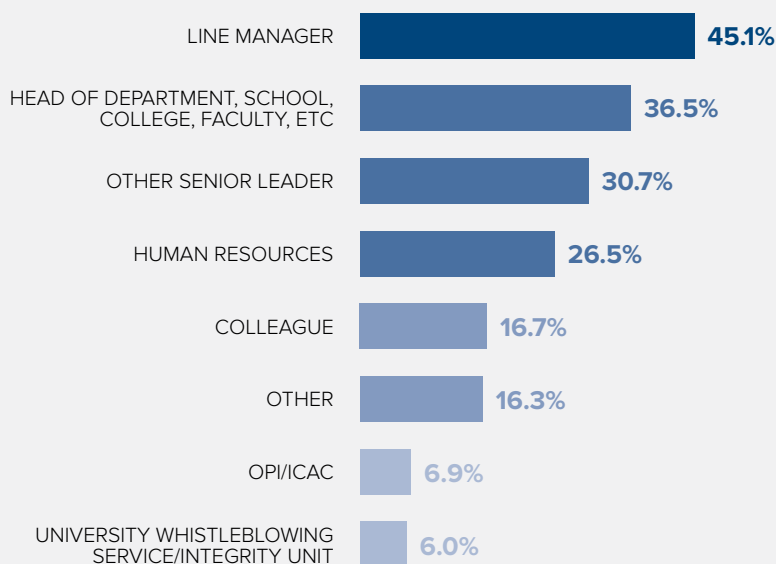
Overall, respondents were dissatisfied with how their report was handled. Two out of five (39.6%) respondents believed they had not been treated respectfully when they reported. Just over one third (36.0%) agreed they had been informed of the process. Leaders were significantly more likely to be satisfied with the way their report was handled.<sup>65</sup>

**FIGURE 27:**  
**Satisfaction with handling of previous reports**



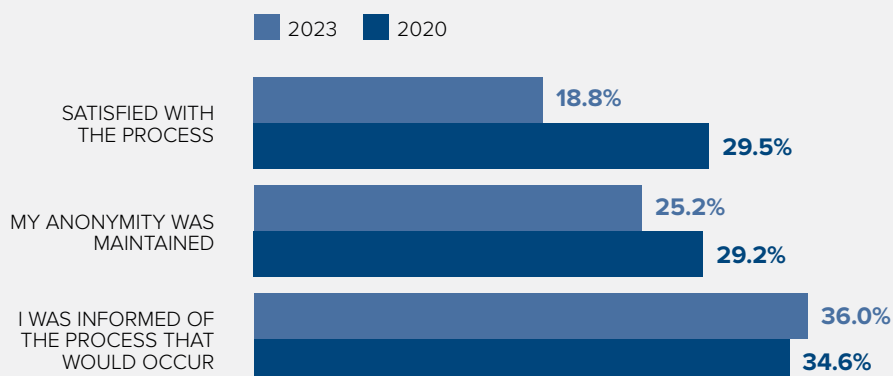
Most respondents explained they had followed their university reporting procedures. The majority of previous reports were made to the respondent's line manager or a senior leader (*Figure 28*). Most respondents (60.1%) stated they only reported to the one individual or agency.

**FIGURE 28:**  
**Who are reports made to<sup>66</sup>**



Where results are comparable with those from 2020, satisfaction with the process of handling reports has decreased and respondents are less likely to believe their anonymity was maintained (*Figure 29*). However, respondents were slightly more likely to agree they were informed of the process that would occur.

**FIGURE 29:**  
**Satisfaction with handling of previous reports (2020 and 2023)**



## Breaches of anonymity

Only a quarter of respondents (25.2%) who had reported believed their anonymity had been maintained (*Figure 27*). The failure to protect reporters' identity was also raised in the qualitative comments.



“During the investigation, all interviewees were told that everything was confidential. However, the University then reversed that decision, and gave [the subject of the report] every document, interview and transcript.”

“Despite being promised anonymity, the university handed all interview details over to the defendant ... This included interviews with other employees who were also promised anonymity and told the truth on that basis (and suffered consequences as a result).”

Several respondents described negative consequences, including being victimised, following having their anonymity breached.



“I also know she knew I had reported her behavior as she was aware of the information that HR had received & that only I or one other person knew. She was very difficult to work with after that and blocked any chance of career advancement for me. Plus I no longer felt safe around her.”

The fear of being identified prevented some respondents from reporting potential corruption or other improper conduct.



“It is almost impossible to report anything anonymously. I have raised concerns before and told that you almost need to discuss with the perpetrator face to face before escalating. Harder to report those in higher positions of power.”

Respondents who have made an internal report may be entitled to protections under the *Public Interest Disclosure Act 2018*. To reveal the reporter's identity may be a breach of that Act.



## Lack of action

Over half of the respondents who had made a report believed no change had occurred as a result of their report (*Figure 27*). Some respondents believed no action was taken as the report was about a senior member of staff.



“I didn’t have chance of being believed, as she was more senior.”

“Uni senior management are protected by decision makers.”

“The report was against a professor. The path of least resistance was taken. No action was taken to protect me or respond to my report.”

Other respondents suggested their workplace had entrenched a ‘culture of excuses’<sup>67</sup> for not addressing reports of poor conduct:



“It never passed the colleague I reported to. They said it was just the way the supervisor was.”

“I spoke to colleagues who also had similar concerns, but they said that that was just the way it was it wasn’t worth sticking your head up. I’ve never bothered again.”

“Ongoing bullying over a number of years. Put down to ‘different working styles’. ‘They’re just like that.’ ‘Oh, that’s just XXXX.’”

Respondents who believed reporting was futile described the poor behaviour they reported continuing unabated.



“Line manager is the head of school and he does nothing. He actively protects certain staff members so there is no point in reporting to him.”

“Despite the perpetrator being found ‘guilty’ of serious misconduct, little to no action was taken to provide any justice for me, or to serve punishment for them.”

The failure to adequately respond to reports may undermine staff trust in university management.



“I reported ... to my line manager / Head of School, and also to the Head of HR, neither of whom took any action. I have had a series of disappointments like this which has undermined my trust in the integrity of those above me, especially senior managers.”

## Victimisation of reporters

Respondents who had made a report recounted feeling humiliated, ostracised, intimidated and admonished for reporting.



“I was made to feel like the worst person in the world, like I was the one with the problem and that I was making it up! I wasn’t, but I was intimidated into silence.”

“I was taken to a small room with my line manager and her next level up and given a ‘talking to’ that I’ll never forget and threatened that I’d lose my job if I took the matter further. I was told to ‘man up’ and that they were sure that the offender was only ‘joking’. I was ostracised for many weeks afterwards. Walked out in tears. Not an experience that I’d wish on anyone.”

“I was mostly admonished for reporting, told that I needed to change my attitude, and then forced to work further with the person involved.”

Some respondents described being fearful that by reporting they had jeopardised their careers. A few described leaving their position after the report was not appropriately actioned.



“The future of my role is in question because of raising the issues.”

“The report was not actioned as it was advised it was not worth the trouble to myself at that time of my career or the career of the person being reported.”

Several respondents also described feeling threatened by staff within their human resources unit for reporting.



“When I went to HR and explained what was happening, I was told: ‘I am afraid things will not end well for you here.’”

“We were threatened that if we say something we will lose our jobs. Only when the union got involved the situation was properly addressed by HR ...”

“I was informed that by persisting with my report to HR that it would go on the record permanently, for myself and the subject of the complaint. The implication was that I should think very carefully about the implication of being labelled as a person who would complain about their line manager.”

Staff of South Australia’s three public universities are public officers under the ICAC Act. Contractors and consultants are also public officers for the period in which they are engaged by the universities. As public officers, they have an obligation to report suspicions of corruption. Two thirds of respondents (65.8%) were aware of this duty to report. This is an improvement on the results from the Commission’s 2020 survey of university public officers (*Figure 30*).

**FIGURE 30:**  
**Awareness of reporting obligations**



Being aware of reporting obligations does not always lead to someone making a report. Respondents to the 2023 survey were somewhat less likely to agree they would report suspicions to the Office for Public Integrity, compared with respondents in 2020 (*Figure 31*). Respondents in leadership roles were more likely to be aware of their reporting obligations<sup>68</sup> and to be willing to report.<sup>69</sup>

**FIGURE 31:**  
**Would be willing to report to the Office for Public Integrity**



Some respondents explained why they had not reported suspected corrupt conduct to the Office for the Public Integrity. This included fear they would be identified, leaving them exposed to negative repercussions.



“I have considered exposing the corruption and mistreatment I have witnessed. However, concerns about revealing my identity, potential legal repercussions, and the university’s robust legal backing have held me back. It is disheartening to see the university’s readiness to prolong such issues, especially when they have access to cost-free legal support.”

“I would never report them because I know I could be easily identified. I believe this would impact on my current and future employment with this and any university.”

“Concerned that reporting is identifiable and then will be punished and create a horrible work environment versus just an uncomfortable one.”

Respondents did not elaborate on how they had formed these fears. It is essential universities ensure their staff are safe from victimisation should they report to the Office for Public Integrity.

The Office for Public Integrity’s Directions and Guidelines states: “A public officer must report to the OPI as soon as practicable after they form a reasonable suspicion as to the matter.”<sup>70</sup> A worrying theme in respondents’ comments was the erroneous belief that reports of suspected corruption should first be made internally.



“I would report it internally initially, and if the response was insufficient I would consider going further (to ICAC) only then.”

“Reporting would first be made internally before the ICAC.”

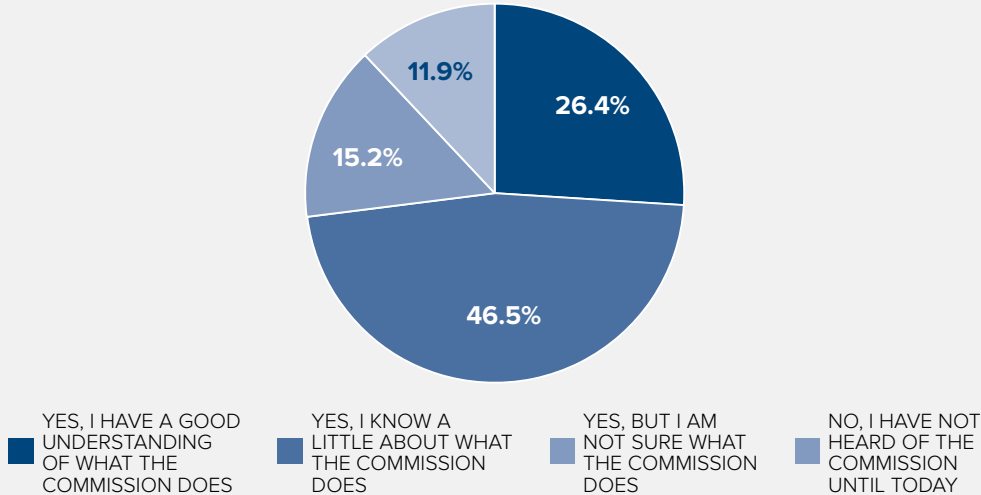
“It is unclear what should be reported to the ICAC (re: threshold) and what should be considered as internal (e.g. not correctly following procedures cf. actively falsifying accounts).”

“If I suspected any sort of corruption, I would first contact the Integrity Unit for further guidance.”

“Re ‘suspected’ activity in an earlier response, I suppose I’m not so clear on how to tell whether the issues I suspect (but have no evidence of) are internal matters or worthy of reporting.”

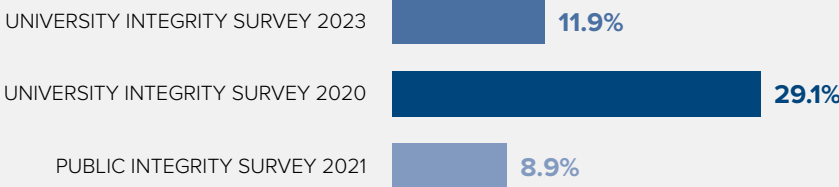
The survey sought views on the Commission, including awareness of the Commission’s work. One in four respondents (26.4%) believed they had a good understanding of the Commission’s work (Figure 32).

**FIGURE 32:**  
**Awareness of the Commission**



The proportion of respondents who have not heard of the Commission has decreased since 2020 (Figure 33). However, public officers in universities are less aware of the Commission than public officers more generally.

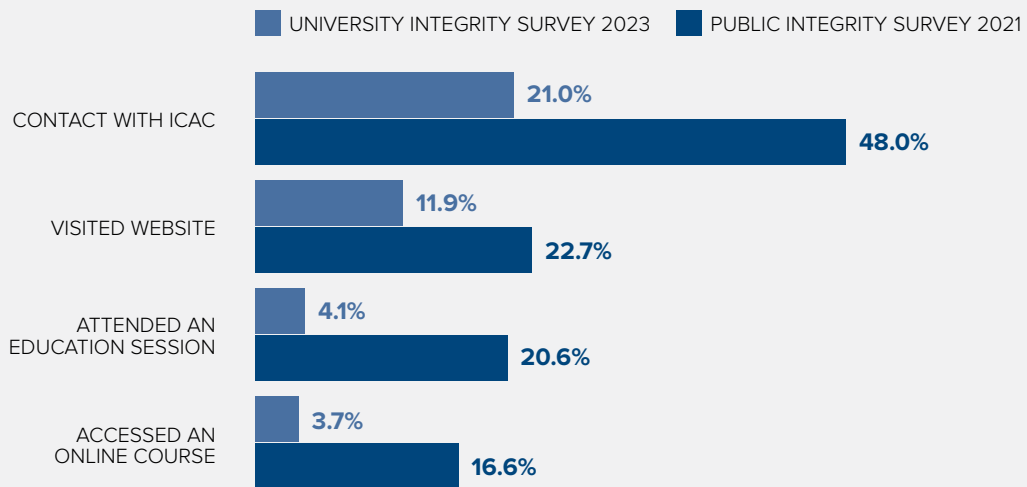
**FIGURE 33:**  
**Not heard of the Commission**



Respondents in leadership roles and high level academic and administrative roles were significantly more likely to claim they had a good understanding of the Commission's work.<sup>71</sup>

Compared with other public officers, university staff had little contact with the Commission (*Figure 34*). Use of the Commission's resources has largely been limited to staff in senior positions.<sup>72</sup>

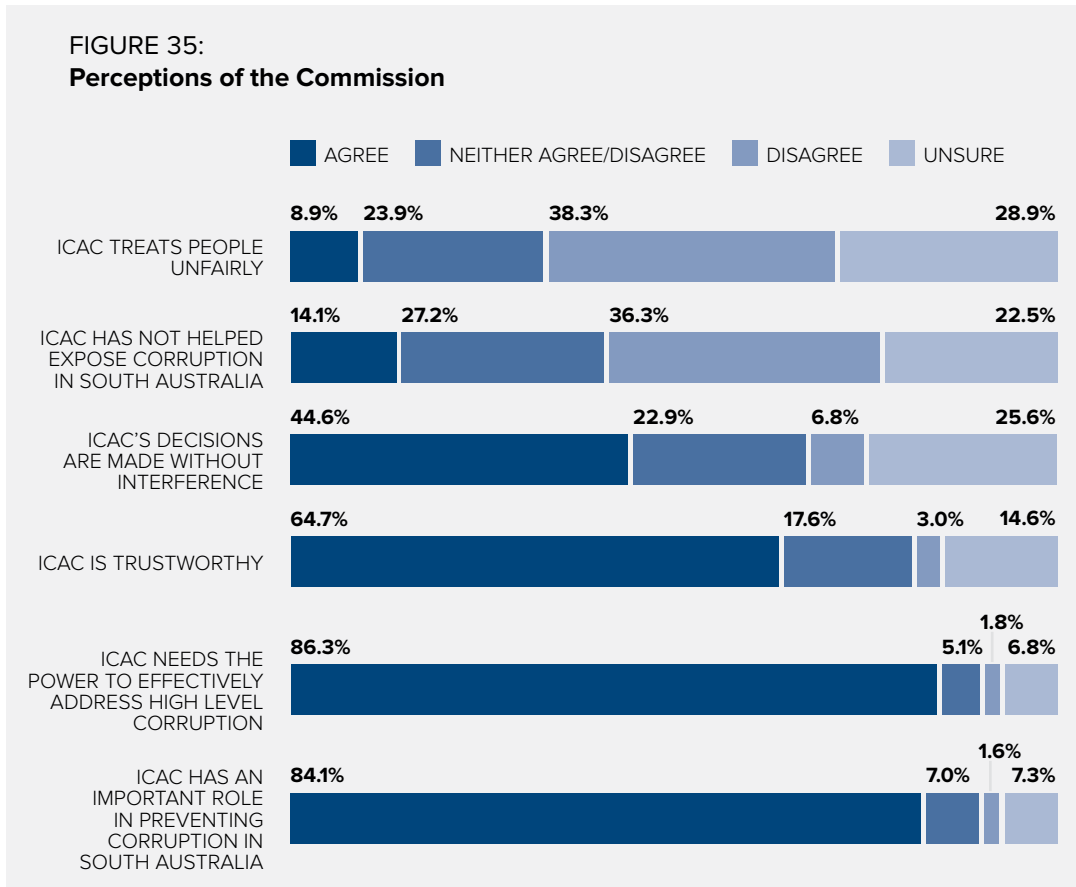
**FIGURE 34:**  
**Contact with the Commission**



## Perceptions of the Commission

While many respondents did not have a good understanding of the Commission, there appeared to a relatively high level of confidence in the Commission’s trustworthiness and importance (Figure 35). However, many respondents were unsure if the Commission treats people fairly or whether the Commission has helped expose corruption in South Australia. This uncertainty may reflect the lack of awareness of the Commission’s work.

**FIGURE 35:**  
**Perceptions of the Commission**



## Misunderstandings of the Commission

Respondents were asked to describe the role of the Commission. A lack of awareness of the Commission appears to have led to uncertainty and misunderstanding about the Commission's functions.

The Commission's jurisdiction is potential corruption in South Australian public administration. However, many respondents believed the jurisdiction extended to private enterprise and other states.

Some described the Commission's jurisdiction as covering all public authorities in Australia, as well as private companies and "large organisations". Several respondents referred to the Commission's powers to fine offenders and to prosecute. Conversely, some respondents provided an overly narrow description of the Commission's jurisdiction. Some respondents believe the Commission is only concerned with the universities or the higher education sector.

Respondents struggled to understand changes to the integrity landscape. Many described the Commission's remit as covering all breaches of integrity, including misconduct and maladministration, whereas these matters were removed from the Commission's jurisdiction in 2021. Several respondents conflated the new National Anti-Corruption Commission with the South Australian Commission.

Some respondents perceived that the Commission has the power to initiate an investigation. This misunderstanding may have negative consequences. The Commission can only investigate a matter if it is referred from the Office for Public Integrity. This requires a report to the Office for Public Integrity. Some staff may not be reporting suspicions as they may be waiting for the Commission to act on its own initiative.



The Commission's first university public integrity survey was conducted in 2020. Many of the findings about perceived corruption in the university sector from that survey are similar to those from the 2023 survey. Nepotism and favouritism in recruitment and misuse of authority continue to be seen as the largest corruption risks.

However, there were some worrying differences in the relative results from 2020 and 2023. Many respondents did not have a good understanding of corruption risks. This may reflect a lack of training. Adequate training is vital for universities to be able to detect and prevent corruption. The proportion of respondents who have received sufficient training on corruption risks has decreased from 2020 to 2023.

The survey also highlighted emerging corruption risks. There was a heightened perception that procurement is vulnerable to corruption. Integrity agencies in other jurisdictions have found corrupt conduct in university procurement and contract management, and these risks also exist in South Australia.

In 2020, respondents perceived universities were vulnerable to improper student enrolments, whereas there was less focus on this issue in 2023. However, an emerging risk related to the perception that teaching staff are not supported to address students' increasing misuse of artificial intelligence.

The Commission's integrity surveys provide an opportunity to focus on specific integrity risks. The 2023 survey examined research integrity, records management, and the management of external professional relationships. Serious corruption risks in each of these areas need attention. Failure to address these could undermine the universities' reputation, put funding for research at risk, undermine the integrity of students' education, and erode staff morale.

It is apparent the universities do not foster a workplace culture where staff feel safe and able to report. Staff anxiety about the negative repercussions of reporting have increased since 2020. University public officers who have made reports to their university have described having their anonymity breached, being required to collect their own evidence before an investigation was instigated, and being victimised.

All three universities would do well to invest in their messaging on integrity standards and their expectations around reporting. Staff need to be empowered to make a report about integrity breaches. Those who receive reports need to be aware of reporting policies and procedures, including their obligations and protections for reporters under the *Public Interest Disclosure Act 2018*.

University public officers do not sufficiently understand their obligations to report suspected corruption to the Office for Public Integrity. It is likely that suspected corrupt conduct is not being reported, leaving the university sector vulnerable to impropriety.

## Question wording

QUESTION TOPIC	RESPONSE
<b>GENERAL DEMOGRAPHIC INFORMATION</b>	
<b>What is your gender?</b>	Female Male Another term (please specify) Prefer not to say
<b>What is your age?</b>	20 years or under 21–34 years 35–44 years 45–54 years 55 years or ago Prefer not to say
<b>Where do you work?</b>	The University of Adelaide The University of South Australia Flinders University Prefer not to say
<b>How would you describe your current employment?</b>	Permanent/ongoing contract Long-term contract (minimum one year) Short-term contract (less than one year) Casual (including sessional) Prefer not to say Unsure
<b>How would you describe your current role?</b>	Academic Non-academic role Senior manager Executive Prefer not to say Unsure
<b>What does your role primarily involve?</b>	Research focused Teaching focused Balanced Other (please specify) Prefer not to say Unsure
<b>What level is your appointment?</b>	Level A to C Levels D and above Adjunct/emeritus Other (please specify) Prefer not to say Unsure
<b>What level is your appointment?</b>	HE01 to HE06 HE07 to HE010 Other (please specify) Prefer not to say Unsure
<b>How long have you worked with this university?</b>	Less than 1 year 1–5 years 6–10 years 11–20 years More than 20 years Prefer not to say

QUESTION TOPIC	RESPONSE
<b>How long have you worked in higher education?</b>	Less than 1 year 1–5 years 6–10 years 11–20 years More than 20 years Prefer not to say
<b>Which College/School/Faculty/Discipline or Unit/Portfolio do you work for?</b>	Open ended text Prefer not to say
<b>CODE OF CONDUCT/ETHICS</b>	
<b>Are you aware of your university's Code of Conduct/Ethics</b>	I am not aware of my university's Code of Conduct/Ethics I am aware of my university's Code of Conduct/Ethics, but I have not read it I have read my university's Code of Conduct/Ethics
<b>Have you received any training relating to your university's Code of Conduct?</b>	Yes, as part of my induction only Yes, I have received ongoing training No Unsure
<b>VULNERABILITY TO CORRUPTION OR OTHER IMPROPER CONDUCT</b>	
<b>Please rate how vulnerable you think your university is to the following types of corruption or improper conduct:</b> Breaches of Code of Conduct/Ethics Favouritism in procurement/awarding of contracts Financial misconduct, theft, fraud Mismanagement of public resources Falsifying information Not declaring or managing conflicts of interest Bribery/improper acceptance of gifts Nepotism/favouritism in recruitment Misuse of authority Failure to perform official duties Improper awarding of grades Falsification of timesheets Improper enrolment practices Breaches of academic integrity (include failure to act in relation to breaches of academic integrity)	Not at all vulnerable Somewhat vulnerable Moderately vulnerable Highly vulnerable Extremely vulnerable Not applicable/unsure
<b>Have you personally encountered or suspected any of the following occurring in your workplace in the last three years:</b> Breaches of Code of Conduct/Ethics Favouritism in procurement/awarding of contracts Financial misconduct, theft, fraud Mismanagement of public resources Falsifying information Not declaring or managing conflicts of interest Bribery/improper acceptance of gifts Nepotism/favouritism in recruitment Misuse of authority Failure to perform official duties Improper awarding of grades Falsification of timesheets Improper enrolment practices Breaches of academic integrity (include failure to act in relation to breaches of academic integrity)	Personally observed Suspected Neither suspected nor observed Unsure
<b>Please provide details about the nature of any corruption or other improper conduct that you have encountered or suspected in your placement in the last three years</b>	Not applicable Open ended text

QUESTION TOPIC	RESPONSE
<b>RESEARCH INTEGRITY</b>	
<b>Do you conduct, or have a role relating to, research</b>	Yes No Unsure
<b>Are you aware of your university's policies and procedures in relation to research integrity</b>	I am not aware of my university's policies and procedures relating to research integrity I am aware of my university's policies and procedures relating to research integrity, but I have not read them I have read my university's policies and procedures relating to research integrity
<b>Do you believe that your university provides sufficient information about responsible practice in research integrity</b>	Yes No Unsure
<b>Have you been provided training in research integrity</b>	Yes, as part of my induction only Yes, I have received ongoing training No Unsure
<b>How vulnerable do you believe your university is to the following:</b> Failure to declare or manage conflicts of interest in relation to research Misuse of research funds (including grants) Research conducted without seeking requisite approvals, permits, or licenses Fabrication, falsification or misrepresentation of research data Fraudulent publication (e.g. improper duplicate publication, plagiarism) Failure to maintain research records Inappropriate disclosure of, or access to, research records Improper practices in relation to research authorship Improper interference from research funders/ partners Making false or misleading representations to obtain a research grant	Not at all vulnerable Somewhat vulnerable Moderately vulnerable Highly vulnerable Extremely vulnerable Not applicable/unsure
<b>Have you personally experienced or suspected any of the following occurring in your workplace in the last three years:</b> Failure to declare or manage conflicts of interest in relation to research Misuse of research funds (including grants) Research conducted without seeking requisite approvals, permits, or licenses Fabrication, falsification or misrepresentation of research data Fraudulent publication (e.g. improper duplicate publication, plagiarism) Failure to maintain research records Inappropriate disclosure of, or access to, research records Improper practices in relation to research authorship Improper interference from research funders/ partners Making false or misleading representations to obtain a research grant	Personally observed Suspected Neither suspected nor observed Unsure
<b>Please describe any instances of people engaging in potential corruption or improper conduct in relation to research in your workplace in the last three years</b>	Not applicable Open ended text box

QUESTION TOPIC	RESPONSE
<b>RECORDS MANAGEMENT</b>	
<b>Are you aware of your university's records management policies and procedures?</b>	<p>I am not aware of my university's policies and procedure relating to records management</p> <p>I am aware of my university's policies and procedures relating to records management, but I have not read them</p> <p>I have read my university's policies and procedures relating to records management</p>
<b>Do you consider that your university provides sufficient information about records management?</b>	<p>Yes</p> <p>No</p> <p>Unsure</p>
<b>Have you received training relating to your university's records management policies and procedures?</b>	<p>Yes, as part of my induction only</p> <p>Yes, I have received ongoing training</p> <p>No</p> <p>Unsure</p>
<p><b>How vulnerable do you believe your university is to the following:</b></p> <p>Failure to adequately protect official information from unauthorised access</p> <p>Passwords being shared</p> <p>Sensitive information being shared using insecure methods for transmission</p> <p>Official records being kept outside the university's electronic record keeping system</p> <p>Official records not being disposed appropriately</p> <p>Records (including emails) not being assigned appropriate information classifications</p> <p>Inadequate documentation of decisions relating to university business</p> <p>Official records being altered or deleted without authority to do so</p>	<p>Not at all vulnerable</p> <p>Somewhat vulnerable</p> <p>Moderately vulnerable</p> <p>Highly vulnerable</p> <p>Extremely vulnerable</p> <p>Not applicable/unsure</p>
<p><b>Have you personally experienced or suspected any of the following occurring in your workplace in the last three years:</b></p> <p>Failure to adequately protect official information from unauthorised access</p> <p>Passwords being shared</p> <p>Sensitive information being shared using insecure methods for transmission</p> <p>Official records being kept outside the university's electronic record keeping system</p> <p>Official records not being disposed appropriately</p> <p>Records (including emails) not being assigned appropriate information classifications</p> <p>Inadequate documentation of decisions relating to university business</p> <p>Official records being altered or deleted without authority to do so</p>	<p>Personally observed</p> <p>Suspected</p> <p>Neither suspected or observed</p> <p>Unsure</p>
<b>Please describe any instances where you have personally experienced or suspected people engaging in improper conduct in relation to records management in your workplace in the last three years</b>	<p>Not applicable</p> <p>Open ended text</p>

QUESTION TOPIC	RESPONSE
<b>OUTSIDE PROFESSIONAL ACTIVITIES</b>	
<b>Are you aware of your university's policies and procedures in relation to outside professional activities?</b>	I am not aware of my university's policies and procedures relating to outside professional activities I am aware of my university's policies and procedures relating to outside professional activities, but I have not read them I have read my university's policies and procedures relating to our professional activities
<b>Have you received training concerning policies and procedures relating to outside professional activities?</b>	Yes, as part of my induction only Yes, I have received ongoing training No Unsure
<b>Do you think that your university provides sufficient information for staff who undertake, or wish to undertake, outside professional activities</b>	Yes No Unsure
<b>Are you aware of any outside professional activities which are not permitted by your university?</b>	Yes No Unsure
<b>Have you been involved in any outside professional activities in the last three years</b>	Yes No Unsure
<b>How vulnerable do you believe your university is to the following:</b> University staff engaging in outside professional activities that are not permitted by their university University staff not declaring conflicts of interest when engaging in outside professional activities University staff inappropriately using university resources (e.g. email, staff, research students) when engaging in outside professional activities University staff allowing the inappropriate use of intellectual property created by the university University staff improperly receiving payments or other benefits from outside professional activities University staff engaging in outside professional activities that compromise their academic role and/or duties	Not at all vulnerable Somewhat vulnerable Moderately vulnerable Highly vulnerable Extremely vulnerable Not applicable/unsure
<b>Have you personally experienced or suspected any of the following occurring in your workplace in the last three years:</b> University staff engaging in outside professional activities that are not permitted by their university University staff not declaring conflicts of interest when engaging in outside professional activities University staff inappropriately using university resources (e.g. email, staff, research students) when engaging in outside professional activities University staff allowing the inappropriate use of intellectual property created by the university University staff improperly receiving payments or other benefits from outside professional activities University staff engaging in outside professional activities that compromise their academic role and/or duties	Yes No Unsure Not applicable
<b>Please describe any instances where you have personally experienced or suspected people engaging in improper conduct in relation to outside professional activities in your workplace in the last three years</b>	Not applicable Open ended text

QUESTION TOPIC	RESPONSE
<b>INTERNAL REPORTING OF CORRUPTION OR OTHER IMPROPER CONDUCT</b>	
<p><b>Please rate how strongly you agree or disagree with the following statements:</b></p> <p>I am confused about what conduct should be reported</p> <p>I would only report corruption or other improper conduct if I had clear evidence</p> <p>I would only report suspected corruption or other improper conduct if it was serious</p> <p>I think I would report suspected corruption or other improper conduct to someone inside my university</p> <p>If I reported I would probably be in trouble with my colleagues</p> <p>If I reported I would be worried about my job</p> <p>I would feel too intimidated to report</p>	<p>Strongly agree</p> <p>Agree</p> <p>Neither agree nor disagree</p> <p>Disagree</p> <p>Strong disagree</p> <p>Unsure</p>
<p><b>Please rate how strongly you agree or disagree with the following statements:</b></p> <p>I feel that my university discourages reporting</p> <p>If I made a report, my university would protect me from negative repercussions</p> <p>My university has provided me with training on corruption risks that relate to my role</p> <p>I feel that my university will sometimes bend the rules to achieve its goals</p> <p>I am aware of my university's policies and procedures for reporting</p> <p>If I made a report I believe that I would be treated fairly</p> <p>If I made a report I am confident that appropriate action would be taken</p> <p>If I made a report I would prefer to remain anonymous</p> <p>My university follows policies and procedures when dealing with a report</p> <p>My university places its reputation over addressing problems</p> <p>My university provides whistleblower protections for staff who report internally</p>	<p>Strongly agree</p> <p>Agree</p> <p>Neither agree nor disagree</p> <p>Disagree</p> <p>Strong disagree</p> <p>Unsure</p>

QUESTION TOPIC	RESPONSE
<b>PREVIOUS REPORTING</b>	
<b>Have you previously made a report of suspected corruption or other improper conduct in your current university?</b>	Yes No Prefer not to say Unsure
<b>For the most recent occasion where you reported potential corruption or other improper conduct, who did you report this to?</b>	My line manager Head of Department, School, College, Faculty etc Other senior university leader Human Resources A colleague in my workplace University whistleblowing service The Office for Public Integrity/ Independent Commission Against Corruption South Australian Police Other (please specify) Unsure/can't remember
<b>Please explain why you chose to report to that particular person or agency?</b>	Prefer not to say Open ended text
<b>What were the nature of the allegations?</b>	Prefer not to say Open ended text
<b>In relation to your most recent report, please rate how strongly you agree or disagree with the following statements:</b> I was informed of the process that would occur My anonymity was maintained I feel satisfied with the process I feel that I was treated disrespectfully My university did not make any changes because of my report I feel satisfied with the outcome of my report	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree
<b>Do you have any further comments on how your report was handled?</b>	Open ended text



QUESTION TOPIC	RESPONSE
<b>THE INDEPENDENT COMMISSION AGAINST CORRUPTION</b>	
<b>Have you heard of South Australia's Independent Commission Against Corruption before receiving this survey?</b>	Yes, I have a good understand 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
<b>Have you previously had contact with the Commission?</b>	No Yes, I have visited the website Yes, I have made a complaint or report Yes, I participated in an ICAC online course Yes, I attended an education/training course Yes, other type of contact (please specify)
<b>What you do understand as the role of the Independent Commission Against Corruption</b>	Open ended text
<b>Please rate how strongly you agree or disagree with the following statements:</b> I believe that ICAC has an important role in preventing corruption in South Australia I feel that the ICAC is trustworthy I feel that the ICAC has not helped expose corruption in South Australia The ICAC treats people unfairly I believe that the ICAC's decisions are made without interference It is important that ICAC has the power to effectively address high level corruption	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree
<b>Please rate how strongly you agree or disagree with the following statements:</b> I think anyone working with or for the university is 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
<b>Do you have any other comments you would like to make regarding any points raised in this survey?</b>	Open ended text

- 1 The original survey was initially worded so that the levels for which administrative staff were appointed overlapped (ie HE01 to HE07; HE07 to HE10). This was changed (ie HE01 to HE06; HE07 to HE10) as soon as the mistake was detected. Some respondents appointed at HE06 or HE07 level may be incorrectly classified.
- 2 The representativeness of the sample is determined by comparing the characteristics of respondents to those of staff employed in each of the universities as reported by the Department of Education. The data from the Department of Education is current as of October 2021 and excludes casual staff. Department of Education, *Selected Higher Education Statistics – 2022 Staff Data* (Australian Government, 10 October 2023).
- 3 Dominic Christian Aumentado, Lorenzo Julio Balagtas, Tiffany Gabrielle Cu and Mendiola Teng-Calleja 'Follow the Leader? The Relationship Among Corrupt Leadership, Followers' Corruption Tolerance, and Workplace Outcomes' (2024) *Asian Journal of Business Ethics* np; Vikas Anand, Blake E. Ashforth and Mahendra Joshi 'Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations' (2005) 19(4) *The Academic of Management* 9; Mohsin Bashir and Shahidul Hassan 'The Need for Ethical Leadership in Combating Corruption' (2020) 86(4) *International Review of Administrative Sciences* 673.
- 4 Claudio W. Abramo 'How Much Do Perceptions of Corruption Really Tell Us?' (2008) 2(1) *Economics* 1.
- 5 Robert M. Groves, Eleanor Singer and Alexandra F. Corning 'Leverage-Saliency Theory of Survey Participation' (2000) 64 *Public Opinion Quarterly* 299.
- 6 Richard Rose and William Mishler 'Bridging the Gap between the Experience and the Perception of Corruption' in Dieter Zinnbauer and Rebecca Dobson (eds), *Global Corruption Report 2008: Corruption in the Water Sector* (Cambridge University Press, 2008) pp 328–331.
- 7 Independent Commissioner Against Corruption, *ICAC University Integrity Survey 2020: South Australia* (December 2020) 44.
- 8 Independent Commissioner Against Corruption, *ICAC University Integrity Survey 2020: South Australia* (December 2020) 56; Independent Commission Against Corruption, *ICAC Public Integrity Survey 2021: South Australia* (June 2020) 8; *Independent Commissioner Against Corruption, ICAC Public Integrity Survey 2018: South Australia* (December 2018) 35; Independent Commission Against Corruption, *Evaluation of the Practices, Policies and Procedures of Safework SA* (November 2018) 196; Independent Commissioner Against Corruption, *Evaluation of the Practices, Policies and Procedures of the City of Playford Council* (November 2019) 60; Independent Commissioner Against Corruption, *Evaluation of the Practices, Policies and Procedures of the Department for Correctional Services* (June 2021) 128; Independent Commission Against Corruption, *Evaluation of the Practices, Policies and Procedures of Super SA* (September 2022) 63; Independent Commission Against Corruption, *Evaluation of the Practices, Policies and Procedures of TAFE SA* (March 2023) 56; Independent Commission Against Corruption, *Robust Recruitment* (August 2023).
- 9 Senitoliba Arriah Joseph and Ibrahim Alhassan 'Favouritism in Higher Education Institutions: Exploring the Drivers, Consequences and Policy Implications' (2023) 7(1) *European Journal of Human Resources* 31; Dennis R. Laker and Mary L. Williams, 'Neptism's Effect on Employee Satisfaction and Organisational Commitment: An Empirical Study' (2003) 3(3) *International Journal of Human Resource Development and Management* 191.
- 10 Vikas Anand, Blake E. Ashforth and Mahendra Joshi 'Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations' (2005) 19(4) *The Academic of Management* 9.
- 11 Independent Commission Against Corruption, *Robust Recruitment* (August 2023).
- 12 Flinders University, *Recruitment Procedure* (24 June 2021); University of Adelaide, *Enterprise Agreement 2023-2025*, (12 July 2023) 30; University of Adelaide, *Recruitment Procedure* (22 December 2022); University of South Australia, *Staff Recruitment and Selection* (20 August 2022).
- 13 Feruzan Irani Williams, Constance Campbell and Luther T. Denton, 'Incivility in Academe: What if the Instigator is a High Performer?' 14(1) (2013) *Journal of Management and Policy and Practice* 35.
- 14 Crime and Corruption Commission, *Australia's First Criminal Prosecution for Research Fraud: A Case Study from The University of Queensland* (December 2017) 18.
- 15 Robyn May, Glenda Strachan and David Peetz, 'Workforce Development and Renewal in Australian Universities and the Management of Casual Academic Staff' 10(3) (2013) *Journal of University Teaching and Learning Practice* 1.
- 16 Regina M. Hechanova, Isabel Melgar and Mario Villaverde 'Organisational Culture and Workplace Corruption in Government Hospitals' 8(2) (2014) *Journal of Pacific Rim Psychology* 62; Blake Ashforth and Vikas Anand 'The Normalization of Corruption in Organizations' 25 (2003) *Research in Organizational Behavior* 1.

- 17 Corruption and Crime Commission, Western Australia, *Report on the Investigation of Alleged Public Sector Misconduct by Dr Nasrul Ameer Ali as a Sessional Academic Employed by Curtin University of Technology* (2 September 2010).
- 18 Fair Work Ombudsman, *University of Newcastle and Charles Sturt University Sign Enforceable Undertakings after Underpayments* (30 August 2022); Julie Hare, 'Melbourne Uni to Repay Another \$22m in Wage Theft Scandal' *Financial Review* (2 November 2022).
- 19 Fair Work Ombudsman, *FWO Announces 2022–23 Priorities* (22 June 2022).
- 20 Dominic Christian Aumentado, Lorenzo Julio Balagtas, Tiffany Gabrielle Cu and Mendiola Teng-Calleja 'Follow the Leader? The Relationship Among Corrupt Leadership, Followers' Corruption Tolerance, and Workplace Outcomes' (2024) *Asian Journal of Business Ethics* np; Vikas Anand, Blake E. Ashforth and Mahendra Joshi 'Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations' (2005) 19(4) *The Academic of Management* 9; Mohsin Bashir and Shahidul Hassan 'The Need for Ethical Leadership in Combating Corruption' (2020) 86(4) *International Review of Administrative Sciences* 673.
- 21 Christian J. Resick, Jacqueline K. Mitchelson, Marcus W. Dickson and Paul J. Hanges, 'Culture, Corruption and the Endorsement of Ethical Leadership' in William H. Mobley, Ying Wang and Ming Li (eds) *Advances in Global Leadership*, Vol 5, (Emerald Group Publishing Ltd, 2009) pp 113–144.
- 22 Corruption and Crime Commission, Western Australia, *Case Study: CCC Investigation Highlights Significant Conflict-of-Interest Risks at Curtin University* (September 2017); Independent Commission Against Corruption, New South Wales, *Investigation into the Over-Payment of Public Funds by the University of Sydney for Security Services* (May 2020).
- 23 Independent Commission Against Corruption, New South Wales, *Investigation into the Conduct of a University of Sydney ICT Manager* (May 2016).
- 24 Independent Commission Against Corruption, New South Wales, *Investigation into the Conduct of a University Manager and Others in Relation to False Invoicing* (June 2015).
- 25 Independent Broad-Based Anti-Corruption Commission, *Corruption Risks in the Public Health Sector* (October 2017) 11.
- 26 Independent Commission Against Corruption, New South Wales, *Investigation into the Awarding of Roads and Traffic Authority and Roads and Maritime Services Contracts* (March 2023); Independent Commission Against Corruption, New South Wales, *Submission to the Legislative Council Inquiry into Procurement Practices of Government Agencies in New South Wales and its Impact on the Social Development of the People of New South Wales*, Standing Committee on Social Issues (January 2024) 9.
- 27 Independent Commission Against Corruption, New South Wales, *Investigation into the Conduct of a University of Sydney ICT Manager* (May 2016).
- 28 Independent Commissioner Against Corruption, *ICAC University Integrity Survey 2020: South Australia* (December 2020) pp 35–37.
- 29 Independent Commission Against Corruption, New South Wales, *Report on Investigation into the University of Newcastle's Handling of Plagiarism Allegations* (June 2005).
- 30 Rebecca Awdry and Andrew Groves 'Why They Do and Don't: A Combined Criminological Approach to Understanding Assignment Outsourcing in Higher Education' (2023) 19(7) *International Journal for Educational Integrity* np; Margardia Rodrigues, Rui Silva, Ana Pinto Borges, Mario Franco and Cidalia Oliveira 'Artificial Intelligence: Threat or Asset to Academic Integrity? A Bibliometric Analysis' (2024) *Kybernetes* 1.
- 31 Academics in Level A to C appointments were significantly more likely than academics in Level D and above appointments to respond that they have encountered and suspected improper awarding of grades ( $\chi^2(3, N=948)=10.862, p<0.05, v=0.107$ ).
- 32 Administrative staff in level HE01 to HE06 appointments were significantly more likely than administrative staff in level HE07 to HE010 appointments to perceive their workplace to be vulnerable to breaches of academic integrity ( $\chi^2(5, N=1056)=14.013, p<0.05, v=0.115$ ).
- 33 Casual staff were significantly more likely than other staff to perceive that they have encountered or suspected improper awarding of grades ( $\chi^2(9, N=2376)=65.810, p<0.01, v=0.96$ ), improper enrolment practices ( $\chi^2(9, N=2378)=20.041, p<0.05, v=0.053$ ), breaches of academic integrity ( $\chi^2(9, N=2378)=17.421, p<0.05, v=0.049$ ).
- 34 Arthur Coren, 'Turning a Blind Eye: Faculty Who Ignore Student Cheating' (2011) 9 *Journal of Academic Ethics* 29; Christopher Walker and Melanie White, 'Police, Design, Plan and Manage: Developing a Framework for Integrating Staff Roles and Institutional Policies into a Plagiarism Prevention Strategy' (2014) 36(6) *Journal of Higher Education Policy and Management* 674.
- 35 Christian Hauser 'Fighting Against Corruption: Does Anti-Corruption Training Make Any Difference?' (2018) 159 *Journal of Business Ethics* 281.
- 36  $\chi^2(5, N=1869)=30.743, p<0.01, v=0.128$ .
- 37  $\chi^2(10, N=929)=33.003, p<0.01, v=0.133$ .
- 38  $\chi^2(15, N=2042)=47.133, p<0.01, v=0.088$ .
- 39  $\chi^2(5, N=1994)=19.424, p<0.01, v=0.099$ .
- 40  $\chi^2(5, N=2017)=56.565, p<0.01, v=0.167$ .
- 41  $\chi^2(5, N=905)=27.696, p<0.01, v=0.175$ .

- 42 Respondents who had not received training on corruption risks specific to their role were significantly more likely than those who had received training to perceive their workplace to be extremely or highly vulnerable to corruption overall ( $\chi^2(25, N=2076)=146.848, p<0.01, v=0.119$ ), breaches of Code of Conduct/Ethics ( $\chi^2(25, N=2064)=198.262, p<0.01, v=0.139$ ), favouritism in procurement/awarding of contracts ( $\chi^2(25, N=2066)=184.570, p<0.01, v=0.134$ ), financial misconduct, theft, fraud ( $\chi^2(25, N=2061)=108.424, p<0.01, v=0.103$ ), mismanagement of public resources ( $\chi^2(25, N=2066)=175.491, p<0.01, v=0.130$ ), falsifying information ( $\chi^2(25, N=2064)=120.166, p<0.01, v=0.108$ ), not declaring or managing conflicts of interest ( $\chi^2(25, N=2069)=153.234, p<0.01, v=0.122$ ), nepotism or favouritism in recruitment ( $\chi^2(25, N=2071)=223.715, p<0.01, v=0.147$ ), misuse of authority ( $\chi^2(25, N=2066)=171.455, p<0.01, v=0.129$ ), failure to perform official duties ( $\chi^2(25, N=2067)=162.956, p<0.01, v=0.126$ ), falsification of timesheets ( $\chi^2(25, N=2069)=63.588, p<0.01, v=0.078$ ), improper enrolment practices ( $\chi^2(25, N=2064)=92.101, p<0.01, v=0.094$ ), bribery or the improper acceptance of gifts ( $\chi^2(25, N=2059)=86.243, p<0.01, v=0.092$ ), improper awarding of grades ( $\chi^2(25, N=2067)=108.362, p<0.01, v=0.102$ ) and breaches of academic integrity ( $\chi^2(25, N=2065)=172.662, p<0.01, v=0.129$ ).
- 43 C.W. Van Bergen and Martin S. Bressler 'Sweat the Small Stuff, How Incidents of Negative Workplace Behaviour Lead to Larger Misconduct' 23(1) (2023) *Journal of Organizational Psychology* 1; Aquinas J. Purcell 'Corruption and Misconduct: A Behavioural Reflection from Investigative Reports into Local Government' 9(1) (2014) *Journal of Law and Governance* 1.
- 44 Joseph A. McKinney and Carlo W. Moore, 'International Bribery: Does a Written Code of Ethics Make a Difference in Perceptions of Business Professionals' 79 (2007) *Journal of Business Ethics* 103; Joseph A. McKinney, Tisha L. Emerson and Mitchell J. Neubert, 'The Effects of Ethical Codes on Ethical Perceptions of Actions Towards Stakeholders' (2010) 97 *Journal of Business Ethics* 505.
- 45 Academics in teaching focused roles ( $\chi^2(10, N=1103)=28.515, p<0.01, v=0.114$ ), administrative staff in level HE01 to HE06 appointments ( $\chi^2(5, N=1057)=16.065, p<0.01, v=0.123$ ) and casual staff are more likely than other staff to be unsure if their university was vulnerable to breaches of Code of Conduct/Ethics ( $\chi^2(15, N=2392)=45.657, p<0.01, v=0.080$ ).
- 46 Academics in teaching focused roles ( $\chi^2(6, N=1092)=36.267, p<0.01, v=0.129$ ), administrative staff in level HE01 to HE06 positions ( $\chi^2(4, N=1055)=12.852, p<0.01, v=0.110$ ) and casual staff ( $\chi^2(9, N=2377)=36.259, p<0.01, v=0.071$ ) were more likely than other staff to be unsure if they have encountered breaches of their university's Code of Conduct/Ethics.
- 47 Academics in teaching focused roles ( $\chi^2(6, N=1134)=48.337, p<0.01, v=0.146$ ), administrative staff in HE01 to HE06 positions ( $\chi^2(3, N=1094)=11.550, p<0.01, v=0.103$ ) and casual staff ( $\chi^2(9, N=2465)=102.575, p<0.01, v=0.118$ ) were less likely than other staff to have received training on their university's Code of Conduct/Ethics.
- 48 Elise Smith, Byrn Williams-Jones, Zubin Master, Vincent Larivière, Cassidy R. Sugimoto, Adèle Paul-Hus, Min Shi, Elena Diller, Katie Caudle and David B. Resnik 'Researchers' Perceptions of Ethical Authorship Distribution in Collaborative Research Teams' 26(4) (2020) *Science and Engineering Ethics* 1995.
- 49 Crime and Corruption Commission, Queensland, *Reducing the Risk of Research Fraud: Lessons from an Audit of Governance, Internal Controls and Corruption Prevention Measures at Three Queensland Universities, Summary Audit Report* (July 2020); John P. A. Ioannidis 'A Generalized View of Self-Citation: Direct, Co-author, Collaborative, and Coercive Induced Self-citation' (2015) 78(1) *Journal of Psychosomatic Research* 1; Jennifer Horner and Fred D. Minifie 'Research Ethics III: Publication Practices and Authorship, Conflicts of Interest, and Research Misconduct' (2011) 54(1) *Journal of Speech, Language, and Hearing Research* S346.
- 50 Crime and Corruption Commission, Queensland, *Reducing the Risk of Research Fraud: Lessons from an Audit of Governance, Internal Controls and Corruption Prevention Measures at Three Queensland Universities, Summary Audit Report* (July 2020); Crime and Corruption Commission, Queensland, *Reducing the Risk of Research Fraud: Lessons from an Audit of Governance, Internal Controls and Corruption Prevention Measures at Three Queensland Universities, Summary Audit Report* (July 2020); Australian Research Integrity Committee, *Annual Report to the Sector 2022-23* (Australian Research Council, nd).
- 51 Academics in Level A to C appointments were significantly less likely than academics in Level D and above appointments to have read their university's policies and procedures relating to research integrity ( $\chi^2(2, N=761)=6.834, p<0.05, v=0.095$ ).
- 52 Academics in Level A to C appointments were more likely than academics in Level D and above appointments to be unsure if their university was vulnerable to the failure to declare or manage conflicts of interest in relation to research ( $\chi^2(5, N=737)=17.141, p<0.01, v=0.153$ ), misuse of research funds ( $\chi^2(5, N=737)=11.594, p<0.05, v=0.125$ ), research conducted without seeking requisite approvals, permits, or licenses ( $\chi^2(5, N=739)=11.963, p<0.05, v=0.127$ ) fabrication, falsification or misrepresentation of research data ( $\chi^2(5, N=737)=19.158, p<0.01, v=0.161$ ), fraudulent publications ( $\chi^2(5, N=734)=23.294, p<0.01, v=0.178$ ), failure to maintain research records ( $\chi^2(5, N=740)=20.378, p<0.01, v=0.166$ ), inappropriate disclosure of, or access to, research records ( $\chi^2(5, N=737)=12.209, p<0.05, v=0.129$ ), improper practices in relation to research authorship ( $\chi^2(5, N=739)=17.024, p<0.01, v=0.152$ ), improper interference from research funders/partners ( $\chi^2(5, N=738)=13.429, p<0.05, v=0.135$ ), and making false or misleading representations to obtain a grant ( $\chi^2(5, N=739)=19.301, p<0.01, v=0.162$ ).
- 53 Hon. Bruce Lander KC, *A Suggestion for a Statutory Body to Deal with Allegations of Research Misconduct* (30 September 2022) A-Suggestion-for-a-Statutory-Body-to-Deal-with-Allegations-of-Research-Misconduct-20220930\_Signed\_Red.pdf ([qimrberghofer.edu.au](http://qimrberghofer.edu.au)), accessed 21 May 2024.

- 54 Crime and Corruption Commission, Queensland, *Australia's First Criminal Prosecution for Research Fraud: A Case Study from the University of Queensland* (December 2017).
- 55 Audit Office of New South Wales, *Universities 2022* (31 May 2023) pp 28–33.
- 56 Jackson Graham and Adam Cary, 'Hackers get details of 47,000 current, former students in Deakin Uni cyberattack' *The Age* (July 13 2022); Lisa Martin, 'Australian National university hit by huge data breach' *The Guardian* (4 June 2019).
- 57  $\chi^2(2, N=2025)=16.401, p<0.01, v=0.090$ .
- 58 Office of the Victorian Information Commission, *Examination of Victorian Universities' Privacy and Security Policies* (June 2021).
- 59 Marius Tuft Mathisen and Einar Rasmussen 'The Development, Growth, and Performance of University Spin-Offs: A Critical Review' (2019) 44 *The Journal of Technology Transfer* 1891.
- 60 Bruce G. Charlton 'Conflicts of Interest in Medical Science: Peer Usage, Peer Review and COI Consultancy' (2004) 64 *Medical Hypothesis* 181; Armen Yuri Gasparyan, Lilit Ayvazyan, Nurbek A. Akazhanov and George D. Kitas 'Conflicts of Interest in Biomedical Publications: Considerations for Authors, Peer Reviewers, and Editors' (2013) 54(6) *Croatian Medical Journal* 600; Bryn William-Jones 'Professors and the Management of Unavoidable Conflicts of Interest: Don't Always Need the Heavy Artillery of Policy' (2013) 2(4) *Bioethique Online* np.
- 61 Flinders University, *Outside Professional Activities Guidelines* (January 2011); Flinders University, *Outside Professional Activities* (January 2011), University of South Australia, *Outside Work Policy* (17 January 2020), University of Adelaide, *Practice of a Discipline Outside the University by Academic Staff Procedure* (27 February 2021).
- 62 Tim A. Mau, 'Corruption in Canada: An Emerging Culture of Entitlement Threatens Good Governance' in Melchior Powell, Dina Wafa and Tim A. Mau (eds), *Corruption in a Global Context: Restoring Public Trust, Integrity, and Accountability* (Taylor and Francis 2019) 223.
- 63 Jeremias J. De Klerk, 'The Devil Made Me Do It!' An Inquiry into the Unconscious "Devils Within" of Rationalized Corruption' 26(3) (2017) *Journal of Management Inquiry* 254.
- 64 Independent Commission Against Corruption, *ICAC Public Integrity Survey 2021: South Australia* (June 2022) 22.
- 65 Respondents in leadership roles were more likely than non-leaders to agree that they were informed of the process for handling their report ( $\chi^2(2, n=200)=10.349, p<0.01, v=0.227$ ), satisfied with the process ( $\chi^2(2, n=210)=14.885, p<0.01, v=0.266$ ), they were treated respectfully ( $\chi^2(2, n=209)=9.747, p<0.01, v=0.216$ ), believe that their university took action ( $\chi^2(2, n=190)=13.422, p<0.01, v=0.266$ ), and were satisfied with the outcome ( $\chi^2(2, n=204)=11.290, p<0.01, v=0.235$ ).
- 66 The 'other' category included an academic integrity officer or their university's integrity unit, the National Tertiary Education Union, the South Australian Ombudsman, their university's research ethics committee or a research integrity officer, or the SA Police.
- 67 Jeff Grimshaw, Gregg Baron, Barry Mike and Neill Edwards, 'How to Combat a Culture of Excuses and Promote Accountability' (2006) 34(5) *Strategy and Leadership* 11.
- 68 Respondents in leadership roles were significantly more likely than non-leaders to be aware that university public officers are required to report suspicions of corruption ( $\chi^2(5, N=1753)=15.969, p<0.01, v=0.095$ ).
- 69 Respondents in leadership roles were significantly more likely to be likely than non-leaders to report any suspicions of corruption themselves are required to report suspicions of corruption ( $\chi^2(5, N=1754)=17.921, p<0.01, v=0.101$ ).
- 70 Office for Public Integrity South Australia, *Directions and Guidelines. For Public Officers, Public Authorities and Inquiry Agencies* (7 August 2023).
- 71 Respondents in leadership roles were significantly more likely to claim that they had a good understanding of the Commission's work ( $\chi^2(3, N=2035)=33.413, p<0.01, v=0.128$ ). Academics in lower level positions ( $\chi^2(3, N=824)=16.088, p<0.01, v=0.140$ ), and staff in lower level administrative roles ( $\chi^2(3, N=915)=59.534, p<0.01, v=0.255$ ) were most likely not to have heard of the Commission.
- 72 Respondents in leadership roles were significantly more likely than non-leaders to have had previous contact with the Commission ( $\chi^2(1, N=1791)=23.463, p<0.01, v=0.114$ ). Administrative staff in level HE07 to HE010 appointments were significantly more likely than administrative staff in level HE01 to HE06 appointments to have had previous contact with the Commission ( $\chi^2(1, N=823)=23.883, p<0.01, v=0.171$ ). Academics in level D and above appointments were significantly more likely than staff to have accessed the Commission's website ( $\chi^2(1, N=712)=7.206, p<0.01, v=0.101$ ). Administrative staff in HE07 to HE010 roles were significantly more likely than those in level HE01 to HE06 appointments to have participated in an ICAC online course ( $\chi^2(1, N=823)=20.803, p<0.01, v=0.159$ ), visited the ICAC's website ( $\chi^2(1, N=823)=12.930, p<0.01, v=0.125$ ), and attended an ICAC education or training course ( $\chi^2(1, N=823)=14.965, p<0.01, v=0.135$ ).

