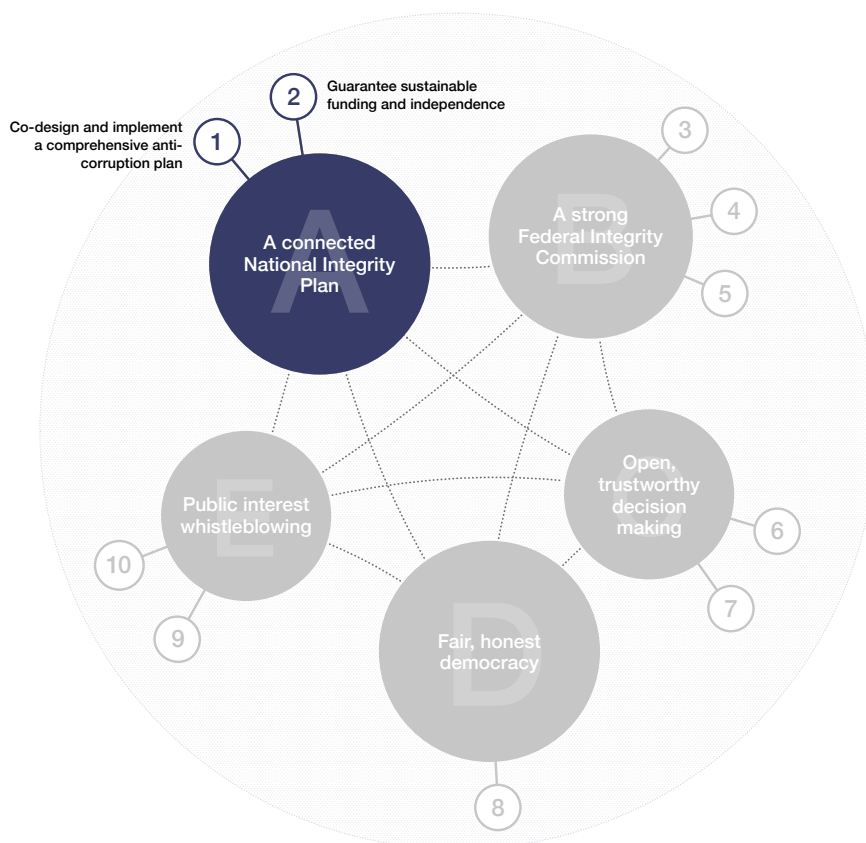




FOCUS AREA A: A CONNECTED NATIONAL INTEGRITY PLAN





Overview

INTRODUCTION

Australia has a strong track record for integrity in public decision-making, democratic innovation and multi-agency frameworks for controlling corruption. However, that track record has been slipping.

Anti-corruption frameworks have been slow to respond to global pressures, suffering gaps, fragmentation and lack of coordination. Even before COVID-19 provided new reasons for ensuring public resources are not lost to corruption, investment in integrity assurance has declined, especially at the federal level. Nationally, many core integrity agencies remain unsupported by the legal and financial independence they need to guarantee their roles.

By creating a dedicated federal anti-corruption agency, Australia is poised to fill its largest institutional gap.

However, this important new body cannot provide a 'silver bullet' solution to all the challenges of maintaining and strengthening integrity in Australia. All agencies with major integrity functions need to be given the correct scope and mandate to operate as part of a coherent national approach, and unified, effective "system" – from auditors-general and ombudsmen to information commissioners and the courts.

In particular, a coordinated national framework is needed, in which federal, state and territory agencies work better together – and with civil society, business and international partners – to achieve a more connected approach to corruption control.

WHAT SHOULD BE DONE

To ensure the nation's system of "checks and balances" works as a connected framework, with better coordination of agencies and roles, Australia should follow other countries by developing a comprehensive national plan to give direction and purpose to shared efforts.

All core integrity agencies need to play their full role in a wider system, rather than separate institutional silos. The new federal integrity commission has especially important roles, not only for fighting corruption in federal government, but helping foster this coordination and cooperation across borders and sectors, in line with international obligations.

Affirming the mission of each integrity agency also requires a new, more systematic approach to their budgets, accountability and constitutional "fit" in Australia's system of government. This offers clearer resolution of longstanding debates over these agencies' position and role – helping deliver a stronger, more sustainable system for the long term.



ACTIONS NEEDED

ACTION ①

CO-DESIGN AND IMPLEMENT A COMPREHENSIVE ANTI- CORRUPTION PLAN

- A holistic plan for protecting public integrity, ensuring business integrity and meeting Australia's international anti-corruption commitments, based in Commonwealth legislation
- Clear roles for a federal integrity commission and all public integrity bodies, including legislative requirements for participation, consultation, cooperation and monitoring involving the states, territories, civil society and business
- Ongoing, legislated mechanisms for improved coordination and information-sharing within and across public integrity systems

ACTION ②

GUARANTEE SUSTAINABLE FUNDING AND INDEPENDENCE

- Sustainable budgets for all core public integrity agencies at federal, state and territory level (combined, not less than 0.15 per cent of public expenditure)
- New federal funding of at least \$100 million p/a for a federal integrity commission, corruption prevention and whistleblower protection
- Greater financial independence for all core integrity agencies and Australia's judiciaries based on 4-year, direct budget allocations by parliament
- Strengthened independence and accountability of all core integrity agencies as constitutional and/or parliamentary officers.



Background

WHY WE MUST ACT

Australia faces an uncertain future, with opportunities but also many risks in the fight against corruption through the next decade.

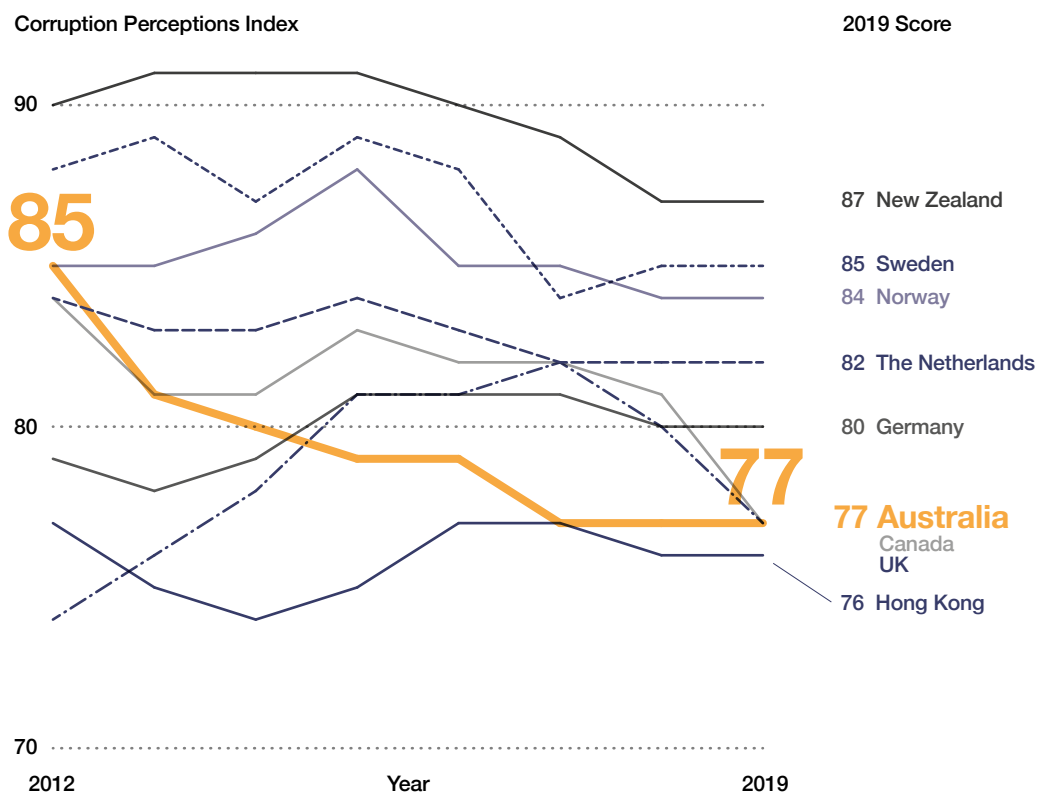
Transparency International has scoped many of the challenges confronting every country, from now to 2030, for seeing public power held to account and used for the common good. Intensified by the COVID-19 pandemic, these trends frame clear choices for how Australia's federal, state and territory governments go about strengthening the integrity system (*see context: Leader, laggard or liability in world anti-corruption?*).

Since 2012, Australia's anti-corruption efforts have slipped on multiple world measures, reflected in Transparency International's Corruption Perceptions Index (Figure 1.1). Within Australia itself, public trust in the nation's system of "checks and balances" rests on building confidence that this system is adapting to challenges, at a time when internationally and domestically, accountability institutions are often seen as under attack.

77

Australia's score on the 2019 Corruption Perceptions Index, (down 8 points since 2012).

Figure 1.1:
Transparency
International
2019 Corruption
Perceptions Index.





Research on citizen attitudes, through the TI Global Corruption Barometer, confirms that among Australians, corruption concerns continue to rise (*see Focus Area C: Open, Trustworthy Decision-making*).

The challenge is not whether Australia's integrity system needs strengthening, but how.

Australian policymakers have a choice between limiting reform to one or two initiatives in the hope these may fix all relevant issues, or taking a strategic approach over time.

The choice is also between being piecemeal – treating public sector corruption as separate from business integrity, or federal corruption issues as separate from state or international ones – and an approach where different integrity and regulatory bodies can play their part more clearly under a coherent national strategy or plan.

Crucial to all integrity systems are the official bodies that lie at its “core”. Together, these provide the checks and balances on which all citizens rely – especially Australia's independent judiciary, integrity in election administration and strong financial accountability.

Evidence from the assessment indicates that often these and other integrity mechanisms continue to work well, providing daily assistance to citizens, business and the public sector. Rather than a system of unnecessary “red tape”, they ensure the elements of public integrity that underpin good governance: honesty, fairness, transparency, diligence and legality.

As seen in Figure 1.2, across Australia, multiple integrity agencies are core to this process. The system is also evolving. Since Australia's first national integrity system assessment in 2005, several

new anti-corruption agencies have been created, and independent Information Commissioners are now standard for all governments.

The single slowest development has been creation of a dedicated, independent federal agency to expose and prevent national-level corruption. How this gap is filled is a crucial issue (*see Focus Area B: A Strong Federal Integrity Commission*).

After leading reforms in rights to information, administrative review and financial accountability in the 1970s-1990s, Australia's federal level has since become more of a follower. This is true not only in anti-corruption, but other focus areas, including parliamentary standards, lobbying, political campaign regulation and whistleblower protection.

How the role of Australia's new federal agency is defined is critically important – and not only to the federal level. The federal government's international responsibilities and potential role in leading a more coordinated approach point to larger questions about the mandate for this body, and the federal government generally, to help Australia's integrity systems work more coherently. How integrity agencies are organised is vital at each level of government – but to meet our challenges, the even more vital question is how to strengthen their collective contributions across the nation as a whole.

Australian policymakers have a choice between limiting reform to one or two initiatives in the hope these may fix all relevant issues, or taking a strategic approach over time.

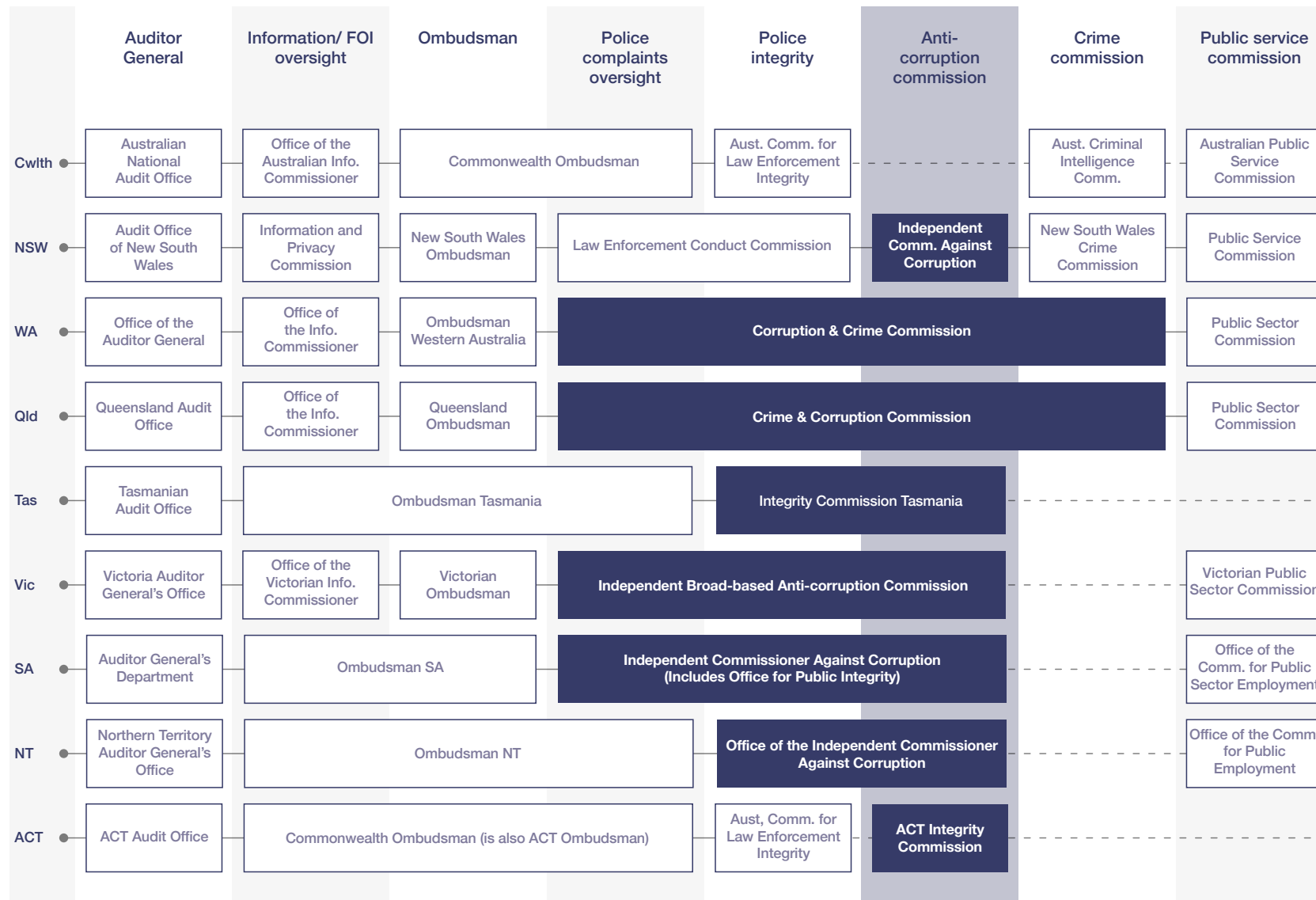


Figure 1.2: Core public integrity institutions in Australia (as at 2020)

Source: Catherine Cochrane, "Towards a national ICAC: A policy analysis of standing anti-corruption commissions in Australia", PhD Thesis, University of Adelaide (2020).



ACTION ①

CO-DESIGN AND IMPLEMENT A COMPREHENSIVE ANTI-CORRUPTION PLAN

For national-level reform to be effective, Australia needs a holistic plan for protecting public integrity, ensuring business integrity and meeting international anti-corruption commitments, based in Commonwealth legislation.

One option for the Commonwealth parliament is to simply create a federal copy of a state anti-corruption body, or new federal law enforcement body. However, the challenges confronting Australia show that this is not enough.

While corruption detection, exposure and prevention does need strengthening at federal level, that in itself will not meet the need for more coordinated responses to all the corruption risks facing Australia. Nor, by itself, will it improve the scale and pace at which Australia meets its important international obligations, such as under the United Nations Convention Against Corruption.

To achieve faster, less fragmented responses than under the current federal “multi-agency” approach, a stronger, enduring framework is needed, in which the relevant agencies – especially the new federal commission – have clear obligations to support and lead a wider strategy.

The closest Australia came to such a strategy was an official process conducted in 2011-13 to develop a National Anti-Corruption Plan. However, this was never finalised.

Internationally, national anti-corruption plans and strategies are becoming standard, led by a range of countries including the United Kingdom. In October 2020, the G20 Ministerial Meeting on integrity and anti-corruption issued new high level principles for national strategies.

For Australia's federal system, a comprehensive strategic approach relies on greater coordination between and within the public integrity systems of the different levels of government. Consistently also with the principles of the Open Government Partnership (OGP), a more coordinated approach hinges on the structured participation of all stakeholders, beyond the level of action and operational cooperation possible under Australia's OGP approach itself.

The federal legislative approach therefore needs to set out clear roles for the federal integrity commission and all public integrity bodies, including legislative requirements for participation, consultation, cooperation and monitoring involving the states, territories, civil society and business. In this way, Australia has the opportunity for a new framework of national anti-corruption cooperation similar to other models, including related fields like Australia's Organised Crime Strategic Framework and National Organised Crime Response Plans.

An example of suitable legislative mechanisms for national coordination include provisions in the National Integrity Commission Bill and Australian Federal Integrity Commission Bill (Part 3, Division 7), introduced to Commonwealth Parliament in 2018 and 2020. Incorporating a national integrity and anti-corruption



plan, this example was welcomed by state agencies such as the NSW Ombudsman and Queensland Crime and Corruption Commission as 'a sound scheme for planning and collaboration at the Commonwealth level, promoting integrity and preventing corruption'.

Within and across Australia's public integrity systems, there is also need for ongoing, legislated mechanisms for improved coordination and information-sharing, beginning with the federal integrity system.

The limits of the present federal multi-agency approach have been noted since at least 2010. In 2016-2017, the Senate Select Committee on a National Integrity Commission received evidence from federal agencies that the approach was 'robust, multi-faceted', operating 'appropriately and effectively' and 'seamlessly'. However, the committee – including government members – ultimately rejected this evidence, concluding it was 'a complex and poorly understood system that can be opaque, difficult to access and challenging to navigate'.

According to the Senate Select Committee, existing agencies also 'struggled to explain... how their individual roles and responsibilities inter-connect' to form the 'seamless' approach claimed.

At federal, state and territory levels, more effective coordination rests on legislated bases for information-sharing between core integrity agencies, and across government, including real-time access to all relevant databases and data sharing across line agencies and regulated entities. New statutory mechanisms can take their lead from successful informal coordination measures among some states, such as:

- Queensland's Integrity Committee, incorporating the Integrity Commissioner, Crime

and Corruption Commission, Queensland Ombudsman, Public Service Commissioner, Information Commissioner, Auditor-General, Electoral Commissioner, Independent Assessor (Local Government) and Racing Integrity Commissioner; or

- Western Australia's Integrity Coordinating Group, comprising the Information Commissioner, Corruption and Crime Commissioner, Auditor General, Public Sector Commissioner and Western Australian Ombudsman.

ACTION ②

GUARANTEE SUSTAINABLE FUNDING AND INDEPENDENCE

Australians rely on their core integrity agencies (Figure 1.2) to operate with a high level of political and functional independence. Tasked with holding other powerful institutions to account, up to the most senior office-holders, they require guaranteed ability to pursue their duties in the public interest, free of undue influence, whatever the challenges.

While core integrity agencies are usually established as statutory authorities with strong legal independence, experience shows that this is not enough to sustain their missions. A new, more systematic approach is also needed to support their budgets, accountability and constitutional "fit" in Australia's system of government – comprised of four elements.



First, the adequacy and sustainability of integrity agency funding is a critical issue.

In 2020, the Commonwealth Auditor-General's [annual report](#) revealed that stagnation in the budget of the Australian National Audit Office (ANAO) – threatening its invaluable performance audit function – had forced him to write to the Prime Minister, requesting funding be placed on 'a more sustainable basis' in support of 'transparency and accountability in the Australian Government sector'.

While research by the [Grattan Institute](#) confirms this stagnation to be real, Figure 1.3 shows it to be a very long-term trend, over many different governments of all political persuasions. Along with other Auditors-General, the ANAO's resources as a share of all government expenditure has been steadily eroding over a 30 year period. As also shown, given the federal level expends by far the most of any Australian government, the very low level of comparative resourcing given to the ANAO makes this erosion a serious national concern.

Figure 1.3: Auditor-general expenditure as % of total expenditure (actual)

Source: updated from A J Brown & M Bruerton (2017), 'Sufficient, stable and secure? An exploratory comparative analysis of integrity agency financial resourcing', *Crime Law and Social Change* Vol 68 No.5

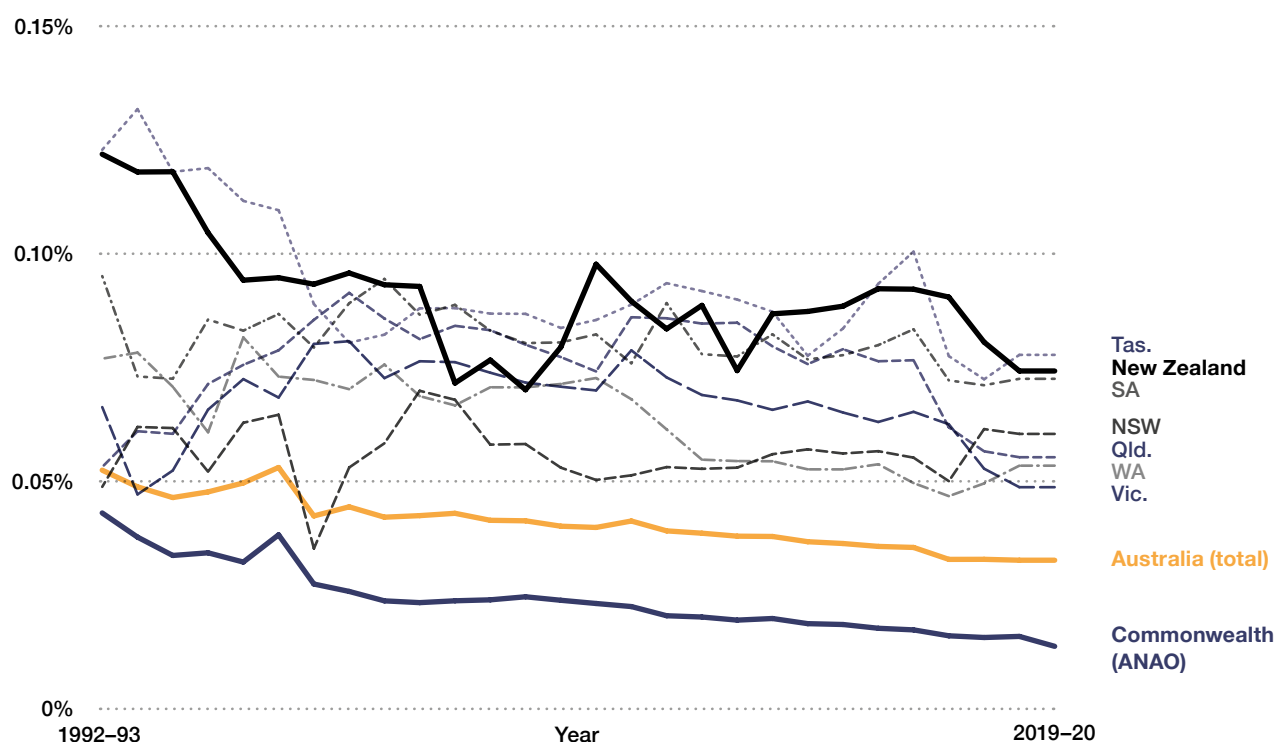


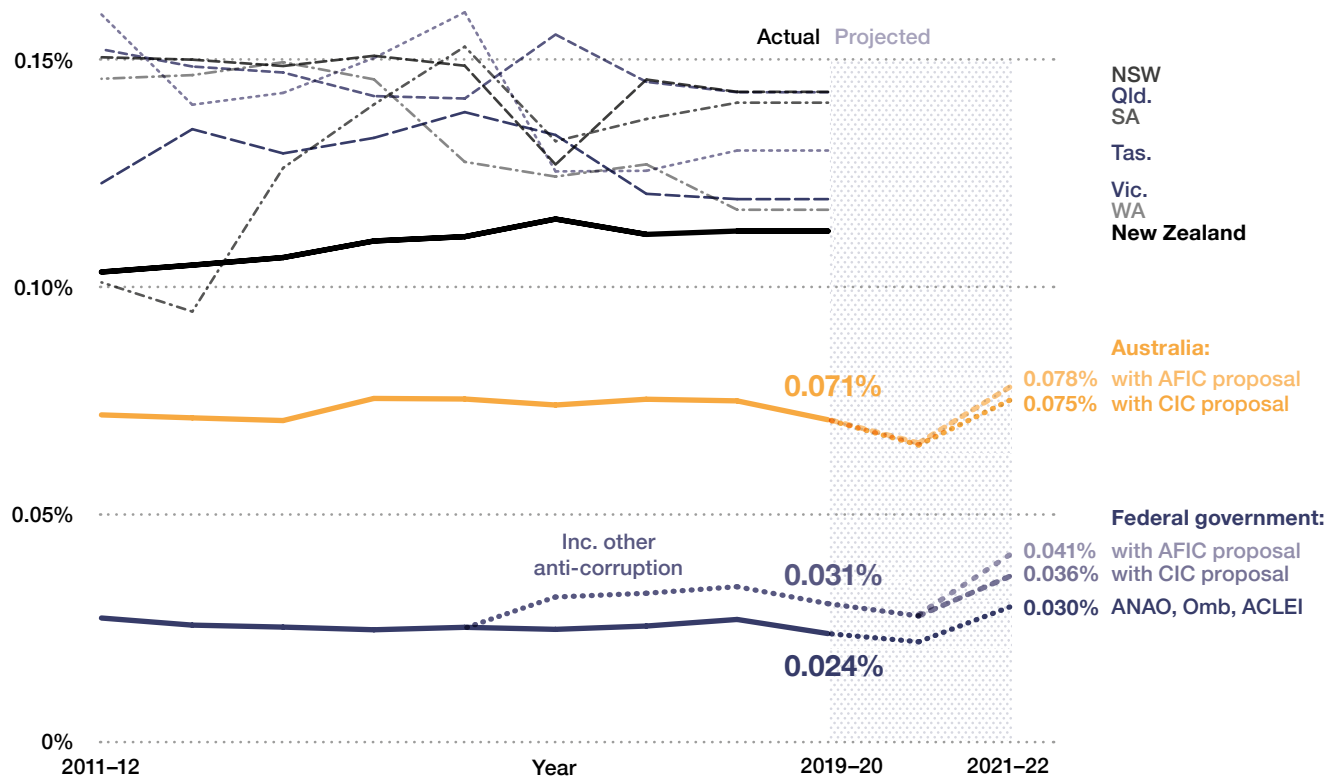


Figure 1.4 shows that, in addition to this problem, the federal level integrity system also remains weakly resourced when other integrity agencies are taken into account. Taking an ‘integrity system approach’, the figure shows recent and projected levels of funding for all of Australia’s federal and state governments, plus New Zealand, for a common group of core integrity agencies: auditors-general, ombudsmen, anti-corruption commissions and police integrity agencies.

Despite their importance to the health of government and society, these

core oversight roles receive only a low percentage of funding overall, with the federal government again the weakest contributor. The federal level spends, at best, around a quarter of the typical spend of the states on these core functions, resulting in Australia’s total public sector spending being a third less than New Zealand’s on the same functions. This share of funding is under even greater pressure as the federal government spends extra as part of its COVID-19 response, without matching funding for integrity functions.

Figure 1.4: Select core integrity agency expenditure as percentage of total expenditure (actual).



Notes: ‘Core integrity agencies’ means Auditors-General, Ombudsmen and anti-corruption agencies, not including organised crime functions but including specialist police integrity agencies (plus for federal and New Zealand, estimated specialist law enforcement agency contributions where no general anti-corruption agency exists). Sources: annual reports and government statistics.

Glossary: **ACLEI:** Australian Commission for Law Enforcement Integrity; **AFIC:** Australian Federal Integrity Commission (proposed); **ANAO:** Australian National Audit Office/Auditor-General; **CIC:** Commonwealth Integrity Commission (proposed); **Omb:** Commonwealth Ombudsman



A new approach is needed to the base resourcing of all core integrity agencies – especially but not limited to auditors-general – including lifting this investment in integrity assurance to a minimum level across the board.

More detailed analysis such as a Productivity Commission inquiry would shed light on the full return on investment (ROI) and investment needs of Australia's integrity agencies. In the interim, a first step to sustainable budgets for all core public integrity agencies at federal, state and territory level should be a target of not less than 0.15 per cent of public expenditure allocated to the core agencies shown in Figure 1.4.

Secondly, as also shown in Figure 1.4, federal integrity funding is set to improve somewhat through spending on the proposed federal integrity commission. On top of funding for existing agencies, proposed new funding of \$104.5 million over four years from 2020-21 would see expenditure on the proposed Commonwealth Integrity Commission rise to \$42.3 million per year – close to the current budget of the Commonwealth Ombudsman, and over half the current budget of the ANAO.

However, as shown in the figure, this important step will make only a limited difference in strengthening the overall system. Even the stronger Australian Federal Integrity Commission (AFIC) proposal, also submitted to Parliament and costed by the Parliamentary Budget Office at \$68.2 million per year, would represent only a moderate contribution (see Focus Area B: A Strong Federal Integrity Commission).

According to earlier analysis as part of the assessment, new federal funding of at least \$100 million per year is needed to support the major functions that need strengthening at that level, including a federal integrity

Stronger budget processes are needed to address the sustainability and financial independence of core integrity functions.

commission, corruption prevention and whistleblower protection.

The third essential element is stronger budget processes to address the sustainability and financial independence of core integrity functions for the long term.

Currently, despite their legal independence, core integrity agencies are usually treated the same as any other government departments. This means they are subject to budget decisions by executive government, including 'efficiency dividends' and other savings measures despite their workload only growing over time.

In severe cases, this lack of financial independence means integrity agencies may be denied resources as a result of political shocks or direct interference. In the worst Australian case, in 2014, the federal government entirely de-funded the Office of the Australian Information Commissioner (OAIIC) notwithstanding that it lacked parliamentary authority to abolish the office itself.

Even after the OAIIC's budget was reinstated two years later, the agency continues to lack the resources to clear the huge backlog of freedom-of-information cases, with evidence to Senate Estimates in October 2019 that this task required an additional \$1.9 million per year.

This deep problem of insufficient independence extends to Australia's judiciaries. As the apex of oversight for



legality of government decisions, the courts are constitutionally the most independent of all integrity agencies. This makes executive control of their budgets a major cause for concern – leading to proposals by Chief Justice Robert French for separate “appropriations” legislation granting funding directly from parliament, advised but not controlled by executive government.

The solution to greater financial independence lies in direct 4-year budget allocations by parliament to all core integrity agencies, and Australia's judiciaries, following this proposal, oversighted by a parliamentary committee process but placing financial control beyond the executive government or political electoral cycle.

The solution has long been in place in New Zealand, where the Public Finance Act 1989 (NZ), section 26E requires it for Officers of Parliament including the Auditor-General and Ombudsman. In Victoria, where the State Constitution also makes the Auditor-General and Ombudsman declared Officers of Parliament, similar reforms were put in place by the Integrity and Accountability Legislation Amendment (Public Interest Disclosures, Oversight and Independence) Act 2019 – placing the budgets of these agencies, the Independent Broad-based Anti-corruption Commission (IBAC) and the Victorian Inspectorate under direct parliamentary oversight.

In New South Wales, the same path is underway following a NSW Parliamentary inquiry, and advice from the NSW Auditor-General on the budget position of the Independent Commission Against Corruption (ICAC), Electoral Commission, Ombudsman and Law Enforcement Conduct Commission. In October 2020, the Auditor-General agreed the current approach to integrity agency funding presented ‘threats to their independent status’, did not sufficiently recognise their roles and functions ‘are different to

other departments and agencies’, and involved an ‘absence of transparency’ and inappropriate application of efficiency dividends and other savings measures.

Finally, the challenge of financial independence reinforces the wider need for strengthened independence and accountability of core integrity agencies as constitutional and/or parliamentary officers.

All of Australia's core integrity agencies – at all levels – should be more connected to be able to respond to national issues.

As seen above, this principle is formally reflected for some agencies in some places, such as Victoria. However, nowhere is it reflected for all core agencies, and in some places, it is reflected for none.

Debate over the constitutional position of integrity agencies can reflect conflict over to what extent they are, or should be, accountable to executive government. The independence of the judiciary is well established, as observed by former High Court Justice William Gummow, including to ensure the accountability of integrity agencies themselves. However, while the need for independence is also recognised for integrity bodies like anti-corruption agencies, through the 2012 Jakarta Principles, it is often controversial in practice.

Strong integrity agency independence is vital as the world experiences continuing erosion in the rule of law. In 2020, even prior to the COVID-19 pandemic, the World Justice Project reported that more countries were declining than improving in rule of law performance for a third year in



a row, including Australia. This 'persistent downward trend' was particularly pronounced in relation to constraints on government powers.

A vivid example was the sacking of several federal watchdog agencies (inspectors-general) by the US Trump administration during the pandemic.

Whether integrity agencies should be recognised as a fourth, integrity branch of government is an ongoing question – advanced by NSW Chief Justice James Spigelman and integrity agency heads at both state and federal level. However, the fact that these agencies are established by parliament to be fully independent of the executive reinforces why they should be formally recognised and constituted as officers of the parliament itself, directly accountable to it.

At federal level, only the Auditor-General is currently constituted this way. As recommended as part of the recent Australian Public Service Review, the same status should apply to the Ombudsman, Information Commissioner, Integrity Commissioner and other independent integrity bodies. Reinforcing this independence is a crucial step in strengthening the sustainability of Australia's core integrity agencies – at all levels – as partners in a more connected national response. ●



In the news

LEADER, LAGGARD OR LIABILITY IN WORLD ANTI-CORRUPTION? CHOICES FOR AUSTRALIA

Australia's slipping anti-corruption record (Figure 1.1) is not explained only by ethics scandals contained within the federal public sector or state governments.

Instead, the reason reinforces the important, wider choices facing how to strengthen the nation's integrity systems. These include public integrity and corruption risks which span state and national boundaries and divides between the public, private and community sectors, all of which need to be addressed by more coherent, connected anti-corruption planning.

Slowness to respond to these wider risks – and lack of a national framework for addressing them – is central to why Australia turned from being an anti-corruption leader to a laggard.

In fact, Australia's diminished reputation also stems from being caught as an active participant in international corruption, but being similarly slow in learning the lessons.

Australia's first major breaches of laws against bribing foreign officials were committed by former and current federal government companies – as revealed by the Cole Royal Commission into the Australian Wheat Board (2006), then the



systemic corruption by Securrency Ltd and Note Printing Australia, companies owned by the Reserve Bank of Australia, finally revealed in 2018.

Despite this legacy, Australia's progress in foreign bribery law reform and enforcement remains limited – notwithstanding important initiatives such as the Bribery Prevention Network.

A similar challenge faces Australia's role as a destination for proceeds of international corruption. While Australia's cooperation against money laundering has been increasing, it is still yet to close many loopholes identified by the worldwide Financial Action Task Force (FATF) in 2015 and 2018.

An example is weakness in efforts to stop corrupt officials and companies – domestic or foreign – from hiding profits in Australian real estate. Despite Australia being an 'attractive destination' for corruption proceeds, FATF found federal and state responsibilities were 'not effectively coordinated'.

Photo 1.1: Myles Curtis, former Chief Executive and General Manager of Reserve Bank-owned banknote company Securrency Ltd, pleaded guilty in 2017 to conspiracy to bribe foreign public officials in Indonesia and Malaysia. Source: The Hume Weekly / ACM



Federal responsibility for controlling the flow of criminal proceeds into real estate was recently transferred to the Australian Taxation Office (ATO). However in 2018, the Australian National Audit Office found this effort was still in its infancy. Transparency International research has confirmed the urgency of stronger regulation in Australia, Canada, the United Kingdom and USA.

Foreign revelations about Melbourne property owned by military leaders from South Sudan, and unexplained wealth behind Sydney properties occupied and owned by family members of ousted Papua New Guinea prime minister Peter O'Neill, point to the ongoing problems stemming from Australia's slow pace of action.

BENEFICIAL OWNERSHIP

Across government and private sector, and international and state boundaries, stopping corruption hinges on closing down the use of anonymous 'shell' companies to hide and transfer assets

In 2020, former senior Western Australian state public servant Paul Whyte pleaded guilty to stealing \$22 million in public funds over an 11-year period, using a fake invoice scheme through three such shell companies.

As host of the 2014 G20 Summit, Australia showed international leadership to shut down anonymous shell companies by winning support for new High Level Principles on Beneficial Ownership Transparency. However little action followed, with promises to move towards an Australian public register of true company ownership remaining unmet.

Slow progress on these issues shows why Australia's success hinges on a wide, long term approach to issues of integrity and regulatory reform.



Photo 1.2, Photo 1.3: The house at Warrawee on Sydney's Upper North Shore (above), bought for \$6 million in August 2020 in the name of Lynda Babao, wife of Papua New Guinea's former prime minister Peter O'Neill (left). Credit: Domain / AAP (Craig Ruttle)

This wider approach is especially relevant to the federal government, as leader of Australia's responsibilities under the United Nations Convention Against Corruption, as well as the national contact point for ensuring Australian businesses meet wider integrity obligations under the OECD's Guidelines for Multinational Enterprises on Responsible Business Conduct.

These roles reinforce the federal government's hold over standards of integrity and conduct across all sectors of society. As shown by the Hayne Royal Commission into Misconduct in Banking, Superannuation and Financial Services (2017-2019), the Australian government's regulatory settings are central to whether the domestic economy becomes fertile ground for corruption.

Yet just as the strength of federal business regulation was a major question giving rise to that inquiry, so too that question remains after leadership changes forced by integrity issues at the main regulator itself.



Photo 1.4: Iron ore mine pit in the Pilbara region, Western Australia – where weak regulation and governance led to the May 2020 destruction of some of the world's oldest Indigenous sacred sites.

Credit: STRINGERimage / Getty Images

NATURAL RESOURCE TRANSPARENCY AND GOVERNANCE

The need for the federal government to lead a broad approach to corruption and integrity risks is also reinforced in other industry sectors.

For example, Australia is still yet to fully implement the global Extractive Industry Transparency Initiative, despite the huge importance of the mining sector to the national economy, instead largely deferring to state governments.

In May 2020, Australia received a stark reminder of weaknesses in state and federal mining regulation, after mining giant Rio Tinto destroyed a 46,000-year-old Indigenous heritage site, the Juukan Gorge rock shelters, during an iron ore expansion.

There were ultimately corporate consequences, but the backlash from Traditional Owners and the wider community highlighted the importance of transparency, informed consent, and

genuine freedom from coercion and undue influence in ensuring private profits do not drive major abuses of entrusted corporate power.

For Australia, these issues provide a reminder that strong public integrity rests on respect for citizens' rights; from fairness and honesty in decision-making and business, to freedom of expression and political participation, to social justice including recognition of Indigenous rights.

In 2013, compliance with the Treaty of Waitangi was included as a measure of the strength or weakness of New Zealand's national integrity system. For Australia, effective ways of resolving the constitutional position of Aboriginal and Torres Strait Islander peoples remain a priority for ensuring respect for equivalent rights, and important measure of public integrity into the future, through reforms such as those proposed by the Uluru Statement from the Heart.



LOOKING AHEAD

As Australia navigates the COVID-19 pandemic and economic recovery, pressures on integrity and accountability reinforce the need for a wide approach to anti-corruption – bridging values, standards and regulation across borders and sectors.

Across the world, Transparency International researchers have identified the fragility of accountability measures in the face of the health and economic responses to the crisis, married with the risks of speed and reduced social oversight – almost a perfect storm of corruption risk (Figure 1.5).

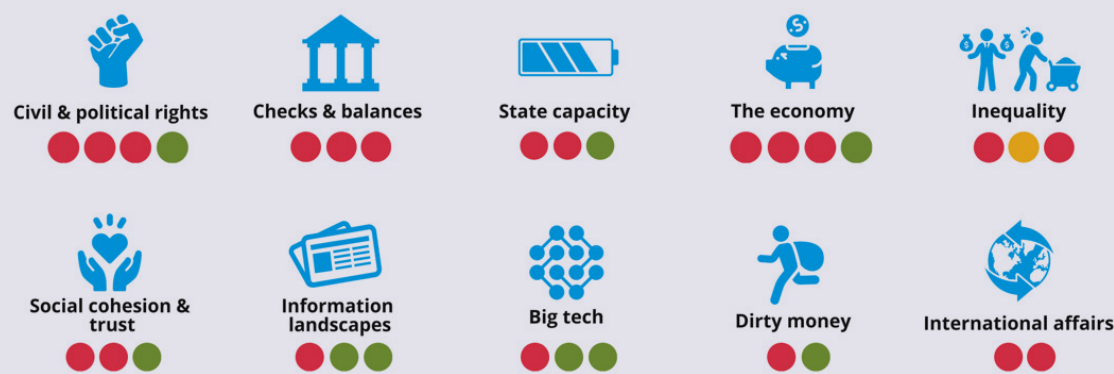
However, as well as the imperatives of protecting public resources and fighting financial exploitation, the months and years

ahead point beyond simply risks of direct financial corruption, and how Australia will defend itself against corruption pressures, to larger questions of how Australia will contribute positively to improved anti-corruption standards in a more coherent way.

For Australia's governments, reform provides the opportunity for a comprehensive national anti-corruption plan that connects all levels, agencies and stakeholders in a positive agenda to bolster and build integrity in the discharge of entrusted power – not simply stemming bad behaviour by public office holders in individual circumstances, but investing in reforms that will help deliver social justice, equity and sustainable prosperity, for the common good. ●

Figure 1.5: Integrity risks and implications in the post-COVID19 era.

Source: Marie Chene & Jon Vrushi (eds), *Getting ahead of the curve: Exploring post-COVID-19 trends and their impact on anti-corruption, governance and development*, Transparency International, May 2020.



Legend

- potential change that poses immediate challenges for anti-corruption
- potential change that poses immediate opportunities for anti-corruption
- neutral developments