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The principal objects of the *Police Integrity Act 1996* include establishing an independent, accountable body whose principal function is to detect, investigate and prevent police corruption and other serious police misconduct.

One of the Commission's strategies to prevent police corruption is to provide informed advice on improvements to NSW Police Force systems and practices.

Preventing Corruption: Lessons from Occupational Health and Safety

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Summary

This paper seeks to promote practical ways to intervene to prevent or minimise corruption before it occurs by considering the similarities between the task of minimising corruption and the task of minimising workplace accidents. It identifies the following ten lessons from Occupational Health and Safety (OHS) strategies for those who wish to prevent corruption and other forms of serious misconduct:

1. Identify integrity hazards as opportunities to intervene to minimise future corrupt conduct
2. Take a systematic approach to identifying and managing integrity hazards and risks
3. Look beyond individual employees and link integrity hazards to the work undertaken or to the work environment
4. Examine 'near misses' as a strategy to identify and understand integrity hazards and risks
5. Consult workers to identify integrity hazards and risks
6. Communicate the hazards and associated risks to enable employees to recognise and manage the hazards they face
7. Tailor information and training to specific types of work
8. Use induction training as one means to equip employees to recognise and manage the integrity hazards and risks specific to their work
9. Incorporate a focus on protecting the employee
10. Learn from experience to improve strategies to minimise corruption risks.

1. Introduction

Preventing corrupt conduct is a very different task from investigating it.

Unlike detecting and investigating corruption, preventing corruption requires intervening *before* the corrupt conduct occurs. However, the best ways to intervene are not always clear.

To illustrate one approach to preventing corruption, in its Project Manta[1] the Police Integrity Commission (PIC) drew an analogy between Occupational Health and Safety (OHS) which seeks to prevent workplace accidents and corruption prevention which seeks to minimise corrupt conduct and other forms of serious misconduct. OHS can provide a useful model for thinking about preventing corruption because:

OHS is better recognised and its language and processes are better understood than those pertaining to corruption prevention.

1. the similarity of the aims of OHS and corruption prevention makes it easy to draw a comparison between the two
2. the relative familiarity of the language and processes used in OHS makes it relatively easy to communicate OHS concepts and for them to be understood by a broad audience
3. OHS strategies are better developed than corruption prevention strategies and hence may offer lessons for corruption prevention.

The purpose of this Research and Issues Paper is to illustrate some practical ways of intervening to minimise corrupt conduct before it occurs, based on OHS practices and strategies. It has been prepared to assist those who are working to minimise corruption, including those who are working to minimise police corruption and other forms of serious police misconduct, by providing a different way of thinking about preventing corruption with practical applications.

After comparing OHS with corruption prevention and describing how OHS works, this paper outlines the OHS position under each of the ten headings listed in the Summary on the previous page and identifies applications for activities to minimise corruption.

[1] The results of Project Manta have been published in two reports: *Project Manta Report 1 Identification and Communication of Command Misconduct Risks* and *Project Manta Report 2 Managing Command Misconduct Risks*. These reports can be found on the Commission's website: http://www.pic.nsw.gov.au/ResearchAndPreventionReports.aspx

2. Comparing OHS to Corruption Prevention

2.1 How are they similar?

OHS strategies seek to minimise employee accidents and maximise employee safety, while corruption prevention strategies seek to minimise corrupt conduct and serious types of workplace misconduct and maximise employee integrity.

Workplace accidents and corrupt conduct each impact negatively on the organisations in which they occur. Both can reduce productivity, involve costs to the individual and the organisation and result in a reduction of morale amongst colleagues. Hence, both OHS and corruption prevention:

- seek to minimise incidents that have negative impacts on employees and organisations
- focus on the workplace and workplace behaviours
- use of a range of methods including investigation, compliance checks and audits, prevention strategies and education.

2.2 How do they differ?

When comparing OHS and corruption prevention it is also important to recognise that they differ in a number of ways:

- not all OHS strategies will be applicable to corruption prevention
- workplace accidents and deaths tend to be more visible than corrupt conduct
- OHS has a legislative basis which imposes obligations on employers.

Each of these points is considered below.

Firstly, not all OHS strategies designed to manage safety hazards will be able to be applied to managing integrity hazards and their associated risks. For example, the OHS literature discusses 'removing', 'fixing' and 'lessening' risks:

> Employers are required to remove or fix any hazards or, if this is not 'reasonably practical', they must lessen the risks of harm to the lowest possible level (WorkCover NSW 2001b, p. 6).

Corruption prevention strategies tend to focus on minimising likelihood of corrupt conduct occurring.

There are limitations to the extent to which integrity hazards can be 'removed'. For example, there are limits to the extent to which the policing 'task environment' and the discretion involved in police work can be changed (Carter & Barker 1994, pp. 17-18; Ede, Homel & Prenzler 2002, p. 28). Hence 'removing' the risk by

discontinuing activities associated with it most often will not be an option for managing the risks associated with some work-related policing integrity hazards. Additionally, in the broader risk management field, some risk management strategies focus on reducing the *likelihood* of the risk occurring while others focus on reducing the *consequences* if the risk were to occur. Corruption prevention strategies tend to focus on minimising the likelihood of the corrupt conduct occurring rather than reducing the consequences of the misconduct.

Corruption prevention outcomes are more difficult to measure than OHS outcomes.

Secondly, since workplace accidents and deaths are more visible than corrupt conduct, it is easier to measure the outcomes of OHS strategies than measure the outcomes of corruption prevention strategies. That is to say, it is easier to count changes to the numbers of accidents or deaths following some strategy that has been trialled to reduce workplace accidents, than it is to assess whether or not there has been any effect on the amount of corrupt conduct that has occurred following the introduction of a specific corruption prevention strategy. Hence setting tangible and measurable targets for OHS – such as 'sustain a significant, continual reduction in the incidence of work-related fatalities with a reduction of at least 20 per cent by 30 June 2012' (NOHSC 2002, p. iii) – is more feasible than setting tangible and measurable targets for corruption prevention activities.

A third difference is that there is a legislative basis for OHS (e.g. the *Occupational Health & Safety Act 2000* in NSW[2]) which imposes statutory obligations on employers to provide workplaces that are safe and without risks to health. While in NSW there is legislation designed to encourage and facilitate the disclosure of corrupt conduct (the *Public Interest Disclosures Act 1994*) and legislation to establish agencies to investigate, expose and prevent corruption and serious misconduct (the *Independent Commission Against Corruption Act 1988* and the *Police Integrity Commission Act 1996*), there is no legislation which imposes statutory obligations on employers to minimise integrity risks in the workplace.

[2] At the time of drafting this paper, NSW was working towards national work health and safety laws to take effect from January 2012. Source: http://www.workcover.nsw.gov.au/newlegislation2012/Pages/default.aspx Downloaded 30/3/2011.

3. How does OHS work?

OHS recognises the importance of actions taken within the workplace, for example, the National Occupational Health and Safety Commission (NOHSC) has stated that 'OHS improvement ultimately depends on actions in individual workplaces' (2002, p. 2).

OHS takes a systematic approach to reducing risk of injury by identifying and managing workplace hazards and associated safety risks.

OHS seeks to reduce the number and seriousness of injuries by reducing risk of injury. OHS takes a systematic approach to identifying, assessing and managing workplace hazards and associated safety risks, as outlined in the following WorkCover NSW[3] description:

> WorkCover encourages a systematic approach to managing workplace risks, where workplace hazards are identified, associated risks are assessed and action is taken to eliminate those risks. Where the risks cannot be eliminated, they must be controlled. Risk management principles are an integral part of WorkCover's information products, training packages and major programs (WorkCover NSW 2004, p. 6).

Hazards are defined in the following way:

> 'Hazard' means anything (including work practices or procedures) that has the potential to harm the health or safety of a person (*Occupational Health and Safety Regulation 2001*, cl 3).

Workplace hazards are associated with safety risks, for example:

1. 'manual handling' is a workplace hazard that would be associated with the risk of 'back strain'
2. 'use of machinery' is a workplace hazard that would be associated with the risk of 'injury by moving parts'
3. 'use of chemicals' is a workplace hazard that would be associated with the risk of 'burning of the skin'
4. 'tears in the carpet' is a workplace hazard that would be associated with the risk of 'tripping or falling'.

The existence of workplace hazards does not cause a workplace accident to occur. For example, not everyone who lifts a heavy object will injure their back.

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[3] WorkCover NSW is a NSW government authority which describes its role as 'administer[ing] work health and safety, injury management, return to work and workers compensation laws and manage the workers compensation system'. It describes its purpose as 'to increase the competitiveness of the NSW economy through productive, healthy and safe workplaces. We are dedicated to promoting productive, healthy and safe workplaces for workers and employers in New South Wales.'
Source: http://www.workcover.nsw.gov.au/aboutus/Pages/default.aspx Downloaded 30/3/2011.

Similarly, just because there is a tear in the carpet, it does not mean that an employee will trip and fall as a result of that tear. Rather, these hazards present areas or opportunities to intervene to prevent possible future workplace accidents and injuries. That is, the recognition that lifting heavy objects can lead to back injury provides an opportunity to improve work practices for moving heavy objects to minimise the risk of back injury.

OHS takes a risk management approach to safety, that is to say, OHS involves identifying health and safety hazards and associated risks in the workplace, assessing them and then determining how best to manage these hazards and associated risks. It incorporates the following steps:

- identify the hazards
- assess risks arising from those hazards
- eliminate or control those risks
- monitor or review risk control measures
- provide information (*Occupational Health and Safety Regulation 2001,* clause 13(3)).

Notably OHS excludes hazards associated with individual employees. That is to say, it does not seek to identify accident-prone or clumsy employees.

4. Integrity hazard

This paper adapts the definition of the term 'hazard' from the *Occupational Health and Safety Regulation 2001* and uses the term 'integrity hazard' to mean:

> anything (including the nature of the work, work practices or procedures) that has the potential to harm or compromise the integrity of an employee.

Table 1 provides a brief comparison of OHS strategies with corruption prevention strategies, incorporating the concept of integrity hazards.

Table 1: Comparison of OHS strategies with Corruption Prevention strategies

	OHS strategies	Corruption prevention strategies
Seek to minimise:	Workplace accidents and injuries	Corrupt conduct and other forms of serious misconduct
Seek to maximise:	Employee safety	Employee integrity
Method:	Identify safety hazards in the workplace and associated risks to employees' health and safety and then determine how to eliminate or control the hazards and associated risks	Identify workplace integrity hazards and associated risks to officers' integrity and then determine how to minimise the integrity hazards and the associated risks
Examples of hazards:	Tears in carpet, use of chemicals	Opportunities that put officers in a position of accepting a bribe or showing favour to friends such as when their duties involve issuing infringement notices Receipt and management of exhibits
Examples of risks:	Employee trips and falls Employee is burnt	Member of community offers bribe and officer accepts bribe Theft of exhibits

5. Lessons from OHS

5.1. Identify integrity hazards as opportunities to intervene to minimise future corrupt conduct

OHS position

A fundamental principle of OHS is that it does not simply wait for an accident or injury to occur and then investigate it. Rather it takes the approach that preventing injuries is possible by identifying and managing workplace safety hazards and their associated risks. The Australian *National Occupational Health & Safety (OHS) Strategy 2002-2012* recognised that:

> Work-related death, injury and disease are not inevitable but can be prevented (NOHSC 2002, p. 3).

Gardner (2011) describes a good OHS system as one that 'should focus on reducing risk not reducing injuries – the latter comes from the former not the other way around'. Also WorkCover NSW has identified the importance of developing and implementing procedures 'to identify hazards ***before*** an injury occurs' (WorkCover NSW 1997, p. 26).

As mentioned earlier in this paper, not everyone who lifts a heavy object will injure their back. Similarly, just because there is a tear in the carpet, it does not mean that an employee will trip and fall as a result of that tear. Rather, these hazards present areas or opportunities to intervene to prevent possible future workplace accidents and injuries. That is, the recognition that lifting heavy objects can lead to back injury provides an opportunity to improve work practices for moving heavy objects to minimise the risk of back injury.

Application to corruption prevention

It is important to identify work-related integrity hazards as they represent opportunities to intervene to minimise the risk of corrupt conduct.

Investigating corrupt conduct which is alleged to have already taken place is not the only way to combat corruption. A different approach is to seek to prevent corrupt conduct (before it occurs) by identifying the nature of the work, work practices and procedures that have the potential to put employees in a position where their integrity may be compromised (that is, identifying the integrity hazards) – such temptations for misuse of resources or theft of materials – and then determining how to manage these integrity hazards and their associated risks.

While this first application provides an 'approach' to preventing corrupt conduct, some of the steps to take to put this approach into practice are illustrated in the applications of the lessons that follow.

5.2. Take a systematic approach to identifying and managing integrity hazards and risks

OHS position

OHS takes a systematic approach to identifying workplace hazards and associated safety risks, assessing the risks, eliminating or controlling those risks, monitoring and reviewing risk control measures, and providing information and training. WorkCover NSW defines 'risk management' as 'the process of finding and fixing health and safety problems'. It identifies the basic steps as:

- identify the hazard (find the problem)
- assess the risk to health and safety from the hazards (work out what could happen and how likely it is to happen)
- eliminate or control the risk (fix the problem), and
- monitor and review the control measures to ensure on-going safety (check regularly that the problem is still fixed or that there are no new problems).[4]

In addition to being systematic, WorkCover NSW also advocates that risk management must be planned, done at the right time and comprehensive to cover all potential hazards and risks (WorkCover NSW 2001b, p. 7).

Application to corruption prevention

Although the specific workplace integrity hazards and associated risks will vary from one workplace to another, the same systematic process can be used to identify the hazards and identify the best strategies to control the risks in any workplace. Such a process would involve:

There will be some integrity hazards in most, if not all, work places. The use of a systematic or structured process to identify hazards will reduce the danger of overlooking significant integrity hazards and associated risks.

- identifying integrity hazards and assessing corruption risks related to the type of work employees undertake and other aspects of the work environment which may increase the likelihood of employees engaging in some form of corrupt conduct or serious misconduct
- determining appropriate strategies to minimise the risks
- monitoring and reviewing the hazards, risks and treatment strategies
- communicating information about recognising and managing the integrity hazards and associated risks to the employees most likely to face these risks and to their supervisors.

[4] Source: http://www.workcover.nsw.gov.au/healthsafety/makingyourworkplacesafer/Riskmanagement/Pages/default.aspx Downloaded 30/3/2011.

5.3. Look beyond individual employees and link integrity hazards to the work undertaken or to the work environment

OHS position

A first step in preventing employee accidents and injuries is to identify the safety hazards and associated risks that arise from the work undertaken and the work environment. The Australian *National Occupational Health & Safety (OHS) Strategy 2002-2012* recognised that:

> Although OHS problems can affect workers in any work situation, not all workers face the same degree or type of risk of injury as others. Risks may vary by, for example, the type of industry, occupation or work (NOHSC 2002, p. 6).

As previously mentioned, OHS strategies do not seek to identify accident-prone or clumsy employees.

When describing how to identify hazards, WorkCover suggests:

> Often the best way to find hazards is by looking at the tasks in your workplace. Consider the steps involved in the task and what hazards there are at each of these steps. Write the steps and any hazards down – this is the start of your safe work procedures.
>
> …
>
> Some hazards will be obvious, such as unguarded machinery or working at heights. Others are not as obvious, such as fatigue. Some hazards can have immediate effects such as electricity or trip hazards. Others cause injuries that develop slowly, for example back injuries from lifting goods.[5]

The WorkCover NSW *Identification Tool for Electrical Hazards On-site* (2001a) provides what it describes as a 'hazard profile'. For each broad job activity or set of tasks related to electrical work (that is, 'general planning', 'excavation & demolition', 'structures trades', 'roofing', 'finish trades' and 'public access'), this hazard profile lists:

- 'what can harm you (hazards)'
- 'what can happen (risks)'
- 'causes which need to be managed (controlled)'.

[5] Source: http://www.workcover.nsw.gov.au/healthsafety/makingyourworkplacesafer/Riskmanagement/Pages/Identifyinghazards.aspx Downloaded 30/3/2011.

A short extract from this hazard profile for the job activities of 'excavation & demolition' is provided in Table 2. As can be seen from this table, the electrical hazards and risks identified are those associated with the nature of the work and the work environment, irrespective of the particular individuals employed to undertake the work.

Table 2: Extract from hazard profile for electrical hazards associated with excavation and demolition

What Can Harm You (Hazards)	What Can Happen (Risks)	Causes Which Need to be Managed (Controlled)
Underground electrical services	Strike underground cabling with machine, hand, tool or other	• Underground services not located and/or isolated. • Drawings incorrect, services not in their expected location. • No excavation Permit to Dig system in place. • Cables not exposed by hand before digging within 1 metre using plant. • Double insulated machine not used.
Power lines near the site and power to the site	Strike or come too close to power lines, e.g. metal roof sheets, ladder, scaffold or machine such as crane or excavator	• Power lines not isolated by the Supply Authority where possible. • Power lines not covered or enclosed. • Machine operating too close to power lines. • Spotter not used to supervise machine operating near power lines. • Material being handled, e.g. metal roof sheet is longer than recommended 4 metre distance to power lines. • Strong wind causes power lines to swing closer to work area.

Source: WorkCover 2001a, p. 3.

Application to corruption prevention

Linking integrity hazards to the types of work undertaken or to the work environment, assists in identifying the audience to whom messages or treatment strategies need to be communicated.

Employees undertaking different types of work are likely to face different integrity hazards. A model based on OHS involves developing an integrity hazard profile for different types of work undertaken in the workplace, that is identifying and documenting those aspects of the work or work environment which may increase the likelihood of employees engaging in some form of corrupt conduct. A strategy for doing this would involve examining the types of work and duties in the workplace and considering the steps involved in the duties and in what ways an employee's integrity could be compromised at each of the steps.

Table 3 provides three examples of different types of police work to illustrate possible integrity hazards and associated corruption risks that may be related to these types of work.

Table 3: Different types of police work with examples of associated integrity hazards and corruption risks

Type of police work	Integrity hazard or vulnerability	Risk (potential corrupt conduct or serious misconduct)
Highway patrol	Drivers, particularly where their employment is at risk, might try to avoid traffic infringement notice	Motorist offers and officer accepts bribe
Maintaining confidential information	Access to confidential information which may be of interest or have value to outside parties	Inappropriate release of confidential information
Storage of exhibits	Access to exhibits of value	Theft of exhibits

Although only one example of an integrity hazard and one example of a corruption risk for each work type is described in Table 3, each work type may in fact be associated with more than one hazard and with more than one misconduct risk.

It is also important to recognise that these integrity hazards and risks are associated with the work, irrespective of the particular officers who undertake that work. Hence, in the same way as OHS strategies do not seek to identify individuals predisposed to clumsiness or accidents, it is not necessary to seek to identify the individual officers most prone to engaging in misconduct to manage these integrity hazards and their associated risks.

5.4. Examine 'near misses' as a strategy to identify and understand integrity hazards and risks

OHS position

Previous accidents can be used as one means of identifying workplace safety hazards. After an accident or an injury has occurred, the circumstances of the accident can be examined to better understand what factors were related to the accident occurring or, expressing this in a different way, what would have needed to be different to reduce the likelihood of the accident occurring. Gardner (2011) has suggested that a good OHS system:

> should encourage reporting incidents not hiding them. When incidents or injuries are reported a good system will seek to find out what went wrong and how it can be corrected rather than who is to be blamed (Gardner 2011).

The OHS literature suggests that an examination of previous occasions where injuries have occurred is not the only way of identifying workplace hazards. It suggests that information about 'near misses' – such as where an employee trips but does not injure themselves – can be used together with information about any actual injuries to better understand the nature of workplace hazards and their associated risks (WorkCover NSW 2001b, pp. 5,12). Employers are advised to treat a near miss as a warning sign (WorkCover NSW 2001b, p. 12). That is to say, an injury does not need to have occurred before an incident can be used to understand the safety hazards in the workplace.

Investigating the incident, whether or not an actual injury occurred, to better understand the nature of the hazard is part of the OHS process:

> Investigating accidents, incidents or 'near misses' helps you to find out what went wrong, why it happened and, if a control measure was in place, why it failed. Perhaps the control measure which you thought was in place did not work because people at the workplace did not know about it (WorkCover NSW 2001b, p. 12).

Application to corruption prevention

Both sustained and unstained allegations can be used to identify and understand integrity hazards.

Continuing the comparison between corruption prevention and OHS would suggest that information from both sustained allegations of corruption (corresponding to 'actual injuries') and unsustained allegations (corresponding to 'near misses') can be used to identify and better understand integrity hazards. Sustained and unsustained complaints and allegations provide opportunities to recognise and understand the possible circumstances where an employee's integrity might be compromised.

Allegations of corrupt conduct, regardless of whether they have been sustained, should be examined to better understand the circumstances and factors were most likely to be related to the suspected corrupt conduct, such as:

- what went wrong (or potentially could have gone wrong in the case of an unsustained allegation)
- why it happened (or why it potentially may have happened in the case of an unsustained allegation)
- if a control measure was in place, why it failed or how it may have been circumvented.

5.5. Consult workers to identify hazards and risks

OHS position

The OHS literature suggests that another way to identify workplace hazards is by talking to workers doing the jobs to find out what they consider to be the main safety issues (WorkCover NSW 2001b, p. 5). When describing how to identify hazards, amongst other methods, WorkCover NSW suggests:

> talk to your workers and contractors. As well as formal consultation arrangements use 'tool box talks' or staff meetings and give workers a chance to contribute.[6]

The OHS literature also advocates combining a work site inspection with talking with workers :

> Walking around a work site, talking with the workers and observing how things are actually done will help you predict what could or might go wrong. Observe: how people actually work; how plant and equipment is used; what chemicals are around and what they are used for; what safe or unsafe practices exist; as well as, the general state of housekeeping (WorkCover NSW 2001b, p. 5).

Application to corruption prevention

Another source of information to assist in identifying integrity hazards are employees' perspectives on the workplace integrity hazards. More specifically, as they are the ones most familiar with the work, employees can be asked to identify opportunities where the work undertaken could result in their integrity being compromised and to identify how existing systems or procedures could be bypassed, as well as what aspects of current systems cause frustrations which may encourage employees to try to bypass the procedures endorsed by the agency. Consulting with employees in this way can be combined with an inspection of the work site to observe how the work is actually carried out.

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[6] Source: http://www.workcover.nsw.gov.au/healthsafety/makingyourworkplacesafer/Riskmanagement/Pages/Identifyinghazards.aspx Downloaded 30/3/2011.
NB 'Toolbox talks' are described in Section 5.6 of this Research and Issues Paper.

5.6. Communicate the hazards and associated risks to enable employees to recognise and manage the hazards they face

OHS position

Clause 13 (2) of the *Occupational Health and Safety Regulation* 2001 states:

> An employer must ensure that any person who may be exposed to a risk to health and safety at the employer's place of work:
>
> a. is informed of the risk
> b. is provided with any information, instruction and training necessary to ensure the person's health and safety.
>
> The information, instruction and training (and the timing of its provision) must be commensurate with the risk to health and safety concerned.

OHS uses a variety of methods to communicate the safety hazards and risks and how best to manage them. In addition to procedure manuals, some other examples of methods of communication include:

- **Material Safety Data Sheets (MSDS)** – are used to provide employers, workers, and other health and safety representatives with the necessary information to safely manage the risk from exposure to hazardous substances. These sheets provide information about hazardous chemicals including, amongst other things, the name of the hazardous substance, the chemical and physical properties of the substance, nature of the health hazard, precautions for safe use and handling, and the manufacturer's or importer's name and contact details. Access to a MSDS can be provided in various ways including paper and microfiche copies and computerised and internet databases.[7]

- **approved industry codes of practice** – are developed to provide practical guidance on how to achieve the standard of health and safety required by the relevant legislation for a particular area of work (WorkCover NSW 2008, p. 1). Codes of practice are available on many topics ranging from 'Façade Retention' (WorkCover NSW 1992), to 'Prevention of Occupational Overuse Syndrome' (WorkCover NSW 1995) to 'Risk Assessment' (WorkCover NSW 2001c).

- **toolbox talks** – tend to be used in the construction industry. They are short, perhaps daily or weekly, discussions or presentations by supervisors to their employees. Each discussion focuses on a specific subject at the beginning of a shift. Toolbox talks provide the opportunity

[7] Source: http://www.deir.qld.gov.au/workplace/subjects/hazardousmaterials/definition/msds/index.htm Downloaded 28/4/2011, last updated 7/3/2011.

for a supervisor to emphasise the importance of a particular issue or procedures, and for the rank-and-file to ask questions or make comments. They generally last no longer than 15 minutes or so. Often participants gather around the project toolbox, hence the name.[8] It has been suggested that successful and useful toolbox talks are those that 'are short, kept interesting and relevant'.[9] The goal of toolbox talks has been described as being:

> to empower employees so that they can recognise, avoid, report and correct safety hazards.[10]

Workplace Health and Safety Queensland emphasises that not only is the development of resources such as MSDSs and codes of practice important, it 'is important that everyone in the workplace knows how to read and interpret an MSDS'.[11]

Application to corruption prevention

To empower employees, information needs to be communicated to employees about:

- the nature of the integrity hazards associated with their work
- how to recognise these hazards and their associated risks, and
- how to respond appropriately.

Workplaces can use a variety of strategies to communicate this information. For example they could develop the integrity equivalents of MSDSs to provide employees with the necessary information to protect their integrity given the types of hazards they may face as a result of the work that they are employed to do. Such information resources could provide:

- a description of the integrity hazard and how it might arise in the work to be conducted
- precautions to be taken to reduce the risk of employees' integrity being compromised
- a clear statement of the appropriate specific actions to take in response to the hazard and its associated risks.

Such resources would need to be readily available to employees who would need to have been trained how to use and interpret these resources.

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[8] Source: http://wiki.answers.com/Q/What_is_the_meaning_of_toolbox_talks Downloaded 30/3/2011.
[9] Source: http:/www.wisegeek.com/what-are-toolbox-talks.htm Downloaded 30/3/2011.
[10] Source: http:/www.wisegeek.com/what-are-toolbox-talks.htm Downloaded 30/3/2011.
[11] Source: http://www.deir.qld.gov.au/workplace/subjects/hazardousmaterials/definition/msds/index.htm Downloaded 28/4/2011, last updated 7/3/2011.

5.7. Tailor information and training to specific types of work

OHS position

WorkCover NSW highlights the need to tailor the communication to the type of work being undertaken by the employee and to ensure that the guidance provided is both specific and detailed. For example:

> [Employees] must understand their responsibility to work safely and to report hazards. Also, they must be made aware of ***every potential hazard*** and trained in how to perform ***every aspect*** of their work safely and efficiently (WorkCover NSW 1997, p. 29).

> The workplace is a dynamic environment, one in which changes are constantly introduced … All of these changes can introduce new hazards. For this reason, on-going communication with employees about ***the specific risks*** in their jobs and ***the specific steps that should be followed*** to guard against an accident or injury is essential (WorkCover NSW 1997, p. 33).

WorkCover NSW has also stated that 'task specific training' must be provided when a task poses a risk to a worker's health and safety and that training should include explaining the dangers involved and how they can be controlled, as well as taking the workers through the task step by step and observing them performing the task until they can do it safely without assistance.[12]

OHS provides separate information and treatment strategies for different risks: for example, there will be one set of information concerning fall prevention, another set of information concerning atmospheric contaminants, another concerning falling objects, another concerning manual handling, and still another concerning long distance driver fatigue.

Application to corruption prevention

Information and training should be:

- specific
- detailed
- tailored to the groups of employees who will encounter the integrity hazard through the type of work they undertake or the nature of their work environment.

To prevent corrupt conduct, it is important that employees are aware of the potential ways in which their integrity may be comprised (that is, the integrity hazards they may encounter in their work) and the specific steps that they should take when they encounter such risks.

Rather than simply providing generic advice that employees should not engage in corrupt conduct, drawing the analogy with the OHS strategies, it is important that employees are made aware of the specific integrity hazards related to the particular work they undertake and the specific steps that they should follow to guard against engaging in corrupt conduct or other forms of serious misconduct.

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[12] Source: http://www.workcover.nsw.gov.au/healthsafety/makingyourworkplacesafer/Pages/Trainingandsupervision.aspx Downloaded 30/3/2011.

Within policing, for example, the information on the specific integrity hazards and associated risks that arise from their work and steps to take to minimise the risk of their integrity being compromised would differ for each of the groups of officers listed below:

- licensing officers
- officers who manage sources (or informants)
- officers working in remote geographical areas
- officers who live and socialise in the communities they police
- officers who execute search warrants
- officers who are responsible for preparing rosters.

5.8. Use induction training as one means to equip employees to recognise and manage the integrity hazards and risks specific to their work

OHS position

When a new staff member joins the organisation or a current employee moves to undertake a new role is an appropriate time to equip these employees with the information that they need to efficiently and effectively perform their duties as well to communicate the behaviour and standards expected of them. WorkCover NSW states that there are key OHS messages that should be communicated as part of an employee's induction:

> Induction training must be given when a worker first starts at the workplace. This should cover (at a minimum):
>
> - how OHS is managed in the workplace
> - how to report a hazard or other safety issues
> - what health and safety procedures there are for their tasks (such as safe work procedures), particularly how to control any risks
> - what information is available to help them do their job safely e.g. operator manuals, material safety data sheets etc
> - anything else that is important for working safely.[13]

[13] Source: http://www.workcover.nsw.gov.au/healthsafety/makingyourworkplacesafer/Pages/Trainingandsupervision.aspx Downloaded 30/3/2011.

Application to corruption prevention

The induction of new employees and transferred workers can be used to communicate key messages about how to recognise and manage the integrity hazards and risks that they may face in their jobs. From a corruption prevention perspective, employee induction should cover (at a minimum):

- how corruption prevention and other serious misconduct is managed in the workplace
- how and to whom to report a possible integrity hazard or other integrity issues
- how and to whom to report suspected corrupt conduct or other serious misconduct
- what procedures there are to protect them and reduce possibility of their integrity being comprised when carrying out their duties
- what information is available to help them to recognise the integrity hazards that they may face in their work and how to respond appropriately to the these integrity hazards and associated risks (i.e. the corruption prevention equivalents of operator manuals, material safety data sheets etc.)
- anything else that is important for protecting their integrity.

5.9. Incorporate a focus on protecting the employee

OHS position

OHS strategies appear to be accepted as having benefits for employees. In addition to focussing on prevention, OHS initiatives can have a focus on protecting the employee from harm, for example one of the objects of the *Occupational Health and Safety Act 2000 (NSW)* is:

> (b) to protect people at a place of work against risks to health or safety arising out of the activities of persons at work.

While not specifically tested, it makes sense that an approach which focuses on protecting employees, rather than taking a punitive approach to identifying individuals most likely to be involved in workplace accidents, may increase employee interest and willingness to participate in OHS strategies.

Application to corruption prevention

Corruption is commonly seen as focussing on some type of disciplinary process for bad conduct. The approach advocated in this paper conceives of integrity hazards arising from the work, rather than the motives of the individual employee. By conceptualising corruption prevention as something that can protect employees from compromising their integrity it may be possible to reduce the stigma, give it a more positive image and hence have employees more willingly participate in corruption prevention efforts which they see to be to their benefit.

5.10. Learn from experience to improve strategies to minimise corruption risks

OHS position

OHS takes the position that the initial strategy developed to treat or minimise a safety risk may not be the only, nor the best, solution. Instead it refers to 'checking to see if the decisions that were made about the risks and the best way to control them are properly put in place and that they are working' (WorkCover NSW 2001b, p. 11). OHS seeks to improve treatment strategies from experience, for example:

> Interventions, including the more effective use of targeted enforcement and incentives, will be increasingly developed and implemented using evidence and experience of what works to achieve greater compliance and best OHS practice (NOHSC 2002, p. 6).

Sharing solutions and OHS information is also advocated (NOHSC 2002, p. 6).

Application to corruption prevention

Strategies to minimise corruption risks should be regularly monitored and reviewed with the view to improving them. This means that agencies should not fear initially trialling a strategy to minimise corruption risks, since the strategy can subsequently be modified based on information obtained by monitoring and reviewing the effectiveness of the strategy. Also organisations and work environments change. The risk treatment strategies that may seem effective at one time may not always be effective.

Consulting with others who face similar integrity hazards and discussing with them the strategies that they have put in place to minimise their corruption risks is another means of seeking to improve strategies to minimise corruption risks. However, when planning to adapt strategies used by others, it is important not to simply transport the strategies used by others directly to your workplace but instead to consider how the nature of the integrity hazard and your work environment might differ from where the strategy has previously been applied.

6. Conclusion

The approach outlined in this model does not address all facets of corruption prevention. For example, while this approach focuses on identifying integrity hazards related to the type of work undertaken and the nature of the work environment rather than identifying individuals who may be more likely to engage in corrupt conduct, this is not to say that the supervision and management of individual employees is not important. While not a panacea, it is suggested that this approach provides a useful way of thinking about and communicating how to prevent corrupt conduct and outlines some practical steps to assist to determine how and where to best intervene to minimise future corrupt conduct.

The PIC intends to publish on its website a series of corruption prevention resources to assist identify workplace integrity hazards, determine treatment strategies to minimise the associated corruption risks, and communicate these workplace integrity hazards and their associated risks.

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