



Our Ref: EC19-000230

Ms Maryann Quagliata
Branch Manager
Enterprise, Risk and Strategy

Ms Lucinda Atkinson
Acting Assistant Secretary
Institutional Integrity Taskforce
Attorney-General's Department
3-5 National Circuit
BARTON ACT 2600

Dear Ms Atkinson

Commonwealth Integrity Commission – Proposed Reforms

Thank you for the opportunity to provide feedback on the proposed Commonwealth Integrity Commission, in particular the establishment and scope of the entity's new public sector division.

Broadly, the Department of Education and Training supports the proposal and looks forward to ongoing discussion and a greater level of understanding on the detail. Our initial comments stem from having read the discussion paper and attendance at the Inter-Departmental Committee meeting on 17 January 2019.

We note the following:

- Integral to success is the mandatory referral obligation requiring heads of departments to report suspected corruption issues that meet a requisite threshold. This threshold will need to clearly define and focus on serious or systemic corruption.
- A clear delineation will be required to ensure departments continue to meet current obligations to detect, prevent and investigate internal misconduct and other integrity issues.
- In relation to the referral of Commonwealth service providers for investigation, we support the intention that this applies to entities engaged to perform functions on behalf of government, and not to third party recipients of Commonwealth funds.

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- Further, we look forward to better understanding the intersections between the proposed legislation and other existing legislation, such as the *Public Governance, Performance and Accountability Act 2013* and the APS Code of Conduct, again from the perspective of strengthening the overall response and integrity of the Commonwealth public sector.

I will be the contact for our department, and can be reached on

Yours sincerely

Ms Maryann Quagliata

30 January 2019

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