



National Anti-Corruption Commission

# Investigation Report

## Operation Elektra

An investigation into  
Serco officers providing  
telephone services and official  
information to detainees in  
immigration detention.

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In the spirit of reconciliation the National Anti-Corruption Commission acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

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ISBN: 978-1-7636221-2-8

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## Executive summary

This is a public report of an Australian Commission for Law Enforcement Integrity (ACLEI) corruption investigation, known as Operation Elektra, which was a joint operation with the Department of Immigration and Border Protection (DIBP), now the Department of Home Affairs (Home Affairs), and the Australian Federal Police (AFP).

Operation Elektra investigated an allegation that a Serco Australia Pty Ltd (Serco) officer located at the Christmas Island Immigration Detention Centre (Christmas Island IDC) was selling mobile phones to detainees.

The investigation did not establish that a Serco officer was selling mobile phones to detainees. However, it was established that a former Serco officer (Officer 1) used her position to provide subscriber identity module (SIM) cards to 2 detainees, with whom she had intimate relationships, and routinely paid for a telephone service for one of the detainees. A second former Serco officer (Officer 2) also used her position to access and disclose Immigration and Border Protection information to a detainee, and a third former Serco officer (Officer 3) disclosed generic detainee information to a detainee.

## Findings

Both Officer 1 and Officer 2 engaged in corrupt conduct, namely 'abuse of office'.<sup>1</sup> No finding is made in relation to Officer 3.

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<sup>1</sup> *Law Enforcement Integrity Commissioner Act 2006* (Cth), s 6(1)(a).

## Outcomes

On 11 September 2017, Officer 1 pleaded guilty to 2 counts of abuse of public office contrary to s 142.2(2) of the *Criminal Code Act 1995* (Cth). Officer 1 was convicted and fined a total of \$2000.

On 15 July 2022, Officer 2 pleaded guilty to 2 counts of, being an entrusted person, making a record of or disclosing Immigration and Border Protection information contrary to s 42(1) of the *Australian Border Force Act 2015* (Cth). Officer 2 was discharged without conviction pursuant to s 19B(1)(d) of the *Crimes Act 1914* (Cth) upon entering a recognizance to be of good behaviour and comply with a supervision order for 10 months.

## Reporting

On 1 July 2023, ACLEI was subsumed into the National Anti-Corruption Commission (the Commission). Under the transitional arrangements, the National Anti-Corruption Commissioner is required to complete the investigation report as though the *Law Enforcement Integrity Commission Act 2006* (Cth) (LEIC Act) had not been repealed.

Following procedural fairness consultation, the Commission on 4 March 2025 provided the investigation report to the Attorney-General, the Secretary of Home Affairs and the Commissioner of the AFP under s 55 of the LEIC Act.

The Commission has since prepared a public version of the report and, as required by s 210 of the LEIC Act, provided an opportunity to affected persons to make submissions about publishing the report.

In light of the already public outcomes in this matter, and having regard to the Commission's competing priorities, completion of this report has not been prioritised. In that context, further publicising the identity of the officers is considered disproportionate.

## Law Enforcement Integrity Commissioner Act investigation reports

The LEIC Act established the office of Integrity Commissioner, supported by a statutory agency, ACLEI.

The role of the Integrity Commissioner and ACLEI was to detect, investigate and prevent corrupt conduct and deal with corruption issues in the following agencies:

- Australian Criminal Intelligence Commission (including the former Australian Crime Commission, the former National Crime Authority and the former CrimTrac Agency)
- Australian Federal Police (including ACT Policing)
- Australian Transaction Reports and Analysis Centre (AUSTRAC)
- Home Affairs (including the Australian Border Force).

Other Australian Government agencies with law enforcement functions were prescribed by regulation as being within the jurisdiction of the Integrity Commissioner. These were:<sup>2</sup>

- Department of Agriculture, Fisheries and Forestry (DAFF)
- Australian Competition and Consumer Commission (ACCC)
- Australian Prudential Regulation Authority (APRA)
- Australian Securities and Investment Commission (ASIC)
- Australian Taxation Office (ATO)
- Office of the Special Investigator (OSI).

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<sup>2</sup> *Law Enforcement Integrity Commissioner Act 2006* (Cth), s 5(1) (definition of 'law enforcement agency') (LEIC Act); *Law Enforcement Integrity Commissioner Regulations 2017* (Cth), s 7.

The LEIC Act provided that a staff member of a law enforcement agency 'engages in corrupt conduct' if the staff member:

- abuses his or her office
- perverts the course of justice, or
- having regard to his or her duties and powers, engages in corrupt conduct of any other kind.

The LEIC Act further provided that the Integrity Commissioner, on completion of a corruption investigation, must prepare a report setting out:

- a) findings on the corruption issue
- b) the evidence and other material on which those findings are based
- c) any action that has been taken, or proposed to be taken, under Part 10 in relation to the investigation, and
- d) any recommendations and, if recommendations are made, the reasons for those recommendations.<sup>3</sup>

The report on the investigation, prepared under the LEIC Act, was required to be given to Attorney-General, and a copy to the head of the law enforcement agency to which the corruption issue relates.<sup>4</sup>

Findings made about whether a person has engaged in corrupt conduct are made based on the balance of probabilities. Those findings may not be the same as those that would be made by a court deciding on criminal guilt beyond a reasonable doubt.

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<sup>3</sup> LEIC Act, ss 54(1)–(2).

<sup>4</sup> Ibid s 55.

Before making a finding, the Commissioner is required to be 'reasonably satisfied', based on relevant facts, that the corrupt conduct occurred and that the corrupt conduct was within the meaning of the LEIC Act.

In considering whether or not the Commissioner is 'reasonably satisfied' of relevant facts, the Commissioner applies the reasoning set out in *Briginshaw v Briginshaw*,<sup>5</sup> *Rejtek v McElroy*,<sup>6</sup> and *Re Day*.<sup>7</sup>

On 1 July 2023, ACLEI was subsumed by the Commission. Under Schedule 2, Item 38 of the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth), for ACLEI investigations completed, but not yet reported on before the transition, the National Anti-Corruption Commissioner must prepare an investigation report as if the LEIC Act had not been repealed.

This investigation report for Operation Elektra has been prepared in accordance with Schedule 2, Item 38 of the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022*.

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5 (1938) 60 CLR 336, 361–62 (Dixon J).

6 (1965) 112 CLR 517, 521.

7 (2017) 91 ALJR 262, 268 [14]–[18].



## Summary of the investigation

### Notification

On 18 May 2017, DIBP, now Home Affairs, notified ACLEI of an allegation of corrupt conduct under s 21 of the LEIC Act.

It was alleged that a Serco officer located at the Christmas Island IDC was selling mobile phones to detainees. The information was provided to DIBP by a detainee at Christmas Island IDC.

### Jurisdiction

On 5 June 2017, the then Integrity Commissioner decided to investigate the corruption issue jointly with DIPB pursuant to ss 26(1)(a) and 26(2) of the LEIC Act under the name 'Operation Elektra'. The then Integrity Commissioner was satisfied:

- The allegation related to a staff member of a law enforcement agency as defined by s 10(2A)(e) of the LEIC Act.
- The information raised the possibility that a Serco officer may have used their position to supply mobile phones to detainees for profit and, if proven, the staff member would have abused their office.<sup>8</sup>
- As such, the information raised a 'corruption issue' as defined by s 7 of the LEIC Act.

On 23 August 2017, the then Integrity Commissioner reconsidered how to deal with the corruption issue pursuant to s 42 of the LEIC Act and decided to investigate the corruption issue jointly with DIPB and the AFP pursuant to ss 26(1)(a) and 26(2) of the LEIC Act.

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<sup>8</sup> LEIC Act, s 6(1).

## ACLEI's jurisdiction over Serco Detainee Service Officers

Since 2009, Home Affairs has contracted Serco to provide immigration detention facilities and detainee services in Australia. Serco employs more than 2000 staff to provide a range of services including security, detainee welfare and detainee engagement.

Under s 10(2A)(e) of the LEIC Act, Home Affairs staff members relevantly include 'a person covered by paragraph (f) or (g) of the definition of officer in subsection 5(1) of the *Migration Act 1958* (Cth)' (Migration Act). Section 5(1)(g) of the Migration Act defines 'officer' to include 'any person who is included in a class of persons authorised in writing by the Minister to be officers for the purposes of this Act, including a person who becomes a member of the class after the authorisation is given'.

On 30 June 2015, the Minister signed the *Migration (Migration Officers) Authorisation 2015*, which authorised a class of persons to be officers for the purposes of the Migration Act.

Relevantly, pursuant to that authorisation, Serco employees or contractors who are 'Detainee Service Officers' (DSO) based in a detention centre are officers for the purposes of the Migration Act and are staff members of a law enforcement agency under s 10(2A)(e) of the LEIC Act.

## Investigation

### Prohibition on mobile phones in immigration detention centres

On 21 November 2016, the Detention Services Manual, which made provision in relation to the operation and regulation of detention centres pursuant to s 273 of sch 2 of the *Migration Act 1958* (Cth), was amended to include mobile phones and SIM cards as controlled items not permitted in IDCs.

## Investigation relating to Officer 1

On 30 May 2017, ACLEI investigators attended the Christmas Island IDC and met with the detainee who had referred the allegation to DIBP. The detainee told ACLEI investigators that a fellow detainee, Detainee A, was using a mobile phone, which they had received from a female Serco officer.

Enquiries by ACLEI on 30 May 2017 confirmed that Detainee A was using a telephone service that was subscribed on 9 January 2017 in the name of a Serco DSO working at Christmas Island IDC (Officer 1).

Enquiries by ACLEI also confirmed that in addition to the telephone service used by Detainee A, another telephone service subscribed in the name of Officer 1 was being used by a second detainee, Detainee B. The telephone service used by Detainee B was subscribed in Officer 1's name on 6 December 2016 while Detainee B was detained at Christmas Island IDC.

The investigation uncovered information indicating that Officer 1 was in an intimate relationship with Detainee B, which commenced while Detainee B was detained at Christmas Island IDC, and continued after Detainee B was transferred to Yongah Hill IDC in April 2017.

On 20 June 2017, the ABF confiscated a mobile phone from a third detainee, Detainee C. An examination of the phone by ACLEI investigators found that the confiscated phone had been in regular contact with Officer 1.

Detainee C had been detained at both Christmas Island IDC and Yongah Hill IDC prior to their removal to New Zealand on or about 18 August 2017. Information obtained by ACLEI investigators indicated that Officer 1 was also in an intimate relationship with Detainee C. It is unclear when the relationship commenced.

On 29 June 2017, a second mobile phone was confiscated from another detainee at Christmas Island IDC. At the time the phone was confiscated, the detainee stated that they received the mobile phone from Detainee A. Closed-Circuit Television footage showed Detainee A entering the detainee's room just prior to the mobile phone being detected. An examination of the phone identified Detainee A as the regular user of the phone.

On 4 August 2017, ACLEI investigators obtained information which identified previous misconduct by Officer 1:

- On 21 January 2016, Officer 1 received a formal warning from Serco in relation to her interactions with Detainee B, and Officer 1 admitted to Serco she had developed feelings for Detainee B. Officer 1 was then cautioned in relation to concerns of Serco management that she was being groomed by Detainee B.
- On 2 May 2017, Officer 1 received a verbal warning from Serco following a security breach, where she was found to have brought a mobile phone into the Christmas Island IDC.

On 8 September 2017, Officer 1 participated in a record of interview with ACLEI investigators, during which:

- She denied knowledge of the telephone service being used by Detainee A.
- She denied bringing a mobile phone into the centre for Detainee B to use, but admitted that she communicated with Detainee B by mobile phone and paid for Detainee B's prepaid telephone service.
- She said she was worried Detainee B might spread rumours about her if she didn't assist in this way.
- She admitted she knew that detainees were not permitted to have mobile phones.

Later that day, ACLEI investigators attended Christmas Island IDC and executed search warrants on Officer 1 and her work area. Notebooks belonging to Officer 1 were found during the search that showed Officer 1 had been in an intimate relationship with Detainee B. It appeared from the notebooks that Officer 1 and Detainee B had engaged in a written exchange via the notebooks until late November 2016 when the phone service for Detainee B was connected and the pair began to communicate via telephone. The notebooks also contained notes indicating that Officer 1 had connected the telephone service for Detainee B.

During the search, Officer 1 admitted to ACLEI investigators she gave a SIM card to Detainee C at the Christmas Island IDC while she was on duty. This SIM card was later confiscated and found to be used by Detainee A. Officer 1 maintained that she did not intend for this service to be provided to Detainee A.

## Investigation relating to Officer 2

A second Serco DSO (Officer 2) who was in contact with Detainee B was identified. Officer 2 formed a relationship with Detainee B while Detainee B was detained at Yongah Hill IDC.

Officer 2 obtained Detainee B's mobile phone number from another detainee and initiated contact. Between 7 and 24 August 2017, Officer 2 and Detainee B exchanged hundreds of text messages.

On 9 August 2017, Officer 2 sent a text message to Detainee B containing a list of detainees who were to be transferred from Yongah Hill IDC to Christmas Island IDC.

Between 9 and 14 August 2017, Officer 2 sent several text messages to Detainee B containing information about the whereabouts, including a residential address, of a former detainee who had been released into the community.

On 2 October 2017, Officer 2 participated in a record of interview, in which she admitted that:

- She had been contacting Detainee B via text messages.
- She accessed the Detention Service Provider Portal (DSP Portal), which allows users to access various details of immigration detainees, at Detainee B's request to retrieve detainee information.
- She provided the address of a detainee, and transfer and transport information about numerous detainees, to Detainee B.
- She knew she was not allowed to disclose that information.

### Investigation relating to Officer 3

A third Serco DSO (Officer 3) also came to the attention of ACLEI investigators during the investigation.

On 4 October 2017, Officer 3 participated in a record of interview with ACLEI and Home Affairs investigators. During the interview, Officer 3 stated that:

- She met Detainee B while on secondment to Christmas Island IDC in 2015 before she started working at Yongah Hill IDC in 2016.
- She started receiving text messages from Detainee B in approximately March 2017. Detainee B was then transferred to Yongah Hill IDC in approximately April 2017, from which time she spoke to Detainee B regularly.
- Detainee B often offered her cups of tea and dinner while she was at work. She thought of Detainee B as a friend and she maintained contact because she felt sorry for Detainee B.
- Detainee B sent emails to her personal email address, which they told her they had retrieved from the social media platform, Facebook.

- She knew it was against Serco policy to maintain contact with Detainee B and she would ask Detainee B to text, rather than call, so that the other Serco officers wouldn't know they were communicating.
- Detainee B asked her regularly if any detainees were going to be transferred to Christmas Island IDC. It was common for detainees to ask her if they were going to be transferred. Detainee B told her that detainees just wanted to know they were going to be transferred before it was time to leave.
- In April 2017, her manager told her she was not supposed to discuss transfer information with detainees, which she didn't realise at the time.
- She didn't understand why providing transfer information to detainees would be an issue, particularly when it would give the detainees time to pack up their belongings.
- She suggested to her manager that it would be better to tell the detainees before it was time for them to leave and her manager agreed that it was better to tell some of the detainees.
- On 12 August 2017, Detainee B asked for her home address, so they could send her a birthday gift, and while she thought Detainee B was joking about the gift, she gave Detainee B her address.
- On 16 or 17 August 2017, she received a bracelet and perfume in the mail from Detainee B, which she threw away because she felt uncomfortable about receiving it.
- On 16 August 2017, she gave Detainee B information relating to the number of detainees who were transferring the following week and vague details about their countries of origin. She didn't think she retrieved the information from the DSP Portal.
- She ceased communicating with Detainee B around 21 September 2017.

## Serco confidentiality conditions

On 3 June 2010, at the commencement of her employment with Serco, Officer 3 agreed to the following confidentiality conditions:

It is a condition of your employment that you will not disclose nor use at any time either during your employment or thereafter, any policy, practice, procedure, prisoner information, client information, supplier information, trade secret, financial, business, confidential or other data belonging to or concerning the business operations or affairs of or otherwise relating to [Serco] or any associated companies, their customers, and other business organisations acquired in the course of your employment with [Serco] without first obtaining [Serco's] written consent to such disclosure, except such disclosure as may otherwise be specifically required or permitted by [Serco], required by law or unless such information has become public knowledge through no action by yourself.

On 18 November 2011, Officer 2 agreed to the same confidentiality conditions at the commencement of her employment with Serco.



## Commissioner's considerations and findings

Section 54 of the LEIC Act requires that my report on the investigation of a corruption issue must set out my findings on the corruption issue. The corruption issue the subject of investigation was whether a Serco officer had abused their office by using their position to supply mobile phones to detainees for profit.

'Abuse of office' is not defined in the LEIC Act. It is a concept primarily used in the context of the criminal law. It generally involves using one's office to dishonestly benefit oneself or another, or to dishonestly cause detriment to another.<sup>9</sup>

While the issue here concerns corruption and not criminality, these notions from the criminal law inform the concept of 'abuse of office' in the present context, which is whether a staff member of a law enforcement agency has engaged in conduct involving an 'abuse of their office'.

### Officer 1

Officer 1 admitted that she provided a SIM card, subscribed in her name, to Detainee C. This SIM card was ultimately passed to Detainee A, although it appears to have been originally intended for Detainee C, and there is no evidence that Officer 1 communicated with Detainee A via the telephone service.

I am reasonably satisfied that Officer 1 also provided a SIM card to Detainee B. The prepaid telephone service used by Detainee B was subscribed in Officer 1's name. It was also paid for and used by Officer 1 to communicate with Detainee B.

The investigation did not establish that Officer 1 sold mobile phones or SIM cards to detainees or otherwise received a financial benefit. However, Officer 1 used her position as a Serco officer to provide telephone services to 2 detainees

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<sup>9</sup> See e.g. *Criminal Code Act 1995* (Cth), s 142.2(1).

with whom she had intimate relationships, when she knew they were not permitted to have such services. In doing so, she abused her office.

Accordingly, I find that Officer 1 engaged in corrupt conduct within the meaning of s 6(1)(a) of the LEIC Act, namely, abuse of office.

## Officer 2

As a Serco officer, Officer 2 was subject to confidentiality conditions, which she agreed to at the commencement of her employment, including that she would not use or disclose detainee information or data concerning the business operations of Serco, acquired in the course of her employment, without prior written consent from Serco, or where the disclosure is required or permitted by Serco.

The disclosure of Immigration and Border Protection information is also governed by s 42 of the *Australian Border Force Act 2015* (Cth) (ABF Act), which makes it an offence for an entrusted person to disclose information, except in limited circumstances, including in the course of the person's employment or where it is authorised or required by law.<sup>10</sup>

Officer 2 admitted that between 9 and 14 August 2017, she accessed the DSP Portal and disclosed Immigration and Border Protection information to Detainee B at Detainee B's request. She also admitted that she knew she was not entitled to do so. The disclosures were in breach of her employment conditions and s 42 of the ABF Act.

I am reasonably satisfied that Officer 2 accessed and disclosed the information to Detainee B because of her personal relationship with Detainee B. As a result, although there is no evidence that Officer 2 received any financial benefit for doing so, Detainee B received information to which they were not entitled. Receipt of that information constituted a benefit for Detainee B.

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<sup>10</sup> ABF Act, s 42(2).

Accordingly, I find that Officer 2 engaged in corrupt conduct within the meaning of s 6(1)(a) of the LEIC Act, namely, abuse of office.

### Officer 3

Officer 3 also developed an association with Detainee B (although in her case there is no suggestion that it was intimate) and communicated with Detainee B regularly. Although this was, to her knowledge, contrary to Serco policy, it is not of itself corrupt.

As a Serco officer, Officer 3 was also subject to confidentiality conditions. Officer 3 admitted that she provided some detainee transfer information to Detainee B, but said that the information was vague and generic, and there is no evidence to the contrary.

Moreover, the confidentiality conditions specifically provide that information may be disclosed if permitted by Serco. Officer 3 told ACLEI investigators that her manager gave inconsistent guidance as to whether she was permitted to disclose transfer information to detainees.

Given the limited nature of the information that was provided, and the guidance that Officer 3 received, I am not satisfied that Officer 3 engaged in corrupt conduct.

## Action under Part 10 of the LEIC Act

On 8 September 2017, on the evidence collected by ACLEI, the AFP charged Officer 1 with 2 counts of abuse of public office contrary to s 142.2(2) of the *Criminal Code Act 1995* (Cth).

On 11 September 2017, Officer 1 pleaded guilty to the charges. On 29 September 2017, Officer 1 was convicted and fined a total of \$2000.

On 20 May 2020, the then Integrity Commissioner referred 2 briefs of evidence to the Commonwealth Director of Public Prosecutions (CDPP) in relation to Officer 2 and Officer 3 pursuant to s 142(1) of the LEIC Act.

After considering the brief of evidence, the CDPP did not recommend charges against Officer 3.

On 15 July 2022, Officer 2 pleaded guilty to 2 counts of, being an entrusted person, making a record of or disclosing Immigration and Border Protection information contrary to s 42(1) of the *Australian Border Force Act 2015* (Cth).

On 2 November 2022, Officer 2 was discharged without conviction pursuant to s 19B(1)(d) of the *Crimes Act 1914* (Cth) upon entering a recognizance to be of good behaviour and comply with a supervision order for 10 months (including accepting community corrections and psychological counselling as required).

## Corruption prevention observations

On 19 September 2022, the then Integrity Commissioner wrote to the Secretary of Home Affairs, highlighting a number of corruption vulnerabilities and prevention opportunities in relation to the immigration detention network (IDN).

Of relevance to this investigation, the letter included the following observations:

### **Reporting frameworks**

During our investigations we have had reported to us that ... Serco officers form "cliques" with other officers as well as certain detainees and detainee groups.

Low levels of internal reporting of suspected misconduct are indicative of a less mature reporting culture and is a corruption vulnerability. Controls could include reviewing and testing reporting frameworks to ensure that they are operating to support reports to be made and escalated as appropriate.

### **Grooming of Serco officers**

In the course of our investigations we have seen evidence of grooming of Serco officers by detainees ... The grooming process can begin from the moment an officer takes up employment and may involve a detainee ingratiating themselves with a staff member through incentives (such as undue financial or other benefits).

Serco's integrity policies state that officers receive an induction training course on ethics and integrity which provides opportunities to raise staff awareness around misconduct and corruption issues. All training is delivered in-house upon commencement and Serco staff are currently provided with an initial 6-week mandatory training course—there are no subsequent ongoing training programs offered throughout the course of their employment.

ACLEI sees benefit in including targeted corruption prevention content in the induction training course for IDC staff, covering grooming and other risks identified by ACLEI, and reporting mechanisms available to staff members. Consideration could also be given to ongoing training needs to Serco officers in relation to corruption and integrity that builds on the induction training.

To counteract the risk of grooming and breach of professional boundaries, consideration could also be given to rotating IDC staff across different roles and locations.

Further, ACLEI also engaged directly with the General Manager Professional Standards and Integrity in Serco about the corruption risks identified in the IDN and subsequently delivered training to ABF detention staff on the risks of grooming and their role in preventing corruption.

On 16 January 2023, the then Integrity Commissioner received a letter from the ABF Commissioner that acknowledged:

- the vulnerabilities identified in the above-referenced letter, and described a number of initiatives underway to address them, and
- ACLEI's ongoing efforts to assist the ABF in enhancing their current control settings.

A handwritten signature in blue ink, consisting of a large, stylized 'B' followed by a horizontal line and a dot.

**The Honourable PLG Brereton AM RFD SC**  
Commissioner

11/06/2025