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**From:** 22  
**Sent:** Tuesday, 16 January 2024 4:52 PM  
**To:** 22  
**Cc:** 'Secretary@homeaffairs.gov.au'  
**Subject:** Operation BANNISTER - Investigation report [SEC=PROTECTED]  
**Attachments:** Operation Bannister - Investigation Report - 16 January 2024.pdf; Operation Bannister - Letter to Secretary HA - 16 January 2024.pdf

Dear 22

Please find attached correspondence and report in relation to Operation BANNISTER for the Secretary's information.

With thanks,

22

The Hon PLG Brereton, AM, RFD, SC  
Commissioner | National Anti-Corruption Commission  
22, Barton  
PO Box 605, Canberra, ACT 2601  
Phone: 22 | Email: 22 [@nacc.gov.au](mailto:22@nacc.gov.au)



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National Anti-Corruption Commission

We **acknowledge** the Traditional Owners and Custodians of Country throughout Australia.

We **recognise** their continuing connection to land, waters and community.

We **pay our respects** to the people, the cultures and the Elders past, present and emerging.



National Anti-Corruption Commission

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Ref: 22/1291

16 January 2024

Ms Stephanie Foster PSM  
Secretary  
Department of Home Affairs  
Level 1, 4 National Circuit  
BARTON ACT 2601

Dear Ms Foster,

**Investigation Report provided to the Attorney-General – Operation Bannister**

I refer to the joint investigation by the Australian Commission for Law Enforcement Integrity (ACLEI) and the Department of Home Affairs (Home Affairs), named Operation Bannister.

Operation Bannister investigated whether a former staff member of Home Affairs, <sup>22</sup> [REDACTED], had engaged in corrupt conduct by assisting a company, Paladin, to gain a contract with Home Affairs for the provision of garrison services in Papua New Guinea. The investigation concluded that there was no such corrupt conduct.

Under item 38 of Schedule 2 of the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth), I am required to finalise the report under the *Law Enforcement Integrity Commissioner Act 2006* (Cth) (LEIC Act). Accordingly, the investigation report for Operation Bannister has been finalised pursuant to section 54 of the LEIC Act and was provided to the Attorney-General today. Pursuant to section 55 of the LEIC Act, I enclose a copy of the investigation report for your records.

I have decided to exercise my discretion to publish a partial version of the report on the Commission's website at [www.nacc.gov.au](http://www.nacc.gov.au). This will occur once a publication version, with limited personal information, has been prepared.

Please do not hesitate to contact me on <sup>22</sup> [REDACTED] if you would like to discuss this matter personally. Alternatively, your staff are welcome to contact <sup>22</sup> [REDACTED] <sup>22</sup> [REDACTED] [@nacc.gov.au](mailto:[REDACTED]@nacc.gov.au).

Yours sincerely,

<sup>22</sup> [REDACTED]

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

**Encl:** Copy of investigation report for Operation Bannister



National Anti-Corruption Commission

# Investigation Report

## Operation Bannister

An investigation into a Home Affairs employee's familial links to a contracted service provider.

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A report to the Attorney-General, prepared under section 54 of the *Law Enforcement Integrity Commissioner Act 2006* (Cth) and Schedule 2, Item 38 of the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth)

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Enquiries about this report can be directed to the  
National Anti-Corruption Commission  
GPO Box 605, Canberra, ACT, 2601  
or by email to [legal@nacc.gov.au](mailto:legal@nacc.gov.au)

Investigation Reports published by the Commissioner  
and summaries of reports which have been made public  
can be found on the Commissions website: [nacc.gov.au](http://nacc.gov.au)

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This publication should be attributed as:

Operation Bannister - An investigation into a Home Affairs employee's  
familial links to a contracted service provider.

National Anti-Corruption Commission, Canberra.

The terms under which the coat of arms may be used can be found on the [Digital Transformation Agency website](https://digitaltransformation.gov.au/).

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## Law Enforcement Integrity Commissioner Act Investigation Reports

1. The *Law Enforcement Integrity Commissioner Act 2006* (Cth) (LEIC Act) established the Office of Integrity Commissioner, supported by a statutory agency, the Australian Commission for Law Enforcement Integrity (ACLEI).
2. 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), and
  - Department of Home Affairs (including the Australian Border Force).
3. Other Australian Government agencies with law enforcement functions were prescribed by regulation as being within the jurisdiction of the Integrity Commissioner. These were:<sup>1</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), and
  - Office of the Special Investigator (OSI).
4. 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.
5. After the Integrity Commissioner completed a corruption investigation, the LEIC Act provided that a report must be prepared setting out:
  - a. findings on the corruption issue; and
  - b. the evidence and other material on which those findings are based; and
  - c. any action that has been taken, or proposed to be take, under Part 10 in relation to the investigation; and
  - d. any recommendations and, if recommendations are made, the reasons for those recommendations.<sup>2</sup>

<sup>1</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.

<sup>2</sup> *Ibid* ss 54(1)–(2).

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6. 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>3</sup>
7. 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.
8. 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.
9. 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>4</sup> *Rejtek v McElroy*,<sup>5</sup> and *Re Day*.<sup>6</sup>
10. On 1 July 2023, ACLEI was subsumed by the National Anti-Corruption 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.
11. This investigation report for Operation Bannister 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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<sup>3</sup> Ibid s 55.

<sup>4</sup> (1938) 60 CLR 336, 361–62 (Dixon J).

<sup>5</sup> (1965) 112 CLR 517, 521.

<sup>6</sup> (2017) 91 ALJR 262, 268 [14]–[18].

## Summary of the Investigation

### Notification

#### The September information

12. On 12 September 2019, the Secretary of the Department of Home Affairs (Home Affairs) informed the former Integrity Commissioner Mr Michael Griffin AM, of media reporting by the Australian Financial Review which alleged that a former Senior Executive Service (SES) member of the then Department of Immigration and Citizenship (now Home Affairs) had assisted Paladin Holding PTE Ltd (Paladin Holdings) to secure a contract with Home Affairs to manage refugee garrison services on Manus Island.<sup>7</sup> Home Affairs indicated that an internal review had not identified any corrupt conduct associated with the tender, procurement or contract management processes of the garrison services contract with Paladin Holdings.<sup>8</sup>
13. Home Affairs also stated that records had been located relating to a former employee, [22] which connected her to Paladin Holdings, [47F(1)] Mr Craig Thrupp who was a Director of Paladin Holdings. Home Affairs indicated that no records had been located to suggest [22] had declared any potential conflict of interest associated with Mr Thrupp.

#### The January information

14. On 30 January 2020, the Secretary of Home Affairs further informed ACLEI that during a Home Affairs investigation into [22] undisclosed conflicts of interest,<sup>9</sup> they discovered a number of payments, totalling \$223,000, made to [22] through the online payment platform PayPal by Paladin Holdings between May and July 2017.<sup>10</sup> The notification stated that the purpose of the payments was unknown.

### Jurisdiction

#### The September information

15. On 29 October 2019, Mr Griffin decided to commence an own initiative investigation pursuant to s 38(1) of the LEIC Act in relation to the allegations relating to [22] undeclared potential conflicts of interest.<sup>11</sup>
16. Mr Griffin was satisfied that:
  - a. The allegations were within ACLEI's jurisdiction, as [22] was an employee of Home Affairs, being 'a staff member of a law enforcement agency' as defined in s 10(2A) of the LEIC Act, and
  - b. The allegations were within the meaning of 'corruption issue' as defined by s 7 of the LEIC Act, because they suggested that [22] may have abused her office as a Home Affairs employee by assisting Paladin Holdings to obtain their contract with Home Affairs.

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<sup>7</sup> CM 19#19724DOC

<sup>8</sup> CM 19#19724DOC

<sup>9</sup> CM 20#2249DOC

<sup>10</sup> CM 20#2249DOC

<sup>11</sup> CM 19#22157DOC



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17. The Integrity Commissioner referred the corruption issue to Home Affairs to investigate, without management or oversight by ACLEI, pursuant to s 26(2)(b)(iii) of the LEIC Act. This was communicated to Home Affairs the same day.

**The January information**

18. As a result of the additional information received from Home Affairs on 30 January 2020, on 5 March 2020, the former Integrity Commissioner, Ms Jaala Hinchcliffe, reconsidered the matter pursuant to s 42 of the LEIC Act, and decided to investigate the allegation that 22 [REDACTED] may have abused her office as a Home Affairs employee by assisting Paladin Holdings to obtain their contract with Home Affairs jointly with Home Affairs, pursuant to ss 26(1)(a) and 26(2) of the LEIC Act.<sup>12</sup>
19. The investigation was designated Operation Bannister.

**Investigation**

20. The investigation focused on the issue of whether the receipt by 22 [REDACTED] of payments made to her through the PayPal online payment platform by Paladin Holdings between May and July 2017, totalling \$223,000, involved an abuse by 22 [REDACTED] of her office as a Home Affairs employee.
21. During the course of the investigation, information also emerged about the role of a former Home Affairs SES officer, 22 [REDACTED] in assisting Paladin Holdings with the tender and procurement process.

**The Paladin Group**

22. Paladin Holdings was the holding company of a group of companies in the Paladin group, which provided security and project services in Australia, the South Pacific and Southeast Asia. They are most prominently known for their work, as a contractor for Home Affairs, managing refugee garrison services on Papua New Guinea's Manus Island between 2017 and 2019.
23. The group comprised the holding company Paladin Holdings PTE Ltd (the parent Singapore based company), and a number of subsidiaries, including Paladin Solutions Pty Ltd (the Papua New Guinea (PNG) based company), Paladin Group Limited (the Hong Kong based company), and Paladin Aus Pty Ltd (the Australia based company).<sup>13</sup> In this report, 'Paladin' refers to the Paladin Group of companies collectively.
24. While the corporate website stated that Paladin was Australian owned, its main operational domain was offshore, with most of its bank accounts held in PNG, Hong Kong and Singapore, and most of financial transactions passing through those countries.
25. At the relevant times, the directors of Paladin were Mr Craig Thrupp and 22 [REDACTED]<sup>14</sup> 22 [REDACTED] and 22 [REDACTED] had become directors by May 2019.

**Contract with Home Affairs**

26. Home Affairs commenced engaging with Paladin to take over the provision of garrison and welfare services to the East Lorengau Refugee Transit Centre (ELRTC) on Manus

<sup>12</sup> CM 20#5418DOC; 20#5004DOC

<sup>13</sup> CM 21#13534DOC

<sup>14</sup> CM 20#27665DOC

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Island from about late August or early September 2017. Prior to the procurement being finalised, Home Affairs executed four letters of intent with Paladin, for a value of \$81,130,743.<sup>15</sup> on the following dates:

- 21 September 2017,
  - 8 November 2017,
  - 5 December 2017, and
  - 7 February 2018.
27. These letters of intent were for the establishment, transition and standard service costs associated with the provision of the garrison services and were intended to ensure immediate cash-flow was available to Paladin to ensure the smooth transition and continuity of services in a short timeframe while the final contract terms and conditions were settled.
  28. Home Affairs first entered a contract with Paladin Solutions PNG Ltd (the PNG company) for the provision of garrison services for the period 21 September 2017 to 28 February 2018 for the value of \$89,243,817. On 28 February 2018, Home Affairs entered into a contract with Paladin Holdings PTE Ltd (the Singapore holding company) for the provision of garrison services for the period 28 February 2018 to 30 November 2019 <sup>47F(1)</sup>
  29. This was a direct procurement, in circumstances where the previous service provider had withdrawn its services with effect from no later than 31 October 2017, and there was perceived to be an urgent requirement to maintain services on the island. The direct procurement has been reviewed by the Australian National Audit Office (ANAO)<sup>17</sup> and its propriety was not the subject of this investigation.
  30. During the tender process, Paladin declared to Home Affairs a conflict of interest, insofar as <sup>22 & 47F(1)</sup> <sup>18</sup>

### Key protagonists

<sup>22</sup>

31. <sup>22 & 47F(1)</sup> and the partner of <sup>22</sup>.
32. <sup>22</sup> was a Home Affairs employee from 3 January 2006 until 10 January 2019, when she retired as an Executive Level 1 employee.<sup>19</sup> From April 2018 until her retirement, <sup>22</sup> was on long service leave and did not attend the workplace.
33. During her career at Home Affairs, <sup>22</sup> worked in areas relating to intelligence analysis, immigration detention, governance, and policy.<sup>20</sup> From December 2016 to April 2017, <sup>22</sup> worked in a policy development team. From about April 2017 until late November 2017, she worked in performance evaluation. From late November 2017 until April 2018, <sup>22</sup> worked in a governance and policy area of the

<sup>15</sup> CM 20#5667DOC

<sup>16</sup> CM 20#5667DOC

<sup>17</sup> Procurement of Garrison Support and Welfare Services | Australian National Audit Office (ANAO)

<sup>18</sup> CM 21#17159DOC

<sup>19</sup> CM 21#20098DOC and 20#17681DOC

<sup>20</sup> CM 22#20964DOC

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Department, focused mainly on preparing the Home Affairs Annual Report.<sup>21</sup> She took long service leave from about April 2018 until 10 January 2019, when she retired.<sup>22</sup>

34. Home Affairs records revealed no application by 22 [REDACTED] for secondary employment with Paladin.<sup>23</sup> Nor was there any conflict of interest declaration in relation to Paladin or Mr Thrupp in her Home Affairs records.<sup>24</sup>
35. 22 [REDACTED] gave evidence that she had discussed with Mr Thrupp how important it was for him and Paladin to disclose his relationship to her in the procurement process;  
47F(1) [REDACTED]

### Mr Craig Thrupp

36. Mr Craig Thrupp was the founding director of and (originally) sole shareholder in Paladin<sup>25</sup>. Between around 2014 and 2016, he transferred 20 percent of his shareholding to 22 [REDACTED] following which he retained an 80 percent shareholding. While both Mr Thrupp and 22 [REDACTED] were directors, Mr Thrupp was the primary decision maker and effectively controlled the group.<sup>26</sup>
37. Mr Thrupp, with 22 [REDACTED] developed the Paladin tender proposal and participated in the negotiations with Home Affairs which culminated in Paladin securing the Manus Island garrison services contract.

22 [REDACTED]

38. 22 & 47F(1) [REDACTED]

39. [REDACTED]

40. [REDACTED]

41. 22 [REDACTED] gave evidence that in 2017, Mr Thrupp discussed with him making payments to 22 [REDACTED] through a Paladin PayPal account, of approximately \$215,000

<sup>21</sup> CM 20#17681DOC and 21#20098DOC

<sup>22</sup> CM 22#20964DOC

<sup>23</sup> CM 20/154-08

<sup>24</sup> CM22#20964DOC

<sup>25</sup> CM 21#13532DOC

<sup>26</sup> CM 21#17159DOC

<sup>27</sup> CM 21#17159DOC and CM 21#13532DOC

<sup>28</sup> CM 21#17159DOC

<sup>29</sup> CM 21#17159DOC

<sup>30</sup> CM 21#17159DOC

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to cover her mortgage. 22 agreed that Paladin funds could be used to make this payment from Mr Thrupp's loan account, to be repaid when dividends were paid.

42. 22 said that payments were often made through PayPal to allow for instant currency transfer and to avoid currency restrictions in countries where Paladin was operating. Typically, 22 PayPal account was used for purchases in PNG, and Mr Thrupp's for purchases in Australia. They had access to each other's accounts to ensure they could move money as required.
43. 22 also said that he was aware that Mr Thrupp paid for renovations to 22 property at 47F(1) and that he had purchased a second property in 22 name, as staff accommodation to save on hotel expenditure which was about \$20,000 a year.

22

44. 22 & 47F(1)

45. 22 did not recall seeing any invoices to Paladin from family members of employees.<sup>32</sup> He was not aware of 22 providing any information to Paladin to assist in securing the contract for garrison services with Home Affairs,<sup>33</sup> and he was not aware of 22 having a Paladin email account, nor of her providing any consultancy services to Paladin during his period of employment.<sup>34</sup>

22

46. 22 was a Senior Executive Service Band 1 (SES Band 1) employee with Home Affairs. He retired in March 2013.<sup>35</sup>
47. 22 met 22 at the Department of Home Affairs in 2011 and they commenced a personal relationship around late 2011 or early 2012.<sup>36</sup>
48. Evidence obtained during the investigation suggested that 22 mentored and guided Paladin through the tender and procurement process for the contract for garrison services on Manus Island. This occurred more than four years after he had retired from Home Affairs. There is no evidence that he provided any sensitive information, but he used his experience to assist with interpreting publicly available information. When the tender was secured, 22 was paid a bonus of \$5000 for his assistance, as were other employees. The evidence indicates 22 did not have a formal relationship with Paladin until he joined the board of directors in about May 2019.<sup>37</sup>

### **Paladin PayPal accounts**

49. In 2017, Paladin opened PayPal accounts that were linked to corporate credit cards. The PayPal accounts were used to transfer money from PNG to Australia, as there

<sup>31</sup> CM 21#12464DOC

<sup>32</sup> CM 21#12464DOC

<sup>33</sup> CM 21#12464DOC

<sup>34</sup> CM 21#12464DOC

<sup>35</sup> CM 22#20964DOC and 22#28229DOC

<sup>36</sup> CM 22#20964DOC

<sup>37</sup> CM 21#17159DOC

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were limits on the amount of money which could be transferred out of Papua New Guinea. This led to large amounts being transferred in multiple transactions.<sup>38</sup>

50. The Paladin PayPal accounts were established using Paladin email accounts.

#### Paladin email accounts

51. Paladin employees and consultants had Paladin email accounts. There was no policy in place restricting who could be issued with Paladin email accounts.<sup>39</sup> Mr Thrupp, [REDACTED] and Paladin's Chief Information Officer could create Paladin email addresses.<sup>40</sup>

#### PayPal transactions between Paladin and [REDACTED]

52. From 31 May 2017, payments were made from Paladin to [REDACTED] PayPal account (which used the Paladin email address [REDACTED]@paladingroup.net).<sup>41</sup> totalling \$215,386.50, as follows:<sup>42</sup>

Date	Amount	From PayPal Account
31 May 2017	\$7,931.35	[REDACTED]
31 May 2017	\$7,931.35	
1 June 2017	\$7,938.54	
1 June 2017	\$6,350.76	
9 June 2017	\$6,169.30	
9 June 2017	\$7,808.10	
28 June 2017	\$9,157.70	
28 June 2017	\$8,482.90	
28 June 2017	\$9,157.70	
28 June 2017	\$8,675.70	
28 June 2017	\$6,747.70	
3 July 2017	\$9,639.70	
3 July 2017	\$9,639.70	
3 July 2017	\$9,446.90	
3 July 2017	\$9,446.90	
6 July 2017	\$9,639.70	
6 July 2017	\$5,012.50	
6 July 2017	\$9,639.70	
6 July 2017	\$9,600.00	
20 July 2017	\$9,157.70	

<sup>38</sup> CM 21#17159DOC

<sup>39</sup> CM 21#17159DOC

<sup>40</sup> CM 21#17159DOC

<sup>41</sup> CM 21#48946DOC

<sup>42</sup> CM 20#7858DOC

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Date	Amount	From PayPal Account
20 July 2017	\$9,157.70	22 & 47F(1)
20 July 2017	\$9,157.70	
20 July 2017	\$9,157.70	
22 July 2017	\$7,229.70	
22 July 2017	\$7,229.70	
22 July 2017	\$5,880.10	
<b>TOTAL</b>	<b>\$215,386.50</b>	

53. Between May 2017 and July 2017, four invoices were issued from 22 PayPal account to Paladin's PayPal account, for 'Management and Consulting Services':

No.	Date	Description	Amount
Invoice 1 <sup>43</sup>	20 May 2017	Management and Consulting Services - 2017	\$85,000
Invoice 2 <sup>44</sup>	20 May 2017	Management and Consulting Services - 2016	\$91,800
Invoice 3 <sup>45</sup>	22 July 2017	Management and Consulting Services - 2017	\$7,500
Invoice 4 <sup>46</sup>	22 July 2017	Management and Consulting Services - 2017	\$7,500
<b>TOTAL</b>			<b>\$191,800</b>

54. Invoices 3 and 4 correlated with payments made from Paladin to 22 on 22 July 2017. There were no payments that directly correlated with invoices 1 and 2.
55. \$194,701.10 was transferred from 22 PayPal account into her Macquarie Bank cash management account, as follows:<sup>47</sup>

Date transferred	Date cleared	Amount
22 June 2017	23 June 2017	\$44,129.40
28 June 2017	30 June 2017	\$17,640.60
28 June 2017	30 June 2017	\$24,581.10
3 July 2017	7 July 2017	\$38,173.20
6 July 2017	10 July 2017	\$33,546.00
20 July 2017	21 July 2017	\$36,630.80
<b>TOTAL</b>		<b>\$194,701.10</b>

<sup>43</sup> CM 20#19740DOC

<sup>44</sup> CM 20#19741DOC

<sup>45</sup> CM 20#19742DOC

<sup>46</sup> CM 20#19743DOC

<sup>47</sup> CM 20#10743DOC



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56. The discrepancy between what Paladin paid [REDACTED], and what [REDACTED] received into her bank account, is likely due to a several transactions being reversed by Paladin prior to being paid. It remains unclear why these reversals might have occurred.
57. [REDACTED] gave evidence that she was not aware that she had a Paladin email address, or a PayPal account linked to a Paladin email address. She said that it was possible Mr Thrupp had been responsible for establishing these to facilitate the transfer of money to her through PayPal. [REDACTED] also thought it was likely Mr Thrupp was responsible for creating the Paladin email address and PayPal account in [REDACTED] name.<sup>48</sup>
58. [REDACTED] agreed that she had received approximately \$200,000 from Mr Thrupp via PayPal, and that this money was transferred to her Macquarie Bank home loan account and assisted her in fully repaying her home loan.<sup>49</sup>
59. She denied having undertaken any work for Paladin or assisting them with the tender to Home Affairs or otherwise with securing the contract.

47F(1)

60. [REDACTED] purchased 47F(1) - a one bedroom unit - in 1997. The property was refinanced on a number of occasions. By late 2017, the mortgage on the property secured \$219,048.87.
61. In November and December 2017, [REDACTED] used money received from Paladin to make the following payments off the mortgage, which fully discharged it:

Date	Amount
16 November 2017	\$120,000
19 December 2017	\$57,914
22 December 2017	\$40,000
<b>TOTAL</b>	<b>\$217,914</b>

62. According to [REDACTED] from about July 2016 until February 2018, a friend of her sister, [REDACTED] 22 & 47F(1) [REDACTED] [REDACTED] said that this was not a rental arrangement, but a boarding arrangement, as although it was a 1bedroom apartment and she did not sleep there, she could come and go. [REDACTED] paid board of \$250 per week.<sup>50</sup>
63. During this time, [REDACTED] resided with [REDACTED] at addresses in [REDACTED] and then [REDACTED]
64. [REDACTED] evidence was that notwithstanding these arrangements and that she was not residing there, 47F(1) [REDACTED] because she had an emotional attachment to the property.
65. During 2018, [REDACTED] and Mr Thrupp engaged interior designers to renovate the property. Most of the cost was paid by Mr Thrupp.

<sup>48</sup> CM 21#17159DOC<sup>49</sup> CM 22#20964DOC<sup>50</sup> CM 22#20964DOC

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47F(1)

66. In May 2018, Mr Thrupp funded the purchase, in the names of 22 of a three bedroom unit at 47F(1) – in the same complex as 47F(1) – for \$920,000.<sup>51</sup> Mr Thrupp, personally or through Paladin, provided the purchase money, and the conveyancing and legal fees and stamp duty totalling \$40,409. Mr Thrupp also funded the furnishing of the property.
67. 22 evidence was that Mr Thrupp had originally wanted to purchase the property through a trust, but due to complexities did so in the joint names of 22 22
68. On 12 July 2018, 22 granted a lease of 47F(1) to Paladin from 1 July 2018 to 30 June 2019 for rent of \$1000 per week paid quarterly. This was said to be for Paladin personnel to use the property for business trips to Canberra, as an alternative to staying in hotels which was expensive. 22 said that Paladin had been spending \$20,000 a year on accommodation, which 22 felt was an excessive cost to the company amounts (although it is significantly less than the rent of 47F(1) which equated to \$52,000 per annum).
69. In April 2019, Paladin requested a 6-month extension of the lease to December 2019, at the same rent of \$1000 per week.
70. Between 27 July 2018 and 2 March 2020, Paladin made the following bank transfers, totalling \$96,282.18 to 22

Date	Transferred amount
27 July 2018	\$13,000
30 August 2018	\$782.18
2 October 2018	\$13,000
10 January 2019	\$13,000
29 March 2019	\$13,000
27 June 2019	\$13,000
26 September 2019	\$13,000
19 December 2019	\$3,250
13 January 2019	\$7,650
4 February 2019	\$2700
2 March 2020	\$2700
2 March 2020	\$1,200
<b>TOTAL</b>	<b>\$96,282.18</b>

71. During the period 22 & 47F(1), they maintained the property. Paladin paid utilities under the lease, but 22 paid other outgoings.

<sup>51</sup> CM 20#26803DOC

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72. The property was sold on 24 July 2020 <sup>47F(1)</sup> [redacted] <sup>22</sup> [redacted] evidence was that she <sup>22</sup> [redacted] retained the proceeds of the sale. She was unable to say whether or not there was any expectation that the proceeds of the sale would be repaid to Mr Thrupp.

### Reporting obligations as a Home Affairs employee

#### Conflicts of interest

73. As an employee of Home Affairs, <sup>22</sup> [redacted] was a member of the Australian Public Service (APS) and subject to the APS Code of Conduct, including the obligation to declare conflicts of interests.
74. A resource on the Home Affairs intranet page in 2018 explained that conflicts of interest can take the following three forms:
- real or actual – where existing private interests directly conflict with current duties and responsibilities
  - potential – where private interests exist that could potentially conflict with official duties in the future
  - perceived – where it could appear that private interests improperly influence the performance of duties, whether or not they actually do.
75. The Home Affairs conflict of interest policy also required all staff to declare conflicts of interest using a provided Conflict of Interest Declaration Form, and to discuss any possible conflict of interest with a supervisor as soon as practicable.<sup>52</sup>
76. Additionally, during her employment at Home Affairs, <sup>22</sup> [redacted] undertook security training, which covered topics including values and integrity.<sup>53</sup>

#### <sup>22</sup> [redacted] conduct in reporting conflicts of interest

77. <sup>22</sup> [redacted] evidence was that she had orally declared her relationship with Mr Thrupp to her supervisor in the middle of 2017.<sup>54</sup> She said that she told her supervisor that <sup>47F(1)</sup> [redacted] was undergoing a contract negotiation with the Australian Border Force. She was unsure whether she informed her supervisor that the company was called Paladin or whether her supervisor provided any response or advice.<sup>55</sup>
78. Investigators spoke to <sup>22</sup> [redacted] supervisor, who recalled:<sup>56</sup>
- <sup>22</sup> [redacted] son had an affiliation with a company who provided services to Home Affairs. They vaguely recalled becoming aware of this through <sup>22</sup> [redacted] Their advice to <sup>22</sup> [redacted] "would have been" to declare this and they would not have advised her that she did not have to do anything about it;
  - The conversation with <sup>22</sup> [redacted] was casual with limited detail. They could not recall if <sup>22</sup> [redacted] had stated the name of the company or the nature of the work of the company;
  - They had no knowledge of <sup>22</sup> [redacted] receiving financial payments from the company, or that <sup>47F(1)</sup> [redacted] was a director and owner of the company;

<sup>52</sup> CM 20#19814DOC

<sup>53</sup> CM 20#20964DOC

<sup>54</sup> CM 20#20964DOC

<sup>55</sup> CM 20#20964DOC

<sup>56</sup> CM 21#47727DOC

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**OFFICIAL: SENSITIVE**

- d. If the company purchased a property for 22 they would expect that to be declared as a change in circumstance to Home Affairs;
  - e. At that time, the Employee Suitability Clearance process was being rolled out in the department, and there was a lot of messaging around reporting, integrity, and transparency. This messaging was being 'drummed into' staff.
79. Notwithstanding the vagueness of the supervisor's recollection, and the speculation as to what advice 22 would have been given, it is clear that there was a conversation in which 22 disclosed the relationship to the supervisor, as she claimed she had.
80. 22 acknowledged that the Home Affairs policy required conflict of interest declarations be made in writing and could not recall making a declaration in relation to Paladin in writing, stating, 'probably I was just too busy...' or that she didn't think about it.<sup>57</sup>
81. The investigation did not find any record of 22 having made a conflict of interest declaration in writing relating to:
- 47F(1) (Mr Thrupp's), position or involvement with Paladin,
  - the payments made to her by Mr Thrupp or Paladin,
  - the acquisition of the property at 47F(1)
  - her relationship with 22 or
  - her change in residential address.
82. 22 said that in her mind, while she did not retire until January 2019, she had finished at Home Affairs in April 2018 when she went on long service leave, and no longer had the obligation to report changes in circumstances.<sup>58</sup>

#### *AGSVA Security Clearance*

83. As part of her employment, 22 applied for and was granted AGSVA security clearances at various levels, 47F(1) ".<sup>59</sup> The holder of a security clearance has ongoing reporting requirements in relation to changes in personal circumstances. Under the heading "Reportable changes", the AGSVA website states (emphasis added):

*You should report only those events that may affect your suitability to hold a security clearance.*

Reportable changes include:

- change of name or identity including gender
- *changes in significant relationships*
- *changes of address or share-housing arrangements*
- *entering into, or ceasing, a marriage, domestic partnership or significant personal relationship*
- changes in citizenship or nationality

<sup>57</sup> CM 20#20964DOC

<sup>58</sup> CM 22#20964DOC

<sup>59</sup> CM 20#17695DOC

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- *changes in financial circumstances, like entering into a mortgage, incurring a significant debt, significant change to household income, receiving a lump sum payment or other financial windfall*
  - changes in health or medical circumstances
  - changes in criminal history, police involvement and association with criminal activity
  - involvement or association with any group, society or organisation
  - involvement with any individual that may be a security concern
  - disciplinary procedures
  - illicit or illegal drug use or alcohol problems
  - residence in a foreign country
  - relatives residing in a foreign country
  - suspicious, unusual, persistent, regular or ongoing contact with foreign nationals
  - changes in religious beliefs
  - security incidents
  - external business interests, including business activities with overseas individuals and entities
  - overseas travel
  - identity document replacement following a cyber-hack (such as driver's licence, passport, Medicare card).
84. 22 acknowledged that she was the holder of a security clearance, with the level changing over time; she was not aware of the level she held in 2017.<sup>60</sup> She acknowledged that as the holder of a security clearance she was under an obligation to report changes in her personal circumstances, including changes in her relationship and financial status.<sup>61</sup>
85. AGSVA records contained a single change of circumstances form submitted by 22 on 9 May 2014. The form reported 22<sup>62</sup>
- a. permanent residential address as being 47F(1) since 1 May 2014;
  - b. primary phone number, secondary phone number and email address, and
  - c. relationship status had changed (the end of a relationship with a previous partner).
86. 22 stated that she was unable to recall whether she declared her relationship with 22 to AGSVA.<sup>63</sup> The investigation did not find any record to suggest 22 made such a declaration.
87. 22 accepted that between July 2016 and February 2018 she did not report a change in her residential address to Home Affairs or AGSVA.

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<sup>60</sup> CM 22#20964DOC

<sup>61</sup> CM 22#20964DOC

<sup>62</sup> CM 21#50200DOC

<sup>63</sup> CM 20#20964DOC

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88. [22] accepted that she did not report a change of circumstances to AGSVA regarding:
- the receipt of money from Mr Thrupp in 2017 that was used to pay off the mortgage on [47F(1)]
  - the purchase of [47F(1)] in 2018 with money from Mr Thrupp, and
  - the receipt of rental income from either [47F(1)]
89. She stated this was because she did not think to do it.

## Consideration

### Abuse of office

90. 'Abuse of office' is not defined in the LEIC Act. It is a concept primarily used in the context of criminal law. It generally involves using one's office to dishonestly benefit oneself or another, or to dishonestly cause detriment to another.<sup>64</sup>
91. 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'.
92. 'Corruption of any other kind' concerns improper conduct connected with official duties that involves dishonesty or personal benefit. This category is a catch-all for corrupt conduct that does not fit into the other categories, but there may also be some overlap. It includes where a staff member has engaged in conduct that was:
- 'a deliberate act of dishonesty, breach of the law, or abuse of public trust or power that undermines or is incompatible with the impartial exercise of an official's powers, authorities, duties or functions';<sup>65</sup> or
  - 'a moral impropriety in, or in relation to, public administration'.<sup>66</sup>

### Payments from Paladin to [22]

93. Between May and July 2017, four invoices were issued ostensibly from [22] Paladin PayPal account to Paladin for consulting services, and Paladin made payments totalling just under \$200,000 to [22]. This preceded Home Affairs commencing to engage with Paladin to procure garrison services, which did not commence until about late August or early September 2017.
94. However, [22] was unaware of the PayPal account created in her name. The evidence was that the account had been created by someone in Paladin, likely Mr Thrupp, to facilitate the payment of money to [22]. The evidence also indicated that [22] did not generate the PayPal invoices ostensibly issued in her name.
95. Mr Thrupp had communicated to [22] his intention to pay [22] mortgage for [47F(1)]. This was also [22] understanding of why the payments were made to her. [22] used the money to discharge her mortgage. The amounts

<sup>64</sup> See eg Criminal Code (Cth) s 142.2(1).

<sup>65</sup> LexisNexis, Encyclopaedic Australian Legal Dictionary (online at 15 March 2021) Corruption.

<sup>66</sup> *Independent Commission Against Corruption v Cunneen* (2015) 256 CLR 1, 32 (Gageler J).

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paid into 22 PayPal account were not for any work she completed for Paladin, but payments by or on behalf of 47F(1) Mr Thrupp, to assist her in paying her mortgage, and she understood them to be paid on that basis.

96. During the tender and procurement process, 22 was employed in a work area within Home Affairs which had responsibility for the Department's Annual Reporting requirements. While there was evidence that 22 had in the past worked in areas of which dealt with reviews relating to detention centres and immigration, there was no evidence that she had any knowledge that would assist Paladin in the tender, was in any position to influence decision-making about it, or had any involvement whatsoever in it. Nor was there any evidence that she had provided any information to Paladin relevant to the tender.
97. The allegation that 22 used her position as an employee of the Department of Home Affairs to dishonestly obtain a benefit for herself or to assist Paladin to secure the garrison services contract is unsubstantiated. Indeed, the timeline and the nature of her duties at the time renders it practically impossible that she did so.
98. However, the investigation raises issues whether:
  - a. 22 failed to disclose a potential conflict of interest arising from her relationship with both 22 Mr Thrupp, and her partner 22 and their connection to Paladin, in accordance with Home Affairs procedures; and
  - b. 22 failed to disclose the following changes in her circumstances, as required of a holder of an AGSVA security clearance and a staff member of the Department of Home Affairs:
    - the commencement of her relationship with 22
    - the change in her primary residence 22
    - money received from Mr Thrupp via Paladin accounts,
    - the acquisition in her name of 47F(1) and
    - rental income received from the leasing of the two 47F(1) units.

#### **Failure to declare potential conflict of interest**

99. 22 did not formally declare to Home Affairs her relationship with Mr Thrupp who was a director of Paladin which was negotiating a contract with Home Affairs, or with 22 who was assisting Paladin to do so.
100. As has been noted, from December 2016 to April 2017, 22 worked in a policy development team; from about April 2017 until late November 2017, in performance evaluation; from late November 2017 until April 2018, in a governance and policy area of the department, focused mainly on preparing the Home Affairs Annual Report; and from about April 2018, she took long service leave until 10 January 2019, when she retired.
101. In none of those positions did 22 have responsibilities relevant to the award of the garrison services contract, nor was she in a position to influence it. Her personal relationships with Mr Thrupp and 22 and their interest in Paladin did not create even a potential conflict of interest, in circumstances where her duties were in a different domain and she had no capacity to influence the award of a contract to Paladin. In other words, assuming that those relationships gave her a relevant "interest" in the award of a contract to Paladin, she had no relevant duty that conflicted with it. Moreover, she informally declared the relationships to her

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supervisor; she emphasised to Mr Thrupp the need for Paladin to disclose the relationship, and Paladin in fact did so.

### **Failure to disclose changes in circumstances**

102. It appears that while an employee of Home Affairs, 22 [REDACTED] did not report changes in her circumstances to Home Affairs or to AGSVA, in respect of:
- changes in her relationship status (to a personal relationship with 22 [REDACTED] and living arrangements (in residing with him 47F(1) [REDACTED]) (by about 2016);
  - changes in her financial circumstances, by receipt of board from 47F(1) [REDACTED] (from about July 2016 until February 2018);
  - changes in her financial circumstances, by receipt of gifts of money (in June and July 2017) and property (in May 2018) from Mr Thrupp; and
  - changes in her financial circumstances, by entry into a lease with Paladin in respect of 47F(1) [REDACTED] (in July 2018).
103. Although the reporting obligation is limited to “*events that may affect your suitability to hold a security clearance*”, at least the change in her relationship status and cohabitation with 22 [REDACTED] and the receipt of substantial gifts of money and property from 47F(1) [REDACTED] were at least arguably reportable changes of circumstances. However, as 22 [REDACTED] stated, from April 2018 she was on long service leave pending retirement and according to her considered that she had no further obligation to make declarations of interest or changes in her circumstances. In all the circumstances – including that her new partner was himself a SESB1 officer; that the changes in her financial circumstances were not adverse, but improved her financial position; and that the donor 47F(1) [REDACTED] (not a stranger, nor a foreign national) – while, given her notified change of circumstances that she was no longer in a previous relationship suggests she should have known that at least her relationship with 22 [REDACTED] ought to have been reported, 22 [REDACTED] explanation that she did not advert to the need to notify these changes in circumstances is understandable. In any event, the non-disclosure does not appear to have been intentional, let alone dishonest or corrupt.

### **Findings and conclusion**

104. The allegation that 22 [REDACTED] abused her office as an employee of the Department of Home Affairs to dishonestly obtain a benefit for herself or to assist Paladin to secure the garrison services contract is unsubstantiated. Indeed, the evidence establishes that she did not do so.
105. 22 [REDACTED] did not fail to disclose a potential conflict of interest arising from her relationship with both 47F(1) [REDACTED] Mr Thrupp, and her partner 22 [REDACTED] and their connection to Paladin, in accordance with Home Affairs procedures, as given her position and duties at the relevant time, there was no potential conflict.
106. Although strictly 22 [REDACTED] may have failed to notify reportable changes of her circumstances to Home Affairs and AGSVA, given the nature and timing of those changes her explanation that she did not advert to the need to notify them is understandable. In any event, the non-disclosure does not appear to have been intentional, let alone dishonest or corrupt.

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107. To the extent that there is evidence of any failure to report a change of circumstances, it is not such as to engage the obligation in s 146 of the LEIC Act to bring it to the notice of the head of the relevant agency.

22



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

16/01/2024

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National Anti-Corruption Commission

## NSAP Minutes

### NACC Senior Assessment Panel (NSAP)

<b>Date</b>	Thursday, 18 January 2024
<b>Time</b>	1000 - 1200
<b>Location</b>	Wellington Room, Level 3, 3-5 National Circuit, Barton / Microsoft Teams
<b>Attendees</b>	Commissioner Brereton (Chair), Deputy Commissioner Gauntlett, Deputy Commissioner Rose, CEO Philip Reed, <sup>22</sup> (GM CPEE), <sup>22</sup> (GM Legal), <sup>22</sup> (Acting GM Operational Capabilities), <sup>22</sup> (Acting GM Operations), <sup>22</sup> (Director Intake and Triage), <sup>22</sup> (Assistant Director Assessments), <sup>22</sup> (Senior Investigator), <sup>22</sup> (Senior Investigator), <sup>22</sup> (Investigator).

Item No	Topic	Action	Presenter
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<sup>22</sup> - Not Relevant

NSAP Minutes – 18/01/2024



## Actions

Item No	Action	Deadline	Responsible
22 - Not Relevant			

22 - Not Relevant			
11	CASE202441 – Home Affairs 22 – Correspondence to go to Secretary of Home Affairs communicating investigation decision.	25 Jan 24	Commissioner BRERETON
22 - Not Relevant			

22 - Not Relevant



22 - Not Relevant



22 - Not Relevant



22 - Not Relevant



22 - Not Relevant



22 - Not Relevant





22 - Not Relevant



22 - Not Relevant



**9. CASE202441 – HOME AFFAIRS –** <sup>22</sup>



22 - Not Relevant



22 - Not Relevant



**DECISION: The Commission to undertake a corruption investigation into the matter under s41(1)(a).**

- The Commissioner to write to the Secretary of the Department.
- 22 - Not Relevant   


22 - Not Relevant



	22 - Not Relevant
6.	

22

**From:** 22 @homeaffairs.gov.au>  
**Sent:** Wednesday, 17 January 2024 10:14 AM  
**To:** 22  
**Cc:** Secretary  
**Subject:** RE: Operation BANNISTER - Investigation report [SEC=PROTECTED]

PROTECTED

PROTECTED

Thanks 22 acknowledged.

I will provide to Stephanie today.

Cheers, 22

22 to Stephanie Foster  
Secretary  
Department of Home Affairs  
Ph: 22  
E: 22 @homeaffairs.gov.au

PROTECTED

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**From:** 22  
**Sent:** Tuesday, 16 January 2024 4:52 PM  
**To:** 22  
**Cc:** Secretary  
**Subject:** Operation BANNISTER - Investigation report [SEC=PROTECTED]

OFFICIAL:Sensitive

Dear 22

Please find attached correspondence and report in relation to Operation BANNISTER for the Secretary's information.

With thanks,

22

The Hon PLG Brereton, AM, RFD, SC  
Commissioner | National Anti-Corruption Commission  
22, Barton  
PO Box 605, Canberra, ACT 2601  
Phone: 22 | Email: 22 @nacc.gov.au



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22

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**From:** 22 [redacted]@homeaffairs.gov.au>  
**Sent:** Wednesday, 24 January 2024 11:58 AM  
**To:** 22 [redacted]  
**Subject:** RE: Telephone call with Commissioner Brereton [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

Thanks 22 [redacted]

2:15 pm works perfectly. The Commissioner can call Stephanie on 22 [redacted] – I have sent a calendar invite to reflect.

Cheers, 22 [redacted]

22 [redacted] to Stephanie Foster  
Secretary  
Department of Home Affairs  
Ph: 22 [redacted]  
E: 22 [redacted]@homeaffairs.gov.au

OFFICIAL

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**From:** 22 [redacted]  
**Sent:** Wednesday, 24 January 2024 10:42 AM  
**To:** 22 [redacted]  
**Subject:** RE: Telephone call with Commissioner Brereton [SEC=OFFICIAL]

OFFICIAL

Thank you 22 [redacted]

2.15 would be perfect.

Is there a number he should call? Or would the Secretary like to phone the Commissioner's number?

22

---

**From:** 22 [redacted]@homeaffairs.gov.au>  
**Sent:** Wednesday, January 24, 2024 10:34 AM

To: <sup>22</sup> [REDACTED] <[\[REDACTED\]@nacc.gov.au](mailto:[REDACTED]@nacc.gov.au)>

Subject: RE: Telephone call with Commissioner Brereton [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

Hi <sup>22</sup> [REDACTED]

Happy to be as flexible as possible, could I test the following times?:

11 am , 11:30, 2:15pm or 4: 15pm.

Would any of these work at your end?

Cheers, <sup>22</sup> [REDACTED]

<sup>22</sup> [REDACTED] to Stephanie Foster

Secretary

Department of Home Affairs

Ph: <sup>22</sup> [REDACTED]

E: <sup>22</sup> [REDACTED] <[\[REDACTED\]@homeaffairs.gov.au](mailto:[REDACTED]@homeaffairs.gov.au)>

OFFICIAL

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From: <sup>22</sup> [REDACTED] <[\[REDACTED\]@nacc.gov.au](mailto:[REDACTED]@nacc.gov.au)>

Sent: Wednesday, 24 January 2024 8:52 AM

To: <sup>22</sup> [REDACTED] <[\[REDACTED\]@homeaffairs.gov.au](mailto:[REDACTED]@homeaffairs.gov.au)>

Subject: Telephone call with Commissioner Brereton [SEC=OFFICIAL]

OFFICIAL

Good Morning <sup>22</sup> [REDACTED]

I am hoping to find a time this afternoon for Commissioner Brereton to have a brief telephone conversation with Secretary Foster.

Would that be possible, please?

<sup>22</sup> [REDACTED]  
<sup>22</sup> [REDACTED]

The Hon PLG Brereton, AM, RFD, SC

Commissioner | National Anti-Corruption Commission

<sup>22</sup> [REDACTED], Barton

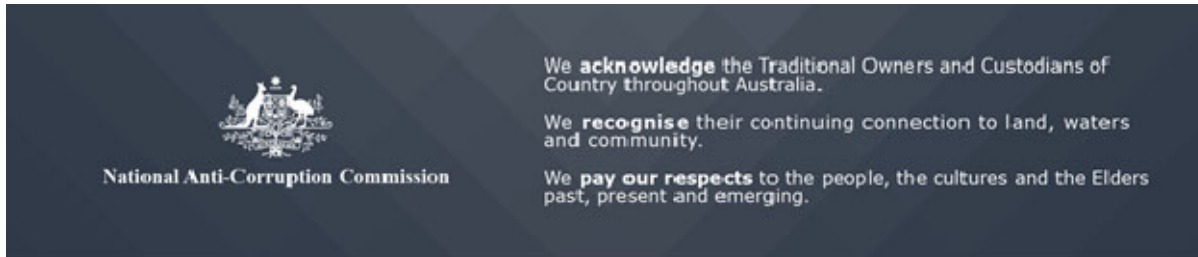
PO Box 605, Canberra, ACT 2601

Phone: <sup>22</sup> [REDACTED] | Email: <sup>22</sup> [REDACTED] <[\[REDACTED\]@nacc.gov.au](mailto:[REDACTED]@nacc.gov.au)>





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