

Investigation into an allegation of corrupt conduct by Shaylee Sten

Public statement

June 2021

Office of the
Independent
Commissioner
Against
Corruption



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Summary of the report

This investigation was undertaken after a report was made to my office alleging corrupt conduct by Ms Shaylee Sten. The report alleged she falsified referee details and impersonated her own referee in order to obtain a position as a public officer in the Department of Territory Families, Housing and Communities (at the time, Territory Families).

After reviewing the matter and evidence available to me, I make the following findings of corrupt conduct against Ms Sten:

1. By section 10(4) of the ICAC Act conduct is corrupt conduct if it is engaged in by a person that could impair public confidence in public administration and that involves:

“(e) dishonestly obtaining or retaining employment or appointment as a public officer”.

2. Consequent upon my findings set out below, Ms Sten obtained employment as a public officer dishonestly, in that she:

- a) provided a false phone number for a named referee
- b) pretended to be the named referee when a phone call was made to that number seeking a referee report in respect of a job for which she had applied
- c) falsely said that her previous employer would *“like to have kept her”* when she knew that she had been dismissed as a result of an internal investigation into fraud
- d) dishonestly failed to disclose that she had been dismissed for matters relating to fraud on her part.

Resume and recruitment fraud is a common issue in recruitment. The New South Wales ICAC estimates that 20-30% of job applications contain false information, ranging from minor omissions to serious falsehoods¹.

There is a serious improper conduct risk associated with hiring staff who have lied or provided false statements in job applications. Hiring such people can lead to further corrupt conduct, poor provision of services, affect an agency’s reputation and impact morale. There have been a number of cases

¹ <https://www.icac.nsw.gov.au/newsletter/issue51/employment.html>

of officials with fraudulent or non-existent qualifications, who obtained positions as public officers falsely and went on to commit other offences.

This report provides yet another example of the risks associated with employment and recruitment processes and practices. If risk-based screening processes were in place, more rigour could have been applied to the recruitment process before Ms Sten was appointed.

The department took swift, and appropriate, actions to investigate the matter and dismiss Ms Sten.

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Glossary

Acronyms and abbreviations

CEO – Chief Executive Officer

COA – Certificate of Aboriginality

DTFHC – Department of Territory Families, Housing and Communities (formerly Territory Families)

HR – Human Resources

ICAC – Independent Commissioner Against Corruption

ICAC Act – *Independent Commissioner Against Corruption Act 2017* (NT)

NLALC – Ngulingah Local Aboriginal Land Council

NTPS – Northern Territory Public Sector

NTG – Northern Territory Government

OCPE – Office of the Commissioner for Public Employment

PSEMA – *Public Sector Employment and Management Act 1993*

Definitions

Corrupt conduct – pursuant to section 10 of the *ICAC Act*

eRecruit – Northern Territory Government online recruitment system

Investigation Report – a report issued under section 50 of the *ICAC Act*

Public officer – pursuant to section 16(2) of the *ICAC Act*

Request to Fill or **RTF number** – A number allocated to individual roles in eRecruit

Persons mentioned in this Report

The identity of some persons referred to in this Report have been protected using the pseudonyms.

Public officer A – Employee, Department of Territory Families, Housing and Communities

Mr Ken Davies – Chief Executive Officer, Department of Territory Families, Housing and Communities

Mr Ken Fleming QC – Independent Commissioner Against Corruption

Person B – Manager, Larrakia Nation

Public officer C – Senior executive, Department of Territory Families, Housing and Communities

Ms Shaylee Sten – former Recruitment Officer, Department of Territory Families, Housing and Communities

Person C – Executive, Larrakia Nation Aboriginal Corporation

Mr Quintin Sten – Husband of Shaylee Sten

Legislation

Independent Commissioner Against Corruption Act 2017

Public Sector Employment and Management Act 1993

ICAC jurisdiction and investigation methodology

1. On 16 December 2019, the Independent Commissioner Against Corruption (ICAC) received a report alleging that a person by the name of Ms Shaylee Sten had engaged in corrupt conduct.
2. The report referred to the fact that Ms Sten, a former Department of Territory Families, Housing and Communities (DTFHC) employee, had provided false referee details for a position with DTFHC. Ms Sten impersonated her referee when contacted by the recruitment panel (the panel) and as a result, she was successful in the position.
3. An investigation into that report of suspected corrupt conduct was undertaken by me.

Jurisdiction

4. Pursuant to section 10(4)(e) of the *Independent Commissioner Against Corruption Act 2017* (NT) ('ICAC Act'), conduct is **corrupt conduct** if it is conduct engaged in by a person that could impair public confidence in public administration and that involves:

“(e) dishonestly obtaining or retaining employment or appointment as a public officer”.

5. On 29 July 2019 Ms Sten submitted an application for the position of recruitment officer, Administrative Officer level 6 (AO6) with DTFHC in eRecruit under Special Measures priority consideration for Aboriginal applicants. She commenced in this position on 26 August 2019.
6. DTFHC is a public body pursuant to section 16(1)(a) of the ICAC Act.
7. Even though Ms Sten was not a public officer at the time of any alleged dishonesty, I may investigate the matter pursuant to section 10(4) of the ICAC Act.

Examinations

8. Examinations in relation to this matter were not required.

Procedural obligations

Privilege

9. In the course of this investigation I have respected matters of confidentiality and privilege pursuant to Part 5 of the ICAC Act, including:
 - client legal privilege
 - privilege against self-incrimination.

Rules of evidence and natural justice

10. By section 60 of the ICAC Act I am not bound by the rules of evidence in the conduct of an investigation.
11. I am therefore concomitantly aware of the particular need to give natural justice to any person who is the subject of an investigation and report.
12. If I, in a report, intend to make adverse findings about a person then, by section 50(2) of the ICAC Act, I *“must give the person ... a reasonable opportunity to respond to the adverse material and include a fair representation of the response in the report.”*
13. A draft copy of the final investigation report was provided to Ms Sten on 10 May 2021, to ensure she had reasonable opportunity to respond to any adverse evidence and adverse findings in the draft report. A response was not received from Ms Sten by the due date. Ms Sten was further contacted on 28 May 2021 via email and on 11 June 2021 via phone where she confirmed she would not be providing a response.

Standard of proof

14. In all of my considerations of the available evidence in this investigation I have used the balance of probabilities as the standard of proof required to establish any relevant fact.
15. I have taken into account, in the use of that standard of proof, the gravity of the allegations against the respective people and bodies against whom findings are made, and the consequences for those people and bodies as a result of this investigation.

Assessment of evidence

16. I have followed carefully all of the evidence in this investigation, and any response from each and every person and body against whom adverse findings have been made in this report, including unsworn responses.
17. In assessing the weight of any evidence, I have taken into account:
 - any inculpatory evidence
 - any exculpatory evidence
 - contemporary records such as emails and phone messages
 - documentary evidence.
18. Where I have doubted the veracity of evidence I have sought assistance from contemporary records to resolve these doubts.

Background

19. On 16 December 2019 I received a report about this matter.
20. The basis of the report is best described in a letter to Ms Sten dated 22 November 2019 from Mr Ken Davies, Chief Executive Officer (CEO), DTFHC, in which the following is said:

***“Section 49(k) - An employee who, in relation to an application of the employee for employment, promotion or transfer to perform duties in an Agency or at any stage in the selection process, provides information to the CEO or the CEO's representative that the employee knows, or ought reasonably to know if false or misleading, commits a breach of discipline.*”**

Particulars of Breach:

You are an ongoing employee of Territory Families employed as a Recruitment Officer in position number 32742, at the Administrative Officer level 6 (AO6) designation, first increment, attracting a salary of \$90,361.00 per annum. You commenced in this role on 26 August 2019;

It is alleged that:

- a) *On 29 July 2019 you submitted an application for the vacancy of AO6 Recruitment Officer, Greater Darwin Region, Territory Families, eRecruit request to fill (RTF) reference number 169295, under Special Measures priority consideration for Aboriginal applicants;*
- b) *On 12 August 2019, you had a telephone discussion with the selection panel Chairperson, and Recruitment Officer for Greater Darwin Region, in regards to the panel seeking to obtain additional referee contact details, specifically for a current or previous direct supervisor who could comment on your demonstrated on the job performance in previous or recent employment;*
- c) *The Chairperson confirmed the panel's request in writing via email to you at 10:29am on that same date. A short time later on that same day, at 12:24pm, you responded to the Chair by email providing the contact details for Person B, purporting their title to be Aged Care Manager/Acting CEO of the Larrakia Nation Aboriginal Corporation (Larrakia Nation), and their work phone number to be mobile telephone number **xxxx xxx 503**, as per **Attachment A**;*

- d) *At 1pm on 13 August 2019, relying upon the referee telephone contact details you provided, the panel called **xxxx xxx 503** and conducted a referee interview with a person who purported to be Person B and who proceeded to provide an employment reference for you. The panel recorded notes of the discussion as part of the selection process;*
- e) *On the basis of the referee information obtained via the nominated contact details for your referees, the selection panel made a recommendation to the delegate to select you for ongoing employment. The delegate approved the panel's recommendation and you were offered and accepted ongoing employment with Territory Families, in position number 32742, from 26 August 2019;*
- f) *Upon learning that you had recently been employed with Territory Families, the CEO of Larrakia Nation, Mr Robert Cooper, raised concerns directly with the Executive Director Greater Darwin Region, Territory Families, Ms Gabrielle Brown, that the selection panel who undertook your recruitment and selection process resulting in your NTPS employment may not have uncovered information relevant to your suitability for the role with Territory Families;*
- g) *The selection panel therefore sought to return to your referee, Person B, whom the panel were of the belief had attested to your performance in your former role with Larrakia Nation, to seek additional information and clarify aspects of the reference that had been provided;*
- h) *Numerous attempts on the part of the panel to contact Person B on **xxxx xxx 503**, went unanswered. The panel then obtained Person B's business contact details and direct landline;*
- i) *On 12 November 2019, the panel spoke to Person B via their landline, during those discussions they advised the panel they had no knowledge or awareness of having provided any employment reference for you;*
- j) *On 21 November 2019 Person B provided a written statement confirming that they **'DID NOT** provide a reference to Territory Families for Shaylee Sten at 1.30pm on 13 August 2019'. Nor did they 'ever provide any written correspondence in relation to provision of any references for Shaylee Sten.' They also confirmed that the mobile number*

xxxx xxx 503 does not belong to them, is completely unfamiliar to them, and they have not ever had any access to that number.

Based on the matters particularised above, I have reasonable grounds to suspect that, through your application for employment, including your communications with the recruitment and selection panel undertaking the selection process, you provided information to the CEO or the CEO's representative (being the selection panel) that you knew, or ought reasonably to have known was false or misleading, in breach of section 49(k) of the Act."

21. That same letter provided an opportunity for Ms Sten to respond to the facts set out within 14 days of receipt of the letter.
22. Ms Sten was suspended without remuneration by operation of that letter.
23. That letter was hand-delivered to Ms Sten's address on 22 November 2019.
24. The letter also contained an opportunity for Ms Sten to respond, within seven days, to the suspension without remuneration.
25. It would appear that no response was received by DTFHC from Ms Sten within the timeframes stipulated in the letter, and on 3 December 2019 a letter was hand-delivered to Ms Sten's address suspending her employment, without pay.
26. On 9 December 2019, Ms Sten sent an email to Mr Davies, tendering her resignation effective immediately. She did not respond to the allegations contained in the letter of 22 November 2019.
27. On 12 December 2019, Mr Davies sent a letter containing a notice of intention to terminate Ms Sten's employment. The basis of that termination was a finding that the allegations (b) to (k) in the letter dated 22 November 2019 had been made out. That letter was hand delivered to Ms Sten's address, but because no one appeared to be present at the address, it was left in a sealed envelope in the letter box. The letter provided a further opportunity for Ms Sten to make submissions about the findings within seven days of the date of the letter. Further, the letter informed Ms Sten that her resignation was not accepted.
28. On 20 December 2019 the Acting CEO of DTFHC, Ms Nicole Hurwood, wrote to Ms Sten terminating her employment pursuant to section 49C(1)(c) of the *Public Sector Employment and Management Act 1993* (PSEMA). She also noted in that letter that Ms Sten had not provided a response, even though she was entitled to.

Investigation

29. I am in receipt of a statutory declaration from Person C, an executive at Larrakia Nation Aboriginal Corporation (Larrakia Nation) dated 14 January 2020.
30. I am informed by that statutory declaration:
- Ms Sten was employed with Larrakia Nation in August 2018 as the Human Resource (HR) Manager.
 - Ms Sten was originally employed in a short-term capacity because the usual occupant was on maternity leave without pay.
 - When the occupant decided not to return to work, Ms Sten was employed on a fixed-term contract in that position with a start date of 20 August 2018.
 - Ms Sten provided *'New Employee Details'* which included her home address, bank details, superannuation details and an emergency contact, her husband, Mr Quintin Sten, with the phone number xxxx xxx 503 [NB: the same number Ms Sten provided as Person B's phone number].
31. Person B, Manager, Larrakia Nation, provided a statutory declaration dated 14 January 2020. The following facts were contained in that statutory declaration:
- Person B was aware of an employee, Ms Sten, but they were not responsible for supervising Ms Sten except for a few weeks in April and May 2019 when they were the jointly acting CEO.
 - They were aware that Ms Sten was *'let go'* from Larrakia Nation in June 2019 as a result of investigations into allegations of fraud on Ms Sten's part.
 - On Friday 15 November 2019 they received 20 phone calls and 3 text messages from Ms Sten on their personal mobile phone, while they were at a conference. The calls were not answered. The calls were received from a phone number which they knew to be Ms Sten's number, because it was a number saved in their contacts.
 - Ms Sten had contacted Person B's work colleagues to seek clarification of Person B's phone number.
 - On 18 November 2019, in a shopping centre, Ms Sten approached Person B and pulled her aside into a vacant aisle, and advised Person B that she had made a huge mistake at her workplace [DTFHC] and didn't know what to do. She informed Person B that she had used Person B's name as a referee and had put down another phone number which was not Person B's number. Ms Sten queried

whether DTFHC were trying to contact Person B and said that DTFHC had been ringing the number she had falsely provided as Person B's.

- Ms Sten advised that the phone number which she had falsely provided had been contacted and a person had given a referee report to DTFHC. She did not tell Person B who had answered the call.
- Person B was very upset and asked Ms Sten:

“Did this person impersonate me whilst providing a reference check?”

Ms Sten admitted that the person had done so.

- Ms Sten told Person B that she was concerned at the ramifications of what she had done. She did not intend to bring it up with DTFHC, and if they approached her she was going to act surprised and say that she must have accidentally left another number on her resume when she put her name down.
- When Person B returned to work on Monday 18 November 2019 she told Person C of the conversation.
- Person B was contacted by Public officer A from DTFHC, who initially asked why Person B had said certain things in the reference about Ms Sten. Person B asked Public officer A what phone number they had spoken to referee on and they repeated the number, xxxx xxx 503.
- Person B confirmed that that was not their phone number and that they had never used such a number. They did not know Public officer A before the call and they did not provide a reference for Ms Sten at any time to DTFHC.

32. I am provided with a document titled ‘AO6 RECRUITMENT OFFICER, REFEREE QUESTIONS’. The date is recorded as 13 August 2019 and the phone number xxxx xxx 503 is listed. It is listed that the applicant for the referee check was Ms Sten, and the referee was Person B.

33. The initial document was hand-written, but I have been provided with a typed version of that document made shortly after the phone call, and from the hand-written document. That document is set out here:

██████████ for Shaylee Sten

13 August 2019

1. Acting CEO, from Nov 2018 to July 2019. She was human resource manager. Covers all aspects of employees, workers comp, payroll, recruitment, case management.
2. Larrakia Nation is diverse with conflicts within family clans. Developed and implemented a recruitment policy, had to bring in equity and fairness, has done a best practice guide for recruitment and case management that people understand for managers. Shows best practice and methods in the policy. Was very informative, included a scope, the employment, classification, secondment, transfers, record keeping. She simplified the process and delivered training to the managers, meeting the cultural observations in having a Larrakia nation people. Is she on panels herself? Yes, the trainee position all the way up to the Executive. Is highly skilled in the area and selection. She types up the report at the end.
3. Legislative requirements – eg merit based recruitment, staff entitlements etc. Has a HR background. Is diverse in her knowledge across a number of awards. Is across the EBG we have a Larrakia. She always has contacts like the fair work Ombudsman etc. She does staff entitlements.
4. Communication skills - has a high level of time management skills, works to the best of her ability. She has communicated with people of all levels and diverse backgrounds and deals with everyone in the same way and same context.
5. Written communication – high level report writing, policy, guidelines? She is a HR generalist, she covers things for us as policy and procedures, came into Larrakia and did the recommendation report. Has made it a more personalised process so she has. She populates a generic template she does for selection report. Has done MOU and MOA and contractual contracts for full time, casual, volunteers. Reports who they are, where they come from, what the interview was like, the panel score, etc, reports are usually 2-3 pages.
6. Analytical and Problem Solving skills? She wears many hats, she is an investigation person she demonstrated through collating data from employees, we have to do a training needs analysis, examining feedback

7. on employees performance reviews, she identified needs, and delivered on those things. She would go above or beyond to source that training.
8. Diverse cultures – she is Aboriginal and has a cross cultural awareness of those she works with, shows it by her knowledge and understanding of people’s background and respects people for their culture. We have a code of conduct which she adheres to.
9. Larrakia got additional funding for additional patrol staff, to engage and recruit 15 new patrol officers, had a week to engage people to get them started for a media release. Shaylee follows the process and doesn’t shortcut. She networks and had a pool of candidates ready to go. She has knowledge and understanding of the job market in Darwin. She engaged those 15 patrol officers, to get them on the roll running. She is very good at time management, can prioritise her work appropriately.
10. Team player or independently? She can be both, autonomous and with the team to achieve outcomes which had to be met within the organisation.
11. Works with colleagues, works under pressure, confidentiality – she communicates openly and honestly. Accepts other values and beliefs and opinions. Is open door policy. Is good at working under pressure and strives to succeed., can multitask. Respects and protects employee information, has a high understanding of confidentiality.
12. What systems does she use in the job she has now, MYOB, Elmo, has used TRIM, when she came everything was manual, she migrated and brought on board Elmo liaising with IT. Is a quick learner and like every system they are all similar in different ways. ELMO is a HR system, and for employer training.
13. Attendance/punctuality – not an issues, always committed, goes out of her way to help others, is punctual and delivers on time without fail. Thinks she would be a great asset to TF. She was in a role for someone who was on leave without pay. We would have liked to keep her but the person is returning and we don’t have the funding.
14. Would she get sick of just recruitment? It is a continual cycle in abandonment issues, case management. 50-60% of time is in recruitment, reviewing PD, looking for the right person. Is a people person. She has innovative ideas, and has the ability to deliver and aims to get it right the first time.

34. Paragraph 13 above deals with attendance/punctuality of Ms Sten while she was employed with Larrakia Nation. The last sentence of the record of what the 'referee' was saying is of particular note:

"We would have liked to keep her but the person is returning and we don't have the funding."

35. The job for which Ms Sten applied was a Special Measures position. The panel had shortlisted four applicants who fell within Special Measures, including Ms Sten. Ms Sten had provided a document titled 'Confirmation of Aboriginality' for Ms Shaylee Maree Sten. The document was dated 17 December 2013 and had the common seal of the Ngulingah Local Aboriginal Land Council (NLALC) affixed to it.

36. On 7 January 2020, a request was made to NLALC, to confirm whether or not the certificate of Aboriginality (COA) was in fact issued by NLALC. The response received, that same day, was that NLALC could not confirm or deny that the COA was issued by the former CEO in 2013. They did however confirm that the seal was the common seal of NLALC, but that the letterhead was different to the NLALC's letterhead.

37. While that document is suspicious, I cannot take the matter of the authenticity of the document any further.

38. Ms Sten was appointed as the Recruitment Officer (AO6) for DTFHC in a full time capacity. The position number was 32742 and the RTF was 169295. In the Selection Outcome Advice for All Applicants (SOAFAA) there is a reference to 'referees' having attested to Ms Sten's abilities. I have knowledge only of one referee report, that being the report detailed above.

Factual findings

39. On the basis of the evidence above I make the following findings on the balance of probabilities:

- a) Ms Sten was dismissed from her previous employment with Larrakia Nation as a result of an internal investigation into her conduct. She was dismissed on 7 June 2019.
- b) In July 2019, Ms Sten applied for the Recruitment Officer (AO6) position with DTFHC.
- c) On 12 August 2019 the selection panel noted that Ms Sten's application did not contain a referee contact specifically for a current or previous direct supervisor who could comment on her demonstrated job performance in her recent employment.
- d) Ms Sten was asked, by phone, that day, to provide contact details for a referee.
- e) Ms Sten, sent an email to the relevant DTFHC officer providing contact details for Person B.
- f) Ms Sten provided the work phone number for Person B as xxxx xxx 503.
- g) That was in fact the phone number which Ms Sten gave to Larrakia Nation as her emergency contact, which was the phone number of her husband, Mr Sten.
- h) A phone call to that number was answered on 13 August 2019 and a 25 minute discussion took place, and is recorded as referee questions and answers. I refer to the document extracted at paragraph 15.
- i) The person to whom the call was made, when asked about Ms Sten's attendance and punctuality, said, among other things:

"We would have liked to keep her but the person is returning and we don't have the funding."
- j) That statement is demonstrably false, given the fact that Ms Sten was dismissed after an internal investigation into fraud on her part.
- k) Consequent upon the answer given by Ms Sten to Person B on 18 November 2019, the only reasonable inference to be drawn from the circumstances and the use of the phone number was that Ms Sten deliberately provided a false phone number in respect of Person B, and further, she was the person who answered that phone number when DTFHC called on 13 August 2019 at 1.00pm.

- l) Ms Sten's subsequent behaviour when confronted with letters from DTFHC on 22 November 2019, 3 December 2019, 12 December 2019 and 20 December 2019 lead me to the inference that Ms Sten knew that her behaviour was dishonest, and she chose to provide no exculpatory evidence.
- m) The sole response from Ms Sten over that period of time was on 9 December 2019 in an email to a DTFHC officer, which said:

"I Shaylee Sten wish to resign from my current position Recruitment Officer (AO6), position number 32742 with Territory Families, as of today 9 December 2019 as I will be relocating interstate due to family commitments.

Thank you for all your support whilst employed with the department."

- n) Information provided to me is that Ms Sten has not relocated interstate, and remains at the address which she had given to DTFHC as her home address.
- o) Ms Sten's employment with DTFHC was terminated on 20 December 2019.

Findings of corrupt conduct

40. I make the following findings of corrupt conduct against Ms Sten.
41. By section 10(4) of the *ICAC Act* conduct is corrupt conduct if it is engaged in by a person that could impair public confidence in public administration and that involves:
- “(e) dishonestly obtaining or retaining employment or appointment as a public officer”.*
42. Consequent upon my findings set out in paragraph 41 above, Ms Sten obtained employment as a public officer, dishonestly, in that she:
- e) provided a false phone number for a referee
 - f) pretended to be Person B when a phone call was made to that number seeking a referee report in respect of job for which she had applied
 - g) falsely said that Larrakia Nation would *“like to have kept her”* when she knew that she had been dismissed as a result of an internal investigation into fraud
 - h) dishonestly failed to disclose that she had been dismissed for matters relating to fraud on her part.

Corruption prevention

43. Resume and recruitment fraud is a common issue in recruitment. NSW ICAC estimates that 20-30% of job applications contain false information, ranging from minor omissions to serious falsehoods².
44. There is a serious improper conduct risk associated with hiring staff who have lied or provided false statements in job applications. Hiring such people can lead to further corrupt conduct, poor provision of services, affect an agency's reputation and impact on morale. There have been numerous high profile cases of senior officials with fraudulent or non-existent qualifications, who obtained positions as public officers falsely and went on to commit other offences.
45. All public officers involved in recruitment must be vigilant to the risk of people attempting to obtain employment as a public officer using fraudulent means.
46. Referees should be identified properly to ensure that the referee is a genuine referee. That is so, whether the referee is being interviewed face to face, or via teleconference. In order to do so, thought must be given beforehand as to how that can be done effectively.
47. This report provides yet another example of the risks associated with employment and recruitment processes and practices. If risk-based screening processes were in place, more rigour could have been applied to the recruitment process before Ms Sten was appointed, such as the requirement to declare any disciplinary or performance proceedings.

² <https://www.icac.nsw.gov.au/newsletter/issue51/employment.html>

Recommendations

It is recommended that:

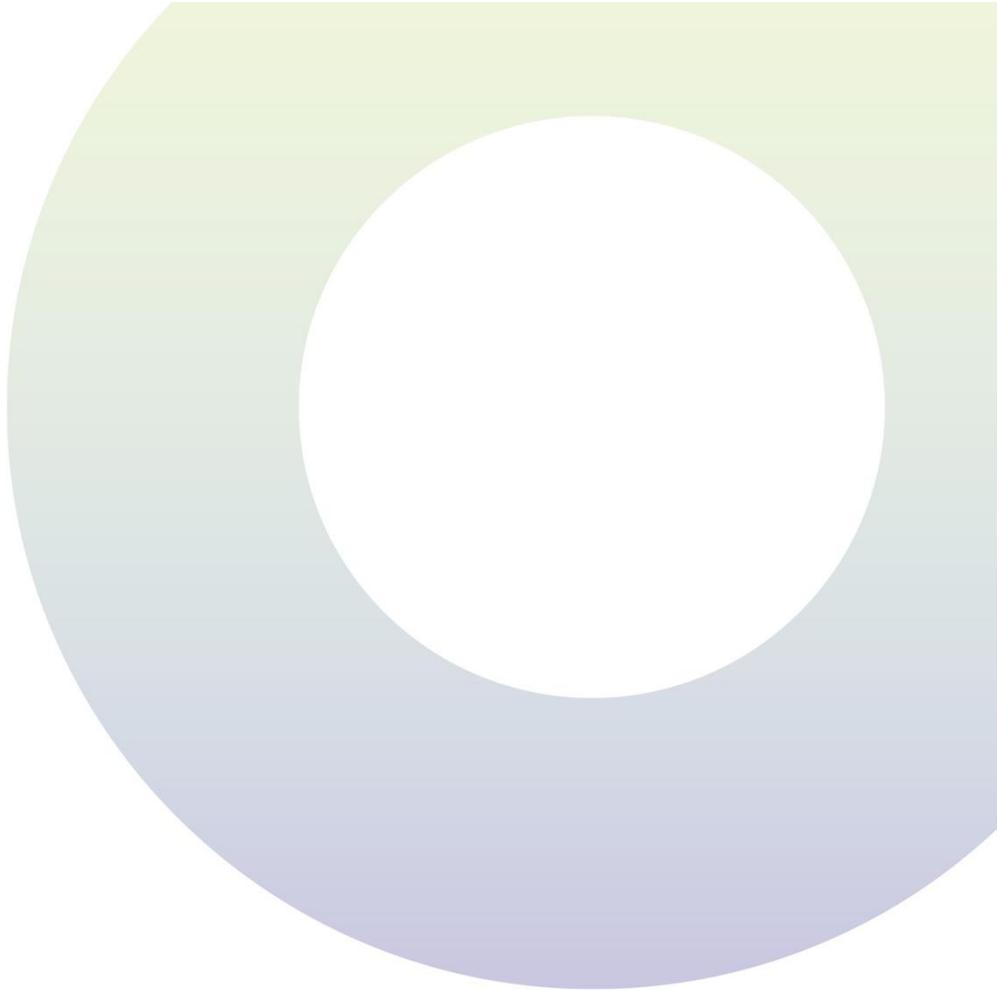
1. The Office of the Commissioner for Public Employment (OCPE) develop and publish guidance on risk-based employment screening, including but not limited to:
 - Explaining the reasons for a risk-based approach to employment screening
 - What an agency should consider when determining their risk-based employment screening
 - The types of risks that may attract more robust pre-employment screening (such as access to confidential information or systems, financial functions, considerable financial delegation, likely to be lobbied by industry, frontline officers, mandatory requirements for certain qualifications, casual contracts)
 - The types of pre-employment screening checks that may be required, depending on the risk identified (such as criminal history checks, certified copies of qualifications, checks with Northern Territory Government (NTG) conduct team, OCPE '*flagged applicant or employee*' list)
 - Post-employment checks for roles identified as carrying risk (such as exit checklists and audits of access to systems etc.
 - Any legal considerations

That the '*Strengthening employment screening practices in the NSW public sector*' be used as a recommended resource when developing the guidelines.

That the guidance be incorporated into the OCPE's training manual.

2. OCPE develop and introduce mandatory pre-employment declaration for all Northern Territory Public Sector (NTPS) candidates with fields including:
 - Disclosure of NTPS agencies and bodies that a candidate has worked for
 - Whether a candidate has been subject to a disciplinary proceeding (either finalised or current)
3. OCPE incorporate guidance on risk-based pre-employment screening in merit selection training
4. OCPE create an across-government register of people who have attempted to attain or retain employment in the NTPS fraudulently

5. The NTPS referee report guidance be revised to include a recommended process for verification of referees to minimise the risk of impersonation or fraudulent references
6. That referee report guidance be revised to include mandatory questions for referees about disciplinary or performance measures
7. That referee report guidance be revised to include an option for HR checks for previous employers



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