

T R A N S C R I P T

I N T E G R I T Y A N D O V E R S I G H T C O M M I T T E E

Inquiry into the Adequacy of the Legislative Framework for the Independent Broad-based Anti-corruption Commission

Melbourne – Monday 25 August 2025

M E M B E R S

Dr Tim Read – Chair

Hon Kim Wells – Deputy Chair

Ryan Batchelor

Jade Benham

Eden Foster

Paul Mercurio

Rachel Payne

Belinda Wilson

WITNESSES

Wayne Gatt, Secretary, and

Jeff Gundy, Manager, Legal and Discipline, The Police Association Victoria.

The CHAIR: We are resuming our Inquiry into the Adequacy of the Legislative Framework for IBAC. We welcome Wayne Gatt, Secretary, and Jeff Gundy, Manager Legal and Discipline, from the Police Association Victoria, to answer our questions. Thank you both for coming in. Before I start I have got to cover some formalities.

Evidence taken by the Committee is generally protected by parliamentary privilege. You are protected against any action for what you say here today, but if you repeat the same things elsewhere, including on social media, those comments will not be protected by this privilege. Any deliberately false evidence or misleading of the Committee may be considered a contempt of Parliament.

All evidence given today is being recorded by Hansard. You will be provided with a proof version of the transcript to check once available and verified transcripts will be placed on the Committee's website.

Thank you both for coming in. Do you have any opening remarks you would like to make?

Wayne GATT: We can give you a summary, Chair, but I will take our submission as having been read –

The CHAIR: That is right, yes.

Wayne GATT: wanting not to waste –

The CHAIR: Great. If you would like to just make a few quick remarks, that would be great.

Wayne GATT: Thank you for having us. Obviously we represent 17,500 serving police officers, who do a really difficult job around the state. Effectively our submission can be boiled down to three key areas. The definition of 'corrupt conduct' under the IBAC Act, in our view, is sufficient, and we would assert that no expansion is necessary. The current definition appropriately captures serious criminal behaviour and is supported by a dual requirement that ensures only conduct meeting both a specified category and a relevant offence is investigated. IBAC already has broad powers to investigate police misconduct independently of that definition, and expanding it risks unfairly exposing our members to disproportionate consequences for matters better handled through internal disciplinary processes. We draw attention to South Australia's 2021 reforms, which narrowed the corruption definition after recognising the dangers of an overly broad approach.

Secondly, we support retaining the current investigative threshold under section 60(2). This threshold ensures IBAC only investigates where there are reasonable grounds to suspect corrupt conduct. It provides legal certainty and protects individuals from unwarranted scrutiny. Compared to other jurisdictions like New South Wales and Queensland, Victoria's framework offers stronger safeguards and better focuses IBAC's finite resources on serious matters.

Thirdly, we believe the criteria for public hearings under section 117 should be amended. Public examinations can cause lasting reputational harm, even where allegations are unproven. We advocate for a presumption in favour of private hearings, reserving public examinations for truly exceptional circumstances. The South Australian ICAC model, which mandates private hearings, offers a balanced and principled approach that protects individual rights whilst preserving investigative integrity. The open court process maintains that and provides for transparency and the public interest considerations to be met.

Fourth, and finally, we raise concerns about information security and confidentiality, particularly in relation to IBAC's media practices and the operation of the *Public Interest Disclosures Act*. The practice of releasing embargoed reports to media outlets before tabling them in the Parliament risks undermining confidentiality. Additionally, the PID Act provisions can inhibit a member's ability to defend themselves, especially when confidentiality notices are attached to briefs of evidence, and we recommend legislative reform to clarify when these confidentiality obligations indeed cease, particularly once charges have been laid.

That is effectively a summary of the submission we have made. We are happy to take any questions, Chair.

The CHAIR: Thank you very much. Let us start with Eden Foster.

Eden FOSTER: Thank you, Chair. Thank you both for coming in today. You briefly touched on it in your introduction, but can you elaborate further on your view that the current definition of ‘corrupt conduct’ in the IBAC Act within Victoria’s police oversight system represents the optimal balance between an effective corruption investigation and the protection of individuals from unwarranted investigation by IBAC?

Wayne GATT: Thank you, Eden. Simply put, when we read the definitions, we struggled to find a form of conduct that would not be catered for in the definitions provided for in the current Act. In the context of serious corruption, we think that the definition is sufficiently broad. If you then overlay in relation to police personnel conduct and police misconduct, there are very few matters – in fact there are no matters – that we consider could not be catered for. We have sat there and tried to think of them, make no mistake. But we think it is sufficiently broad. To go any further in the context of broadening particularly the definition of ‘corruption’ we think would disproportionately focus IBAC’s activities on matters of insignificance that it ought not focus on and take it from things that it should. It might surprise you that we believe that IBAC has a very important role to play; it is an important component of the state’s integrity framework and is essential for the operation of a healthy police force. But in order to do that, it cannot be distracted from systemic, serious corruption and sent on frivolous investigations of a minor nature that would be best dealt with by the agency itself.

Eden FOSTER: Okay. Thank you.

The CHAIR: Great. Let us go to Paul Mercurio.

Paul MERCURIO: My question is very similar. It is interesting in the submissions that a lot of people do want the definition of ‘corrupt conduct’ broadened, and also they are talking about introducing the idea of grey corruption. You answered pretty well, but I am just still interested in why there is so much conjecture about the fact and that a lot of people do think it needs to be broadened and to bring in grey corruption. Can you just speak to that for a moment?

Wayne GATT: It is hard to speak what other people suppose and what motivates their submissions. To the extent that in public discourse we hear of wanting IBAC’s framework to be broadened, I think it is fair to say, if we are being truly honest, it stems out of a lack of trust in the policing agency itself or a lack of trust that its own investigative processes, once IBAC has made a referral to Victoria Police or to the Chief Commissioner to investigate more minor matters, will do so impartially and effectively. I think that is what it boils down to. I can understand those reservations. I do not necessarily agree with them, but I can understand those perceptions. I would say this: just because a complaint has been made about a member of the police force, be it a PSO or a Police Officer, it does not mean it happened – it does not mean it is true. It does not mean, because the outcome that is sought by a complainant is not necessarily determined or arrived at by the investigating agency, be it IBAC or Victoria Police, that it points to a flawed process or a flawed definition.

Paul MERCURIO: If the term was broadened, are you concerned that there would be many more frivolous complaints levelled?

Wayne GATT: Indeed. I think we highlight in our submission some of the commentary from the South Australian reforms: the existing definition of ‘corruption in public administration’ was unreasonably wide in its effect, capturing conduct such as exceeding a speed limit in a motor vehicle. We say if IBAC is wasting its time with that, corruption is safe in Victoria, because it will never have time to properly investigate those serious matters. We represent Police Officers. Everything they stand for determines that they would want IBAC to be focused on serious and wilful misconduct, on corruption. If it spends its time dealing with matters that we have just highlighted that were highlighted in the work in South Australia, then it will never have time for that.

Paul MERCURIO: Excellent. Thank you.

The CHAIR: Great. We are going to jump to Ryan Batchelor now.

Ryan BATCHELOR: Thanks, Chair. Thanks for coming in today. I just want to go to section 117 and the public examinations provisions, which you mentioned in your opening statement. You suggest that the

threshold should be amended so that public examinations only happen in exceptional and rare cases. I just wonder if you could expand on the risks that you believe exist to your members' reputations, careers or wellbeing that can materialise from public examinations at IBAC.

Wayne GATT: I think our problem comes with the subjective assessment of 117(1)(c). It says:

a public examination can be held without causing unreasonable damage to a person's reputation, safety or wellbeing ...

You tell me when that can happen in the modern age. There is a little thing out there called Google. If you punch in a person's name into that Google machine, it will spit out whatever is printed. With the greatest amount of respect to our colleagues in the media, they are simply reporting what is alleged, but that will not stop a prospective employer making an assessment about a person's suitability, on the basis of those allegations. We say that for facts and matters unproven that is grossly unfair. Police Officers in Victoria accept the accountability of their position. What we cannot accept on their behalf is that with that accountability comes a prejudice against their reputation forever, indefinitely, in matters that are unproven. We accept, however, that IBAC, if it was operating as indeed I think South Australia does, in a model where it presumes private hearings, the open court system once charges are laid effectively deals with the issues around the community's right to know, the public interest. It is just the order of getting that bit right. It comes at a point at which a reasonable person makes an assumption that there is a case to answer, not at a point where it is simply an inquiry.

Ryan BATCHELOR: Some other submitters to the inquiry on the topic of public examinations have suggested that there should be examinations held for educational and preventative purposes.

Wayne GATT: I would call that entertainment.

Ryan BATCHELOR: Which probably answers the second part of my question as to if you have got any reflections on those suggestions.

Wayne GATT: Well, I would call that entertainment value, and that is not what we say IBAC has been established to do. It has a very important role. One of those roles is not to provide grabs for the 6 o'clock news. There is plenty that can be reported on. Indeed the news can report once a matter is before the courts, the open courts, and indeed hear the evidence tested, but that in our submission ought not to occur before it has formed its own view that there is a case to answer. We say that because of all those risks, having regard for (c), as clumsily worded as it is, it should rarely, if ever, be established.

But we say that the Act in South Australia does a much better job at making that abundantly clear. I indeed agree with the previous submitter, whose evidence I got to hear prior to coming here today, who talked about how experienced personnel within the Inspectorate at times are challenged by reading this Act. Well, I am with them, and I am not unaccustomed to reading Acts of Parliament. We are used to it. We do it each and every day. But I can tell you what, you have to read this one backwards to understand it, and every subsection is contingent on another. So it is very difficult, in our view, to clearly understand what the intent of the Act is because of the way it has been written in many of these important areas.

Ryan BATCHELOR: Thanks, Chair.

The CHAIR: Thank you. Let us go to Belinda Wilson.

Belinda WILSON: Thanks, Chair. I am interested to know what concerns, if any, you have with IBAC providing an embargoed copy of the report to the media before it is tabled in Parliament?

Wayne GATT: Well, those embargoes can be broken, so it is an unnecessary risk that ought not to be taken. And fundamentally and principally, we believe that that reporting should in its primacy be made to the Parliament, to the people who are elected by people in Victoria to hear it first, not by journalists in a pre-emptive way.

Belinda WILSON: Thank you.

Wayne GATT: It is the cart before the horse.

Belinda WILSON: Yes.

The CHAIR: Thank you. Let us go to Jade Benham.

Jade BENHAM: Thank you, Chair. Thanks for coming in this afternoon. We heard in your introduction a point about the confidentiality provisions, and we heard from the previous witness as well. Can you elaborate on the concerns you have with the operation of confidentiality provisions when a public interest disclosure is made about a Victorian Police Officer?

Wayne GATT: It is not dissimilar to the evidence you previously heard, and it was interesting to actually hear it from somebody else who sees it from a different perspective. It is not so much a question of when it is turned on, it is a question of when does it actually turn off. It is very unclear in the Act. Does it occur when charges are laid? It is almost presumed in the legislation, and it causes us, and indeed our members, some consternation in terms of when they can seek advice and from whom in those circumstances. There are also times when they would seek advice from us, as their representatives, or from counsel engaged by us on their behalf, and if a brief of evidence is subject to a notice, then it can leave them questioning, despite the fact that they have been charged with an offence, whether they can actually speak to counsel or the police association in furtherance of those matters. I cannot speak to the specifics, but I will say that we have matters afoot at the moment where civil actions could cause a party, and indeed in this case, Victoria Police, to explain itself or indeed to provide a disclosure on matters. But it is in a position where it cannot even defend itself on the basis of these confidentiality notices. We do not like that for them. We also do not like it for the other party in relation to that matter, who cannot seek to have a matter ventilated in the courts because Victoria Police cannot respond to those assertions.

Jade BENHAM: So there is no room to even apply for an exemption in that case?

Wayne GATT: This is a case before VCAT that was deferred to the Supreme Court presently on the basis that it says it is in a position where Victoria Police is simply asserting an obligation under the Act. It seems ludicrous, to be honest, that the tribunals and courts cannot resolve matters because of an Act, and it seems ridiculous that the parties to a notice do not truly understand what the limitations and obligations of them are.

Jade BENHAM: Does anyone truly understand what the limitations are?

Wayne GATT: Do you, Jeff?

Jeff GUNDY: Not a hope. None.

Wayne GATT: That is two of us.

Jade BENHAM: Great. Thank you.

The CHAIR: All right. Thank you very much. Let us go to Rachel Payne.

Rachel PAYNE: Thank you, Chair. Thank you, Wayne and Jeff, for appearing before us today and for your submission. Are there any other ways you think the legislative framework for IBAC can be improved?

Wayne GATT: Simplification. I mean, this legislation: it is important that it is understood by the parties, so people that work in the public sector – by police officers, statutory office holders, senior executives in the public sector – but also by the community. In all seriousness, we do speak to our experience in reading legislation. It is what we have been doing since we were early in our careers. But the reality is that average people in the community that might need to rely on IBAC simply do not have that experience. It should be an Act that is written in the simplest terms possible. I am not saying it is simple content – I am not saying that it will not go around in circles a little bit – but it ought not go to out of its way to be confusing, and it appears to do that for some unapparent reason. If it could be simpler to understand, then the community I think will engage with it more and it will achieve its purpose better. I think that clarity with respect to section 117 – in our view it should clearly presume hearings are held in private. We are fundamentally opposed to a system that prejudges the subject of an investigation and that potentially compromises outcomes in court. Clearly that cannot be the objectives of an investigation conducted by an integrity body: that what is said publicly might ultimately prejudice the hearing of a matter should charges be laid in the future. That cannot be the outcome that the parties are seeking. There is clearly, in our view, aside from arguments that say it has some form of deterrent value, which we say comes eventually anyway – what forensic value is there? I heard the comment

made that clearly it is a bad day for somebody when they have a public hearing. Well, it is a very bad day, yes, and the next day is going to be worse. Indeed days for years after are going to be really troubling for those people, and we say that (public examinations) ought to be considered in the most rare and exceptional cases.

Rachel PAYNE: I might ask one more question if I have time.

The CHAIR: Please do.

Wayne GATT: Sorry, there is one final thing. I do not know if IBAC have submitted it themselves, but we are not opposed to IBAC being well resourced. For those that might say that is a counterproductive narrative for us as police, we have an interest in Victoria Police being as ethically healthy as it can be, and to the extent that they require resources to do their job and do it well and effectively, we would support that.

Rachel PAYNE: Just on IBAC being equipped to manage its investigative abilities but also its requirements, quite a few people who have submitted and appeared before us as witnesses have indicated that they do not feel IBAC is the appropriate body to look at police oversight or alleged police misconduct and corruption. Does the police association have a firm position on that?

Wayne GATT: That IBAC isn't?

Rachel PAYNE: Yes.

Wayne GATT: Again I hear those arguments in public discourse. IBAC is independent, broad-based and anti-corruption – I mean, if it is not IBAC, then what is it? Will changing the name and giving another body the same purpose, the same mission, the same outcome satisfy people? We understand the referrals, the capacity in the Act to refer back to the Chief Commissioner in certain circumstances. We say that is appropriate. If you want organisations that employ north of 25,000 people to maintain ethical health, you have to give them the responsibility that comes with that as well, on the minor issues. But maintain the oversight that is required. But if the matter is about a workplace injury, well, surely the appropriate agency is WorkSafe. I mean, those referrals we think are appropriate, but at all times IBAC maintains the capacity to investigate and investigate of its own motion. We think it is a reasonable balance, to be quite honest. But in a practical sense it would need 25,000 people itself if it became the sole investigative body for every complaint in Victoria. That surely would not be sustainable, and any injection of resources by a state government just simply would not be enough if that was the ultimate objective, in our view.

Rachel PAYNE: Thanks, Chair. Thank you.

Wayne GATT: It would also lack the capacity – Rachel, sorry – to deal with complex investigations. When you get into areas like sexual offending, for example, there is expertise that is amassed, and I think there is an appropriate reason why those referrals are made in the Act.

Rachel PAYNE: Thank you.

The CHAIR: I wonder if I could take you a bit further on that topic. We have already heard that there is a tension between IBAC's anti-corruption role and its oversight of police, just in terms of resources with IBAC being required by the Act to prioritise corruption. It could be a risk that IBAC just does not have the resources, expertise or even the purpose as a primary purpose to provide adequate oversight of police. Do you not see that as a problem?

Wayne GATT: Sorry, that it does not have the resources?

The CHAIR: Well, the resources and the primary purpose – you know, it is almost like it is a secondary purpose for it in the Act.

Wayne GATT: Oversighting police?

The CHAIR: Yes.

Wayne GATT: I do not read it as secondary. I mean, if anything, the Act has an excessive concentration of its energy or its attention on police. It specifically defines 'police conduct' and 'police misconduct', for

example, in ways that it does not do for other public officials. So it goes further. Whether or not it has the physical resources – the people and the money – to do its job, well, I suppose the Commissioner for IBAC would have to talk to that. As I said earlier, Chair, in no way am I opposed to them having more resources. I want them to be able to focus on corruption properly. I do not want them to be distracted by frivolous matters that effectively should be dealt with by Victoria Police. Minor inactions by members, minor duty failures or things that in any other workplace would simply be seen as performance-based should not become the remit of a state's integrity agency. I mean, if it is going to do that, it will become bogged down with matters that will distract it from making sure we have an ethically healthy policing agency. Indeed I think that in itself will defeat its primary purpose.

The CHAIR: If I can just take it a bit further, we have already heard today that it was essentially built as an anti-corruption agency, but there is a lot of police misconduct that is not corruption, such as excessive use of force or something like that. Would it not be better to have a specialised agency that is perhaps better able and skilled to assess those kinds of allegations than to have an anti-corruption agency take that on as well?

Wayne GATT: To have an IBAC and an OPI, for example – going to the previous nomenclature of the Office of Police Integrity – is just a different way of doing it. I mean, if you extracted policing from IBAC and put it into another agency, I suppose it would probably cost you more to do it. It would probably duplicate those resources. Would it achieve anything more? I do not necessarily believe so. I am not sure it has any value from that perspective. Resourcing does. I mean, you can only investigate what you are resourced to do. We know that in policing. There are a finite number of crimes and investigations that you can conduct with the people and the money that the state government provides for you. They would be exactly the same. So you have to focus on the areas of greatest harm and greatest benefit. But whether they are separate or combined into one – if anything, I think separating it might provide a degree of duplicity in structures within the agency that might mean that it costs more to run and diminishes frontline resources. But that is probably a matter for IBAC to talk to, in terms of how they would want to see them structured.

The CHAIR: Thank you. Good. Do you want to ask something?

Jade BENHAM: Yes. Have we got time for one more?

The CHAIR: We do.

Jade BENHAM: Earlier you mentioned that the referral back to Victoria Police is appropriate from IBAC. Being a regional representative, I want to ask you a question about cases of assault, serious misconduct or sexual abuse perpetrated by VicPol members. In the regions we know that stations are well and truly undermanned, so if it was to be referred back to Victoria Police, essentially it would be mates investigating mates or colleagues in Victoria Police. Do you still find that appropriate?

Wayne GATT: No. We do not support that. We have submitted previously – not in this round but previously – that it is inappropriate and that it puts our members in an unenviable situation of having an inherent conflict of interest. We do have PSC, which is independent from regional investigators, and in terms of matters of a serious nature those investigations are conducted by PSC independently and it is reasonably well resourced to deal with those issues. The issues that generally speaking, in our experience, would be dealt with in a regional way would be more matters of performance and much more minor in scale. That would be best dealt with by management intervention in our view. But we do not advance that the Detective Sergeant at the local CIU should be investigating a serious misconduct investigation from somebody downstairs in the uniform branch.

Jade BENHAM: But if it is appropriate in one case, as you were talking about earlier, how do we separate that from geography, in those cases? Can you expand on that a little bit?

Wayne GATT: I am not sure I understand your question.

Jade BENHAM: It is a conflict of interest in one case but not in another. Where is the line?

Wayne GATT: Well, I think there is a degree of severity. I think you have to recognise that when you have an agency that is policing, it inherently, by its very nature, will deliver you complaints. Police have an important role. With that responsibility and authority comes a propensity to acquire complaints in the ordinary

course of their work. That means that all of those complaints will need to be investigated, but not all of them are at the same level. Serious corruption should be a matter for IBAC, or at the very least oversighted by IBAC. Serious misconduct can be either; it can be IBAC, it can be Victoria Police. But for matters of performance and, as I said to you, issues like somebody not doing something that is quite right or not following procedure properly, for example, our view has always been that those are matters best dealt with in a management and performance capacity.

Jade BENHAM: Internally.

Wayne GATT: Internally. They do not represent the same conflict that serious corruption or serious misconduct does, and that is why there is a PSC.

Jade BENHAM: Thank you.

The CHAIR: Thanks. Belinda Wilson.

Belinda WILSON: I guess on a similar stream, I am interested to know what your thoughts are on police investigating police in terms of family violence.

Wayne GATT: Well not from the same area. That is 100 per cent our view, and it is not a dissimilar response. I do not take a view that police cannot investigate other police officers. We have had the PSC for many decades, and indeed we have had different iterations of that in years gone by. I will say that we are not incapable of finding wrongdoing in our colleagues and holding them to account. It happens all the time. Police officers are investigated and charged and brought before the courts today, and indeed many times through the year, on the basis of wrongdoing that is consistent with family violence matters or allegations of family violence. So the system is holding people to account today. I can understand in a regional setting that could be very troubling for a victim-survivor. I do not advance that that should happen. Victoria Police has recently established SOFVU, which is centrally based and has specialty detectives in that investigative stream to try and address this issue as best as possible. It remains a fact, however, that at a local level victim-survivors or complainants will attend a local police station in the first instance.

Belinda WILSON: Which can become problematic, I would suggest.

Wayne GATT: It can do, but it is often the first point of call that they will go to a police station. It is what happens from that point that counts.

Belinda WILSON: I think from a regional perspective, as Jade was referring to earlier, if I have got Johnny who plays football at the local football club with Peter in the next town, that is very difficult if he is doing the investigation or that station is doing the investigation and they all play at the same footy club – as an example.

Wayne GATT: I will say SOFVU are doing a lot of good work. They are centralised, and I can say with significant confidence because of the role that we have in supporting members that they have a remit across the state of Victoria, including regional Victoria. If I was to pick an area that was most heavily oversighted and risk-managed, it would be family violence offending.

Belinda WILSON: And so it should be. Thank you.

The CHAIR: Ryan Batchelor.

Ryan BATCHELOR: Sorry, one other question. I know you appeared before us back when we were talking about FOI. We have had an issue raised in the context of the application of FOI provisions to IBAC's investigation of police matters and the extent to which the protection from FOI can – there is a conjecture as to whether the exemptions from FOI carry forward if a referral is made back to Victoria Police. I am wondering if you have got any views on whether IBAC's investigations into police misconduct matters should be subject to freedom of information, whether they are handled by IBAC or by VicPol?

Jeff GUNDY: Sorry, is the question whether they should be open for –

Ryan BATCHELOR: Open for FOI, yes.

Jeff GUNDY: As you rightly say – and I heard the previous people, and I think it was Mr King I heard also earlier. He is right where he says that IBAC is not open to FOI. It is a very simple blanket ‘No’. Victoria Police also do on occasion use the same analogy. If the matter has gone to IBAC, albeit if IBAC are not investigating and it gets farmed back, there is still a blanket ‘No, you will not get them under FOI’. There has been some success –

Ryan BATCHELOR: Do you support that as a matter of the legal framework?

Jeff GUNDY: Do I support that as a –

Ryan BATCHELOR: Well, does TPA have a view?

Wayne GATT: Well, I can understand why it is in place: there is a need to protect complainants. I can understand legal practitioners’ desire to have, as discoverable, information that might support them. You have to balance that against the need of an integrity agency or indeed Victoria Police to maintain not only the confidence of a complainant but witnesses and other people involved in that investigation, particularly when you are dealing with sensitive matters in policing. It is a fine balance, I think. I can understand the desire to have it, but I understand the reason why it exists presently.

Ryan BATCHELOR: Thanks.

The CHAIR: Thank you. I do not think anyone else has got –

Jade BENHAM: I just might ask one more.

The CHAIR: All right.

Jade BENHAM: Is that okay? Completely different topic – would greater collaboration between IBAC and the internal ethical command –

Jeff GUNDY: The Professional Standards Command?

Jade BENHAM: Yes. Great. Thank you. Would that improve outcomes, or is there the ability for greater collaboration and would that have a positive effect, if it is able to be done?

Wayne GATT: I do not think that is an area we can properly talk to. That is probably one for someone like the Assistant Commissioner for PSC to talk to, or indeed IBAC, about their personal engagement. I cannot see how it would hurt, but it must occur to us – like, their inner workings are a matter for them – fairly high level now. I mean, there are referrals made. Those referrals are reported back to IBAC – indeed there has to be ongoing engagement between the two parties for the system to work, presently. More communication is really about outcome.

Jade BENHAM: Thank you.

The CHAIR: Great. Can I just very quickly clarify: early on, when we asked about broadening the definition of ‘corrupt conduct’, were your comments there particularly with respect to the oversight of police or corruption more generally within other agencies as well as police?

Wayne GATT: I am speaking for the policing industry. As I said, the reason we assert that is that there are multiple layers within the Act that deal with police. So you have the definition of ‘corrupt conduct’, but then you have the sub-definitions of ‘misconduct’ and ‘police conduct’ as well. We say that if you look at all of those definitions across the Act, it provides a very broad spectrum. In fact you struggle – or we struggle anyway – to find circumstances we say could not fit into such a broad definition.

The CHAIR: All right. Thank you both very much. Very helpful discussion. We will suspend the hearing now so that we can hear from some new witnesses.

Witnesses withdrew.