



Western Australian Auditor General's Report

# Second Public Sector Performance Report 2011

Report 7 – September 2011





**THE PRESIDENT  
LEGISLATIVE COUNCIL**

**THE SPEAKER  
LEGISLATIVE ASSEMBLY**

**SECOND PUBLIC SECTOR PERFORMANCE REPORT 2011**

I submit to Parliament my Public Sector Performance Report for 2011 under the provisions of sections 24 and 25 of the *Auditor General Act 2006*.

A handwritten signature in black ink, appearing to read 'C. Murphy'.

COLIN MURPHY  
AUDITOR GENERAL

7 September 2011

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# Auditor General's Overview

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This is the second Public Sector Performance report for 2011. These reports address performance by public sector agencies across a broad spectrum of government operations. This report contains two items:

- A performance audit of the use of ICT contractors in government.
- An investigation into the acceptance of gifts and benefits by public officers in the Department of Health.

WA public sector agencies spend over \$600 million each year to procure ICT goods and services. A key component of this expenditure is the temporary employment of ICT contractors.

ICT contractors provide agencies with a flexible resource of expert advice and capacity to implement ICT business solutions. If managed well, ICT contractors can be a cost effective solution but if managed poorly, they can be an expensive waste of money.

In this audit we assessed how well six agencies planned for, procured and managed their ICT contractors. Only one of the agencies performed well on all counts. Common weaknesses at the other agencies included a lack of robust strategic planning for ICT, poor procurement practice and a failure to adequately recognise or address potential conflicts of interest.

The second item was an investigation into the acceptance of gifts and benefits by public officers in the Department of Health. The investigation was undertaken at the request of the Minister for Health and a member of the opposition.

Our approach was to firstly conduct a preliminary investigation to assess the need for a more detailed investigation. Our objective was to determine whether public sector officers had improperly accepted gifts or travel, and whether there was any evidence of decisions being influenced as a consequence. While we did not find any evidence of improper conduct or influence, we did find weaknesses in Health's management of sponsored travel and gifts especially the recognition of potential conflicts of interest and the management of those risks. Health has acknowledged these issues and is taking steps to address them – action that we will monitor.

Both report items contain salient recommendations for all agencies. Agencies need to take a strategic approach to planning for their ICT needs. They need to proactively manage ICT procurement and implementation processes to ensure they are achieving both value for money and expected results. The management of potential conflicts of interest is a common theme across both audits. Agencies need to recognise conflicts of interest when they arise and ensure they have good controls in place to deal with them in a transparent manner.

# Use of ICT Contractors in Government

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## Executive summary

### Introduction

Good information and communications technology (ICT) systems and processes can deliver government services faster, more conveniently and at less cost to the taxpayer. However getting the right ICT systems is not easy. Understanding business needs and selecting the right technology to deliver the appropriate solution are complex tasks.

Government agencies often engage ICT contractors to provide advice and deliver technology solutions. When managed well, ICT contractors can deliver ICT solutions effectively and efficiently. If managed poorly, agencies can waste a lot of money on ICT for limited or zero benefits.

Maintaining a current strategic ICT plan and establishing and implementing a robust governance framework is key to making effective use of ICT contractors and delivering successful outcomes.

The engagement of ICT contractors in government agencies should comply with State Supply Commission (SSC) and the Department of Finance (DoF) procurement policies. Government Trading Enterprises operate under their specific enabling legislation. Although they do not have to comply with SSC and DoF procurement policies, they should demonstrate value for money and follow best practice.

This audit examined whether agencies are strategically managing ICT contractors to achieve agency objectives and in accordance with government policy and guidelines.

We looked at how well six agencies planned, procured and managed ICT contractors:

- Department of Education (DoE)
- Department of Mines and Petroleum (DMP)
- Western Australian Land Information Authority (Landgate)
- Lotteries Commission (Lotterywest)
- Electricity Retail Corporation (Synergy)
- Tourism Commission (Tourism WA).

We also examined the role of DoF in pre-qualifying and monitoring suppliers to Common Use Arrangements (CUA) 14008 – ICT Services, and CUA 22008 – Temporary Personnel, Category 4 – Temporary ICT Personnel.

We expected to find appropriate governance arrangements in place and that the procurement of ICT contractors complied with relevant legislation, SSC policies, DoF's procurement guidelines and agency policies. We define ICT contractors as any entity or individual not employed in the public sector but engaged under a contract to deliver services to an agency.

## Audit Conclusion

Landgate was the only agency that managed all aspects of ICT contracting and procurement well. A key area for improvement at four agencies, DMP, Lotterywest, Synergy and Tourism WA was a lack of comprehensive and up-to-date strategic ICT plans. Without an up-to-date ICT strategy, agencies significantly increase the risk of making poor use of contractors and getting poor ICT outcomes.

DMP, Lotterywest and Synergy did not fully comply with procurement policy for some of their contract arrangements. This included failure to develop business cases, establish contract management plans, seek appropriate approvals and lack of competitive tendering for some contracting arrangements. Three agencies, DoE, DMP and Synergy could improve their management of conflicts of interest.

Government agencies can be confident that ICT contractors listed on CUAs have undergone a rigorous assessment process.

## Key Findings

Landgate planned, procured and managed ICT contractors well. The other agencies need to strengthen their processes to ensure they are managing strategically and promoting open and effective competition to achieve value for money. Specifically:

- DMP, Lotterywest, Synergy and Tourism WA lacked either comprehensive or up-to-date strategic ICT plans. Each of these agencies had some elements of a strategic ICT plan in place, however these:
  - were often out of date
  - did not clearly align ICT projects and sourcing strategies with identified current and future business needs
  - did not include resourcing requirements, lacked clear objectives and associated performance measures
  - did not address risks of different ICT delivery options or strategies to mitigate them.
- DMP, Lotterywest and Synergy did not fully comply with procurement policy for some of their contracting arrangements:
  - Synergy could not demonstrate that the procurement process for a contract originally valued at \$380 000 included competitive tendering. Subsequent variations to the scope of this contract increased total payments to over \$3 million
  - Synergy obtained ministerial approval for a \$38 million contract arrangement as required. However Synergy reduced the scope of this work to \$21 million. Synergy then entered into further arrangements, including some work beyond the original scope, valued at over \$30 million and did not obtain ministerial approval
  - DMP did not document business cases for two contracts with a total value of just over one million dollars
  - Lotterywest did not have an up-to-date management plan for an ICT contract valued at over \$5 million.

- Potential conflicts of interest were not effectively recognised and managed at DoE, DMP and Synergy:

- DMP engages a contractor who provides ICT business process review and reform services. This includes developing specifications for required ICT business applications that DMP then puts to open quotation.

However the contractor has a close relationship with a company that has successfully bid for and provides software and system support to 12 of DMP's business applications. The contractor also delivers ongoing training to DMP staff for those business applications.

The potential for conflict of interest was not identified or addressed in DMP's ICT sourcing strategy or conflict of interest register. DMP's internal audit raised concerns about the close relationship between the contractor and the company and DMP responded by ensuring their internal staff reviewed and agreed all contract specifications prior to open quotation. In our opinion the risk of a conflict remains with the contractor providing advice on ICT business solutions but also providing training to staff in implementation of those solutions.

- DoE and Synergy did not maintain a gifts register. Acceptance of gifts by staff involved in procurement can give rise to potential conflicts of interest. For this reason it is important for agencies to maintain a register and monitor acceptance of gifts by staff.

We also found that:

- DoF had a robust pre-qualification process to list suppliers on CUAs 14008 and 22008 and administered it well overall. However DoF agrees it could improve its ongoing monitoring of suppliers through the life of the CUAs to ensure they remain appropriately qualified to deliver services.

## What should be done?

Agencies should:

- ensure they have up-to-date and comprehensive strategic ICT plans. Useful guidance for key elements of an ICT strategy can be found in the Information Systems Control and Audit Association's (ISACA) COBIT framework
- comply with relevant government policy, guidelines and good practice for procurement
- proactively manage the risk of conflicts of interest by maintaining conflict of interest and gift registers. Where contracting arrangements present potential conflicts, these should be recognised and mitigation strategies documented through the strategic plan or conflict of interests/risk register.

### **Response from Department of Mines and Petroleum**

The Department of Mines and Petroleum (DMP) has considered the audit findings and is currently updating its strategic ICT plans and strengthening its governance arrangements to ensure compliance with government procurement policies and better practice guidelines.

### **Response from Landgate**

The positive audit result provided confirmation of the significant work undertaken by Landgate staff to manage ICT Contracts.

### **Response from Department of Education**

The Department of Education accepts the finding of the audit and the recommendations of the Auditor General and has initiated appropriate action to address the recommendations.

### **Response from Synergy**

Synergy has now implemented a new Contract and Procurement System (CAPS) to provide ongoing management and oversight of procurement activities. A new CIO has been appointed to oversee development of an ICT strategy and operational plans. A Project Investment Council has been established, providing strong and effective project gatekeeping, and project management training has been improved and increased. Gift and conflict of interest registers have been established.

### **Response from Lotterywest**

It is noted that Lotterywest overall is managing ICT Contractors to deliver appropriate objectives and monitoring performance in this area to ensure that desired outcomes are met. Given the large project undertaken by Lotterywest over the last five years, the issue of developing a forward looking IT strategy document has been delayed until the project is completed [in August this year]. The time is now right to proceed with this undertaking and it will commence shortly. The establishment of a corporate Project Management Office with associated procurement responsibility will serve Lotterywest well into the future, with the adoption of Project Management disciplines across a broad area of Lotterywest's operations. An essential element in this discipline is awareness of, and adherence to, appropriate governance structures and protocols. This process is now well underway within Lotterywest.

### **Response from Department of Finance**

It is agreed that DoF could always do more in terms of ongoing checks and reviews of suppliers. However, the extent to which these checks and reviews are carried out needs to be balanced with the degree of risk each contract presents and the appropriate allocation of limited resources.

DoF considers that the risks to the state (financial and service quality) with CUA 22008 and CUA 14008 are low and sufficient business intelligence is obtained through its network of agency contract staff, contract managers, buyers (including CIOs or their equivalent from the key state government agencies) and industry groups to enable action to be taken should it be necessary. However, DoF will assess each CUA individually and an ongoing risk based due diligence regime instituted where appropriate.



## Background

Government is heavily reliant on ICT to deliver key services to the public. The ICT environment is continually evolving with new hardware and software technologies delivering business solutions faster and more effectively. Systems that are state-of-the-art today could be out-dated in a few short years.

This presents a number of strategic risks to agencies when planning and implementing new ICT systems or maintaining existing systems. Typical questions agencies need to consider include:

- Should business applications be 'off-the-shelf' making them easy to implement, maintain, and upgrade but perhaps less adaptable to the specific needs of the organisation, or should an agency develop customised software to match their specific needs?
- Should agencies develop in-house capacity for developing, maintaining and upgrading their software applications or should they outsource this function or do a combination of both?
- Should hardware be capable of large storage and processing capacity, or do trends in cloud computing make this less important?

In answering these questions, agencies need a clear ICT strategy that aligns with the business objectives of the agency and a plan to implement their strategy that includes clear measurable outcomes, responsibilities for delivery, and budgets and timelines. Agencies need to continually monitor progress and achievement of outcomes and be prepared to adapt to changing circumstances.

Agencies often choose to procure ICT goods and services from the private sector as a key part of their ICT strategies. Where they do so, they are required to procure services following established State Supply Commission (SSC) policies and DoF guidelines or the principles that these encompass.

In October 2010 we reported on ICT Procurement in Health and Training. That report highlighted:

- that ICT procurement is expensive and often does not deliver intended outcomes on time or on budget
- good governance and planning are critical to successful procurement
- the importance of managing contractors' conflicts of interest
- the risks from poorly managing ICT procurement processes.

### ICT is expensive

In the 2009-10 financial year WA government agencies spent about \$7 billion on goods and services of which about \$602 million was spent on ICT goods and services. The amount spent by Government Trading Enterprises (GTEs) on ICT goods and services is also considerable.

The six agencies involved in this audit spent an estimated \$360.85 million on external ICT goods and services in the 2009-10 financial year.

Agency	Estimated expenditure on contracted ICT goods and services in 2009-10 financial year
Department of Education	\$271 million
Department of Mines and Petroleum	\$9 million
Landgate	\$24.2 million
Lotterywest	\$11.25 million
Synergy	\$45 million
Tourism WA	\$0.4 million
<b>Total</b>	<b>\$360.85 million</b>

**Table 1: Estimated annual expenditure on contracted ICT goods and services for the audited agencies in the 2009-10 financial year**

*These amounts were provided by the agencies and in some cases are best estimates of annual ICT expenditure. The figures do not include in-house ICT staff costs.*

### Good ICT governance supports successful outcomes

Establishing a strong governance framework and maintaining appropriately skilled in-house ICT, planning and where appropriate contract management capacity increases the likelihood that successful outcomes will be achieved.

If an appropriate governance framework is not established, there is an increased risk that ICT projects will be over budget, take longer than anticipated to implement and intended benefits may be delayed or not fully achieved. The strategic ICT plan is the road map by which an agency aligns its ICT capabilities with its business objectives. Without an up-to-date strategic ICT plan senior management cannot:

- ensure that ICT projects are aligned with and delivering against current business objectives
- make considered decisions about the allocation of ICT resources
- have a clear understanding of and manage ICT related risks.

An appropriate governance framework should include:

- a current and up-to-date strategic ICT plan that:
  - documents the agency's ICT environment and business needs
  - details its chosen service delivery model
  - provides ongoing analysis and review to support its sourcing strategy
- an operational plan to implement the ICT strategy that includes clear measurable outcomes, responsibilities for delivery, and budgets and timelines

- procurement practices that:
  - comply with the external regulatory regime and the agency's internal policies and procedures
  - include clear and measurable performance standards
  - include effective and timely performance monitoring
  - include a process for reporting high level ICT business performance to senior management and where appropriate, Boards of Directors.

### ICT Procurement Framework

Agencies should comply with the SSC's policies and DoF's procurement framework and guides. These are designed to ensure efficient processes that achieve value for money by promoting open and effective competition. The appropriate level of competition or market testing is determined by the value of the procurement. More rigorous processes are required as the value of the procurement increases.

Where an agency has a partial delegation to conduct its own procurement it must involve DoF in procurements of more than \$20 000. Agencies within the metropolitan area are also required to use pre-qualified suppliers for some purchases. DoF has established Common Use Arrangements (CUAs) for certain products and services.

Two relevant CUAs are 14008 – ICT Services and 22008 – Temporary Personnel, in which Category 4 refers to ICT temporary staff.

GTEs operate under their own enabling legislation. While they do not have to comply with SSC policies and DoF's procurement framework, they should demonstrate value for money and follow best practice.

### ICT contractors can be cost effective and give flexibility but may also increase risk exposure

Agencies use ICT contractors to provide flexibility in delivery of ICT goods and services. They give agencies the ability to bring in specialised skills for short periods, for defined projects, and to supplement internal resources. They can also be used to outsource ICT service delivery. Contractors are often most up-to-date with emerging technologies. Despite these advantages there are also a number of risks that agencies need to manage.

Although consultants and contractors play an increasing role in the design and delivery of ICT services, accountability for service delivery remains with the agency.

The interests of contractors do not necessarily align with those of an agency. Over-reliance on contractors can expose agencies to 'contractor capture'. This can occur where an agency:

- fails to understand its business needs
- does not select the right technological solution
- permits a contractor to become the sole entity that can support its ICT systems.

A report for the Independent Commission Against Corruption in New South Wales<sup>1</sup> articulated the risks associated with contractor capture.

The report highlights that where a knowledge gap exists and it is difficult to recruit skilled IT staff, contractors may conveniently fill the void. However once in an agency, they have a financial interest in maintaining and extending the business relationship. They do this by:

- increasing the agency's dependence on their services
- embedding customised proprietary software in the agency, which reduces its capacity to manage and maintain systems in-house or seek alternative suppliers
- seeking and obtaining access to major systems and data
- establishing close relationships with agency staff responsible for business management and procurement.

Risks associated with contractor capture include:

- loss of control of business applications, reduced capacity to source services from alternative suppliers, achieve cost savings through competition and maintain business continuity due to:
  - reliance on customised software
  - dependence on contractor's services for business continuity and application development
- contract creep by small and continuous variations to existing contracts and expanding scope of works without tendering
- capacity to influence the organisation's decision making on ICT strategy and procurement
- potential conflict of interest and exposure to risk of fraud due to privileged position of contractor and its relationship with agency staff.

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<sup>1</sup> e-Corruption Vulnerabilities in the New South Wales Public Sector ICAC – April 2001

## What did we do?

This report expands on our October 2010 report by looking at how a further six agencies used ICT contractors to meet their ICT needs.

Our objective was to determine whether agencies are strategically managing ICT contractors to achieve agency objectives and in accordance with government policy and guidelines.

We focused on a number of the key issues identified in our previous work. We also examined the role of DoF in pre-qualifying and monitoring suppliers for CUAs 14008 and 22008.

We used four lines of inquiry:

1. Did the agencies plan the engagement of ICT contractors well – do they maintain an up-to-date strategic ICT plan and operational plan for delivery of outcomes?
2. Did the agencies procure their ICT contractors well – do they comply with legislation, policies and procedures?
3. Do agencies have robust contract management frameworks to monitor performance under the contracts and ensure they are achieving desired outcomes?
4. Does DoF pre-qualify and monitor its CUA suppliers well?

The audit involved a mix of agencies allowing us to examine both large high value procurements as well as some of lower cost. The agencies involved are listed on page 5 of this report.

### Audit methodology

We examined agencies' strategic management of ICT and how selected contracts had been planned, procured and monitored. We did not evaluate how successful a particular ICT project was at achieving its desired outcomes.

Our audit reviewed a range of contracts for ICT goods and services under CUAs 14008 and 22008 and, where relevant, agency specific sole supplier arrangements that were current in financial year 2009-10. See Table 2.

The sample was based on materiality, significance to the core functions of the agency, risk and dollar value. The contracts varied in value from \$45 000 to \$194 million. Some were relatively simple contracts while others were high value and involved complex outsourcing arrangements with strategic partners which ran over several years. The contracts included land information records, Synergy's Customer Information System which includes customer billing, and DMP's Environmental Assessment and Regulatory System (EARS) and Mines and Mineral Deposits (MINEDEX) applications.

Agency	Number of Contracts Examined	Total Value
Department of Education	5	\$271 million
Department of Mines and Petroleum	6	\$3.4 million
Landgate	2	\$90 million
Lotterywest	3	\$14.5 million
Synergy	4	\$80.5 million
Tourism WA	4	\$0.52 million
<b>Total</b>	<b>24</b>	<b>\$459.92 million</b>

**Table 2: Total value of contracts examined**

*Total value is the estimated value over the life of the contract, which may be up to five years*

The audit was conducted in accordance with Australian Auditing Standards for performance engagement.

## What did we find?

### Summary of Agencies' Performance in Planning, Procuring and Managing ICT Contractors

Landgate planned, procured and managed ICT contractors well. The other agencies need to strengthen their processes to ensure they are managing strategically, that the procurement of ICT contractors complies with relevant procurement policies and there is effective management of potential conflict of interest. Specifically:

- DMP, Lotterywest, Synergy and Tourism WA lacked either comprehensive or up-to-date strategic ICT plans
- DMP, Lotterywest and Synergy did not fully comply with procurement policy for some of their contracting arrangements
- potential conflicts of interest were not effectively recognised and managed at DoE, DMP and Synergy.

Table 3 summarises agencies’ performance in planning, procuring and managing ICT contractors. Individual findings specific to each agency can be found in the section below the table.

Agency	Comprehensive and up-to-date ICT strategy and plans	Consistently complied with legislation and procurement policies	Monitor contractor performance to ensure they are achieving desired outcomes	Recognise and appropriately manage conflicts of interest
Landgate	●	●	●	●
Department of Education	●	●	●	●
Tourism WA	●	●	●	●
Lotterywest	●	●	●	●
Department of Mines and Petroleum	●	●	●	●
Synergy	●	●	●	●

Table 3: Summary of agency performance in planning, procuring and monitoring ICT contractors

- No issues
- Moderate issues – findings that individually may not be significant but are of sufficient concern to warrant action as soon as possible
- Significant issues – findings that represent a significant risk to the agency should they not be addressed promptly

### **Landgate was managing ICT contractors well**

Landgate was better practice in their management of ICT contractors. They were able to demonstrate that they managed all aspects of ICT contracting and procurement well.

Landgate's main objectives and functions are to administer and provide access to the government's land location information systems and promote and market land information products and services for commercial purposes. The information systems administered by Landgate are vital to the efficient operation of the property market and the calculation of rates and taxes in WA.

We found that there is clear alignment between Landgate's strategic objectives, its strategic ICT plan, and the engagement of contractors who provide application development and ICT infrastructure services. Landgate has a robust governance framework and has maintained the necessary in-house capacity to effectively plan, procure and manage the engagement of ICT contractors.

The procurement of ICT contractors complied with the *Land Information Authority Act 2006*, SSC policy and DoF guidelines. Landgate has also established a sound process to monitor contractor performance and overall ICT performance is reported to senior management and the Board on a regular basis.

### **DoE managed well, however they could strengthen their management of potential conflicts of interest by maintaining staff gift registers**

DoE was established on 30 October 2009 following the demerger of the Department of Education and Training. DoE has approximately 770 schools and education centres throughout the state and a staff complement of about 33 000. It spent approximately \$271 million on ICT goods and services in 2009-10.

We found that DoE planned, procured and managed its ICT contractors to achieve agency objectives. Its procurement complied with government policy and guidelines and it monitors contractors' performance to ensure they are achieving the desired outcomes.

DoE's strategic ICT plan provides a sound business planning framework and it has a robust and well established procurement and contract management regime. DoE's policies include the ICT Contract Manager's Guide, a detailed, comprehensive and practical guide for managers with links and references to relevant policies, forms and governance requirements.

While no issues of conflict of interest were identified among the contracts sampled, we noted that DoE does not maintain gifts registers. DoE has a staff conduct policy stating that staff should not accept gifts during any tender, advertising or evaluation process. However, in the absence of a gifts register, DoE cannot demonstrate it is effectively managing the risk of procurement staff being offered or receiving gifts. Acceptance of gifts by staff involved in procurement can give rise to potential conflicts of interest. For this reason it is important for agencies to maintain and monitor acceptance of gifts by staff. DoE has agreed to establish and maintain gift registers.



### **Tourism WA met all the criteria for procuring and managing contractors, but its ICT strategic plan was out of date**

Tourism WA has undergone a major restructure in the last 12 months which has changed its ICT environment. Although Tourism WA is managing ICT contractors to achieve its objectives and its procurement complied with SSC policy and DoF guidelines, it has not updated its strategic ICT plan to reflect its current ICT environment and sourcing strategy.

As a consequence there is no up-to-date high level governance document explaining how it delivers its ICT services. Tourism advised us it intends to complete the update of its ICT strategy in the near future.

### **Lotterywest could improve strategic management and strengthen their contract management framework**

Lotterywest operates under the *Lotteries Commission Act 1990* and in accordance with the rules and regulations governing the operation of lottery games. It has recently undertaken a business transformation project replacing its central gaming system, lottery terminals and associated data communications network infrastructure. It has also replaced its legacy business systems and plans to launch a new Grants Management System in 2011.

Lotterywest spent approximately \$11.25 million on contracted ICT goods and services in 2009-10.

Lotterywest is required to adhere to the SSC procurement policies and can undertake its own procurement activities up to a value of \$1 million without involving DoF or requiring any DoF approvals. This is a significant exemption and gives Lotterywest a relatively high degree of autonomy from DoF.

We found that Lotterywest had generally managed its ICT contractors well, however areas for improvement included:

- Lotterywest did not maintain an up-to-date strategic ICT plan. Without a documented and current strategic ICT plan that explains how Lotterywest delivers ICT services, the executive management and the Board cannot be assured that adequate controls are in place to mitigate risk or have adequate information to make strategic management decisions.
- Lotterywest had not fully complied with the requirements in its purchasing manual and DoF's procurement guidelines. It had not established a formal contract management plan for its \$14 million contract to provide an enterprise resource planning solution to replace its legacy business applications. A contract management plan incorporates transition management, performance monitoring and ensures that both parties fulfil their commercial and contractual commitments. If contract management plans are not established for high value contracts there is a higher dependence on individual project management or IT staff, and increased risk that the effectiveness of post-award contract management will be reduced.

## DMP

We found that DMP could improve its ICT strategy and that its procurement of ICT contractors had not fully complied with SSC policy and DoF guidelines. In our opinion the Department is also exposed to a potential conflict of interest through its contracting arrangements:

### *Strategic ICT planning*

Although DMP's strategic ICT plan summarises the Department's ICT programs and projects, management controls and processes and its enterprise architecture, it does not clearly define or include:

- a strategic overview of the IT infrastructure, programs and projects and how they are aligned to meet current business objectives including an identification of strengths, weaknesses and risks associated with the current delivery model
- identified future business needs and how these drive proposed changes in IT programs, projects and the delivery model
- analysis of costs and benefits related to future delivery options
- specific objectives with associated performance measures and timelines to track delivery of ICT strategic outcomes.

The lack of strategic analysis and detail means that senior management may not have sufficient information to make informed decisions about ICT strategy, allocation of resources and procurement.

### *Compliance with procurement policy*

The procurement of ICT contractors did not fully comply with government policy and guidelines. Application support and maintenance services for two of the Department's core business systems were initially delivered for at least two years without a contract in place. A lack of clear agreed terms and conditions embodied in a signed contract makes it difficult to enforce the conditions.

DoF advises that a business case should be established for procurements over \$150 000. DMP did not document the business case for two contracts:

- Business Process Review and Reform Services – value \$480 000
- Corporate Training Programs – value \$533 000.

The lack of a documented business case to support the procurement of ICT services makes it difficult to demonstrate that the business need had been identified and alternative sourcing options considered. It also makes it hard to conduct effective evaluation.

### **Conflict of interest**

DMP has not clearly documented a potential conflict of interest associated with one of its ICT contractors or the risk mitigation strategies it has in place to deal with this potential conflict.

In principle it is not appropriate for contractors to provide management advice and to deliver associated services that may arise from that advice. One contractor has provided "Business Process Review and Reform Services" to DMP over a five year period. The contractor's work has included developing specifications for business solutions that DMP then puts to open quotation. However, the contractor has a close relationship with the company that has successfully bid for and provides software and support services for approximately 12 of DMP's business systems applications. The contractor also delivers training programs to DMP staff for those business applications.

In March 2010, DMP's Internal Audit highlighted the potential conflict arising from the close working relationship between the two contractors. DMP examined the potential conflict of interest between the two contractors and ensured internal DMP staff agreed and approved contract specifications prior to open quotation.

We acknowledge that DMP has partially mitigated the potential conflict of interest by competitively tendering the Business Process Review and Reform Services, and training contracts. However, there is a risk that the contractors are positioned to create demand for each other's services and in our opinion, this continues to represent a potential conflict of interest. We have recommended that DMP should wherever possible, avoid sourcing strategic ICT consultancy and associated service delivery from the same contractor. Where contracting arrangements present potential conflicts, these should be recognised and mitigation strategies should be documented through the strategic ICT plan or agency conflict of interest/risk register.

### **Synergy**

Synergy was established under the *Electricity Corporations Act 2005* on 1 April 2006 following the disaggregation of Western Power Corporation. Its main activities are energy procurement, marketing, electricity and gas sales, billing and payment processing.

Although Synergy is not required to comply with SSC procurement policies it must obtain ministerial approval for transactions above \$20 million.

Synergy has undertaken a business transformation program which included the implementation of a new billing and customer relationship management system in August 2009. Synergy engaged contractors to manage the project and has entered into system support, maintenance and development contracts with a number of strategic partners.

We found that Synergy has recognised weaknesses and taken steps to strengthen its contract management and procurement processes. However we also found that:

- there are gaps in Synergy's strategic management of ICT contractors
- Synergy could not demonstrate that it complied with its procurement policy when it purchased ICT consultancy services to manage its Business Transformation Office and did not obtain Ministerial approval prior to awarding a \$30 million contract
- conflict of interest is not managed well. Synergy is not complying with its own conflict of interest policy to maintain a gifts register.

### ***There are gaps in Synergy's strategic management of ICT***

In response to a 2009 internal audit report that was critical of contract management and procurement processes, Synergy established an in-house vendor management group and has implemented a robust contractor and procurement system which has standardised sourcing, selection and commitment processes.

Although Synergy has taken steps during the last 12 months to improve its contracting governance framework, there are still gaps in its strategic management of ICT:

- Synergy did not have a current documented strategic ICT plan or a documented ICT contract management framework
- there were no individual contract management plans for its high value ICT service contracts
- although contractor performance is reported to executive meetings in accordance with contract Service Level Agreements, Synergy does not produce an annual ICT performance report.

Synergy confirmed that it is taking appropriate action to finalise its ICT strategy and contract management framework.

### ***The procurement of ICT contractors did not fully comply with enabling legislation and agency procedures***

We examined four contracts related to Synergy's business transformation program. Two of the contracts did not comply with Synergy's legislative and policy obligations.

Synergy could not demonstrate that the procurement of ICT consultancy services to manage its Business Transformation Office complied with its procurement policy. We also found that Synergy did not obtain Ministerial approval prior to awarding a \$30 million contract.

While Synergy did conduct a formal process for the procurement of ICT consultancy services valued at \$380 000 it has not been able to show that the process was a competitive one, or that it had a waiver under its policy to justify not conducting a competitive tender. Between August 2008 and October 2010, sixteen statements of work were added to the original agreement increasing the scope of work and overall value to more than \$3 million.

In December 2007 Synergy obtained Ministerial approval to enter into a \$38.1 million consultancy service and core services agreement with one supplier to implement and run for a period of five years a new customer information and relationship management computer system.

After completion of the implementation phase of the above contract, Synergy conducted two new competitive tenders for the maintenance and running of the system. Synergy advised this change in strategy reduced the cost of the original agreement approved by the Minister to \$21 million. Simultaneously Synergy also conducted a separate competitive tender for work outside the scope of the original contract for back office services. One supplier was successful in both the application management and back office services tenders, and in exchange for an additional discount from the supplier Synergy agreed to combine these two contracts. The \$30 million application management and back office services contract signed in July 2009 required Ministerial approval under section 68 of the *Electricity Corporations Act 2005*.

In July 2010, Synergy advised the Minister that it had inadvertently entered into the agreement without seeking the necessary approval. On 21 December 2010, Synergy wrote to the Minister seeking section 68 approval for services valued at \$60.4 million, which reflected the original value of the contract and the value of change requests and enhancements to the system.

### ***Conflict of interest is not managed well***

Although Synergy has detailed conflict of interest, gifts and entertainment policies that mirror best practice we found that Synergy does not maintain a conflict of interest or a gift register.

Conflict of interest and gift registers help provide assurance to the Board and Executive that exposure to risk associated with conflict of interest and the receipt of gifts is mitigated by appropriate controls. If conflicts and gifts are not recorded in registers, an agency cannot demonstrate that it has oversight in this area and that potential risk has been independently assessed and appropriately managed.

### **DoF pre-qualifies its CUA suppliers well but should improve its ongoing monitoring of them**

The CUA process was developed by DoF as part of a procurement reform initiative, and based on identification of products commonly used by government.

We examined two CUAs:

- CUA 22008 – a three year contract with a two year option for extension, valued at \$200 million. Its use is mandatory within the Perth metropolitan area
- CUA 14008 – a three year contract with two, two year options and an estimated total value of \$720 million.

We found that DoF had a robust and well managed pre-qualification process. Agencies can therefore be satisfied that suppliers listed on these CUAs have undergone a rigorous assessment process.

However, we also found that DoF can improve its monitoring of suppliers and its due diligence during the life of a CUA. DoF has agreed that it will assess the performance of individual CUAs and institute further due diligence checks where appropriate.

Agencies rely upon the assurance offered by registration on a CUA, and expect ongoing oversight to ensure quality standards are adhered to. The ICT industry is rapidly changing and evolving. Companies may merge, change key personnel, add new services or cease providing some services. Such changes can alter the financial status of a company, its risk profile, and the key personnel available.

### ***Pre-qualification of suppliers***

We found that both CUAs had a detailed business case that evidenced thorough industry research, a review of other Australian jurisdictions and the previous CUA, consideration of various procurement options, a procurement plan, a formal request for tender containing detailed specifications and a head agreement with standard supplier conditions.

Suppliers on both CUAs had undergone a full tender and evaluation process in accordance with DoF procurement policies, were approved by the Executive Director, Government Procurement and endorsed by the State Tender Review Committee.

The evaluation process for each CUA included:

- a desktop pre-qualification assessment, compliance requirements, a qualitative assessment of the services offered and a price summary
- a three phase short listing process including value for money assessments
- financial due diligence and referee checks.

### ***Monitoring of CUA suppliers***

DoF had a robust and well managed pre-qualification process in place for suppliers listed on the two CUAs we reviewed. However, we found that it could improve the monitoring of suppliers during the life of a CUA, which may be up to seven years.

Each CUA has a contract management plan with performance and monitoring criteria.

DoF should conduct ongoing monitoring and review as well as random audits of suppliers during the life of the CUA. However we found that only limited monitoring or due diligence was carried out.

Although DoF considered that the risks to the state are low and that sufficient business intelligence is obtained to take action if necessary, it has agreed that it will assess CUAs individually and based on identified risk, institute further due diligence checks where appropriate.

# Acceptance of Gifts and Benefits by Public Officers in the Department of Health

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## Overview

It is not uncommon for public sector officers to be offered gifts during the course of their work. However, acceptance of gifts can give rise to potential conflicts of interest if the recipient has authority to influence decisions in favour of the donor. For this reason, agencies need to provide staff with clear guidance on the circumstances where acceptance of gifts is appropriate or inappropriate. Agencies also need to ensure they have controls, such as gift registers and monitoring of procurement and contracting decisions, to prevent gifts being used to assert inappropriate influence on public sector officers.

This report deals with the issue of public officers in the Department of Health accepting gifts, free accommodation and free travel. In May 2011 the Minister for Health tabled a report in Parliament that provided details about the number of times senior officers from the Department of Health had accepted gifts, free accommodation or free travel since July 2010. The tabled report showed that 25 gifts and 234 offers of travel benefits had been accepted. The value of the gifts ranged from \$30 to \$350, and the value of free travel and accommodation ranged from \$400 to \$17 000. Twenty-nine per cent of these gifts and travel benefits had been provided by companies that were reported to have a financial or commercial relationship with the Department. The figures reported for the Department of Health were significantly higher than any other public sector agency.

In June, the Auditor General received requests from both the Government and Opposition to examine whether the Department appropriately manages issues around gifts and free travel. The Auditor General agreed to conduct a preliminary investigation to determine whether the acceptance of travel and gifts was in accordance with Departmental policy and the Public Sector Commission's expectations. We examined the 25 gifts as well as the 22 highest value cases of free travel and accommodation in the Department's report.

## Conclusion

We found no evidence that Department staff or private companies had inappropriately benefited from the gifts or travel we examined. However, we found serious weaknesses in the way the Department manages gifts and sponsored travel, especially its failure to recognise the risk of potential conflicts of interest and to appropriately manage and monitor that risk.

The Department has now reviewed its approach to managing gifts and sponsored travel. It is currently implementing policy and process improvements which have been endorsed by the Public Sector Commission and will address our concerns. The Public Sector Commissioner has provided detailed comments which are included in full at the end of this report.

## Key findings

The Department defines free travel as a sponsorship rather than a gift, and treats sponsored travel and gifts differently.

- Although all the sponsored travel applications we tested explained the benefits of the travel and were approved in accordance with policy requirements, the risks around conflicts of interests were not identified and managed in accordance with policy:
  - All travel requests we tested identified the funding source for the travel, were approved by someone with appropriate delegated authority and contained details to show the travel was work related
  - None of the travel requests we tested were supported by conflict of interest documentation that aligned to the Department's policy for managing conflicts of interest. We considered this a serious weakness in the Department's process.
- Gifts were accepted in breach of policy. Policy did not allow gifts above a 'negligible value' to be accepted, but the Department reported to Parliament that 25 gifts valued from \$30 to \$350 were accepted by staff. The report was based on information from different business areas within the Department that may or may not have had gift registers. As a result the reliability of the information is uncertain.
- The Department did not have a program to monitor compliance with its policies for travel or gifts. This left the Department unaware of practices that could be inappropriate and which had the potential to cause reputational damage.
- No officers who reported having accepted gifts or travel benefits during the period were later involved in awarding contracts to the company that supplied them with the gift or sponsored travel.
- The Department has reviewed and amended its travel policy and practices to better reflect the risk associated with sponsored travel and conflicts of interest. It has also committed to introducing awareness-raising and compliance monitoring activities. Its proposed changes have been endorsed by the Minister and the Public Sector Commission. It is also in the process of reviewing its gifts policy, and will also consult with the Public Sector Commission during this process.



## What should be done?

The Department of Health should:

- Implement its revised policy and procedures as a priority.
- Schedule compliance monitoring for six months to a year after its new policies and procedures are implemented, then take action in response to breaches and any other identified issues.
- Preclude officers that have received gifts or travel benefits from participating in, or influencing commercial decisions about the donor organisations.

## Agency response

WA Health accepts the key findings noting that as part of this review “no officers who reported having accepted gifts or travel benefits during the period were later involved in awarding contracts to the company.”

WA Health is currently revising both the existing Staff Air Travel Policy and the Attendance at Functions and the Acceptance of Gifts, Prizes or Inducements Policy to; strengthen the monitoring and compliance of these policies; ensure any potential, perceived and actual conflict of interests are identified; and align the policies with the OAG findings. The revised policies are due for implementation in the last quarter of 2011.

## Background

The acceptance of a gift or a travel benefit by a public officer has the potential to cause a real or perceived conflict of interest in the event that the officer is later involved in a decision affecting the provider of the gift or benefit.

It is common practice across the world for companies in the health-care industry to sponsor health professionals to attend local or international courses, seminars, conferences and research meetings. Doctors have a professional obligation to pursue continuous professional development and participate in medical research initiatives, so that they can offer the best health service possible to their patients. Nonetheless, the potential conflicts of interest associated with travel sponsorships from the health-care industry have long been recognised by professional associations, regulators, academics and industry. The Department of Health has an obligation to recognise and appropriately manage these integrity risks.

## What did we do?

We conducted a preliminary investigation to see whether the gifts and sponsored travel accepted by public officers in the Department of Health during the period July 2010 to May 2011 complied with the accepted standards of practice for the public sector.

We tested all 22 cases of sponsored travel valued above \$10 000, including the 15 cases highlighted in media reports, to see if they complied with policy. We also tested procurement documentation relating to 23 companies who supplied sponsored travel to officers to determine whether those officers had been involved in procurement decisions.

We consulted with the Public Sector Commission about the Department of Health's policies and strategies, as well as the Corruption and Crime Commission about integrity risks in the Department. We also met with representatives from Medicines Australia and the Australian Medical Association (WA).

## What did we find?

The Department of Health's policies draw a distinction between free accommodation or travel and other types of gifts. The Department defines travel paid for by external organisations as a form of sponsorship, which it terms "sponsored travel." There are separate policies in place for gifts and sponsored travel.

### **Sponsored travel applications had supporting documentation and were approved in accordance with travel policy**

All of the travel requests we tested complied with policy requirements to detail the benefits of the travel in relation to work and to be approved by the Director General or Chief Executive of the relevant Area Health Service. We also note that at least 16 requests for sponsored travel were declined during the period, which indicates that this type of travel was not automatically approved. The reasons given for declining applications included too many officers attending the same event, and not enough notice given of proposed travel.

### **Potential conflicts of interest were not assessed and managed in accordance with policy**

The sponsored travel requests we tested did not document conflict of interest issues in accordance with the Department's policy. The Department has a robust policy for managing conflicts of interest. Its policy provides definitions and guidance on identifying and assessing conflicts of interest, and requires officers to report and record these situations using a standard *Conflict of Interest Assessment Guide and Record*. The policy documentation also includes an extensive guide to help officers identify appropriate strategies to manage conflict of interest situations.

*Conflict of Interest Assessment Guide and Record* forms were not completed for the travel requests we tested. Without this documentation, it is not clear that all the risks were identified and managed carefully.

For example, in one case, a pharmacist who had been on the pharmaceutical tender committee was sponsored by a pharmaceutical company to attend an international pharmacists meeting in Europe. The sponsorship offer from the company explicitly stated that one of the aims of the sponsorship was for the pharmacist to provide the company with "expert opinion as to the main potential requirements for the smooth introduction of new drugs into the Australian market generally, and specifically Western Australia." We would have expected that the required conflict of interest documents would have recognised the potential for this situation to give rise to a conflict.

In 17 of 22 cases, documentation that supported travel requests included a brief statement about conflicts of interest. The content of these statements varied. Some noted that the sponsorship did not create any obligations on the Department regarding the sponsoring company and some declared that no conflict existed.

### **Gifts were accepted in breach of policy**

All 25 of the gifts noted in the Department's report to Parliament were accepted in breach of policy, which stated that "officers should refrain from the acceptance of gifts, prizes or other inducements (other than minor items of negligible value such as pens and calendars)." The Department reported that officers had accepted gifts such as wine, champagne, books and ball tickets, ranging in value from \$30 to \$350. Although this figure represents a very small proportion of Health staff, all these gifts were above 'negligible' value so were in breach of the Department's policy.

Because the Department's policy did not allow acceptance of gifts above negligible value only some business areas within the Department maintained gift registers. To compile its report to Parliament, the Department therefore relied on advice from staff to supplement the gift registers that did exist. While it had little other alternative, we cannot be assured that the information reported is complete.

### **There was no program to monitor policy compliance, so breaches and risks could not be identified and addressed**

Health did not have a program to monitor its policies for travel or gifts. Monitoring compliance with policy helps to identify individual breaches, to identify any systemic issues, and to reinforce the importance of the policy itself. We expected the Department to monitor compliance with its sponsored travel and gifts given the reputational damage and other consequences of policy breaches.

### **Officers that reported having accepted gifts or sponsored travel from companies did not later evaluate contract bids from those companies**

We found that none of the officers who received gifts or sponsorships from companies were later involved in awarding contracts to those companies. We tested the evaluation reports of contract bids to see whether the officers who received the gifts and travel sponsorships were involved in these evaluations. We reviewed evaluation documentation for 37 contracts under which the companies supply goods or services to the Department. The dates of the contract evaluations we tested ranged from September 2005 to May 2011.

There are a range of decisions that could be influenced by travel sponsorships from companies. Our testing focused on the key risk area of procurement, but many other risks could be involved. It is important that recipients of gifts and sponsored travel identify what the potential conflicts of interest might be and consider how they should be managed before they arise.

During the Department's procurement processes, evaluation panel members must sign a declaration detailing any pecuniary or other interests they have concerning potential suppliers. They must also declare whether they have received any gratuities, such as gifts or travel sponsorships, from potential suppliers. However, there are no formal restrictions preventing someone who declares an interest or gratuity from participating in the evaluation process. The Department advised that when a conflict of interest is declared, its procurement managers seek nomination of a different officer to participate in the procurement process.

The Department reported to Parliament that it had a commercial or financial relationship with 33 companies that provided gifts or travel benefits to its officers during the period. Although we found that no officers later evaluated contract bids from companies that gave them gifts or travel sponsorships, there were more than 1 000 purchases from eight companies that did not involve a contract evaluation process. We expect to do further work in the near future to satisfy ourselves the processes and approvals for these purchases were appropriate.

### **Improved arrangements for managing sponsored travel and gifts**

The Department of Health has plans to implement changes to its policies and procedures to better address risks around gifts and sponsored travel. In August 2010 the Minister for Health sought advice from the Public Sector Commission about the appropriateness of the Department of Health's management of sponsored travel. The Public Sector Commission recommended that the Department reassess its management of integrity risks associated with sponsored travel. The Department then commenced a review and consulted with the Public Sector Commission during this process.

## Acceptance of Gifts and Benefits by Public Officers in the Department of Health

### ***Sponsored travel***

The Department's review resulted in proposed changes to better emphasise risks associated with sponsored travel. The revised draft policy will:

- require sponsored travellers to identify and declare perceived, potential or actual conflicts of interests. The policy provides some examples of conflicts of interest to assist officers to recognise them when they arise
- require officers who apply for sponsored travel to complete a declaration that they are aware of the Department's conflict of interest policy and have complied with its requirements
- require a signed agreement from the sponsoring company stating that the sponsorship does not create any obligation on the Department in relation to the company or its products, and noting that the sponsored officer may be excluded from future formulary, procurement or other activities concerning the company.

The Department has also committed to:

- conducting awareness raising activities in relation to policy requirements
- monitoring compliance with its policy requirements
- implementing an electronic system to manage travel requests. The system will streamline the approval process and improve the Department's ability to monitor and report on travel and associated conflicts of interest.

These improvements have been endorsed by the Department's executive, the Minister for Health and the Public Sector Commission. We also consider that the improvements will address our own concerns. The Department expects to implement the policy and associated initiatives in the last quarter of this year.

### ***Gifts other than travel***

The Department has also recently commenced a review of its gifts policy in consultation with the Public Sector Commission. The Department expects that a revised policy will authorise the acceptance of gifts under the following conditions:

- it is approved by the officer's manager
- it is recorded in a central register
- gifts cannot be accepted by officers who make decisions that affect the Department's commercial relationship with the provider.

## Comments by the Public Sector Commissioner

- All public sector employees have a legislative obligation to act with integrity in the performance of official duties, and to comply with the Public Sector Code of Ethics, their agency's code of conduct and any other Act governing their conduct (section 9 of the *Public Sector Management Act 1994*).
- The Code of Ethics outlines expected standards of conduct for public officers. The codes three principles are Personal Integrity, Relationships with Others and Accountability. The Personal Integrity principle within the Code of Ethics reinforces the obligation on employees to act with care and diligence and to make decisions that are honest, fair, impartial, and timely, and consider all relevant information. Considering all relevant information includes assessing whether actions or decisions are consistent with legislation, ethical codes, sector wide policy and agency rules and procedures.
- The Public Sector Commissioner's Circular *Requirement for Public Sector Agencies to Develop Codes of Conduct* requires all agencies to develop, implement and promote a code of conduct and to ensure compliance. Agency codes of conduct are developed in consideration of the Code of Ethics. The Commission's *Conduct Guide* assists agencies to develop Codes of Conduct.
- The Public Sector Commission assists agencies to communicate how their code of conduct is to be applied and provides guidance about how risks are identified, addressed and managed by supervisors and employees alike. Employing authorities should ensure there are measures in place to assess compliance with their code and that processes are in place for matters to be reported and followed up.
- The Commission's Accountable and Ethical Decision Making Training Program provides guidance on ethical conduct in relation to conflicts of interest and acceptance of gifts. The Commissioner has personally conducted AEDM training for CEOs and some boards and committees. In accordance with the Commissioner's Circular Training on Accountable and Ethical Decision Making in the Western Australian Public Sector, CEOs are required to ensure AEDM training is provided to their employees.
- Each public sector agency should consider and assess integrity risks associated with the functions and processes that it administers. The receipt of gifts or other non monetary benefits that is not part of an employee's entitlement can place a public officer in a position of actual, perceived or potential conflict of interest between the obligation to act impartially and the private interest associated with receiving the gift.
- To manage this integrity risk, employing authorities should develop a clear position about how their employees are required to act in the event a gift is offered to them. This is usually articulated within a code of conduct or policies and procedures linked to it.
- It is not necessarily appropriate to have a blanket ban or a one-size-fits-all rule in relation to gifts, even within a single agency. A situation involving a procurement officer accepting regular hospitality or an expensive gift from a supplier at the time a tender is being assessed should not be compared to a nurse or a teacher accepting a gift in appreciation of work done in the normal course of their work, even where the gift is of similar monetary value.

#### Acceptance of Gifts and Benefits by Public Officers in the Department of Health

- Ethical issues such as the acceptance of gifts are rarely black and white. Principles of transparency, impartiality and honesty should guide behaviour, as should context, timing and proportionality. What is appropriate is to ensure that employees have an appreciation of high order principles, an understanding of the rules, and an awareness of how such actions will be perceived.
- Employing authorities must strive to engender a commitment among employees to the core principle of public service that no person should derive a private benefit, beyond their lawful entitlement, through their position or through the use of their authority.
- The observations and recommendations of the report of the Office of the Auditor General are consistent with these principles and approach. The Commission has provided advice to the Department of Health in relation to employee sponsored travel. It has advised that while a number of relevant policies were in place, those policies were not fully aligned to the principles set out above, and some were not uniformly applied. The Commission has worked with the department to highlight key controls to address actual or real conflict of interest and to manage these appropriately. However, it is acknowledged that such controls, however robust, may not always address perceived conflicts.
- The Commission will continue to work with the Department of Health and other departments to assist in evaluating the workability of policies, the strength and reliability of compliance controls and the extent to which they are effective in helping to identify and manage conflicts of interest. However, as always, responsibility for management of issues and for engendering a commitment to integrity in the agency rests with the employing authority.

# Auditor General's Reports

REPORT NUMBER	2011 REPORTS	DATE TABLED
6	Right Teacher, Right Place, Right Time: Teacher Placement in Public Schools	31 August 2011
5	Public Sector Performance Report 2011 – Agency Compliance with Procurement Requirements – Managing the Priority Start – Building Policy	29 June 2011
4	Information Systems Audit Report	15 June 2011
3	Audit Results – Annual Assurance Audits completed since 1 November 2010, including universities and state training providers; and Opinion on a Ministerial Notification	25 May 2011
2	Opinion on Ministerial Notification: Ministerial decision to not provide information to Parliament in relation to the theatre production of <i>The Graduate</i>	23 March 2011
1	Raising the Bar: Implementing key provisions of the <i>Liquor Control Act</i> in licensed premises	23 March 2011

The above reports can be accessed on the Office of the Auditor General's website at [www.audit.wa.gov.au](http://www.audit.wa.gov.au)

On request these reports may be made available in an alternative format for those with visual impairment.