

CROSS RIVER RAIL DELIVERY AUTHORITY

CROSS RIVER RAIL PROJECT

Probity Plan for Project Participants: Transaction Stage

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Commercial-in-Confidence

Revision history

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Approval

Senior Responsible Officer Approval	Name	Graeme Newton
	Position	CEO
	Signature	
	Date	14 February 2018
	Comments	

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1 Introduction

The Queensland State Government is committed to projects that are transparent and accountable and which ensure that all interested parties are given fair and equitable treatment. The Cross River Rail Delivery Authority (CRRDA) has been established to lead the development, procurement and delivery of the Cross River Rail Project (CRR Project or the Project). In this regard, the CRR Project will be underpinned by probity practices that ensure the procedural integrity of the Project is maintained.

Maintaining a high degree of probity throughout each stage of the Project is the responsibility of all project participants. Participants means members of the CRRDA team involved in the process and includes employees, advisers, consultants and contractors. The key objectives of probity for all project participants should be to contribute towards ensuring:

- independence
- transparency
- equity
- confidentiality
- security
- accountability.

The purpose of this Probity Plan is to outline the following:

- underlying probity principles
- risks and consequences
- probity protocols for participants aimed at managing and mitigating probity risks.

This Probity Plan will be approved by the CEO and is effective from the date of signing by the authorised delegates, until a final contract has been awarded for each of the Procurement Packages.

This Probity Plan, updates the initial Project Probity Plan developed by QProcurement who were engaged as the Project's probity adviser until October 2017. This document provides a high-level probity framework and probity guidance for the Project. It is intended to be a "living document" and may be updated as the Project progresses.

Any addition or amendment to this Probity Plan after it has been approved will require the approval of the Probity Adviser and the Project Director.

Project participants must bear in mind that the consequences of a challenge on a probity issue could result in project delays, inappropriate publicity, legal action and/or loss of credibility for the Project. Project participants need to be mindful of the sensitivity of the Project at all times.

1.1 Probity Framework

The CRR Project is a major, high value, complex project, and has been split into a number of work streams, which will involve a number of procurements. To facilitate maintaining the integrity of the process, the probity framework will comprise a number of documents.

The Probity Plan is the overarching document outlining the key probity objectives and principles to be adhered to.

Within the Project there are a number of major procurements. Specific Process Probity Plans will be developed to detail the key probity risks and process, and mitigation strategies to assist in ensuring that probity is adhered to during the transaction phase. Furthermore, probity protocols or guidelines will be issued to cover specific requirements and situations.

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2 Briefings and Acknowledgements

A probity briefing session will be provided to project participants. The purpose of the session is to provide a briefing on the responsibilities for probity throughout the Transaction Phase of the Project.

At the briefing, attendees will be required to sign an Attendance Register. Further briefings may be necessary throughout the life of the Transaction Phase of the Project.

All participants will be provided with a copy of this Probity Plan, which outlines the probity protocols to be adhered to. All project participants will be required to comply with the probity requirements.

All project participants will be required to complete and return acknowledgements in relation to Confidentiality and Conflicts of Interest as provided by CRRDA.

All declarations are to be returned to the Project Director or his/her delegate.

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3 Independence

3.1 Underlying Principles

All project participants must be independent and free from conflicts of interest or otherwise disclose the potential conflict so that the Project Director has an opportunity to assess and resolve the conflict. All potential conflicts must be disclosed as soon as possible. All actual and perceived conflicts must be addressed. Any Project Team member or participant should stand aside from any decision making process where it is determined that he/she has a material conflict (actual or perceived).

3.2 Risks and Consequences

The risk for the Project is that a decision is challenged on the basis that a project participant involved in the decision is alleged to have been unduly influenced in some way by a party that may be interested in submitting an expression of interest or proposal (bid) for the Project.

3.3 Protocols

3.3.1 Declaring any Actual and Potential Conflicts of Interest

All project participants at a “personal level” should review and sign the acknowledgements regarding confidentiality and conflicts of interest as provided by CRRDA.

Examples of interests in relation to any party that may be interested in submitting a bid for the Project that would need to be declared include the following:

- an equity stake
- a debt (past or present)
- an employment or consulting arrangement
- a commercial relationship (customer or supplier)
- business or other activity
- a personal and/or family relationship.

where the interest could reasonably raise an expectation of a conflict of interest with the Project or its related processes.

In addition, the most senior representative of each consultant engaged as part of the Project Team should undertake conflict of interest checks at the “firm/company level” and declare in writing any interests or relationships, which could possibly be construed by a reasonable person as having any influence, or might reasonably be anticipated as creating a perception of influence on the independence, or otherwise, of the consultant firm/company.

In view of the industry factors and the sensitivity of the Project, it is particularly important that the following be adhered to in relation to declarations of any conflicts of interest situations:

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- The declaration must be timely, and in any case, when it first becomes known to a project participant that a conflict of interest situation could arise, whether actual, perceived or potential.
- In making the declaration of the potential conflict, specific details should be provided to enable an initial review and assessment of the issue. Depending on the nature of the issue, such details could include:
 - The names of individuals and/or organisations in question,
 - Nature of the interest in relation to that party, and
 - Dates and periods of time when the interest occurred.
- The declaration should be reviewed and assessed as to whether it creates an issue with determination of the management and actions that may be required.

Signed declarations should be submitted to the Project Director who will review all declarations and will consider all potential conflicts identified with the Probity Adviser.

All project participants should note that there is a continuing obligation to immediately and truthfully declare any changes that may occur to their independence or the independence of their consultant firm/company (if you are the most senior representative of the consultant firm/company), subsequent to the date the initial Declaration is signed.

3.3.2 Managing Conflicts of Interest

It is understood and not unusual that conflicts of interest can and do occur in the normal course of State Government Agencies or Authorities Officials' work. A conflict of interest arising is not wrong in itself as individuals in organisations often have previous associations, business interests, other ongoing projects and relationships. The key is the disclosure and management of the conflict, or potential conflict of interest.

The primary objective of managing an identified conflict of interest is to ensure that decision are made, and can be demonstrated to be made, in accordance with a well-documented process and without bias.

A key test is whether an individual could be influenced or appear to be influenced by a private interest in the performance of their role – would a reasonable and informed person think such relationships and interests could conflict or appear to conflict with the role in question.

No single set of guidelines is able to address every possible situation as conflicts of interest can occur in different ways and need to be addressed on a case-by-case basis depending on the detailed information of each situation. Judgement is required to be applied to the conflict of interest situation – consider whether a reasonable person, in possession of all the relevant information in relation to the issue would be likely to think that the entity or individual's integrity was at risk from an unresolved conflict of interest.

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3.3.3 Avoiding Conflicts of Interest

It is not possible to define all potential areas of conflict of interest and if project participants are in doubt as to whether a conflict exists, they should raise this with the Project Director. In some circumstances, the appearance of a conflict of interest could itself jeopardise the perception of a project participant's public integrity. Accordingly, project participants should be aware how outside parties might perceive their actions.

Project participants must not use their position to obtain a benefit for someone else. Decisions must not be improperly influenced by family or other personal relationships.

3.3.4 Favours, Gifts and Entertainment

Project participants should not seek or accept favours, gifts and/or entertainment from any party, which could influence them. Included in this category are gifts in kind, such as free accommodation or travel whether for the project participant or his/her immediate relatives.

3.3.5 Reporting Inappropriate Behaviour

If a project participant perceives that there is any behaviour that is inappropriate and contrary to this Probity Plan, they should immediately bring the matter to the attention of the Project Director.

Where a project participant is offered a benefit, gift or invitation for entertainment, regardless of whether it is accepted or not, if the project participant feels that such circumstances involve an attempt to induce favoured treatment, they should immediately provide details to the Project Director.

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4 Transparency

4.1 Underlying Principles

Transparency of processes and management of project participants is to be achieved through the application of relevant protocols in accordance with the project requirements.

4.2 Risks and Consequences

A lack of transparency in the way processes are undertaken or project participants are managed is likely to result in reduced confidence in the Project, its processes or its participants on the part of both internal and external parties. In turn, reduced confidence in the Project, its processes or its participants is likely to impact on the quantity and quality of interest in the Project.

4.3 Protocols

4.3.1 Processes

There needs to be transparency in how each of the critical tasks within the Project will be achieved. This will be the responsibility of the Project Director, in conjunction with the other Project Team staff and consultants where necessary, to establish relevant procedures for the achievement of the requirements of the Project. This includes relevant timelines and milestones.

4.3.2 Participants

There also needs to be transparency and clarity in relation to all project participants regarding their roles and responsibilities and particularly their independence and objectivity.

5 Equity

5.1 Underlying Principles

There must be a level playing field for interested parties at all times. No Proponent should receive or be perceived to have received special treatment or favoured access to information by comparison to that which is made available to all other Proponents.

5.2 Risks and Consequences

A risk for the Project is that a party may allege that it was not given an equal opportunity in the Project and/or one of its processes because it did not receive, have access to or benefit from receiving information provided to other parties. Such a problem would, if established, impact upon the integrity of the Project and could result in project delays, inappropriate publicity and/or legal action.

5.3 Protocols

5.3.1 Exclusivity of Project Participants

All project participants who perform tasks for CRRDA during the Project are required to act exclusively for CRRDA in relation to the Project, i.e. adviser's engagement team members, and individual team members cannot perform services for a Proponent in relation to a specific Project during the Transaction Phase if they are providing services to CRRDA for that Project.

Provided the relationship is appropriately disclosed to, and after assessment approved by the Project Director, project participants are not precluded from performing services to Proponents that are outside of the Project during the Transaction Phase.

Given the broad level of interest from industry participants and the need for CRRDA to ensure they have appointed advisers with appropriate industry knowledge and experience, it is possible that the appointed advisers may have provided or may currently be providing services to potential Proponents.

The probity in relation to the appointed advisers in the Project relies upon a combination of:

- appropriate disclosure of any actual or potential conflicts of interest;
- appropriate consultation between the Project Director, the Probity Adviser and the respective appointed adviser in making an assessment of potential conflicts of interest and determining whether the potential conflict of interest can be appropriately managed;
- management of actual or perceived conflicts of interest through instigating conflict management and confidentiality procedures such as ethical divider procedures and information barriers within the appointed adviser's organisation to ensure separation between the team providing services to CRRDA in

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connection with the Cross River Rail Project. These procedures must be documented and be made available to the Project Director and Probity Adviser upon request; and

- extension of confidentiality obligations and conflict disclosure obligations to employees, consultants, contractors and representatives from the appointed adviser engagement teams.

5.3.2 Communication with Interested Parties and Media

To ensure that a consistent approach is taken in communicating with interested parties in relation to the Project, they must be advised to deal directly with the contact person identified in the project documentation. All other project participants should refuse to enter into discussions with interested parties in relation to the Project.

5.3.3 Information Provided to Interested Parties

Where information is provided to any interested parties during the Project, care must be taken to avoid any favoured treatment and information should be distributed on an equal basis.

5.3.4 Proponent Briefings

If Proponent Briefings are to occur, the Project Team should arrange a common briefing at which all interested parties will hear the same message at the same time. Sufficient notice of the briefing should be given to allow interested parties to attend.

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6 Confidentiality

6.1 Underlying Principles

All project participants must treat and keep strictly confidential all information relating to the Project, other than information which is generally available in the public domain, except as a result of a breach of the confidentiality undertaking (“Confidential Information”).

6.2 Risks and Consequences

The risk for the Project is that confidentiality is breached at some time. Any breach of confidentiality could result in the following:

- CRRDA’s interests being jeopardised
- the competitive position of an interested party being jeopardised.

All Project Team members must be particularly cognisant of the confidential nature of the Project in all dealings with:

- colleagues within CRRDA;
- colleagues in other agencies; and
- consultants, former colleagues, industry participants and others who may express an interest in the Project.

It is the responsibility of all project participants to understand and implement the protocols set out below and in this Probity Plan.

6.3 Protocols

6.3.1 Establishing Confidentiality

At the earliest opportunity, all participants involved in the Project must review and sign the CRRDA acknowledgements in relation to confidentiality and conflicts of interest.

Signed declarations should then be submitted to the Project Director for review.

6.3.2 Dealing with Requests for Confidential Information

If a project participant is requested by any person (other than a person working on the Project who has signed the Confidentiality Declaration) to disclose Confidential Information, the participant must promptly refer the request to the Project Director. The Project Director will liaise with the Probity Adviser as appropriate in determining whether or not there should be disclosure and/or any other appropriate strategy adopted.

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6.3.3 Security, Storage and Handling of Confidential Information

All participants must keep all written or recorded Confidential Information, which is in their possession, or control, securely stored and labelled confidential. All project participants are responsible for the security of information taken from the Project Office and/or each of the home offices of the project participants. All project participants should ensure that Confidential Information is kept in their control at all times. In particular, project participants should not leave Confidential Information unattended.

Confidentiality management includes dealing appropriately and securely with hard copies of documents plus electronic data in its many forms – including (but not limited to):

- electronic data stored in CRR's and advisers' electronic or manual filing systems;
- emails including both information contained in them or sent as an attachment to them; and
- information loaded or stored on USBs, laptops, or other media.

Common breaches of confidentiality management include:

- sending documents to a printer and not collecting them;
- not recovering all copies of confidential documents provided for discussion purposes that were not intended to be retained;
- leaving confidential information in sight (or on a screen) during a meeting;
- not shredding unwanted copies;
- leaving confidential information in sight (or on a screen) when you leave your desk overnight, for lunch, to attend a meeting or to take a break; and
- leaving confidential information or documents in the car, with unattended luggage or otherwise prone to accidental loss.

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7 Security

7.1 Underlying Principle

The most effective preventative measures for breaches of security is the consciousness at all times on the part of all project participants that security is important.

7.2 Risks and Consequences

The risks to the Project if security is breached can be significant, including resulting in project delays, inappropriate publicity and/or legal action.

7.3 Protocols

The following sub-paragraphs seek to address the more important protocols associated with security.

a) Overall Environment

The most effective preventative for breaches of security is the consciousness at all times on the part of all project participants that security is important. If anything unusual occurs or if there is any new aspect to the process, these need to be considered in the light of the potential impact on security.

It is generally too late to rectify a security breach once it has occurred. Accordingly, the most significant effort needs to be put into establishing preventative measures. All project participants should see it as an important aspect of their role, whatever that role may constitute in detail to be vigilant in terms of security and to raise issues and make appropriate recommendations to the Project Director where these would appear necessary.

b) Project Office

A dedicated Project Office has been established within CRRDA.

Project Team members with authority to have access to the Project Office will be issued with security cards to enter the premises, and a Register will be maintained over the security cards.

c) Home Offices

During the Project, consulting organisations will form part of the Project Team. Where they conduct their work out of their respective "home" offices they must remain conscious of their obligations under this Probity Plan.

d) Paper Information

A central filing system must be established within the Project Office and each of the home offices of team members in which correspondence, working papers and other documentation can be efficiently and securely filed.

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If Confidential Information is removed from the Project Office or the home office, extreme care should be taken to ensure that such Confidential Information remains in the possession and control of that person and is not left unattended.

e) Electronic Information

The computer network used by all project participants in the Project Office and each of the home offices of the team members should be discrete and separate from other users who are not project participants. Electronic files should not be linked to the organisational server.

In the event a discrete system is unable to be established, a network area should be established within the system and access to all project files by the project participants must be restricted to those project participants. In addition, folders should be established within the CRR folder for each category of tasks and access restrictions described in the File Plan and applied to each of the sub folders implemented.

f) Reporting of Security Breaches

All project participants should be alert to all actual or suspected breaches of security and immediately notify the Project Director. .

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8 Accountability

8.1 Underlying Principle

All project participants must be accountable for the work undertaken by them and the decisions taken in relation to the Project must be documented, defensible and supported by minutes, comprehensive working papers and/or reports.

8.2 Risks and Consequences

A risk to the Project is that decisions are made without proper authority, consultation and/or sign off. This could result in inappropriate decisions being made, project delays, inappropriate publicity and/or legal action.

8.3 Protocols

8.3.1 Documenting Decisions

- a) A critical aspect of probity is the proper support of decision making. Accordingly, all decisions should be defensible and supported by minutes, comprehensive working papers and/or reports.
- b) At each stage of the Project, key process documentation should be developed and adhered to, in order to provide adequate and appropriate documentation to support decisions. This includes the reports of Advisers involved during any assessment process. The process adopted must be clear and understood.
- c) As described in the confidentiality and security sections of this Probity Plan, documentation must be appropriately secured and safeguarded at all times.

Security, confidentiality and communication are of paramount importance at all stages of the Project.

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9 Probity Issues

Specific probity issues likely to be associated with the Project include:

9.1 Large and diverse number of stakeholders

Maintaining confidentiality and managing sometimes competing objectives will be challenging due to the large and varied number of parties involved including – Queensland Rail (QR) who are procuring the European Train Control Systems (ETCS) which will be used on the QR network, including the CRR component, as well as being engaged in a number of other concurrent and related projects (New Generation Rolling Stock, Far North Coast ETCS), Brisbane City Council (BCC) , Department of Transport and Main Roads (DTMR) and other government agencies with review or referral Project roles, and land owners on sites adjacent to the new stations.

9.2 High profile and high value of the Project

There is a high degree of political sensitivity involved in any government project, and Right to Information legislation makes appropriate information available, upon request, to the media and general public and therefore open to scrutiny. This is heightened for CRR, which is likely to be the largest government-delivered project delivered this decade in Queensland. The mechanisms for control of information and appropriate levels of communication with Government, media, and the general public throughout the Project will ensure that the probity objectives of transparency and confidentiality are achieved.

9.3 Concurrent Interlinked Projects

To maximise market participation and competitiveness, the Queensland government determined that bidders (and their advisers) should be able to participate in more than one of RIS, TSD and ETCS procurement processes subject to satisfactory demonstration of separation and segregation controls of personnel and information between the projects, including ongoing evidence of bidders' and advisers' ability to manage compliance of probity undertakings and, providing appropriate access to CRR's probity adviser to confirm adherence to such undertakings..

9.4 Commercial and technical complexity of CRR

This is a large and complex project, and is taking place while there are a large number of other infrastructure projects being concurrently undertaken in Australia, creating competing demands for technical and commercial resources for government and bidders alike. As such there is a need to apply a consistent and pragmatic approach to addressing potential conflicts of interest.

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10 Probity Strategies

Probity strategies to be adopted to address the Project's risks and develop a strong probity culture and environment include:

10.1 Definition of roles and responsibilities

A Project Team including a clear governance structure and approvals process has been established by CRR to develop, oversee, and manage the Project and address any issues which may arise.

10.2 Project documentation

Project documentation is to be clear and unambiguous such that process rules are well defined, accountability is allocated, and all participants are treated in an equitable manner.

10.3 Project and works package specific protocols and process probity plans

Project and works package specific protocols will be developed to help manage the probity risks associated with the large stakeholder group and associated interactions , and other key aspects of the Project, as required.

10.4 Record keeping

Records are to be maintained throughout the Project and provide sufficient information to enable audit and independent review functions to be carried out easily if necessary. Agendas and minutes are to be prepared for all meetings that prospective and actual Proponents attend. Departures from established procedures should only be for sound and well-documented reasons.

10.5 Development of a Probity Plan

The development of a Probity Plan (this document) based on best-practice probity principles and procedures is an essential compliance tool. This Probity Plan will be used by the Probity Adviser, Project Team, and the State's Advisers to measure performance in a probity context.

10.6 Probity Issues Register

Despite the best of efforts in planning and implementation, probity issues may occur. The CFO, Project Director, and the Probity Adviser are to be advised immediately when probity issue becomes known. They will assess the situation and in consultation with others as required, will determine the actions to be taken, including which parties need to be advised of the issue and when. No other party to the Project including Project Team members should take any independent action.

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Subject to the nature of the issue arising advice may be required to the Treasurer and/or relevant Ministers on the nature of the issue and the remedies being considered.

Remedial action will be taken, as considered necessary by the CFO, Project Director and Probity Adviser, and the issue and how it has been dealt with will be recorded in a Probity Issues Register to be maintained by the Probity Adviser and the issue, subject to materiality, may be included in the Probity Adviser's report.

11 Probity Adviser

The Probity Adviser is an independent observer who is appointed to ensure that the evaluation process is followed in a manner which is fair to all proponents. Any concerns of a probity nature may be referred to the Probity Adviser by any proponent or any member of the evaluation team or wider Project team.

Government requires the Project to be conducted in a fair and impartial manner and with the utmost integrity. To help minimise any probity risks, CRR has appointed, through competitive tender, O'Connor Marsden & Associates (OCM) as independent Probity Adviser to oversee the Project.

The Probity Adviser's scope of work includes:

- working closely with CRR officers and any representatives of other government agencies involved to provide probity advice at each step of the Project to ensure that best practice probity principles are followed;
- monitoring each step of the tendering process for compliance with Government processes and other legislative requirements;
- advising how emerging issues and risks including potential conflicts of interest can be managed and/or resolved;
- reviewing and advising on the Project's key documentation including call documents, protocols, evaluation plans, evaluation reports and key correspondence with proponents;
- attending meetings with Project team members, bidders and advisers and provide probity briefings and other relevant input;
- attending Evaluation Panel and Review Board meetings and provide probity advice as required; and
- providing written probity reports as required on the probity of the Project.

Reports from the Probity Adviser remain confidential to CRR.

Should any person wish to raise or discuss an issue of a probity nature during the Project, such inquiries are to be directed to:

11.1 Probity Adviser Contact Details

Probity Adviser:	Iain McIndoe / Rory O'Connor (OCM)
Mob:	0409 347 150 / 0416 107 627
Email	imcindoe@ocm.net.au / roconnor@ocm.net.au

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Appendix A: Business as Usual Protocols

The CRR Project is complex. To mitigate key probity risks such as:

- A perception that potential participants have contact with key parties in the Project team during the Project and in so doing have an inappropriate influence over the decision-making process;
- The potential for allegations to be made that the release of unauthorised information in relation to the Project resulted in providing certain potential participants with an unfair advantage; and
- The potential for allegations to be made that some market participants were not afforded as much opportunity for interactions or meetings as others and have therefore been disadvantaged in the Project.

The following protocols have been established:

Business as usual versus Project-related interaction

It is recognised that you or/and your colleagues will have previous or on-going personal or business relationships with members of potential market participants or/and key stakeholders outside of the Project. You and your colleagues should attempt to avoid situations likely to engender a conflict of interest or which might create a perception of preferential treatment or access to confidential information. However, in respect of specific issues that may arise:

- If a conflict of interest or other probity issue does arise or the potential for one could be seen to be occurring, this should be declared to the CFO, Project Director or the Probity Adviser who will document the matter in the Probity Register and recommend any management action required. It is each individual's responsibility to immediately bring such matters to the attention of the Project Director and/or Probity Adviser.
- Any individual who becomes aware of, or believes that a breach has occurred, or a breach is likely to occur, any action or circumstance which may be in breach of the above, has the responsibility to communicate their concern to the CFO, Project Director, and/or the Probity Adviser.
- Discussions with key stakeholders such as media representatives, potential participants, key suppliers, community interest groups and industry associations that may be required in the course of your day to day activities must continue, but should not include any discussions concerning the Project.
- Enquiries regarding the Project received during business as usual interactions should be directed to the Project Director. Similarly, key stakeholders' requests for information/documents pertaining to the Project should be directed to the Project Director.

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- No meetings should be held with potential market participants to discuss issues pertaining to the Project without the prior approval of the CFO, Project Director and/or Probity Adviser.

Ethical Conduct

Individuals shall act impartially and not give preferential treatment to any private organisation or individual:

- Should an individual become aware of an actual, perceived, or potential conflict of interest they must immediately bring this to the attention of the Project Manager in the first instance or, if of a significant nature, to the Project Director and/or Probity Adviser;
- Individuals must not disclose Project information to any potential market participant or to any other person who is not authorised to receive such information;
- Individuals shall endeavour to avoid any actions creating the appearance that they are violating the law or these ethical principles;
- Individuals are required to act lawfully, fairly, honestly and in the best interests of Government; and
- Individuals should not accept gifts or gratuities from potential participants.

Enquiries

Enquiries regarding the Project will come from many sources:

- All media enquiries relating to the Project are to be directed to the Project Director or the Communications Manager;
- All phone enquiries from the 'general public' relating to the Project should be forwarded to the Project Director or the Communications Manager; and
- All correspondence from the general public in relation to the Project is to be referred, in the first instance, to the Project Director or the Communications Manager for processing (unless covered by agreed pro-forma responses). Advice will be subsequently provided to the Project Director.

Lobbyists

- Lobbyists can enhance the strength of the democratic process by assisting individuals and organisations to communicate their views on matters of public interest to the Government, and so improve outcomes for the individual and the community as a whole;
- The public, however, has a clear expectation that lobbying activities will be carried out ethically and transparently, and that Government Representatives who are approached by lobbyists are able to establish whose interests the lobbyists represent so that informed judgements can be made about the outcome they are seeking to achieve; and

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- Should you or your colleagues be approached by a lobbyist in relation to the Project direct the individual to the Project Director or the Project Manager.

Any interaction with lobbyists must be conducted in accordance with the Queensland Government Professional Lobbyist Code of Conduct.

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