Consultation phase two summary of feedback

The second phase of consultation confirmed broad support for the Corruption Risk Assessment Tool and its overall structure, content, and purpose. Stakeholders considered the tool a practical and comprehensive means of identifying corruption vulnerabilities across a broad range of public sector functions. Participants also proposed a number of additional changes, some of which have not been incorporated and are outlined below.

What we heard

- **Wording:** Some diagnostic statements were lengthy or combined several concepts.
- **Definitions:** Key technical terms needed clearer explanation.
- **Coverage:** Suggestions to strengthen coverage of procurement, grants and funding, regulatory decision making, governance, organisational culture, political and foreign influence, and third-party relationships.
- **Framing:** Some statements could read as asking whether misconduct has occurred and not whether a control gap is present.
- **Workforce:** Corruption risks can involve contractors, consultants, secondees, delivery partners, and third parties, as well as employees.
- **Guidance:** Plainer wording, easier navigation, and additional explanations and examples were requested.

What we changed

- Refined the wording of selected diagnostic statements and made the vulnerability being assessed clearer.
- Added diagnostic statements covering non-competitive procurement, verification of grant applicants, programme-level funding decisions, panel and external assessor influence in regulatory decisions, and governance oversight.
- Updated the glossary, guidance, and instructions, including clearer direction on how to read the statements.
- Used “employee” consistently and defined it in the glossary to include contractors, consultants, secondees, and others with authorised internal access.

Feedback considered but not adopted

- Request to include political or ministerial influence over funding decisions. These factors generally sit outside an agency's direct control. The tool focuses on corruption and insider threat risks arising from within an organisation, whereas political or ministerial influence originates outside the organisation.
- Request to include foreign influence and interference risks and risks specific to local government or infrastructure sectors. The current focus is on a core set of common corruption risks that public sector agencies can readily assess. More specialised corruption risks, including sector specific risks, have been recorded for consideration in future enhancements.
- Request to make selected domains mandatory. The current approach of strongly encouraging, but not requiring, completion of all relevant domains has been retained. Making domains mandatory could shift the tool for a corruption risk assessment towards a broader governance maturity assessment.

Overall, the consultation has resulted in targeted improvements to the tool's content, terminology, guidance, and usability. Stakeholder feedback has helped strengthen the tool while maintaining a focus on corruption and insider threat risks that agencies can reasonably assess and influence through their own governance, systems, and controls.