

# IBAC Annual Plan

## 2021/22

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Year 1: The IBAC Plan 2021–25

## Acknowledgement

IBAC acknowledge the Traditional Owners of country throughout Victoria and pay respect and recognise the contribution from their Elders past and present.

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# Contents

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<b>1</b>	<b>About IBAC</b>	<b>5</b>
1.1	Who we are	5
<b>2</b>	<b>The IBAC Plan 2021–25</b>	<b>6</b>
2.1	Our vision	6
2.2	Our guiding principles	6
2.3	Our strategic pillars	7
<b>3</b>	<b>Our strategic focus areas</b>	<b>8</b>
3.1	High risk police units, divisions and regions	9
3.2	High risk public sector agencies	9
3.3	Major infrastructure projects	10
3.4	Undue influence	10
3.5	Use of force on people at risk	10
3.6	Police responses to police family violence incidents	11
<b>4</b>	<b>Our strategic initiatives</b>	<b>12</b>
4.1	RCMPI recommendations and police oversight reforms	12
4.2	Corruption prevention strategy	12
4.3	Enhanced complainant experience	13
4.4	IBAC operating model	13
4.5	Intelligence framework	13
4.6	Investigations framework	14
4.7	People strategy	14
4.8	Enabling IT and data infrastructure strategies	14
4.9	Project management office	14
<b>5</b>	<b>Our structure and core work</b>	<b>15</b>
<b>6</b>	<b>Our accountability to government</b>	<b>16</b>
<b>7</b>	<b>Our financial performance</b>	<b>17</b>



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# 1. About IBAC

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**IBAC's Annual Plan 2021/22 (Annual Plan) outlines the organisation's strategic priorities and focus areas, in addition to core work for the year, and provides a budget overview.**

## 1.1 Who we are

IBAC is Victoria's independent anti-corruption and police oversight agency. We are responsible for preventing and exposing public sector corruption and police misconduct.

IBAC works to expose and prevent corruption.

We do this by:

- receiving and assessing complaints and notifications, including assessing all complaints to see if they qualify as public interest disclosures
- referring matters to other appropriate agencies (such as public sector bodies and integrity agencies) for action
- investigating allegations of serious or systemic corruption and police misconduct
- undertaking strategic research and other initiatives to inform the public sector, police and the community of the detrimental impacts of corruption and how it can be prevented.

## Our jurisdiction

Our jurisdiction covers the entire Victorian public sector, including:

- all state government departments and agencies
- Victoria Police
- local government
- public schools and universities
- public hospitals
- parliamentarians
- judiciary.

## Our legislation

We are established under the *Independent Broad-based Anti-corruption Act 2011* and work under other Acts of Parliament including, but not limited to, the *Public Interest Disclosures Act 2012* and the *Charter of Human Rights and Responsibilities Act 2006*.

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# 2. The IBAC Plan 2021–25

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The IBAC Plan 2021–25 (The IBAC Plan) describes our strategic direction over the next four years.

## 2.1 Our vision

Our vision is a public sector and police that acts with integrity for all Victorians.

## 2.2 Our guiding principles

Our work is guided by the following principles:



**We believe that acting in the interests of Victorians should be at the centre of all we do.**

We aim to provide the best possible experience for everyone who contacts IBAC. We're accessible, and we make sure everyone understands our processes and what we can and can't do. If a complaint comes to us that's outside our legislative remit, we'll advise the complainant of other options to follow or agencies who may be able to help.



**We are intelligence led.**

We gather information, data and evidence to form real insights about where we should focus our efforts in maintaining integrity across the public sector and Victoria Police. IBAC collects and analyses intelligence, which alerts us to trends, emerging public sector corruption and police misconduct risks, and opportunities to improve our work. We are focused on being able to effectively use intelligence and data to inform good decision-making and improve our practices.



**We collaborate.**

We're fiercely independent when we need to be, but value collaboration when it's appropriate. Collaboration to us means sharing information and resources, building trust and working together to achieve a common purpose. We work across IBAC and with our key stakeholders to bring diverse people and thinking together in order to ensure integrity across the public sector and police.

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## 2.3 Our strategic pillars

Our strategic pillars are the foundation of The IBAC Plan and the areas of focus of our work. To read more about the strategic pillars refer to The IBAC Plan on the IBAC website: [www.ibac.vic.gov.au](http://www.ibac.vic.gov.au)



**An independent, fair and trusted integrity agency**



**A targeted approach to police misconduct**



**A progressive and connected workplace**



**A collaborative way forward**

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# 3. Our strategic focus areas

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IBAC has identified six strategic areas of focus to guide our work to prevent and expose public sector corruption and police misconduct in 2021/22.

These focus areas have been informed by our strategic intelligence assessments, complaints and notifications data, operational intelligence and stakeholder consultation.





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### 3.1 High risk police units, divisions and regions

In keeping with Strategic Pillar 2: A targeted approach to police misconduct, we will focus on exposing police personnel misconduct in specific regions, divisions and work unit levels within Victoria Police and use this intelligence to inform prevention strategies. These work areas will be identified and targeted via the development of significant corruption and misconduct risk indicators. We will focus on alleged misconduct in these work areas, including helping to strengthen Victoria Police oversight and accountability for these matters.

#### What actions will IBAC take?

In addition to progressing current investigations and reviews, we will:

- develop a police work area risk-identification model
- develop data dashboards to highlight trends in allegations and cases (initially these will be for internal use with a longer-term aim to have public dashboards)
- produce a special report on corruption and misconduct risks associated with the Critical Incident Response Team
- produce investigation summaries and case studies to inform the community and support investigation outcomes
- undertake targeted education and engagement with high risk Victoria Police work areas
- conduct a regional-based public awareness campaign on IBAC's police oversight role.

### 3.2 High risk public sector agencies

As part of our commitment to taking a more intelligence led approach to prioritising our finite resource efforts, we will focus more of our public sector work on agencies assessed as at higher risk of corruption.

Our current research, intelligence and investigations learnings have identified that public sector agencies are vulnerable to corruption if they hold valuable information (which could be misused) or are responsible for high value investments, outsourcing of public services delivery or allocation of grant or relief funding. Another potential corruption risk indicator is a low level of corruption complaints and notifications which could indicate obscuring behaviour. As such, our focus will include agencies within this scope, including community service organisations.

#### What actions will IBAC take?

- Enhance our ability to identify high-risk agencies by developing data dashboards to highlight trends in allegations and cases. Initially these dashboards will be for internal use with a longer-term aim to have public dashboards.
- Implement a communications and engagement program to highlight IBAC's research and report on corruption risks associated with government funded human services delivered by community service organisations and then engaging with government agencies and community service organisations to inform their corruption prevention strategies.
- Undertake targeted communications activities with other high-risk agencies and engage with 'in-house' public sector agency integrity units.

## 3. Our strategic focus areas

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### 3.3 Major infrastructure projects

Major infrastructure projects across state and local government involve significant expenditure and corruption risks exist in the management and control of public funds. Our objective is to inform agencies' corruption prevention strategies and expose corruption risks. Our focus in 2021/22 is major infrastructure projects in the transport sector.

#### What actions will IBAC take?

We will conduct a research project and report on corruption risks associated with major transport infrastructure projects and undertake targeted education and engagement with the Major Transport Infrastructure Authority and other stakeholders to inform their approaches to corruption prevention.

### 3.4 Undue influence

We will continue our important work exposing and seeking to prevent improper influence on decision-making in the public sector, with a focus on undue influence by lobbyists, political donors and third-party facilitators. We will report on investigations that highlight the corruption risks presented by undue influence, and propose reforms to strengthen accountability and transparency.

#### What actions will IBAC take?

We will undertake targeted education and engagement to promote report findings, and conduct an overarching digital awareness campaign to highlight the risks of undue influence across state and local government.

### 3.5 Use of force on people at risk

We will continue to expose and seek to prevent use of force by police, corrections and other public sector officers involved in the supervision of others that is not authorised or justified by law, against Victorians who are diverse or experience vulnerability or marginalisation. This includes Aboriginal and Torres Strait Islander people, LGBTIQ+ and culturally and linguistically diverse community members, and people experiencing mental illness, many of whom may have limited capacity or confidence to report misconduct. Beyond individual cases, we will continue to focus on the effectiveness of police investigations into use of force complaints referred to Victoria Police by IBAC, and monitor the implementation and management of previous IBAC recommendations.

#### What actions will IBAC take?

- Undertake a thematic review focussing on the effectiveness of police investigations into referred use of force complaints.
- Publish an audit of police handling of complaints made by Aboriginal people and utilise its findings to improve practice.
- Commence work on a special report on police use of force.
- Produce investigations summaries and use of force case studies to support investigation outcomes and introduce the case examples into IBAC's education program and presentations to Victoria Police.
- Implement our Focus Communities Strategy to help ensure IBAC is accessible, accountable and engaged with our diverse community. This is a multi-year strategy.

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### **3.6 Police responses to police family violence incidents**

Research indicates that family violence responses by Victoria Police involving other police personnel are less likely to result in charges. The 2015 Victorian Equal Opportunity and Human Rights Commission review into sex discrimination and sexual harassment within Victoria Police identified inadequate policy and practice relating to police family violence matters and links to other issues regarding predatory behaviour and sexual harassment. IBAC has continued to receive a substantial number of complaints and notifications on these issues. We aim to expose behaviours indicative of inappropriate response or misconduct and inform prevention strategies. Consistent police responses to family violence incidents involving police personnel are critical to ensure integrity and ethical standards and to remove any perceived conflicts of interest.

#### **What actions will IBAC take?**

- Continue to target education and engagement with Victoria Police, incorporating use of police family violence perpetrator examples throughout IBAC's Victoria Police education programs and presentations.
- Undertake a thematic review focused on the effectiveness of police investigations into referred family violence complaints.
- Provide advice to Victoria Police on its Employee Related Family Violence program.

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# 4. Our strategic initiatives

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**In Year 1 of The IBAC Plan, we will embed the plan across the organisation, including in divisional plans and individual performance development plans.**

## 4.1 RCMPI recommendations and police oversight reforms

In its response to the Royal Commission into the Management of Police Informants (RCMPI), the Victorian Government has committed to introducing legislation and policy changes that will require IBAC to establish a new compliance and reporting function in relation to Victoria Police's registration and management of human sources. IBAC will prepare for the implementation of these recommendations, by:

- implementing secure information sharing capability between IBAC and the Public Interest Monitor
- establishing internal capability to oversight the implementation of our recommendations (see 4.9 Project Management Office).

In addition, the Victorian Government indicated in its response to the RCMPI that it would consider the findings and recommendations of the 2018 IBAC Committee Inquiry into the external oversight of police corruption and misconduct as part of its implementation of Recommendation 61 of the RCMPI's report. The RCMPI recommended that Government undertake a principles-based review of the police oversight system, within two years, to ensure that the system:

- is consistent and coherent
- contributes to improved police accountability
- delivers meaningful, outcome-focused monitoring of police decisions and actions.

IBAC will contribute to the Department of Justice and Community Safety's systemic review of Victoria's police oversight system and implement any legislative changes arising from that review. This will be a multi-year program.

## 4.2 Corruption prevention strategy

We will implement our new Corruption Prevention Strategy 2021–24, building on the solid foundations we have established to create a corruption-resistant Victorian public sector. The strategy sets out an ambitious program of work to enhance our capacity and capability to undertake corruption prevention activities. It includes five focus areas to guide our prevention efforts:

- 1. Understand:** better leverage research and intelligence to build a more comprehensive picture of the Victorian corruption landscape, and use this data to target prevention work, measure impact and influence reforms
- 2. Inform:** provide more accessible, responsive and targeted information and guidance to the public sector and community to raise awareness about the risks of corruption and how to prevent it
- 3. Engage:** apply targeted engagement approaches to help the public sector build its capability to resist corruption and proactively promote integrity
- 4. Expose:** embed a prevention focus in IBAC's work to expose public sector corruption and police misconduct to enable a holistic, responsive and tailored approach to prevention
- 5. Collaborate:** work closely with other Victorian integrity agencies to facilitate an efficient, whole-of-system approach to building integrity and preventing corruption.

We will adopt a phased approach to implementing the strategy, and work to ensure the insights and findings arising from the Integrity and Oversight Committee's Inquiry into the education and prevention functions of Victorian integrity agencies informs and helps refine IBAC's future approach.

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Key activities to be implemented during the first phase of the strategy will include redeveloping the IBAC website to improve visibility and accessibility of information so stakeholders can quickly find what they need to report corruption and build their corruption resistance. We will also establish a new stakeholder relationship management system to improve our engagement and better coordinate collaboration with other organisations and agencies. We will also commence implementing our Focus Communities Strategy to more effectively engage with Victorian communities who are diverse or experience vulnerability or marginalisation so that we can better understand their needs and priorities and improve awareness of our role in preventing, exposing and investigating public sector corruption and police misconduct. This will be a multi-year program.

### **4.3 Enhanced complainant experience**

We will continue to strive to enhance the user experience of our services by moving to a more complainant-centric approach to how we receive and handle the matters within our remit. This will include refining how we communicate with complainants, telephone access and our website experience. This work will be supported by the development of a Public Interest Disclosure (PID) Strategic Framework and establishing a dedicated resource to coordinate its implementation. The framework will coordinate a range of inputs and provide strategic oversight and coordination of the activities, engagements, and external stakeholder interactions across all of IBAC. It will include a state-wide PID operational overview and plan, a stakeholder engagement and communications strategy and more robust internal governance arrangements. This will be a multi-year program.

### **4.4 IBAC operating model**

IBAC recognises that it must continually identify opportunities to improve the way it communicates and engages with the Victorian community to ensure our ability to expose and prevent corruption is effective. A key part of this broader aim is to ensure we more clearly and consistently communicate how we operate, and provide more clarity and understanding of our role by explaining how we deliver our legislative mandate and public value outcomes for all Victorians.

### **4.5 Intelligence framework**

We will undertake a program of work to fully exploit the current operational intelligence holdings and capability and enhance that with new sources of intelligence through contemporary data mining and analysis tools. Our intelligence framework will also be reviewed and an intelligence triage mechanism will be established to support a more targeted approach to our core work. This will be a multi-year program.

## 4. Our strategic initiatives

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### 4.6 Investigations framework

We will enhance our investigations framework to strengthen governance, performance measures, cross-functional connections and quality assurance across the investigation life cycle.

### 4.7 People strategy

Our people strategy focus in 2021/22 will be on two core streams: talent strategy and workplace transformation program. Through our talent strategy we will define a strong employee value proposition to create a culture where everyone's strengths are cultivated and people can take ownership of their careers. We will also continue to build leadership skills within the organisation, ensuring shared responsibility and individual accountability, and improved staff engagement.

Our workplace transformation program will create a more progressive and connected workplace by refreshing our organisational values and ways of working and strengthening our approach to diversity, inclusion and safety so everyone in our workforce feels included and safe, both physically and mentally. This will be a multi-year program.

### 4.8 Enabling IT and data infrastructure strategies

Our focus this year is to roll out modern devices and collaborative tools to support a more mobile workforce, commence migration of on-premises IT services to the cloud and continue to mature our cyber and information security. Collectively, implementation of our IT, cloud adoption and information security strategies will allow us to leverage the cloud to strengthen our use of data, analysis and applied research, improve our efficiency and effectiveness by working smarter and more collaboratively and enhance our IT systems, digital capability and information security. This will be a multi-year program.

### 4.9 Project management office

We will establish a project management office (PMO) to track progress and report on implementation of strategic initiatives and outcomes in The IBAC Plan. This new function will help to provide a central point of accountability and uplift project management capability across the organisation. The PMO will ensure IBAC is ready, willing and able to make the changes required to achieve the IBAC vision and outcomes.

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# 5. Our structure and core work

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**Core business will continue while delivering the first year of The IBAC Plan. Following is an overview of the ‘business as usual’ activities each division undertakes that will also need to accommodate new responsive priority activity required to be undertaken during the year.**

## **Prevention & Communication division**

The Prevention & Communication division plays a lead role in preventing and exposing public sector corruption and police misconduct. It provides strategic intelligence and research insights on corruption and police misconduct issues and risks and identifies ways for public sector agencies to strengthen their policies, systems and practices to prevent corruption. The division produces reports, case studies, information sheets, videos, podcasts and other resources to inform the public sector and the community on the impacts of corruption, and engages with the public sector, Victoria Police and others, including community, to help build the capacity to prevent corruption.

## **Legal, Assessment, Review & Compliance division**

The Legal, Assessment, Review & Compliance division receives and assesses complaints and notifications of corruption and misconduct, engaging directly with the public, public sector and police. The division also supports the organisation by representing IBAC in court, responding to and conducting litigation and providing a range of in-house legal advice services. It also manages IBAC’s statutory compliance, engagement with external oversight bodies and monitors Victoria Police’s statutory compliance. The division also conducts reviews of Victoria Police and public sector investigations, providing recommendations for improvement.

## **Operations division**

The Operations division investigates allegations of serious and systemic public sector corruption and police misconduct, working in collaboration with other divisions. Investigations are supported by high quality operational intelligence, financial analysis and tactical capabilities, robust technical solutions and physical and technical surveillance.

## **Corporate Services division**

Corporate Services leads IBAC’s strategic planning and provides finance and procurement, governance and risk, human resources, and information and digital services. The division works collaboratively across the whole organisation to ensure IBAC has the financial resources, people, capability and support services to achieve its vision. It drives delivery of capable and forward-looking technology and information systems, and ensures strong people leadership practices are in place to develop our people, and promote an inclusive workplace that operates in line with our values and preferred culture.

# 6. Our accountability to government

## Budget Paper No. 3 non-financial performance measures

As part of IBAC's accountability to the Victorian Parliament, IBAC is expected to achieve the following performance targets in 2021/22 for preventing and exposing public sector corruption and police misconduct, as set out in the State Budget Paper No. 3 (BP3).

Performance measure	Type of measure	Unit of measure	2021/22 target
Corruption prevention initiatives delivered by IBAC	Quantity	number	100
Proportion of standard IBAC investigations into public sector corrupt conduct (excluding police personnel conduct and police personnel corrupt conduct) completed within nine months	Quantity	per cent	60
Proportion of complex IBAC investigations into public sector corrupt conduct (excluding police personnel conduct and police personnel corrupt conduct) completed within 18 months	Quantity	per cent	60
Proportion of standard IBAC investigations into police personnel conduct and police personnel corrupt conduct completed within nine months	Quantity	per cent	60
Proportion of complex IBAC investigations into police personnel conduct and police personnel corrupt conduct completed within 18 months	Quantity	per cent	60
Satisfaction rating with corruption prevention initiatives delivered by IBAC	Quantity	per cent	95
Public Interest Disclosure complaints and notifications assessed within 30 days (new)	Timeliness	per cent	N/A <sup>1</sup>
Complaints or notifications about public sector corrupt conduct (excluding police personnel conduct and police personnel corrupt conduct) assessed by IBAC within 45 days	Timeliness	per cent	85
Complaints or notifications about police personnel conduct and police personnel corrupt conduct assessed by IBAC within 45 days	Timeliness	per cent	90

### Limitations

IBAC's ability to achieve target levels for the BP3 measures is impacted by several variables that can have a significant impact on assessment and investigation timelines. These include:

- the volume of complaints and notifications received
- the number of open preliminary inquiries and investigations at a point in time
- the number of standard versus complex investigations by police and public sector, with the potential for changes to a cohort distorting results when expressed as a percentage

- COVID-19 related work interruption and remote working arrangements during 2021 are anticipated to have some continuing impacts on IBAC's core business activity.

The IBAC Plan will require us to further improve our measurement of performance outcomes. IBAC will continue to review its performance measures and, over time, develop new measures which are more qualitative in nature than the current measures to better assess IBAC's impacts and outcomes.

<sup>1</sup> The new output is a metric that is not currently tracked. Consequently, 2021/22 target measures are not included, to allow IBAC an opportunity to begin data collection to establish a baseline and estimate appropriate targets.



# 7. Our financial performance

## Budget Paper No. 3 2021/22 financial performance statement (budget)

A robust, well-resourced independent anti-corruption agency is vital to community wellbeing. Corruption and police misconduct adversely impact the welfare, security and efficient functioning of Victoria. The budget is a key element of IBAC's overall strategic planning framework, setting the organisation's medium and long-term financial strategy and detailing the resourcing that will be allocated to delivering on the Annual Plan for the 2021/22. The information below provides an overview of IBAC's budget.

### IBAC funding overview

IBAC's funding for the next four years is as follows:

**Table 1: IBAC funding overview 2021/22 to 2024/25**

	2020/21	2021/22	2022/23	2023/24	2024/25
	\$ million				
	Actual	Budget			
Appropriation	42.2	48.8	49.8	50.9	51.9
2021/22 ERC funding		4.2	4.6	2.8	1.7
<b>Total appropriation budget</b>	<b>42.2</b>	<b>53.0</b>	<b>54.4</b>	<b>53.7</b>	<b>53.6</b>
Treasurer's advance	0.1	7.0	-	-	-
Trust reserves	3.9	0.9	-	-	-
<b>Total confirmed funding</b>	<b>46.2</b>	<b>60.9</b>	<b>54.4</b>	<b>53.7</b>	<b>53.6</b>
Trust reserves subject to carry over approval		2.5			
<b>Potential total funding</b>		<b>63.4</b>			

At the beginning of 2020/21, IBAC was faced with a funding deficit of more than \$6 million. With the approval of the Assistant Treasurer, IBAC used its trust reserves to fund the deficit. The success of business cases submitted to government in 2020 and 2021 has provided budget certainty and enabled projects that were put on hold to be progressed in 2021/22.

IBAC has sought approval to re-phrase the 2020/21 trust underspend (\$2.5 million) to 2021/22. Subject to receiving this approval<sup>2</sup>, the use of trust reserves could increase to \$3.5 million in 2021/22 as the Assistant Treasurer had previously approved the use of \$900,000 million of trust reserves for 2021/22.

As a result of these changes, IBAC's budget will increase by more than 30 per cent in 2021/22 compared to its actual

expenditure in 2020/21. The majority of this funding is provided as a Treasurer's Advance, which is non-recurrent funding, for the recruitment of staff in 2021/22 only.

Other initiatives are funded for two or three years with only a relatively small component of funding being recurrent. As a result, IBAC will have to manage a large increase in its workforce immediately followed by a large decrease in the following year.

IBAC has agreed to undertake a base review of its operations in 2021/22, which will be used to inform future resourcing needs. Until this is completed, and IBAC's longer term funding position is settled, IBAC will be limited in its abilities to plan for the longer term.

<sup>2</sup> After further discussion with the Department of Treasury and Finance, it is anticipated the re-phrase request will be approved.

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## 2021/22 budget

IBAC will use its available trust funds in 2021/22. Trust funding was recognised in 2013 as revenue, therefore cannot be recognised again as revenue and use of the trust will result in a corresponding deficit.

As a result, IBAC is presenting the 2021/22 budget as follows:

**Table 2: 2021/22 budget**

<b>Budget 2021/22</b>		
<b>Income</b>	\$ million	\$ million
Appropriation	53.0	
Treasurer's advance	7.0	
		60.0
<b>Expenditure</b>		
Employee expenditure	43.0	
Other operating expenditure	16.0	
Depreciation	4.4	
		63.4
<b>Comprehensive result</b>		<b>(3.5)</b>

## Capital projects

Apart from the cyclical replacement of equipment and computer systems, there are no significant replacement of assets planned for 2021/22. IBAC's assets mainly consist of leasehold improvements, computer systems and office equipment. IBAC's capital expenditure is funded by depreciation equivalent funding.

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