

ACT Ombudsman – Quarterly Report

A REPORT ON THE ACTIVITIES OF THE ACT OMBUDSMAN

1 APRIL TO 30 JUNE 2021

Report by the Acting ACT Ombudsman
Penny McKay

REPORT NO. **4 | 2021**

Introduction from ACT Ombudsman

Following the retirement of the ACT Ombudsman, Michael Manthorpe PSM on 31 July 2021, as Acting ACT Ombudsman I am pleased to introduce the fourth quarterly report for 2020–21.

Our priority for this quarter was reinforcing stakeholder relationships and re-establishing direct engagement through attending forums and providing information sessions on our role with community organisations following the impact of COVID-19 restrictions on usual business practices.

The ACT Ombudsman works together with several agencies, including the ACT Human Rights Commission and Inspector of Correctional Services, to provide independent oversight and to promote and protect the integrity and accountability of the ACT public sector. I value the support and shared goals that working with the various oversight agencies brings. Together, we champion an integrated and collaborative approach to integrity and improved public administration within the ACT.

We welcome feedback about our ACT Ombudsman activities and these quarterly reports, as we continue to explore the most effective ways to influence improvements in ACT public administration and make a positive difference for the people of the ACT. Feedback can be provided to ACT.Ombo@ombudsman.gov.au

Penny McKay
Acting ACT Ombudsman

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1. Our strategy in the ACT

The role of the ACT Ombudsman is to influence systemic improvement in public administration in the ACT and provide assurance that ACT agencies within our jurisdiction act with fairness and integrity.

We undertake this role through our complaint handling activities as well as our oversight of:

- the ACT Freedom of Information (FOI) framework
- the ACT Reportable Conduct (RC) Scheme
- ACT Policing (as the Commonwealth Ombudsman)
- the ACT Integrity Commission (as the Inspector of the ACT Integrity Commission).

We also play a support role for the Judicial Council for which the ACT Ombudsman is the Principal Officer.

Our functions are supported by an education and engagement program which aims to improve agencies' complaint handling. We work with agencies to help ensure they provide accessible and effective complaint handling processes to the public. Our goal is to assist agencies to manage complaints effectively and encourage agencies to use complaints as a valuable tool to improve their own service delivery.

In addition to the ACT Ombudsman's Annual Report, we publish quarterly reports to provide highlights of our work throughout the year.

Our reports are published on the ACT Ombudsman website at ombudsman.act.gov.au/publications/reports

The fourth quarterly report for 2020–21 covers 1 April to 30 June 2021.

2. Complaints management

Complaints received

During this reporting period, as outlined in Table 1, the Office received a total of 150 complaints, which is a slight decrease compared to the 158 complaints received last quarter.

Complaint levels are 15 per cent higher than for the same period last financial year.

Table 1—ACT complaints received from 1 April to 30 June 2021, compared to the same quarter in the previous financial year

Complaints received 1 April to 30 June*	2019 20	2020 21
Complaints received about ACT agencies	107	127
Complaints received about ACT Policing	15	20
Complaints received about the FOI Act	5	0
Complaints received about ACT Reportable Conduct Scheme	1	2
Complaints received about ACT Integrity Commission	1	1
Total complaints received	129	150

*This data is dynamic and may be updated. For this reason, there may be minor differences when compared to previous published reports.

Complaints about ACT Directorates and agencies

Of the complaints received about ACT agencies this quarter, 38 related to the Community Services Directorate, followed by 30 complaints related to the Chief Minister, Treasury and Economic Development Directorate and 27 complaints about the Justice and Community Safety Directorate.

Note: These complaints are a subset of the total complaints referenced in Table 1, above and does not include complaints about the FOI or RC Scheme.

Table 2—ACT Directorate and agency complaints received from 1 April to 30 June 2021

ACT Directorate / agency	Number of complaints received 1 April to 30 June 2021	Percentage of total complaints received 1 April to 30 June 2021
Community Services Directorate	38	26%
Chief Minister, Treasury and Economic Development Directorate	30	20%
Justice and Community Safety Directorate	27	18%
Independent Statutory Offices	9	6%
Health Directorate	8	5%
Transport Canberra and City Services Directorate	8	5%
Environment Planning and Sustainable Development Directorate	5	3%
Canberra Health Services	2	1%
Education Directorate	0	0%
Total complaints received about ACT agencies	127	
ACT Policing	20	14%
Total complaints received	147	98%*

*Percentages may not add up to 100% due to rounding.

Further details about the number of complaints received about ACT Directorates and individual agencies between 1 April to 30 June 2021 is provided at **Appendix A**.

How complaints were made

Table 3 details the complaint numbers lodged via different channels for the fourth quarter of 2020–21 and provides a breakdown of how complaints were made over the last 3 financial years.

Table 3—How complaints about ACT agencies were made during the fourth quarter of 2020–21 and annually over the last 3 years

Complaint Channel	Q4	2018 19	2019 20	2020 21
	2020 21			
Telephone	57	196	174	199
Internet	38	128	134	171
Email	30	31	90	111
Written	1	13	9	11
In person	0	8	15	6
Social media	0	-	-	1
SMS	1	-	-	1
Total	127	376	422	500

Data on how complaints were made over the last 3 years shows a continuing trend of the telephone being the preferred channel for the lodgement of complaints followed by the internet via an online form and email.

Complaints finalised

As outlined in Table 4, the Office finalised 157 complaints during this quarter:

- 130 complaints about ACT agencies
- 24 ACT Policing complaints
- 1 complaint about the *Freedom of Information Act 2016*
- 2 complaints about the Reportable Conduct Scheme.

Table 4—ACT complaints finalised from 1 April to 30 June 2021, compared to the same period of the previous financial year

Complaints finalised from 1 April to 30 June *	2019 20	2020 21
Complaints finalised about ACT agencies	111	130
Complaints finalised about ACT Policing	14	24
Complaints finalised about the FOI Act	5	1
Complaints finalised about ACT Reportable Conduct Scheme	2	2
Complaints finalised about ACT Integrity Commission	1	0
Total complaints finalised	133	157

* This data is dynamic and may be updated. For this reason, there may be minor differences when compared to previous published reports.

Complaints to the Office can result in different outcomes, including a clearer explanation of a decision, an apology, further action taken by the agency, or an expedited process within the agency.

Every complaint is assessed to see if it can be resolved quickly or whether a more formal investigation is warranted. Our renewed focus on early resolution provides a better service for complainants and agencies.

Several factors determine how we deal with a complaint including whether:

- the agency concerned had an opportunity to resolve the complaint or an internal review pathway exists
- another oversight body or a tribunal could provide a better outcome
- a reasonable outcome is available for the complainant.

Positive outcomes for complainants can be achieved with or without a full investigation. For example, there are times where we can provide a better explanation to the complainant based on our knowledge of the processes of Directorates and agencies.

During this quarter the Office finalised 12 complaints using preliminary inquiries. A preliminary inquiry is a one-off, straightforward inquiry made of an agency to determine whether to investigate a complaint. Agencies are asked to provide a response within a week.

Most preliminary inquiries made this quarter were used to assess if complaints had been lodged with the agency and if so, what action had been taken. In 5 cases we decided to investigate after receiving information using preliminary inquiries.

Outcomes of investigated complaints

During this quarter, the Office finalised 16 investigations related to ACT agencies. More than one outcome can be achieved per complaint investigation. The outcomes achieved this quarter included:

- a better explanation by the Ombudsman or by the agency
- an apology
- a change of decision
- a change to law, policy or practice.

The table at **Appendix B** provides further details of the outcomes of complaint investigations finalised this quarter, broken down by ACT Directorates and agencies.

Case study

We were contacted by a complainant, advising they had not received a refund of ACT vehicle registration fees after moving interstate. A combination of human error and system software changes hindered both the payment of the refund and the resolution of the complaint.

Following an investigation by the Ombudsman, Access Canberra contacted the complainant, apologised for the delay and confirmed the refund had been paid. This resolved the matter to the complainant's satisfaction. Access Canberra also advised that the transition to the new customer experience software system is now complete.

ACT enquiries

The ACT Ombudsman received enquiries that included:

- 30 enquiries about the Reportable Conduct Scheme
- 11 enquiries about FOI
- one enquiry about our role as the Inspector of the ACT Integrity Commission.

Performance against service standards

Our Office has service standards which apply to complaints we receive about both the Australian Government and ACT agencies.

We aim to resolve 60 per cent of all government complaints within 7 days. We are usually able to achieve this timeframe for routine or simple complaints, but more complex complaints will take longer. This means we may not always meet the 60 per cent target if we receive a higher proportion of more complex complaints.

This quarter, 43 per cent of complaints about ACT agencies were closed within 7 days, with 83 per cent of complaints finalised within 30 days and 94 per cent finalised within 90 days.

We continue to explore ways to deliver efficiencies in complaints management while ensuring we provide the ACT community with appropriate levels of service for complex complaints.

New and ongoing complaint trends

This quarter, the ACT agency with the highest number of complaints was Housing ACT (37), followed by Access Canberra (26) and ACT Corrective Services (25).

Housing ACT

Complaints about Housing ACT increased again this quarter, up from 31 complaints in the previous quarter and from 23 complaints in the same quarter of the previous financial year.

The most common issues included in complaints were:

- financial matters, including rent calculations and dealing with arrears
- maintenance and repairs, including water damage and leaks
- neighbourhood disputes and antisocial behaviour.

This quarter we made one assisted referral to Housing ACT. The assisted referral process can support complainants to have issues resolved more quickly and is used for vulnerable complainants or urgent matters.

Following complaints to the Ombudsman, Housing ACT was in some instances able to change decisions, policies or practices or expedite actions.

Access Canberra

Complaints about Access Canberra increased from 19 in the previous quarter to 26 this quarter. This was also an increase when compared to the 8 complaints received in the same quarter for the previous year. Most of the complaints received this quarter related to:

- building and development issues
- Fair Trading
- processes associated with getting a Working with Vulnerable People card
- vehicle registrations and licenses
- parking and traffic infringement notices.

In response to one complaint, Access Canberra offered an apology and waived an application fee. In another, additional safeguards were added to an internal workflow.

ACT Corrective Services (ACTCS)

Complaints about ACTCS decreased this quarter. We received 25 complaints, compared to 34 received in the previous quarter and 36 in the same quarter of the previous financial year. Complaints about ACTCS can cover a wide range of issues, including:

- management of visits
- management of assaults
- discipline issues
- use of restraints
- appropriate access to fresh air and exercise.

We made one mandatory referral to the ACT Human Rights Commission in relation to a health matter and one assisted referral to ACTCS.

ACTCS provided a better explanation to a complainant in 5 cases and agreed to amend a sentence management plan based on additional information provided in one other. Further details about the remedies available following complaints can be found at **Appendix B**.

3. ACT Policing

The Commonwealth Ombudsman receives and considers complaints about ACT Policing. This quarter we received 20 complaints about ACT Policing and finalised 24 complaints. Complaint numbers were down from the previous quarter in which we received 30 complaints and finalised 34 complaints.

Of the 24 complaints finalised this quarter, none were investigated. In most cases we were able to resolve the complaint through early resolution tools, including referring the complainant back to the agency to raise their concerns in the first instance.

Figure 2—Trends in ACT Policing complaints received and finalised from 1 April to 30 June 2021



The Office is responsible for inspecting ACT Policing records related to the use of certain covert and intrusive powers under ACT legislation. No inspections were conducted during this reporting period. The next inspections of ACT Policing under the *Crimes (Surveillance Devices) Act 2010* (ACT) and the *Crimes (Controlled Operations) Act 2008* (ACT) are scheduled to occur in August 2021.

4. Engagement

Community engagement

We continued to meet regularly with Who's New on the Street (homelessness services) and Prisoner's Aid (services to detainees, people in community corrections and their families). We are also planning a program of increased engagement with the ACT's Aboriginal and Torres Strait Islander communities.

Agency engagement

We liaise regularly with Directorates and agencies across the ACT as part of our oversight role to monitor possible systemic issues and identify potential improvements to public administration.

This quarter, the ACT Ombudsman met the Acting Commissioner of ACT Corrective Services, Mr Ray Johnson and the Human Rights Commissioner, Dr Helen Watchirs OAM. The ACT Ombudsman and Deputy Ombudsman also met with the Strategic Board of the ACT.

ACT Corrective Services (ACTCS)

As part of our oversight role in relation to the Alexander Maconochie Centre (AMC) we:

- continued to meet regularly with ACTCS, the ACT Human Rights Commission, the Official Visitors, the Inspector of Correctional Services and the Public Advocate
- delivered training about the importance of complaint processes and the role of the ACT Ombudsman to custodial officer recruits.

Housing ACT

The Office has regular liaison meetings with Housing ACT where complaint trends, issues impacting each organisation and initiatives to assist agencies are discussed. This quarter we discussed changes in complaint management and reporting initiated by Housing ACT.

ACT Integrity Commission

We receive monthly reports from the ACT Integrity Commission about their activities. As Inspector of the ACT Integrity Commission, we provide assurance that the Commission is following legislative requirements concerning its operations.

This quarter we received one complaint about the Commission which is being assessed.

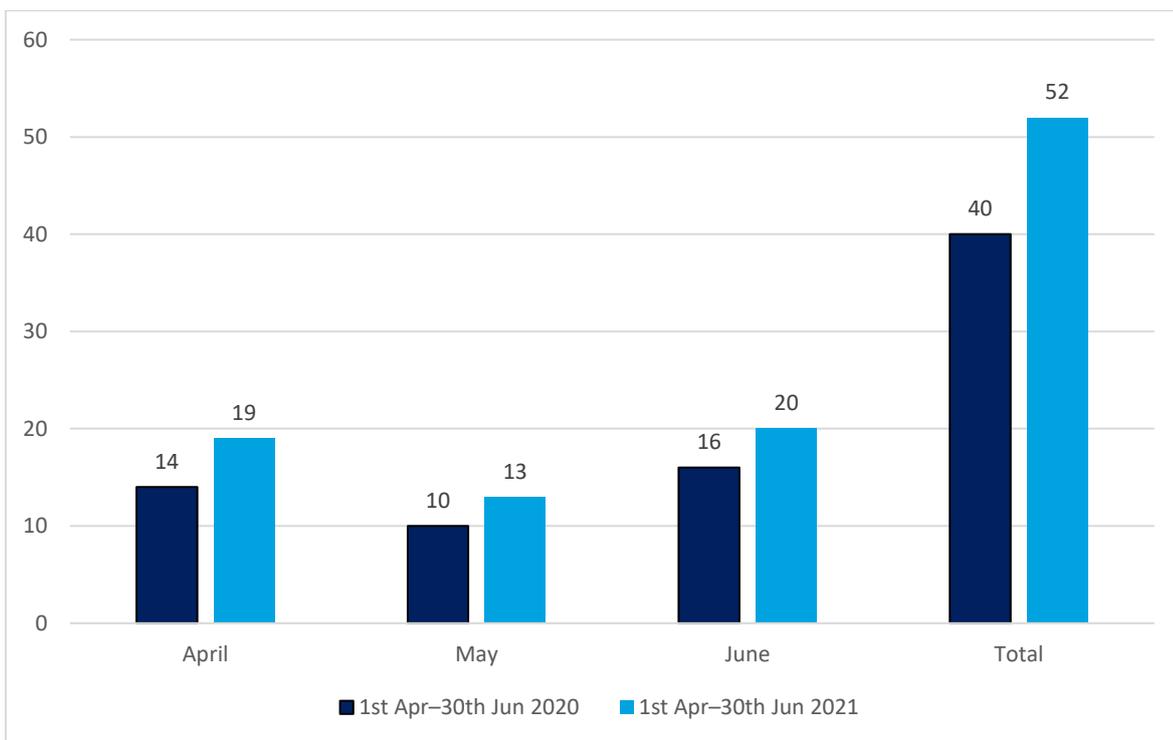
5. Reportable Conduct Scheme

Notifications received

This quarter the Office received 52 notifications from entities about allegations of reportable conduct, with 4 of these being notified to ACT Policing by entities.

As outlined in Figure 3, this is a 30 per cent increase in the reporting of notifications compared to the same quarter in the previous year. The increase in notifications received this quarter may reflect there were minimal COVID-19 restrictions during this period in the ACT, with limited disruption to schools and businesses. This is compared to the same time last year when the operations of ACT schools and businesses were greatly impacted by the COVID-19 pandemic.

Figure 3—Notifications received from 1 April to 30 June 2021, compared to the same period of the previous financial year



The largest number of notifications received were from government and non-government schools (21 reports) followed by education and care service providers (14 reports) and kinship and foster care (11 reports).

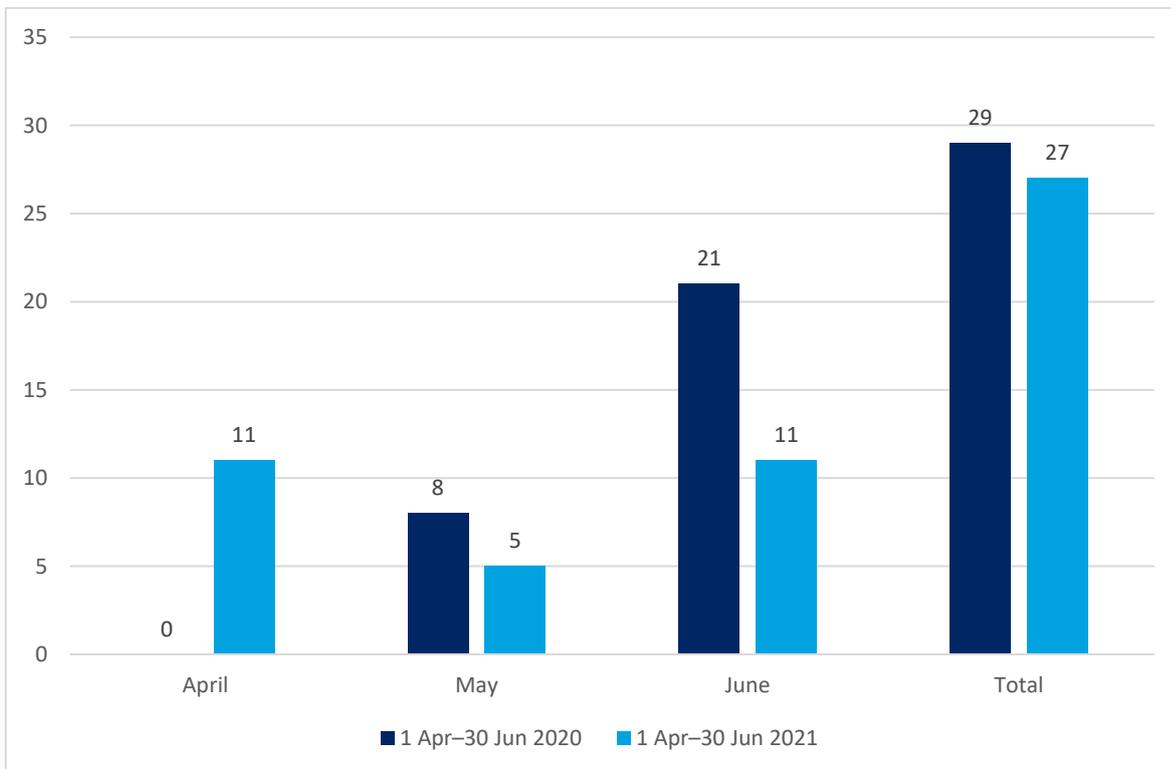
Table 5—Notifications received from 1 April to 30 June 2021 by sector

Sector	Number of notifications received 1 April to 30 June 2021	Percentage of total notifications received 1 April to 30 June 2021
Government and Non-Government Schools	21	40%
Education and Care Service Providers	14	27%
Kinship and Foster Care	11	21%
Residential Care Organisations	2	4%
Religious Organisation	2	4%
ACT Directorates	1	2%
Health Service Providers	1	2%
TOTAL	52	100%

Reports finalised

In this quarter, as outlined in Figure 4 below, the Office finalised 27 matters, a 7 per cent decrease in finalised cases as compared to the same quarter for the previous financial year.

Figure 4—Reports finalised from 1 April to 30 June 2021, compared to previous financial year

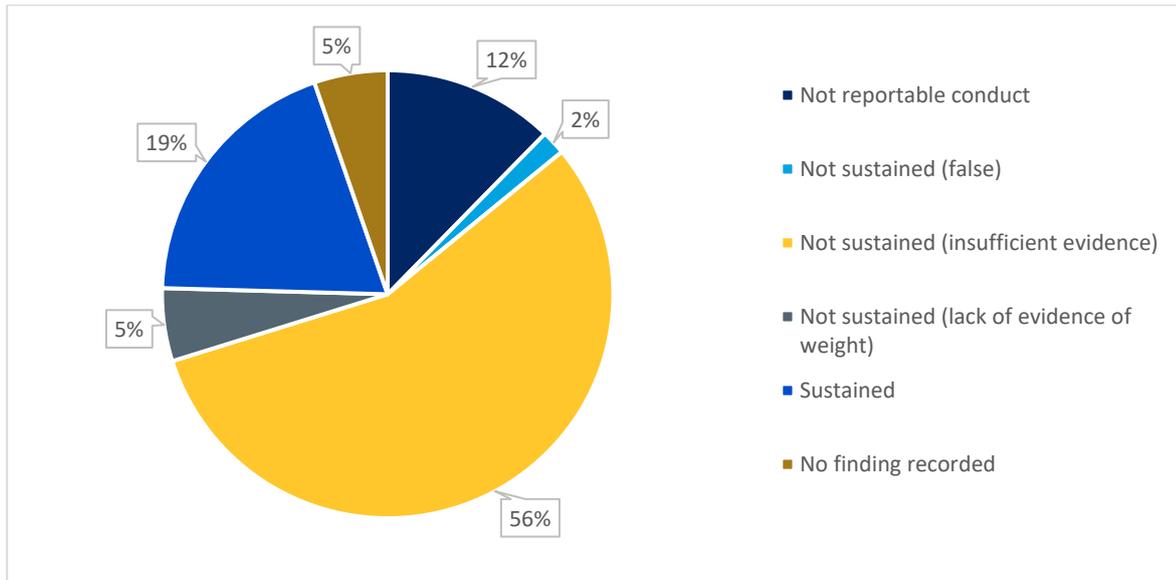


Entities must report the results of the investigation when completed and any action taken, or proposed to be taken.

An investigation into alleged reportable conduct may find the allegation was not sustained based on insufficient evidence or lack of evidence of weight. In some cases, an allegation may be found to have been false or may not meet the definition of reportable conduct.

The investigation outcomes of each allegation, and the action taken by entities this quarter, are summarised in Figure 5 and Table 6. A notification may contain multiple allegations, each having a finding and action recorded.

Figure 5—Investigation outcomes reported by entities from 1 April to 30 June 2021



*Percentages may not add up to 100% due to rounding.

Table 6 — Final investigation actions taken by entities from 1 April to 30 June 2021

Action	Number of actions taken by entities 1 April to 30 June 2021	Percentage of total actions taken by entities 1 April to 30 June 2021
No action after the investigation process	22	39%
Performance monitoring or managing	17	30%
Counselling	8	14%
Training	5	9%
Termination	4	7%
Other	1	2%
TOTAL	57	101%*

Note: an investigation may contain more than 1 allegation, which may result in more than 1 finding and action.

*Percentages may not add up to 100% due to rounding.

Performance against service standards

Our Office has service standards for the Reportable Conduct function.

When we receive a notification from an entity about an allegation of reportable conduct (s 17G notification) we assess the initial response by the organisation against criteria such as its reporting to other bodies, its risk assessment, and its investigation plan. This allows the entity to consider our feedback during its investigation. We aim to do this within 7 days in 80 per cent of cases.

This quarter we assessed 75 per cent of initial notifications within 7 days.

When we receive a final report from an entity following its investigation into reportable conduct allegations (s 17J report) we consider whether there was a proper investigation, appropriate action taken and whether we need further information from the entity. This gives the entity reasonable opportunity to act on our feedback or provide further information. We aim to complete this within 28 days in 80 per cent of cases.

This quarter we completed 65.5 per cent of these assessments within this timeframe.

We will continue to work to meet our services standards and provide entities with timely feedback.

Engagement and monitoring activities

The Office monitors the practices and procedures that entities put in place to prevent reportable conduct and deal with reportable allegations and convictions. This quarter we continued providing feedback on policies, practices and procedures through our casework and liaison meetings.

We continued our liaison with Barnardos, the Education Directorate, the Community Services Directorate, and Access Canberra (Working with Vulnerable People Registration Scheme). We also engaged with ACT Policing and attended the Children and Young People Oversight Agency meeting, the Redress Implementation Group meeting, and the Bimberi Oversight meeting.

6. Freedom of Information

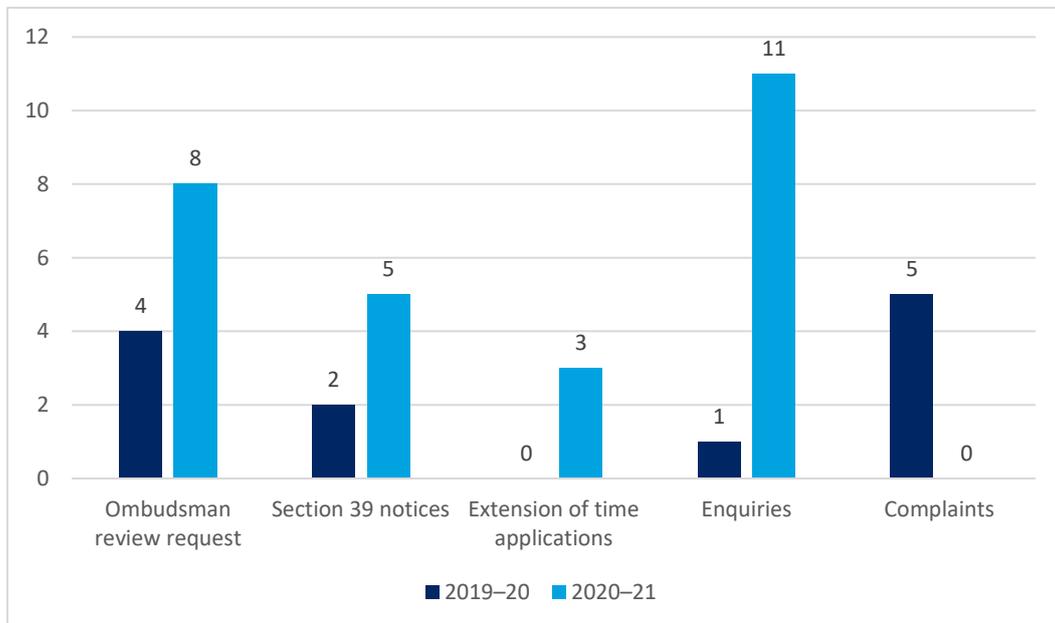
FOI contacts received

As outlined in Figure 6, the Office received 27 contacts about our role under the FOI Act during this quarter. This represents an increase of 4 compared to the 23 contacts received in the previous quarter.

This comprised:

- 8 applications for Ombudsman review
- 5 section 39 notices (notices given to the Ombudsman to advise that a decision on an access application was not made in time)
- 3 extension of time requests
- 11 enquiries
- no complaints.

Figure 6—FOI contacts received from 1 April to 30 June 2021, compared to the same period of the previous financial year



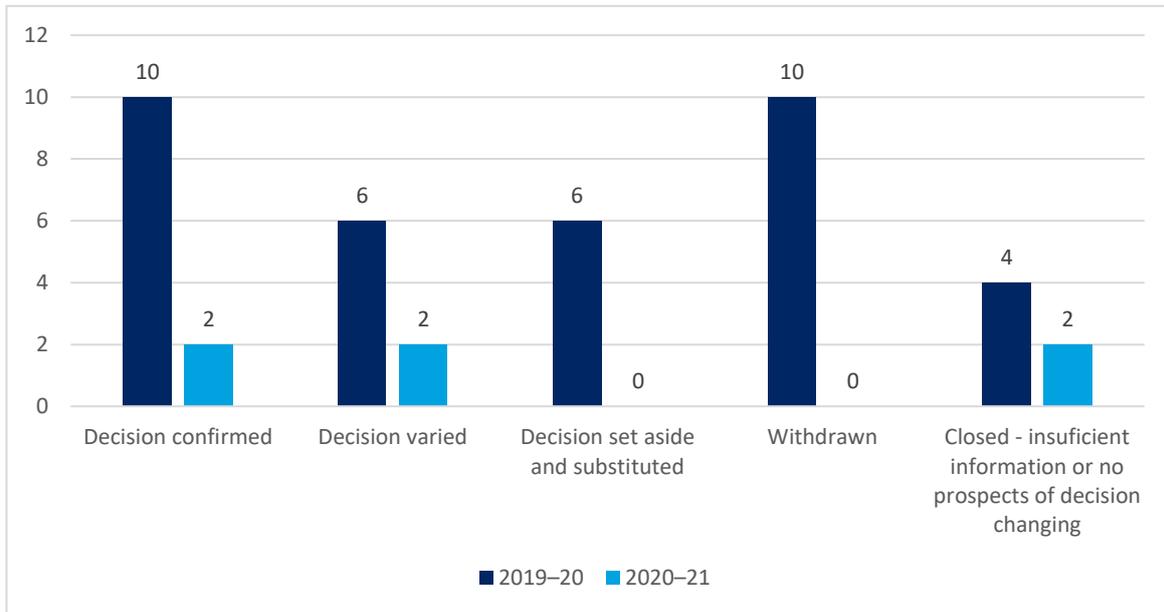
Finalised FOI reviews

As shown in Figure 7, the Office finalised 6 Ombudsman reviews this quarter.

The outcomes of these reviews were:

- the original decision was confirmed in 2 cases
- the original decision was varied in 2 cases
- the original decision was set aside in 0 cases
- no matters were withdrawn by the applicant following informal resolution activities
- 2 matters were finalised without review with our Office finding there were no reasonable prospects of success in one matter and the application was invalid in the other matter.

Figure 7—FOI review requests finalised from 1 April to 30 June 2021, compared to the same period of the previous financial year



Performance against service standards

Our Office has service standards for our FOI review applications. Our ability to meet service standards is expected to vary depending on the number of cases that can be finalised through informal resolution processes and the complexity of matters.

This quarter we didn't meet the three service standards in relation to the 6 matters that were finalised:

- no FOI review matters were finalised within 6 weeks (below the standard of 30 per cent)
- 17 per cent were finalised in 12 weeks (below the standard of 60 per cent)
- 67 per cent were finalised in 6 months (below the standard of 95 per cent).

This reflects the complexity of some review matters that were considered in this reporting period.

FOI review matters can generally be finalised in 6 weeks where informal resolution is successful.

Where a formal decision is required, routine matters are expected to take 12 weeks to finalise with complex matters taking longer.

Published decisions

As of 30 June 2021, we have published 67 decisions on the ACT Ombudsman website.

Five of these decisions were published during this reporting period. Publication of decisions provides agencies and applicants with guidance on the FOI Act including the application of the public interest test.

Engagement and monitoring activities

The ACT team is planning the next FOI practitioners' forum following the forum it hosted on 18 February 2021.

Appendix A: Complaints received about ACT Directorates and agencies from 1 April to 30 June 2021

Directorate / Agency	Total received	Total finalised	Finalised with investigation	Finalised without investigation
Canberra Health Services	2	2	-	2
Chief Minister, Treasury and Economic Development Directorate	30	31	2	29
Access Canberra	26	27	2	25
ACT Revenue Office	3	2	-	2
Canberra Institute of Technology	-	-	-	-
University of Canberra	1	2	-	2
Chief Minister, Treasury and Economic Development - other agencies	-	-	-	-
Community Services Directorate	38	29	6	23
Housing ACT	37	28	6	22
Community Services - other agencies	1	1	-	1
Education Directorate	-	-	-	-
Environment Planning and Sustainable Development Directorate	5	7	-	7
Health Directorate	8	6	-	6
Justice and Community Safety Directorate	27	34	4	30
ACT Corrective Services	25	32	4	28
Justice and Community Safety - other agencies	2	2	-	2
Transport Canberra and City Services Directorate	8	9	3	6
Transport Canberra and City Services	8	9	3	6

ACT Ombudsman – Quarterly report, 1 April to 30 June 2021

Directorate / Agency	Total received	Total finalised	Finalised with investigation	Finalised without investigation
Independent statutory offices	9	12	1	11
ACT Court or Tribunal	1	1	-	1
ACT Human Rights Commission	4	5	-	5
ACT Electoral Commission	-	-	-	-
Director of Public Prosecutions	-	-	-	-
Legal Aid ACT	1	1	-	1
Public Trustee and Guardian for the ACT	3	5	1	4
Prescribed authorities	-	-	-	-
ACT Law Society	-	-	-	-
Territory-owned corporations	-	-	-	-
ACT Long Service Leave Authority	-	-	-	-
Icon Water	-	-	-	-
Total ACT Government	127	130	16	114
ACT Policing	20	24	-	24
Total ACT	147	154	16	138

* Data on complaints finalised includes complaints that were received in earlier quarters as well as complaints received during the current quarter.

Appendix B: Outcomes of complaint investigations finalised from 1 April to 30 June 2021

Note: More than one remedy can be achieved following a complaint investigation

Directorate / Agency	Investigations finalised	No remedy	Action expedited	Apology	Change to law, policy or practice	Decision changed or reconsidered	Better explanation by Ombudsman	Better explanation by agency	Agency officer counselled/disciplined	Remedy provided by agency	Penalty waived or reduced	Other financial remedy	Total positive remedies achieved
Canberra Health Services	-	-	-	-	-	-	-	-	-	-	-	-	-
Chief Minister, Treasury and Economic Development Directorate	2	-	-	1	1	-	1	-	-	1	2	-	6
Access Canberra	2	-	-	1	1	-	1	-	-	1	2	-	6
ACT Revenue Office	-	-	-	-	-	-	-	-	-	-	-	-	-
Canberra Institute of Technology	-	-	-	-	-	-	-	-	-	-	-	-	-
University of Canberra	-	-	-	-	-	-	-	-	-	-	-	-	-
Chief Minister, Treasury and Economic Development - other agencies	-	-	-	-	-	-	-	-	-	-	-	-	-
Community Services Directorate	6	-	2	3	1	4	5	2	-	1	-	1	19
Housing ACT	6	-	2	3	1	4	5	2	-	1	-	1	19
Community Services - other agencies	-	-	-	-	-	-	-	-	-	-	-	-	-
Education Directorate	-	-	-	-	-	-	-	-	-	-	-	-	-
Environment Planning and Sustainable Development Directorate	-	-	-	-	-	-	-	-	-	-	-	-	-
Health Directorate	-	-	-	-	-	-	-	-	-	-	-	-	-
Justice and Community Safety Directorate	4	1	-	-	-	1	4	5	-	1	-	-	12
ACT Corrective Services	4	1	-	-	-	1	4	5	-	1	-	-	12
ACT Emergency Services Agency	-	-	-	-	-	-	-	-	-	-	-	-	-

ACT Ombudsman – Quarterly report, 1 April to 30 June 2021

Directorate / Agency	Investigations finalised	No remedy	Action expedited	Apology	Change to law, policy or practice	Decision changed or reconsidered	Better explanation by Ombudsman	Better explanation by agency	Agency officer counselled/ disciplined	Remedy provided by agency	Penalty waived or reduced	Other financial remedy	Total positive remedies achieved
Justice and Community Safety – other agencies	-	-	-	-	-	-	-	-	-	-	-	-	-
Transport Canberra and City Services Directorate	3	-	-	1	2	1	3	2	1	1	-	-	11
Transport Canberra and City Services - other agencies	3	-	-	1	2	1	3	2	1	1	-	-	11
Independent statutory offices	1	1	-	-	-	-	-	-	-	-	-	-	1
ACT Court or Tribunal	-	-	-	-	-	-	-	-	-	-	-	-	-
ACT Human Rights Commission	-	-	-	-	-	-	-	-	-	-	-	-	-
Director of Public Prosecutions	-	-	-	-	-	-	-	-	-	-	-	-	-
Legal Aid ACT	-	-	-	-	-	-	-	-	-	-	-	-	-
Public Trustee and Guardian for the ACT	1	1	-	-	-	-	-	-	-	-	-	-	1
Prescribed authorities	-	-	-	-	-	-	-	-	-	-	-	-	-
ACT Law Society	-	-	-	-	-	-	-	-	-	-	-	-	-
Territory-owned corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
ACT Long Service Leave Authority	-	-	-	-	-	-	-	-	-	-	-	-	-
ICON Water	-	-	-	-	-	-	-	-	-	-	-	-	-
Total ACT Government	16	2	2	5	4	6	13	9	1	4	2	1	49
ACT Policing	-	-	-	-	-	-	-	-	-	-	-	-	-
Total ACT	16	2	2	5	4	6	13	9	1	4	2	1	49