

From: [REDACTED]
Sent: Monday, 27 September 2021 8:51 AM
To: Committee, LE (SEN) <le.committee@aph.gov.au>
Cc: ACLEI Strategic Engagement <strategy@aclei.gov.au>; ACLEI Corruption Prevention <prevention@aclei.gov.au>
Subject: FW: Invitation to lodge submission - Inquiry into vaccine related fraud and security risks [SEC=OFFICIAL]

OFFICIAL

Dear Sean

Thank you for the invitation to provide a submission to the Parliamentary Joint Committee on Law Enforcement's Inquiry into vaccine-related fraud and security risks. ACLEI has not been made aware of any allegations of corruption issues (within the scope of the *Law Enforcement Integrity Commissioner Act 2006*) relating to vaccine fraud. As such, ACLEI will not make a formal submission on this occasion. However, we offer some observations that may assist the Secretariat's work in support of the inquiry.

State and Territory health and integrity agencies are well placed to provide information on actual and potential vaccine-related fraud and security risks given their specific role in the vaccine rollout in Australia.

Some common corruption vulnerabilities that come to ACLEI's attention include unauthorised access and modification of information. These are relevant considerations in the context of ongoing discussions of vaccine passports and accompanying requirements to record and register vaccination status. Law enforcement officials may also be exposed to heightened corruption risk in a future context where they have to enforce vaccine passports as part of their border control functions.

Please see a list of relevant publications of interest, below, in case these are useful:

- The UNODC published a report in December 2020 entitled [COVID-19 Vaccines and Corruption Risks: Preventing Corruption in the Manufacture, Allocation and Distribution of Vaccines](#). As I know that the UK at least has had cases of vaccine fraud and developed a range of preventive measures.
- The U4 Anti-Corruption Resource Centre has published the following of relevance:
 - 24 August 2021 article on [COVID-19 vaccine certificates: the digitalisation of fraud](#) (covers fraudulent negative COVID-19 test certificates; the EU Digital COVID Certificate (and traffic of fake or real certificates; and fake inoculations)
 - April 2021 report on [Mitigating corruption risks in the COVID-19 vaccine rollout](#) which is specifically targeted for donors (and would address the submission's focus on risks specific to South Pacific nations).

Yours sincerely,

[REDACTED]

[REDACTED]
Executive Director Corporate Services & Governance Branch
Australian Commission for Law Enforcement Integrity

P [REDACTED] • M [REDACTED]
[REDACTED] EA [REDACTED] • www.aclei.gov.au