

ACT AUDITOR–GENERAL'S **PERFORMANCE AUDIT REPORT**

ACT Corrective Services rostering

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The ACT Audit Office acknowledges and respects their continuing culture and the contribution they make to the life of this city and this region.

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ISSN: 2204-700X (Print) ISSN: 2204-7018 (Online)

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Produced for the Office of the ACT Legislative Assembly by the ACT Audit Office.

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PA 24/19

The Speaker
ACT Legislative Assembly
Civic Square, London Circuit
CANBERRA ACT 2601

Dear Speaker

I am pleased to forward to you a Performance Audit Report titled 'ACT Corrective Services rostering' for tabling in the Legislative Assembly pursuant to Subsection 17(5) of the *Auditor-General Act 1996*.

The audit has been conducted in accordance with the requirements of the *Auditor-General Act 1996* and relevant professional standards including *ASAE 3500 – Performance Engagements*.

Yours sincerely



Ajay Sharma PSM
Auditor-General
18 June 2026

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Terminology

Term	Definition
Basic rostering	
Shift	A shift is a designated allocation of roster hours. A shift worker, such as a Custodial Officer, undertakes their work in a rostered environment.
Relief shift	A relief shift is a temporary assignment designed to fill in for an absent employee, covering roster shortfalls due to leave, illness or training to enable operations to continue uninterrupted.
Roster	A roster identifies the ordinary hours of work of an employee who works shifts. Rosters at the AMC and CTU set out the start times, finish times and rotation of shifts over at least a 28-day period.
Roster pattern	A roster pattern is a repeating sequence of shifts. Roster patterns have been developed for the different Custodial Officer classifications. Roster patterns help streamline staff scheduling by automating the allocation of shifts based on pre-defined patterns.
Base roster patterns	Base roster patterns are the agreed roster patterns for the AMC and CTU. Base roster patterns reflect the posts that require coverage across the AMC and the CTU.
Line (in a roster)	A line in a roster refers to a Custodial Officer's allocated roster pattern. Each roster pattern has space for several Custodial Officers to fill the line.
Staff rotation	Staff rotation refers to the practice of moving Custodial Officers between roster patterns. This practice aims to balance staffing needs and provide an opportunity for Custodial Officers to move to another area to expand their knowledge or reduce burnout.
AMC and CTU rostering	
Master Roster	The Master Roster is an Excel spreadsheet that collates AMC and CTU Custodial Officer rostering arrangements. It assists with planning and forecasting coverage needs and ensuring there are no double-ups of posts and roster line staff allocations.
Daily Roster	The Daily Roster shows the detailed and specific roster arrangements at the AMC and CTU on any given day. It shows any changes to expected staffing arrangements due to absences, shift swaps or changes to start times. The Daily Roster is a visual tool for the AMC Staff Officer and Operations Managers to identify which Custodial Officers are assigned to the AMC and CTU posts.
Full roster (for a day)	The full roster is the number of Custodial Officers needed to meet operational requirements on any given day. The full roster differs according to the time of day

Term	Definition
	(i.e. fewer officers are needed at night) and day of the week (e.g. visits do not occur on a Monday or Tuesday and fewer officers are needed on those days).
Day target (AMC)	The day target is the daily staffing requirement needed to ensure operations run as intended at the AMC. The day target reflects the number of Custodial Officers required to fill the posts for the day plus an additional 15 officers. The additional 15 Custodial Officers represents a contingency for unplanned absences and long-term leave.
Hours of work and changes to hours of work	
Weekly hours	<p>Weekly hours are the expected number of hours to be worked by a Custodial Officer each week. They are worked as an average over the roster cycle because actual hours worked in any given week will differ because of the roster patterns.</p> <p>Full-time Custodial Officers at the AMC work 38 hours per week and Custodial Officer Class 1 positions at the CTU work 40 hours per week (but are entitled to accrued days off).</p>
Overtime	<p>Overtime is hours worked beyond an employee's ordinary hours of work.</p> <p>Overtime payment rates for overtime worked by Custodial Officers are:</p> <ul style="list-style-type: none"> • time and a half for the first three hours on a day/shift; • double time for any further overtime worked on that day/shift; and • Sunday will be paid a rate of double time at the employee's ordinary hourly rate of pay for all time worked.
Shift swap	A shift swap occurs when shift employees exchange shifts with each other. Shift swaps may occur for changes in shift time due to operational requirements (day shift to night shift), changes in shift dates to assist in managing over and under coverage or shift swaps between officers where both accept the change.
Unplanned absence	This is a form of absence from the workplace that is not approved in advance. Unscheduled absences most commonly occur for personal leave (for illness or caring purposes) or compassionate leave.
Unauthorised leave	This is an absence from the workplace of any type that has not been formally approved. This also includes absences that have been notified but for which no leave application has been submitted and/or approved.
Flexible working arrangement	<p>A flexible working arrangement is where a Custodial Officer has negotiated a change to the standard roster pattern, e.g. they may not work nights or weekends because of family or care responsibilities.</p> <p>A Custodial Officer may request a flexible working arrangement, in accordance with the <i>Fair Work Act 2009</i>, to support their work and life balance. Flexible working arrangements must be recorded in writing and be in place for a specified duration of up to three years.</p>

Term	Definition
AMC operations	
Post	A post is a work location or 'unit' within the AMC.
De-man (a post)	De-manning of posts is the scaling down of operations or activities for the duration of a staffing shortfall and may include suspension of non-essential activities. It occurs when the number of Custodial Officers on duty is below the level required to ensure the maintenance of normal activities at the AMC. The Regime Management Plan outlines daily considerations in relation to the de-manning of posts.
Core day	The core day is the timetable of activities at the AMC. It identifies the key activities of detainees (and staff) and when detainee cells are locked/unlocked for the day.
Lock-in or 'regime lock in'	A lock-in refers to a period where specific units, or a portion thereof, are locked down to maintain safety and security. During a lock-in, detainees must remain in their specific unit.
Prison lockdown or 'patrol state'	This is a period where the entire AMC is in complete lockdown during normal business hours. It may be due to an emergency as defined in the <i>AMC Emergency Management Plan</i> or other exceptional circumstances. In a full prison lockdown only essential services and activities are maintained.
Regime Management Plan	<p>The Regime Management Plan (RMP) is a document which sets out amendments to the Core Day to maintain safety and security during periods in which resources and operational requirements do not permit delivery of the Core Day.</p> <p>The Regime Management Plan identifies the types of services and activities that will be delivered at the AMC at the different stages of the plan and minimum staffing requirements for each stage.</p>

Summary

ACT Corrective Services employs Custodial Officers to manage detainees at the Alexander Maconochie Centre (AMC) and provide transport for detainees between the AMC and other facilities, such as the ACT courts. Custodial Officers within ACT Corrective Services contribute to the safe, secure and humane management of detainees.

As of August 2025, there were approximately 286 Custodial Officers across both the AMC and Court Transport Unit (CTU). Custodial Officers work in a rostered environment to ensure continuous delivery of services. The terms and conditions of Custodial Officers' employment is outlined in the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*.

The audit considered ACT Corrective Services' management of rostering arrangements for Custodial Officers. The audit focused on ACT Corrective Services:

- systems and processes for the planning and administration of Custodial Officer rosters; and
- implementation of controls to mitigate fraud and integrity risks that relate to rostering.



Conclusions

Governance and administrative arrangements

ACT Corrective Services has not developed and implemented sufficient or effective policies and procedures to support the broader operational planning and administration of Custodial Officer rosters. There are limited policies or procedures in relation to some fundamental rostering issues such as compliance with the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, staff rotation, shift swaps and staff availability and leave. This may contribute to perceived unfairness and inequity and mistrust.

ACT Corrective Services has a range of governance and oversight groups that consider rostering issues. These groups consider matters of strategic and operational interest, including Custodial Officer staffing and roster related issues, but their operation can be improved by more regular meetings and specific and explicit consideration of staffing and roster-related issues.

Custodial Officer rosters

ACT Corrective Services has not developed and implemented effective Custodial Officer rostering arrangements that meet the needs of the organisation, its staff and detainees.

There are different roster patterns in place for the different Custodial Officer levels (and different roles). ACT Corrective Services has not documented why the range of roster patterns in place for AMC and CTU Custodial Officers roster patterns are used and whether they are optimal and appropriate. The roster patterns that are in place do not:

- provide for a consistent and predictable staff base or readily support Custodial Officer rotation across roles, which is an important mechanism for staff development and risk management; or
- support a team-based approach to rostering. Because of the different roster cycles there is no consistency between the shifts worked by supervisors and staff and the alignment of teams with supervisors does not occur. This makes supervision and performance management more difficult.

The rostering of Custodial Officers is necessarily impacted by unplanned leave, which may result in a shortfall of Custodial Officers available for work. To manage the risks of unplanned leave ACT Corrective Services identifies a day target for the number of CO1s rostered as the number of Custodial Officers required to occupy posts on any given day plus 15. The use of the 'plus 15' contingency reflects an understanding and acknowledgement of the level of unplanned leave that occurs in the AMC and the need to roster accordingly. A review of CO1 roster patterns shows that the roster patterns provide for the day target of CO1 staff to be consistently exceeded every day across the six-week period. Notwithstanding this, unplanned leave and unauthorised leave continue to impact ACT Corrective Services' operations.

Custodial Officer rostering issues

The resulting impact of unplanned leave and unauthorised leave is a shortfall of Custodial Officers available for work. In response to a shortfall of Custodial Officers ACT Corrective Services must make decisions to maintain the operation of the AMC, such as:

- de-manning posts and re-allocating working Custodial Officers to priority posts;
- cancelling pre-planned Custodial Officer training and re-allocating working Custodial Officers to priority posts; or
- engaging Custodial Officers to work longer shifts at overtime rates.

The de-manning of posts necessarily involves the re-allocation of Custodial Officers to posts that ensure the safe and continuous operation of the prison. The posts identified as being of a lower priority include education, programs and activities posts. Not allowing these activities to go ahead impacts the rehabilitation of detainees.

In the 18 months to July 2025 a high proportion of scheduled training was cancelled (27 percent). The major reason cited was 'operational requirements', meaning there were insufficient Custodial Officers to cover the required posts at the AMC. The cancellation of pre-planned training

compromises the learning and development of Custodial Officers and their capacity to undertake their roles effectively.

High overtime levels were identified as an issue in the *Blueprint for Change* report in 2022, which identified that more than 35,000 hours of overtime were worked in 2021-22. Since December 2024 ACT Corrective Services has attempted to implement controls over the use of overtime, through a pre-approved limit of five overtime shifts per day at the AMC and a requirement for Operations Managers to seek approval from a Senior Director for any additional shifts. ACT Corrective Services has also reduced overtime shifts from 12 hours to eight hours. Since the introduction of the new overtime arrangements there has been a downward trend in overall overtime expenditure and cost savings have been achieved through shorter overtime shifts.

Custodial Officer roster reform

Since 2015, there have been various attempts to reform Custodial Officer rostering arrangements. The mechanisms for changing rosters are governed by the Enterprise Agreement and there is a high bar for making any changes to a roster, irrespective of the merits or otherwise of the change.

Reforms to staffing and rostering were proposed as part of ACT Corrective Services' 2021 *Blueprint for Change* initiative. The report identified many issues in relation to staffing shortages and rostering arrangements. Recommendation 10 of the *Blueprint for Change* report provided for a staffing and/or rostering solution for both AMC and CTU. This led to the *AMC Roster Project 2022 – Roster for the Future* (the Roster Review Project) which commenced in October 2021. Roster packages were developed and considered by Custodial Officers, but not agreed to.



Key findings

Governance and administrative arrangements

Paragraph

Framework for rostering arrangements

The *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* (Enterprise Agreement) is the framework under which Custodial Officers are employed within ACT Corrective Services. The Enterprise Agreement identifies, for both the AMC and CTU, 'strategies to address staff shortfalls' including the use of overtime. Specifically for the AMC the Enterprise Agreement states that 'over rostering will occur and will be used as a relief for unscheduled and scheduled absences'. The Enterprise Agreement also identifies priority posts to be filled at the AMC and the importance of a Regime Management Plan to assist with the 'scaling down of operations or activities' in response to any staffing shortfall. The Enterprise Agreement is necessarily a key driver of arrangements for Custodial Officer staffing and rostering.

2.9

Key provisions relating to Custodial Officers are outlined in Section M of the Enterprise Agreement, including requirements relevant to mandatory qualifications

2.16

and training, fatigue management and performance management. Fatigue management requirements are also outlined in the *JACS Managing Fatigue in the Workplace Policy* and *JACS Managing Fatigue in the Workplace Guideline*. ACT Corrective Services has not developed any policy or procedural documents specifically relating to mandatory qualifications and training and ensuring that rostering arrangements support the achievement of these requirements. Furthermore, ACT Corrective Services has not developed specific policies and procedures relating to fatigue management for Custodial Officers.

Policies and procedures for the planning and administration of rosters

The *Corrections Management (Core Day) Policy* and Core Day Operating Procedure outline requirements for the day-to-day operation of the AMC. The Policy provides a commitment to 'maximising the time out of cell for detainees, to providing activities and supports to enhance a detainee's desire and ability to reintegrate successfully into the community and lead a law abiding and constructive life'. The Policy also provides for detainees 'to engage in a minimum of five and a half (5.5) hours of constructive activity each weekday' and 'have access to organised recreational and other activities'. The Policy acknowledges that there may be a need 'to adjust the Core Day and reduce the time out of cell hours on a given day or for a specific period where necessary and reasonable'. In practice any shortfalls in Custodial Officer staffing will impact on the Core Day and detainee services and activities. 2.27

The Regime Management Plan is a requirement of the Enterprise Agreement and the *Corrections Management (Core Day) Policy*. The Regime Management Plan 'clearly sets out amendments to the core day to maintain safety and security during periods in which resources and operational requirements do not permit delivery of the core day'. The Regime Management Plan in use at the AMC is unsigned and undated. It has not been endorsed by the ACT Corrective Services Commissioner, as required under the *Corrections Management (Core Day) Policy*. 2.36

The Regime Management Plan operates on a traffic light system to identify whether services and activities can be delivered with associated staffing resources. The Regime Management Plan provides the staffing profile of Custodial Officers required for each of the 'Green', 'Amber' and 'Red' categories. The Regime Management Plan is primarily used by CO4 Operations Managers at the AMC as a workforce management tool to: help make decisions about the day-to-day running of the prison; and in doing so balance the safe running of the site with the needs of detainees. In practice, any management action in response to shortfalls in Custodial Officer staffing should be guided by the Regime Management Plan. 2.37

There are shortcomings in the policies and procedures that support the broader operational planning and administration of Custodial Officer rosters at the AMC and CTU. Other than the *Managing Leave in KRONOS* operating procedure, there are no specific or tailored policies and procedures in relation to some fundamental rostering issues such as: compliance with elements of the Enterprise Agreement (such as the mandatory training requirements) and any other legislative obligations; staff rotation; shift swaps; and staff availability and leave. In the absence of specific and tailored policy and procedural guidance the Workforce Planning Team and 2.47

Custodial Officers do not have a common understanding of agreed practices. This may lead to perceived unfairness and inequity and mistrust.

Governance for the oversight of rosters

ACT Corrective Services has a range of governance and oversight groups that consider matters of strategic and operational interest, including Custodial Officer staffing and roster related issues. These groups include the Executive Leadership Team, the Workplace Consultative Committee, the Local Consultative Committee and the Safety, Health and Wellbeing Committee. There is evidence that the Executive Leadership Team and the Workplace Consultative Committee consider rostering and roster related issues. The Local Consultative Committee, however, has not convened on a regular basis to consider the Regime Management Plan (as it is required to do) or rostering issues more broadly. This is a missed opportunity for the Committee to participate in, and provide effective input towards, rostering arrangements at the AMC and their impact, and intersection with, the Regime Management Plan.

2.67

Managing rostering risks

ACT Corrective Services has both strategic and operational risk registers in place. Both registers consider risks that extend to the rostering of Custodial Officers. Strategic Risk 4 in the Strategic Risk Register covers work, health and safety matters that relate to risks associated with the rostering of Custodial Officers. The *ACT Corrective Services Operational Risk Register* (April 2025) places importance on Custodial Officers undertaking the relevant training to ensure they can respond to risks – especially in relation to accidents, detainee self-harm and detainee/offender violence. Both strategic and operational risk registers note the requirement for an AMC-specific work, health and safety risk register.

2.80

Custodial Officer rosters

Overview of rostering arrangements

Custodial Officers at the AMC are rostered using roster patterns that seek to ensure continuous staffing of the AMC 24 hours per day, seven days per week. Rostering arrangements at the AMC seek to achieve different coverage requirements depending on the day and time of the week, e.g. the highest number of Custodial Officers required is between Wednesday and Friday (when visits to the AMC are scheduled) and very few Custodial Officers are required overnight (when detainees are locked in their cells).

3.9

The term ‘full roster’ is used in the AMC Regime Management Plan and refers to the number of Custodial Officers needed to meet operational requirements to enable full delivery of activities and services at the AMC. ACT Corrective Services identified that a ‘full roster’ varied from 63 Custodial Officers on a weekend through to 74 from Wednesday to Friday. ACT Corrective Services has not specifically identified or documented its staffing needs to determine what constitutes a ‘full roster’ either in

3.10

the Regime Management Plan or elsewhere. ACT Corrective Services advised that these numbers were likely arrived at based on funding and/or risk calculations.

In February 2023, the consultant engaged for the *Roster Review Project* prepared a draft 'Post Assessment' for ACT Corrective Services. This work also considered staffing needs and the implication of adding new posts to maintain service and Custodial Officer safety. The work identified there was a need for more posts and Custodial Officers to fill them. The draft document was not finalised and there is no evidence that ACT Corrective Services has drawn on this analysis to determine 'full roster' numbers. 3.11

Custodial Officers at the CTU work eight-hour shifts from Monday to Friday (except for overtime and Saturday shifts where required). The Enterprise Agreement specifically identifies the CTU establishment: 25 permanent Custodial Officer 1 positions; 1 Custodial Officer 2 position; and 1 Custodial Officer 3 position. In practice, the number of Custodial Officers required to meet the daily operational needs of the CTU may be different (greater or fewer) to the approved establishment in the Enterprise Agreement. Additional coverage is provided as needed on a daily basis through assigning relief Custodial Officers. 3.15

The rostering of ACT Corrective Services' Custodial Officers at the AMC and CTU is facilitated through the use of the UKG Pro IT platform (a cloud based human resource and workforce management system), a Master Roster and Daily Rosters. The Master Roster is an Excel spreadsheet managed by the Workforce Planning Team in the People and Culture Team. Its primary purpose is to facilitate the forecasting of coverage needs for the various posts in the AMC and, through its incorporation into UKG Pro, the time and attendance management of Custodial Officer staff. The Daily Roster shows the specific roster arrangements at the AMC and CTU on any given day. The Daily Roster is a visual tool for the AMC Staff Officer and Operations Managers to identify which Custodial Officers are assigned to the AMC and CTU posts. Creating the Daily Roster involves a series of manual (rather than automated) steps. 3.24

AMC Custodial Officer rosters

A roster pattern represents sequences of days on, night shifts and rest days for a cohort of staff. Roster patterns have been developed across all the Custodial Officer grades. Custodial Officer roster patterns are currently documented in the Master Roster Excel spreadsheet. The Master Roster is typically copied and 'rolled-over' from the previous year and updated as necessary. The Master Roster spreadsheet does not adequately identify what roster patterns are being used (and how frequently) or the rationale for their use, nor does it provide assurance that Custodial Officers are being rostered in accordance with the requirements in the Enterprise Agreement. ACT Corrective Services does not have documentation that demonstrates which roster patterns are optimal and why they best support the operational needs of the AMC. 3.33

CO1 roster patterns include a 48-week roster cycle that results in 19 shifts over six weeks and an average of 38 hours per week at the end of the 48-week roster cycle (based on 150 12-hour shifts and three 8-hour shifts that are allocated for training). Some of the roster patterns enable long breaks between shifts of up to nine days off 3.42

before any leave, absenteeism or shift swaps are factored in. A review of CO1 roster patterns for coverage against the number of CO1s required for a six-week period shows that the roster patterns provide for the day target of CO1 staff to be consistently exceeded every day across the six-week period. This means that CO1 roster patterns consistently exceed the requirements of the day target, which itself has a built-in contingency of 15 additional officers.

The use of six-week wide roster patterns results in variation within the period and makes it more difficult to balance staffing across the AMC. The use of six-week wide roster patterns creates instances of longer breaks within the patterns and results in periods of higher hours in some weeks more than others. Six-week wide roster patterns promote misalignment in shifts worked and shifts off, which means it is easier for imbalances in Custodial Officer coverage to occur. 3.47

The CO1 roster works to a 48-week roster cycle, while the CO2, CO4 and new CO3 trial rosters work to an 18-week roster cycle. This leads to a lack of team-based rostering and scheduling gaps. Because of the different roster cycles there is inconsistency between the shifts worked by supervisors and staff and the alignment of teams with supervisors does not occur. Some pre-approved roster patterns result in a Custodial Officer having a nine-day break before any absence or shift swap is factored in. Operationally, when absences and shift swaps are taken into account, the 48-week and 18-week rosters are erratic and do not provide for a consistent and predictable staffing base due to the number of different roster patterns applied. 3.57

Rotating Custodial Officers between posts supports sound work, health and safety planning. The AMC and CTU Work, Health and Safety Risk Registers identify the rotation of officers as being a control to managing the demanding nature of the Custodial Officer working environment. The 2015 roster patterns do not readily support Custodial Officer rotation. Custodial Officers do not frequently rotate between the different posts across the AMC as a standard practice. A yearly expression of interest process provides a fixed point for consultation with Custodial Officer staff on potential rotations, but rotation can also occur throughout the year if requested by Custodial Officers or management. 3.63

CTU Custodial Officer rosters

Historically, the CTU has operated on a standard eight-hour Monday-Friday roster as it provides coverage between 6:30am and 6:00pm, with overtime available on Saturdays and public holidays when bail court matters are heard. There is a Master Roster identifying the rostering patterns for the CTU, similar to the AMC. Similar to the AMC, the roster patterns are not documented other than in the Master Roster Excel spreadsheet and UKG Pro. This creates human risk and version control issues. 3.75

In April 2024, ACT Corrective Services approved a pilot 10-hour roster (including for weekdays and Saturdays) for interested CO1 staff working at the CTU. The aim of the trial was to promote the CTU as more attractive to applicants and bring wage and work/life balance in line with conditions at the AMC. The pilot 10-hour roster ceased in October 2025. ACT Corrective Services determined that there had not been any significant changes in overtime, overall labour costs, absenteeism or sharing of AMC 3.76

resources to provide additional support and staff during gaps in the required coverage.

Leave arrangements

Under the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, Custodial Officers have a range of leave entitlements including, but not limited to, annual and personal leave. Annual leave is generally planned and approved in advance, while personal leave is for specific reasons, such as being unfit for work due to personal illness or personal injury or caring for an immediate family member. Unplanned leave is leave that an employee takes from work without prior approval. The management of unplanned leave is highly reactive and, notwithstanding best efforts, may mean a shortfall of Custodial Officers in attendance. To manage the risks of unplanned leave ACT Corrective Services identifies a day target for the number of CO1s rostered as the number of Custodial Officers required to occupy posts on any given day plus 15. The use of the 'plus 15' contingency reflects an understanding and acknowledgement of the level of unplanned leave that occurs in the AMC and the need to roster accordingly. 3.83

Unauthorised leave is time away from work without approval (either prior to or after the taking of leave). There is a high number of unauthorised whole-shift absences for CO1s; an average of 49 unauthorised absences per month over the period January 2024 to June 2025. There is also a high number of part-shift absences; an average of 28-part shift absences per month between January 2024 and June 2025. The practice of taking unauthorised leave necessarily impacts the administration of the rosters. 3.106

When unplanned (and potentially unauthorised leave) has been taken, Custodial Officers are requested to provide satisfactory documentation for the absence within three days of returning to work. Where no evidence is provided, ACT Corrective Services advised that unauthorised absences are processed in arrears as a payroll deduction, thereby ensuring that staff are not paid for the absence. Despite Custodial Officers having three days on return to work to provide satisfactory documentation, there has been much more leniency based on the leave reconciliation period being six weeks. This becomes problematic where officers are taking multiple unauthorised absences in a six-week period as effectively managing and accounting for such absences becomes difficult and creates risks that officers may either be under or over paid. ACT Corrective Services advised that since April 2026 staff leave audits are now being undertaken on a four-week basis rather than six-week basis. 3.107

ACT Corrective Services advised that three individuals' use of unauthorised leave had been further considered and two of these employees had received a 'formal direction'. It is apparent that ACT Corrective Services is not managing unauthorised absences as a form of employee misconduct. The number of Custodial Officers being managed for unauthorised leave (three in total) appears to be low. 3.108

Custodial Officer rostering issues

De-manning of posts

A resultant impact from unplanned and unauthorised leave is a shortfall of Custodial Officers. A shortfall of Custodial Officers means that operational managers at the AMC must make daily decisions to de-man posts and may mean that detainees are not afforded access to programs and activities. This limits detainee rehabilitation, such as through reduced program or activity schedules, restricts detainees attending non urgent medical appointments and compromises the safety and security of the prison. 4.16

In instances where the AMC is short staffed Custodial Officers need to be prioritised to posts, and associated roles and responsibilities, that ensure the safe and continuous operation of the prison. Under these circumstances lower-priority posts are 'de-manned'. The Regime Management Plan outlines considerations for the de-manning of posts. The posts identified as having to be filled in the Regime Management Plan are necessarily those that relate to key security requirements of the AMC. The posts identified as being of a lower priority include education, programs and activities posts. 4.17

Cancellation of training

Clause M of the Enterprise Agreement outlines mandatory training that all Custodial Officers must undertake to maintain minimum standards of competency. Training includes CPR, fire awareness (including breathing apparatus), fire drills and use of force. This training must be undertaken annually. Additional training in first aid and mental health needs to be completed by all Custodial Officers every second year. In addition to the training outlined in the Enterprise Agreement, there are a range of other training requirements including those identified as a priority by the Commissioner, ACT Corrective Services and specialist training for higher level Custodial Officers. 4.24

Training for Custodial Officers is built into CO1 roster patterns. CO1s are allocated three training days per annum to undertake mandatory training and any other training that is relevant to their role. Given the breadth of training priorities and the increase in requirements since 2015, it is unlikely that three days per annum is sufficient to meet requirements. The Organisational Capability Unit advise that a minimum of five 8-hour training days is required to ensure that Custodial Officers comply with training requirements. 4.33

Custodial Officers above the CO1 grade (CO2 to CO4) do not have a training component built into their rosters. Where CO2 to CO4 staff are allocated training days their positions need to be backfilled by Custodial Officers on relief shifts. Not building mandatory training into rostering arrangements may lead to one, or likely both, of two key issues: 4.34

- it immediately requires the use of relief shifts or overtime arrangements to cover CO2 to CO4 staff that attend training. This comes at an increased financial cost to ACT Corrective Services and, potentially, leads to higher fatigue for staff who are undertaking additional shifts; and
- it creates the risk that training will not be routinely accommodated and undertaken by Custodial Officers. In a high-risk and volatile environment where maintaining competency in mandatory training is crucial, training must be viewed as a priority for all Custodial Officers.

Analysis of training data for the 18 months between January 2024 and July 2025 shows that a high proportion of scheduled training is cancelled; 27 percent of scheduled training sessions were cancelled. The major reason cited for training to be cancelled is because of ‘operational requirements’. Seventy-seven percent of training that is cancelled is identified as due to this reason. ‘Operational requirements’ means that there are insufficient Custodial Officers to cover the required posts at the AMC and management has decided, often at very short notice, that officers assigned to training are required to fulfill operational roles to ensure the safe and effective functioning of the AMC. 4.46

There are a range of systemic challenges and practical barriers to ensuring Custodial Officers undertake and complete mandatory training. Systemic challenges relate to the rostering arrangements, including time for training not being built-in to CO2 to CO4 rosters and the number of roster patterns not allowing for flexibility to accommodate training requirements. Practical constraints and considerations including: 4.53

- Custodial Officers may be deterred from undertaking training as a 12-hour shift may be preferred to a shorter training 8-hour shift; and
- training is often scheduled on days that Custodial Officers are not rostered on to attend work. This is a disincentive to attend training.

Use of overtime

High overtime levels and inadequate staff resources were reported as an issue in the *Blueprint for Change* report in 2022. The *Blueprint for Change* report identified that more than 35,000 hours of overtime were worked in 2020-21. The *Blueprint for Change* report identified a need for the ‘AMC and CTU [to] maintain sustainable staffing resources that meet operational requirements and promote safe practice and officer wellbeing’ and that the success of this measure would be a ‘reduction in overtime and vacant posts by ten per cent and increase in staffing by ten per cent in first twelve months and then as per post analysis within three years’. 4.66

Prior to December 2024, ACT Corrective Services had minimal controls in place to manage overtime arrangements. Prior to December 2024, ACT Corrective Services had no policy or procedural guidance relevant to the administration of overtime arrangements. There was no policy or procedural guidance that identified Enterprise Agreement requirements, Custodial Officer eligibility, process(es) for approving overtime or roles and responsibilities. 4.73

On 13 December 2024, email instructions were provided to AMC Area Managers and AMC Operations Managers in relation to a new AMC Daily Roster and overtime process. Further instruction was provided on 7 February 2025. The new procedure provided for a pre-approved limit of a maximum of five overtime shifts per day at the AMC. In the event that more than five overtime shifts were needed, the new procedure required the Operations Managers to seek approval from a Senior Director. The new procedure also required that all overtime was to be allocated through the use of KRONOS so that it would be 'fully auditable'. These measures were put in place to reduce the overreliance on overtime and increase fairness and equity in overtime arrangements.

4.82

ACT Corrective Services advised that the basis for a maximum of five pre-approved overtime shifts was to allow limited autonomy for the Custodial Officer Grade 4 to use their existing delegation for approval of overtime. ACT Corrective Services advised that the reasoning for this decision was not recorded but was agreed to and discussed at an executive meeting. There is no evidence that ACT Corrective Services has undertaken any business planning to determine whether five overtime shifts are commensurate with the need to fill roster gaps created by leave and other vacancies or to match the operational requirement for the number of posts to be filled on the day.

4.83

The audit considered data from ACT Corrective Services on the number of overtime shifts between January 2025 and July 2025. Between January 2025 and July 2025 there was an average of 60 overtime shifts worked each month. These 60 shifts are in addition to the five pre-approved overtime shifts that are available. Additional overtime shifts are permitted where required for operational reasons. The initial impact of the new overtime arrangements implemented from December 2024 was a decrease in overtime usage for the first three months of 2025. Since then, however, overtime usage has again increased and for the period April 2025 to July 2025, there were 19 days each month where overtime usage exceeded the pre-approved daily limit of five overtime shifts. ACT Corrective Services asserted that this was primarily due to an unprecedented number of hospital watches and other operational demands and that 'they have remained lower than they would have been in the absence of the new arrangements'.

4.88

ACT Corrective Services has progressively reduced its overall overtime expenditure between mid-2024 and mid-2025. Since the introduction of the new overtime arrangements in December 2024 there has been a downward trend in overall overtime expenditure. Cost savings have been made as overtime shifts have reduced from 12-hours in duration to 8-hours in duration.

4.94

Fatigue management requirements for the rostering of Custodial Officers are outlined in the Enterprise Agreement. Amongst other things, Custodial Officers must not work more than ten shifts a fortnight (including overtime) and rostered days off must be at least two consecutive days in a fortnight. The approved base pattern rosters adhere to these requirements.

4.101

The requirements may be circumvented, however, when Custodial Officers work overtime shifts or swap shifts with colleagues. The potential for fatigue to

4.102

accumulate during these instances is high. ACT Corrective Services advised that any arrangements under these circumstances are supported by risk mitigation activities such as fatigue impacts, employee consent and operational oversight and management.

Custodial Officer roster reform

Blueprint for Change initiative

Reforms to staffing and rostering arrangements were proposed as part of ACT Corrective Services' 2021 *Blueprint for Change* initiative. The March 2022 *Blueprint for Change* report identified that 'a broad-based investigation into staffing-related matters, including rosters, overtime, leave, workplace injuries, policy, training and service delivery' had been undertaken. Six key findings were made, aspects of which related to staffing and rostering. The report identified there was a shortage of staff and noted 'areas of resource drain are evident in the high volume of hospital escorts and absenteeism, causing high levels of overtime, vacant posts and increasing cost burden of excess annual leave'. The report identified work underway in relation to rostering arrangements and that 'the Rostering team is chairing a consultative project to formally review the roster'. 5.18

Roster Review Project

The *Blueprint for Change* initiative provided further impetus for reform to rostering arrangements for Custodial Officers. Specifically, Recommendation 10 of the *Blueprint for Change* report provided for 'a staffing and/or rostering solution for both AMC and CTU that enables regular and sustainable staff access to training and ensure the training program: 5.27

- responds to the prioritised skill needs in the operational environment;
- is of high quality content and delivery;
- has limited impact or dependency on operations'.

The *AMC Roster Project 2022 – Roster for the Future* (the Roster Review Project) commenced in October 2021. The purpose of the project was to revise Custodial Officer rosters to 'better meet operational requirements while at the same time improving staff development opportunities and wellbeing'. 5.28

In April 2024 the consultant engaged for the Roster Review Project prepared two detailed roster packages for ACT Corrective Services; a CO1 and CO2 roster package; and a CO3 and CO4 roster package. The roster packages provided information on the shortcomings of the current rosters including that: 5.34

- they did not factor in, or specifically allocate time for, training needs and requirements of Custodial Officers;
- were inconsistent and inequitable in their approach; and
- provided for reduced coverage at various points in the roster cycle.

The roster packages identified different options for future rosters, including: 5.35

- two weeks of training blocks of nine-hour days built into the roster;
- improvements to inconsistency of staffing levels between night and day shift;
- more equity in scheduling of day, night and relief shifts; and
- group-based or team-based rosters, which sought to better align the rosters of CO1s and CO2s into groups or teams.

The mechanisms for changing rosters are governed by the Enterprise Agreement. For a new roster to be introduced, a simple majority of 50 percent plus one is required to satisfy the requirements of the Enterprise Agreement. An employee that does not participate in a roster vote is regarded as having responded with a 'no' to any roster change. This means that a high bar is set for there to be any changes to a roster, irrespective of the merits or otherwise of the change. 5.39

In September 2024 Elections ACT, on behalf of ACT Corrective Services, commenced a voting process for CO1 and CO2 staff for the proposed new roster. Eighty-one percent of CO1s voted in the process (179 out of 221 CO1s), with 40 officers in favour of the roster and 139 not in favour. For the purpose of the voting requirements of the Enterprise Agreement, only 18 percent of CO1s were identified as in favour of the proposed rosters. Seventy-two percent of CO2s voted in the process (23 out of 32 CO2s), with seven officers in favour of the roster and 16 officers not in favour. For the purpose of the voting requirements of the Enterprise Agreement, only 22 percent of CO2s (seven from a total of 32) were identified as in favour of the proposed rosters. 5.46

A Project Closure Report was prepared in November 2024 by the Project Manager. The Project Closure Report was not specific or explicit in its review and analysis of why the proposed rosters were not agreed to, but noted 'anecdotal post-ballot feedback from AMC staff varied, indicating that some preferred the current roster, some saw positive elements to the proposed rosters, but wanted more time to consider the changes'. The Project Closure Report identified a number of key lessons, many of which related to communication and engagement. 5.50

Future rostering arrangements

ACT Corrective Services commissioned a program evaluation of the *Blueprint for Change* in 2024. The evaluation confirms that there were numerous challenges with the Roster Review Project including contractual issues with the supplier, the limitations of the Enterprise Agreement for introducing any proposed changes to the roster and a lack of staff trust to support amended rosters. The evaluation also found that two years since the *Blueprint for Change* the current rosters and management of overtime remains unsustainable. This presents a key risk to ACT Corrective Services operating environment as there is a high likelihood that rostering of staff is not optimal, effective or meeting operational needs. 5.63

Recommendations



Recommendation 1 Rostering policies and procedures

ACT Corrective Services should develop and implement specific and tailored policies and procedures to address rostering issues such as:

- a) compliance with the Enterprise Agreement (including fatigue management and mandatory training requirements) and any other legislative obligations; and
- b) staff rotation, shift swaps and staff availability and leave.

Recommendation 2 Governance for the oversight of rosters

ACT Corrective Services should:

- a) review its existing governance forums and determine where oversight of Custodial Officer rostering and roster-related issues are most effectively considered;
- b) specifically and explicitly reflect this requirement in the governance forum's terms of reference; and
- c) implement a standing agenda item for the consideration of rosters and roster-related issues to enable appropriate management oversight and decision-making to occur.

Recommendation 3 Documentation of Custodial Officer roster patterns

ACT Corrective Services should clearly identify and document the roster patterns for each Custodial Officer classification level and the rationale for their use.

Recommendation 4 Comprehensive review of staffing needs

ACT Corrective Services should undertake a comprehensive review of its Custodial Officer staffing needs at both the AMC and CTU. Following the review ACT Corrective Services should identify and document the minimum requirements for Custodial Officers at different classifications to fill posts and roles.

Recommendation 5 Identification and documentation of rosters

Following the comprehensive review of Custodial Officer staffing needs, ACT Corrective Services should develop and document rostering patterns that meet the staffing needs of the AMC and CTU. The rostering patterns should:

- a) clearly identify and demonstrate how the rostering patterns are meeting the staffing needs of the CTU;

- b) clearly and separately identify what contingencies have been built into the rostering patterns to account for unscheduled and unauthorised absences;
- c) accommodate training requirements for all Custodial Officer classifications; and
- d) support:
 - i) team-based rostering for the purpose of supervision and performance management; and
 - ii) rotation of Custodial Officers across posts and roles to minimise integrity risks.

Recommendation 6 Policy and procedural guidance on the administration and use of overtime

ACT Corrective Services should:

- a) review the effectiveness of overtime arrangements implemented since December 2024 and determine whether the arrangements are operating effectively and fit for purpose as a longer-term arrangement; and
- b) (following this review) develop formal policy and procedural guidance on the administration and use of overtime, which seeks to:
 - i) recognise and manage fatigue risks associated with working too many overtime shifts; and
 - ii) ensure fairness and equity in the allocation of overtime shifts.

Recommendation 7 Fatigue management arrangements

ACT Corrective Services should:

- a) review its fatigue management arrangements, including policy and procedural guidance and WHS Risk Register controls, for compliance with better practice requirements for the management of fatigue; and
- b) (following this) review all existing flexible working arrangements for compliance with the better practice requirements for the management of fatigue.

Agency response

In accordance with subsection 18(2) of the *Auditor-General Act 1996*, the Justice and Community Safety Directorate was provided with:

- a draft proposed report for comment. All comments were considered and required changes were reflected in the final proposed report; and
- a final proposed report for further comment. All comments were considered and required changes were reflected in the final report.

As part of the final proposed report process, the directorate was invited to provide comments for inclusion in the Summary chapter of the final report. No comments were provided for inclusion.

1 Introduction

ACT Corrective Services

Alexander Maconochie Centre

- 1.1 The Alexander Maconochie Centre (AMC) is the ACT's only prison. It has been operational since 2009 and accommodates male and female detainees (both on remand and those sentenced). The AMC operates under the *Corrections Management Act 2007* and the *Human Rights Act 2004* and in doing so seeks to promote rehabilitation, detainee human rights and reintegration outcomes for the ACT community.
- 1.2 As of 30 June 2025, there were 432 detainees at the AMC. A total of 135 detainees identified as First Nations Australians and 297 identified as non-Indigenous.

Court Transport Unit

- 1.3 The Court Transport Unit (CTU) is responsible for transporting detainees within the ACT to and from ACT courts and other locations such as hospitals.

Healthy Prison Review of the Alexander Maconochie Centre 2025

- 1.4 In December 2025, the ACT Office of the Inspector of Custodial Services (ICS) completed its third Healthy Prison Review of the AMC (and by necessity the CTU). The review considered aspects of the AMC under the following themes:
 - leadership and culture;
 - drugs and harm minimisation;
 - culturally appropriate care of Aboriginal and Torres Strait Islander peoples;
 - implementation of previous OICS and coronial recommendations;
 - purposeful activity; and
 - rehabilitation and preparation for release.
- 1.5 The review made thirty recommendations for improvement to the management and operation of the AMC. According to the ICS:

The key recommendation of this review is that ACTCS implement a structured day of purposeful activity for detained people at the AMC, as an overarching strategy to promote rehabilitation, reduce reoffending, improve the motivation and wellbeing of detained people, and reduce demand for illicit drugs.

Custodial Officers

1.6 ACT Corrective Services employs Custodial Officers at the AMC and in the CTU.

1.7 Within the context of the AMC, Custodial Officers are responsible for:

- searching detainees and visitors;
- escorting detainees and visitors;
- observing and assessing detainee behaviour; and
- responding to incidents.

1.8 Within the context of the CTU, Custodial Officers are responsible for:

- transporting detainees; and
- maintaining public safety by escorting offenders to court.

1.9 As of 11 August 2025, there were approximately 286 Custodial Officers across both the AMC and CTU. Custodial Officer Grade 1 is the most junior position and Custodial Officer Grade 4 is the most senior position. Table 1-1 shows the number of Custodial Officers at each grade (including those staff on temporary higher duties as at 11 August 2025).

Table 1-1 Custodial Officers employed by ACT Corrective Services (11 August 2025)

Custodial Officer Grade	Number
Custodial Officer Grade 1	243
Custodial Officer Grade 2	32
Custodial Officer Grade 3	8
Custodial Officer Grade 4	3
Total	286

Source: ACT Audit Office based on information provided by ACT Corrective Services.

ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026

1.10 The *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* sets out the terms and conditions of employment for Custodial Officers working in ACT Corrective Services. The Agreement outlines expectations for workplace values and behaviours, rates of pay and allowances, leave arrangements, communication and consultation requirements and appeals processes amongst other things.

1.11 Section M of the Agreement includes specific provisions for ACT Corrective Services Custodial Officers. Section N has specific provisions for Custodial Officers working at the CTU and Section O includes specific provisions for Custodial Officers working at the AMC.

Roles and responsibilities

ACT Corrective Services – Corporate Services

- 1.12 The People and Culture Team in the Corporate Services Branch of ACT Corrective Services is responsible for planning, administering and maintaining Custodial Officer rostering arrangements for both the AMC and CTU. The People and Culture Team reports to the Executive Branch Manager, Corporate Services.
- 1.13 The Director of Wellbeing and Rosters is responsible for the management of Custodial Officer rosters. Under the direction of the Director of Wellbeing and Rosters the Workforce Planning Team Leader is responsible for:
- managing the end-to-end roster scheduling process for Custodial Officers at both the AMC and CTU; and
 - maintaining the UKG Pro system (a cloud-based workforce management system that is used to track employee time and attendance, manage schedules and automate payroll processes).

ACT Corrective Services – Court Transport Unit (CTU)

- 1.14 Prior to February 2025, the Director of the CTU was responsible for the management of all aspects of CTU rosters. Since February 2025, the Workforce Planning Team Leader within the People and Culture Team in the Corporate Services Branch has been the central coordinating role for rosters for both AMC (all aspects of roster administration) and CTU (in relation to the CTU daily roster and processing CTU overtime). Leave management and flexible working arrangements for Custodial Officers based at the CTU remains the responsibility of the Director of the CTU.

ACT Corrective Services – AMC Staff Officer and AMC Operations Managers

- 1.15 The AMC Staff Officer is a liaison point between the Workforce Planning Team Leader and operational management at the AMC. The AMC Staff Officer plays a key role in roster administration. The Staff Officer has delegated authority to oversee the daily rosters and approves overtime at both the AMC and CTU.
- 1.16 Outside of standard business hours, such as nights and weekends, AMC Operations Managers are responsible for maintaining staffing arrangements. AMC Operations Managers are generally a Custodial Officer Grade 4 or 3 (where performing higher duties). They do not have delegated authority to approve overtime when the Staff Officer is on duty, but they do have a role in approving overtime after hours, on weekends or when the Staff Officer is away. They also have a role in relation to executing detainee lock-ins and de-manning posts.

Oversight agencies

1.17 There are several agencies with a role in the oversight of the AMC.

ACT Office of Inspector of Correctional Services (ICS)

1.18 The ACT Office of Inspector of Correctional Services (ICS) operates under the *Custodial Inspector Act 2017*. The ICS provides independent oversight of ACT correctional and youth detention facilities, focusing on continual improvement and prevention of ill-treatment of detainees.

ACT Human Rights Commission

1.19 Amongst other things, the ACT Human Rights Commission has a role in advocating for people's rights to justice, dignity and wellbeing.

1.20 The Discrimination, Health Services, Disability and Community Services Commissioner (within the ACT Human Rights Commission) handles complaints received by the Commission from members of the public including detainee complaints and inspections of correctional centres.

ACT Official Visitors

1.21 ACT Official Visitors provide independent oversight of services for people in government institutions and community facilities who are dependent on service providers, including those in correctional facilities.

ACT Ombudsman

1.22 The ACT Ombudsman has a role in:

- improving public administration in the ACT; and
- providing assurance that ACT Government agencies falling within their remit act with fairness and integrity.

1.23 The ACT Ombudsman's remit includes ACT Corrective Services management of the AMC.

Relationship Protocol

1.24 There is a Relationship Protocol between the ACT Inspector of Correctional Services, the ACT Human Rights Commission and the ACT Ombudsman which confirms arrangements for how the organisations will work together to oversight custodial services.

Better practice roster administration

- 1.25 Rosters should be planned to meet the business and operational needs of the organisation while supporting staff wellbeing to achieve a good work life balance.
- 1.26 According to the NSW Ministry of Health Rostering Resource Manual¹ and WorkSafe Victoria's Work-related Fatigue Manual², effective roster administration should ensure:
- sufficient and appropriately skilled staff are rostered to work and meet anticipated demands;
 - compliance with regulatory frameworks including relevant work, health and safety legislation (i.e. the *Corrections Management Act 2007* and *Human Rights Act 2004*) and industrial awards and agreements (i.e. the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*);
 - good cost management and value for money to avoid overstaffing and ensure optimal coverage of staff across assigned posts; and
 - fair rostering of staff, which provides appropriate flexibility.
- 1.27 Features of effective roster administration should include:
- forward-rotation of staff and a roster monitoring system that includes checking hours and shifts worked against actual rosters each month;
 - appropriate governance structures to oversee roster planning, creation, approval, monitoring and reporting; and
 - processes to continuously review and improve roster administration.
- 1.28 Better practice also requires that robust IT systems support roster administration. This can be through automating scheduling tasks, enabling shift swaps or other shift adjustments, allocating overtime shifts and integrating both payroll information and other HR data for workforce planning.

Roster patterns

- 1.29 Rosters for operational environments are generally prepared using roster patterns. Roster patterns identify the recurring shift structure within a roster, with information on start and finish times and the type of shift an employee works. Roster patterns help streamline scheduling of staff by automating the allocation of shifts based on pre-defined patterns.³

¹ NSW Ministry of Health (May 2025) *Rostering Resource Manual Best Practice*.

² WorkSafe Victoria (August 2020) *Work-related Fatigue: A Guide for Employers*.

³ [Roster Pattern Overview https://docs.powerworker.com/docs/overview-2](https://docs.powerworker.com/docs/overview-2) accessed on 31 October 2025.

1.30 Roster patterns enable:

- consistent scheduling by defining repeating shifts over a set period;
- customisation of different work structures, such as duty rosters and incident rosters;
- flexibility by allowing patterns to vary day to day, by role and/or operational needs; and
- compliance with workplace regulations, including fatigue management requirements.⁴

Audit objective and scope

Audit objective

1.31 The objective of the audit was to assess the effectiveness of ACT Corrective Services' management of Custodial Officer rostering arrangements.

Audit scope

1.32 The scope of the audit included consideration of ACT Corrective Services' management of rostering arrangements for Custodial Officers, including staff working at the AMC and in the CTU.

1.33 The audit focused on ACT Corrective Services:

- systems and processes for the planning and administration of Custodial Officer rosters; and
- implementation of controls to mitigate fraud and integrity risks that relate to rostering.

1.34 The audit is informed by, and considered as necessary, the reform activities and initiatives including:

- the *AMC Roster Project 2022 – Roster for the Future*; and
- *Blueprint for Change 'A new future for custodial services'*.

1.35 The audit considered rostering arrangements with reference to the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, which came into force in late 2023.

⁴ Ibid.

Out of Scope

- 1.36 The audit focused on rostering arrangements. The audit recognised that staff rostering arrangements relate to, and are impacted by, broader staffing arrangements for Custodial Officers, such as:
- strategic workforce planning; and
 - recruitment and retention.
- 1.37 The audit did not specifically consider such arrangements, except to the extent they relate to staff rostering.
- 1.38 The audit did not consider management arrangements more broadly for the AMC or CTU except to the extent they relate to staff rostering.
- 1.39 The audit did not consider the effectiveness of the management of the AMC or CTU, or the health, well-being and rights of detainees more broadly.

Audit criteria, approach and method

Audit criteria

- 1.40 To form a conclusion against the objective, the following audit criteria and sub-criteria were used:
- Criterion 1 - Does ACT Corrective Services have effective systems and processes to plan Custodial Officer rosters?
 - Does ACTCS have a fit-for-purpose rostering system to facilitate the scheduling of Custodial Officer shifts?
 - Are there documented policies, procedures and processes to support the planning and creation of Custodial Officer rosters to meet business needs and are they complied with?
 - Are there processes in place to ensure the rosters comply with provisions in the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*?
 - Are there processes in place to ensure the rosters comply with work, health and safety legislation, policies and procedures as well as other relevant legislation such as the *Public Sector Management Act 1994* and the *Human Rights Act 2004*?
 - Are there processes in place to consult Custodial Officers about rosters and ensure fairness in rostering?
 - Criterion 2 - Does ACT Corrective Services have effective processes to administer Custodial Officer Rosters?
 - Are there clear roles and responsibilities and managerial oversight for creating and approving Custodial Officer rosters?

- Does the rostering system facilitate efficient administration of rosters – such as for leave, overtime and shift swap arrangements?
- Are there appropriate governance structures to monitor and report on Custodial Officer rosters?
- Are there processes in place to review Custodial Officer rosters and plan for future rosters?
- Criterion 3 - Does ACT Corrective Services have effective processes to promote the integrity of Custodial Officer rosters?
 - Are there processes and controls to manage risks, including workforce planning, recruitment and fraud risks, associated with Custodial Officer rosters?
 - Are there processes and controls to manage and minimise overtime expenditure?

Audit approach and method

- 1.41 The audit was performed in accordance with *ASAE 3500 – Performance Engagements*. The audit adopted the policy and practice statements outlined in the Audit Office’s *Performance Audit Methods and Practices (PAMPr)* which is designed to comply with the requirements of the *Auditor-General Act 1996* and *ASAE 3500 – Performance Engagements*.
- 1.42 In the conduct of this performance audit the ACT Audit Office complied with the independence and other relevant ethical requirements related to assurance engagements.
- 1.43 The Audit Office engaged Orkest Consulting for technical advice. Orkest provides workforce planning and design consultancy specialising in roster optimisation.
- 1.44 The audit approach and method consisted of:
- reviewing legislation, policies, procedures, guidelines, research documents, and relevant reports and publications (including the *Blueprint for Change* report, *AMC Roster Project 2022 – Roster for the Future* and relevant work, health and safety policies and procedures);
 - a walkthrough of the AMC and CTU rostering systems to identify the processes for building roster templates, creation, approval, publication, maintenance, payroll processes and adjustments;
 - identifying and documenting the internal control environment that relates to the planning, administration, monitoring and reporting of AMC and CTU rosters;
 - reviewing risk and fraud management documentation;
 - conducting audit interviews and discussions with key staff in ACT Corrective Services (including Custodial Officers) and other stakeholders (such as advocacy and oversight bodies);
 - reviewing reporting (Ministerial, Executive Briefs) relating to AMC and CTU rosters and associated issues;

- reviewing better practice guidance in relation to rostering from other jurisdictions;
- comparing and contrasting AMC rosters with CTU rosters to determine similarities and differences in practices; and
- reviewing information, data and reporting related to overtime expenditure.

1.45 The Audit Office also met with relevant key stakeholders including:

- the ACT Inspector of Correctional Services;
- Official Visitor for Corrections;
- Official Visitor for Corrections and Children and Young People; and
- representatives from the ACT Ombudsman.

2 Governance and administrative arrangements

2.1 This chapter discusses governance and administrative arrangements for the management of Custodial Officer rosters. It includes consideration of:

- the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* and its requirements;
- policies and procedures to support the effective planning and administration of rosters; and
- governance arrangements for the oversight of rostering arrangements.

Summary



Conclusions

ACT Corrective Services has not developed and implemented sufficient or effective policies and procedures to support the broader operational planning and administration of Custodial Officer rosters. There are limited policies or procedures in relation to some fundamental rostering issues such as compliance with the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, staff rotation, shift swaps and staff availability and leave. This may contribute to perceived unfairness and inequity and mistrust.

ACT Corrective Services has a range of governance and oversight groups that consider rostering issues. These groups consider matters of strategic and operational interest, including Custodial Officer staffing and roster related issues, but their operation can be improved by more regular meetings and specific and explicit consideration of staffing and roster-related issues.



Key findings

Framework for rostering arrangements

Paragraph

The *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* (Enterprise Agreement) is the framework under which Custodial Officers are employed within ACT Corrective Services. The Enterprise Agreement identifies, for both the AMC and CTU, 'strategies to address staff shortfalls' including the use of overtime. Specifically for the AMC the Enterprise Agreement states that 'over rostering will occur and will be used as a relief for unscheduled and scheduled absences'. The Enterprise Agreement also identifies priority posts to be filled at the AMC and the importance of a Regime Management Plan to assist with the 'scaling down of operations or activities' in response to any staffing shortfall. The Enterprise Agreement is necessarily a key driver of arrangements for Custodial Officer staffing and rostering.

2.9

Key provisions relating to Custodial Officers are outlined in Section M of the Enterprise Agreement, including requirements relevant to mandatory qualifications and training, fatigue management and performance management. Fatigue management requirements are also outlined in the JACS *Managing Fatigue in the Workplace Policy* and JACS *Managing Fatigue in the Workplace Guideline*. ACT Corrective Services has not developed any policy or procedural documents specifically relating to mandatory qualifications and training and ensuring that rostering arrangements support the achievement of these requirements. Furthermore, ACT Corrective Services has not developed specific policies and procedures relating to fatigue management for Custodial Officers.

2.16

Policies and procedures for the planning and administration of rosters

The *Corrections Management (Core Day) Policy* and Core Day Operating Procedure outline requirements for the day-to-day operation of the AMC. The Policy provides a commitment to ‘maximising the time out of cell for detainees, to providing activities and supports to enhance a detainee’s desire and ability to reintegrate successfully into the community and lead a law abiding and constructive life’. The Policy also provides for detainees ‘to engage in a minimum of five and a half (5.5) hours of constructive activity each weekday’ and ‘have access to organised recreational and other activities’. The Policy acknowledges that there may be a need ‘to adjust the Core Day and reduce the time out of cell hours on a given day or for a specific period where necessary and reasonable’. In practice any shortfalls in Custodial Officer staffing will impact on the Core Day and detainee services and activities.

2.27

The Regime Management Plan is a requirement of the Enterprise Agreement and the *Corrections Management (Core Day) Policy*. The Regime Management Plan ‘clearly sets out amendments to the core day to maintain safety and security during periods in which resources and operational requirements do not permit delivery of the core day’. The Regime Management Plan in use at the AMC is unsigned and undated. It has not been endorsed by the ACT Corrective Services Commissioner, as required under the *Corrections Management (Core Day) Policy*.

2.36

The Regime Management Plan operates on a traffic light system to identify whether services and activities can be delivered with associated staffing resources. The Regime Management Plan provides the staffing profile of Custodial Officers required for each of the ‘Green’, ‘Amber’ and ‘Red’ categories. The Regime Management Plan is primarily used by CO4 Operations Managers at the AMC as a workforce management tool to: help make decisions about the day-to-day running of the prison; and in doing so balance the safe running of the site with the needs of detainees. In practice, any management action in response to shortfalls in Custodial Officer staffing should be guided by the Regime Management Plan.

2.37

There are shortcomings in the policies and procedures that support the broader operational planning and administration of Custodial Officer rosters at the AMC and CTU. Other than the *Managing Leave in KRONOS* operating procedure, there are no specific or tailored policies and procedures in relation to some fundamental rostering issues such as: compliance with elements of the Enterprise Agreement

2.47

(such as the mandatory training requirements) and any other legislative obligations; staff rotation; shift swaps; and staff availability and leave. In the absence of specific and tailored policy and procedural guidance the Workforce Planning Team and Custodial Officers do not have a common understanding of agreed practices. This may lead to perceived unfairness and inequity and mistrust.

Governance for the oversight of rosters

ACT Corrective Services has a range of governance and oversight groups that consider matters of strategic and operational interest, including Custodial Officer staffing and roster related issues. These groups include the Executive Leadership Team, the Workplace Consultative Committee, the Local Consultative Committee and the Safety, Health and Wellbeing Committee. There is evidence that the Executive Leadership Team and the Workplace Consultative Committee consider rostering and roster related issues. The Local Consultative Committee, however, has not convened on a regular basis to consider the Regime Management Plan (as it is required to do) or rostering issues more broadly. This is a missed opportunity for the Committee to participate in, and provide effective input towards, rostering arrangements at the AMC and their impact, and intersection with, the Regime Management Plan. 2.67

Managing rostering risks

ACT Corrective Services has both strategic and operational risk registers in place. Both registers consider risks that extend to the rostering of Custodial Officers. Strategic Risk 4 in the Strategic Risk Register covers work, health and safety matters that relate to risks associated with the rostering of Custodial Officers. The *ACT Corrective Services Operational Risk Register* (April 2025) places importance on Custodial Officers undertaking the relevant training to ensure they can respond to risks – especially in relation to accidents, detainee self-harm and detainee/offender violence. Both strategic and operational risk registers note the requirement for an AMC-specific work, health and safety risk register. 2.80

Framework for rostering arrangements

ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026

2.2 The *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* (Enterprise Agreement) is the framework under which Custodial Officers are employed within ACT Corrective Services.

CTU-specific provisions

2.3 Section N of the Enterprise Agreement outlines provisions for Custodial Officers at the CTU. It includes provisions in relation to hours of work and the application of overtime and penalty rates.

2.4 It also includes a provision in relation to 'strategies to address staff shortfalls':

Arrangements for backfilling of CO Class 1 vacancies due to employee unscheduled absences and/or other emergency operational requirements are to occur as follows:

1. Relief (over rostered) employees from other facilities
2. Casuals
3. Overtime.

AMC-specific provisions

2.5 Section O of the Enterprise Agreement outlines provisions for Custodial Officers at the AMC. It outlines key principles for AMC operations including the development of a Regime Management Plan (refer to paragraphs 2.23 to 2.30), the intent of which is to:

... outline staffing levels based on the current operational capacity of the AMC. In the event of any notable change in detainee numbers, ACTCS will consult with the union(s) regarding resource implications.

2.6 The Enterprise Agreement also provides for remediation action to be taken in response to staffing shortfalls including changes to be made to the AMC and its operations or the deployment of additional staff:

Where the Assistant Commissioner determines that the number of COs on duty is below the level required to ensure the maintenance of routine functions, including the safety of staff and the security and welfare of detainees at the AMC, the Assistant Commissioner in accordance with the AMC Regime Management Plan, shall determine:

Appropriate adjustments required to routine AMC functions; and/or

Scaling down of operations or activities for the duration of the shortfall, including suspension of non-essential activities such as:

- (a) Education/Programs;
- (b) Activities;
- (c) Canine Unit;
- (d) Therapeutic Centre;

and/or Engagement of casual CO staff;

and/or Offer overtime to staff in accordance with C9 - Overtime;

and/or Attendance of staff in accordance with C16 - Emergency Duty.

2.7 The Enterprise Agreement also identifies a number of essential CO1 posts and notes that 'as a minimum standard, management of AMC operations will be undertaken in accordance with [the posts]'.

2.8 In relation to rostering arrangements the Enterprise Agreement states ‘consistent with the healthy prisons philosophy of the AMC the roster will aim to achieve continuity in detainee management and best practice in fatigue management’. Furthermore ‘over rostering will occur and will be used as a relief for unscheduled and scheduled absences’.



2.9 The *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* (Enterprise Agreement) is the framework under which Custodial Officers are employed within ACT Corrective Services. The Enterprise Agreement identifies, for both the AMC and CTU, ‘strategies to address staff shortfalls’ including the use of overtime. Specifically for the AMC the Enterprise Agreement states that ‘over rostering will occur and will be used as a relief for unscheduled and scheduled absences’. The Enterprise Agreement also identifies priority posts to be filled at the AMC and the importance of a Regime Management Plan to assist with the ‘scaling down of operations or activities’ in response to any staffing shortfall. The Enterprise Agreement is necessarily a key driver of arrangements for Custodial Officer staffing and rostering.

Provisions relevant to all Custodial Officers

2.10 Key provisions relevant to Custodial Officers at the AMC and CTU are outlined in Section M of the Agreement. Policy requirements in relation to fatigue management are outlined in the *JACS Managing Fatigue in the Workplace Policy* and *JACS Managing Fatigue in the Workplace Guideline*. Table 2-1 shows:

- key requirements that need to be considered when planning and administering Custodial Officer rosters; and
- commentary on how the key requirement has been recognised and considered by ACT Corrective Services.

Table 2-1 Key requirements for rostering ACT Corrective Services Custodial Officers (Section M of the Enterprise Agreement)

Clause	Requirement	Audit Office assessment
M14 – Mandatory qualifications and training (M14.5 and M14.6)	<p>All COs Class 1, 2, 3 and 4 are required to maintain minimum standards of competence, as assessed on an annual basis in each of the following – CPR, Fire Awareness, Fire Drills and Use of Force.</p> <p>All COs Class 1, 2, 3 and 4 are required to maintain minimum standards of competence as assessed on a triennial basis in each of the following – First Aid and Mental Health.</p> <p>Mandatory training days will be pre-rostered in advance, with training to be provided to staff within paid work time.</p>	<p>There are no specific policies and procedures supporting the implementation of requirements for mandatory qualifications and training.</p> <p>Training days are built into the roster for some CO classifications (CO1 and CO3 Security), but training does not routinely occur as scheduled.</p> <p>Training is further discussed in Chapter 4 of the audit report.</p>

Clause	Requirement	Audit Office assessment
M26 – Fatigue management	<p>ACTCS is committed to achieving the appropriate balance between work and personal life and to minimising the extent to which excessive hours are worked.</p> <p>In relation to AMC officers:</p> <ul style="list-style-type: none"> - Employees that work under 10 hour shifts at the AMC may work up to 12 shifts per fortnight (including overtime) and must have 2 consecutive days off within a fortnight which may include up to a maximum of 3 double shifts; - Employees that work 10 to 12 hours shifts at the AMC may work up to 10 shifts per fortnight (including overtime) and must have 2 consecutive days off within a fortnight; - Employees may work a maximum of 3 double shifts in any fortnight; - Employees must either work a single shift or have a day off between any two sets of double shifts. - Employees on 10 to 12 hr shifts are not permitted to work double shifts. - The maximum working hours in any 24-hour period is 18 hours. <p>For Court Transport Unit officers:</p> <ul style="list-style-type: none"> - CTU employees and employees who work 8 hour shifts at other facilities must have at least 1 day off per week. - Notwithstanding the above, CTU employees may work a Saturday morning overtime shift at the CTU, and one additional shift at another facility on the same weekend on no more than two occasions per calendar month. 	<p>The JACS <i>Managing Fatigue in the Workplace Policy</i> and JACS <i>Managing Fatigue in the Workplace Guideline</i> supports fatigue management (see paragraphs 2.11 to 2.13).</p> <p>The approved base roster patterns adhere to the fatigue management requirements as outlined in the Enterprise Agreement. Notwithstanding this, there is concern with overtime and shift swaps and the potential for accumulated fatigue during these instances.</p> <p>Fatigue management is discussed in Chapter 4 of the audit report.</p>
M32 - Performance management	<p>Employees, including casual employees, will participate in a program of regular, ongoing structured feedback, and the development of individual PADP's consistent with the ACTPS Performance Framework.</p> <p>There will be quarterly assessments for new employees, or officers on probation and at least every 12 months for all other employees. The process will comprise of feedback to be provided by relevant supervisor(s) and will include a written assessment and face to face discussion.</p>	<p>The <i>ACT Government Performance Framework</i> is the overarching framework for managing employer and employee expectations in the workforce and applies to all ACT public sector agencies, including JACS (ACT Corrective Services). ACT Corrective Services advised that it adheres to this framework and the accompanying ACT <i>Public Service Performance Framework Guidelines</i>.</p>

Clause	Requirement	Audit Office assessment
		<p>However, the approved roster patterns are not based on team structures or the alignment of supervisors to staff for consecutive shifts. This makes performance management more difficult.</p> <p>Custodial Officers are generally rostered / stationed at one post at the AMC for at least a 12-month period.</p> <p>The extent to which the rosters support effective performance management is discussed in Chapter 3 of the audit report.</p>

Source: ACT Public Sector Correctional Officers Enterprise Agreement 2023- 2026 Section M.

JACS Managing Fatigue in the Workplace Policy and JACS Managing Fatigue in the Workplace Guideline

2.11 The purpose of the *JACS Managing Fatigue in the Workplace Policy* is stated as:

... [ensuring] that all practicable actions are taken to prevent incidents related to fatigue, and that following any incident, appropriate action is taken to protect and support workers.

2.12 The policy applies to all JACS staff (including ACT Corrective Services) and recognises that shift workers and night workers are at a higher risk of fatigue. The policy is underpinned by a risk management approach and requires that all steps of the risk management approach be documented and carried out with workers and their Health and Safety Representative (HSR).

2.13 The *JACS Managing Fatigue in the Workplace Guideline* provides information about fatigue and guidance for preventing and managing fatigue in the workplace. The guideline provides information on signs and symptoms of fatigue and outlines how and why fatigue can adversely affect safety in the workplace.

2.14 Section 2.2 of the *Managing Fatigue in the Workplace Guideline* also states:

Business units with workers that are considered at higher risk of fatigue, such as shift-workers and emergency service workers, should implement tailored policies and procedures relevant to their operations.

2.15 ACT Corrective Services has not developed tailored policies and procedures to support managing fatigue for its Custodial Officers in accordance with this guideline.



2.16 Key provisions relating to Custodial Officers are outlined in Section M of the Enterprise Agreement, including requirements relevant to mandatory qualifications and training, fatigue management and performance management. Fatigue management requirements are also outlined in the *JACS Managing Fatigue in the Workplace Policy* and *JACS Managing Fatigue in the Workplace Guideline*. ACT Corrective Services has not developed any policy or procedural documents specifically relating to mandatory qualifications and training and ensuring that rostering arrangements support the achievement of these requirements. Furthermore, ACT Corrective Services has not developed specific policies and procedures relating to fatigue management for Custodial Officers.

Policies and procedures for the planning and administration of rosters

2.17 Documentation of policies and procedures provides clarity of roles and tasks, mitigates risk and provides a day-to-day roadmap of how activities and functions are to be carried out.

2.18 There are a range of supporting policies and procedures that relate to staffing and the rostering of Custodial Officers, particularly at the AMC.

The Corrections Management (Core Day) Policy - Notifiable Instrument NI2023–350

2.19 The *Corrections Management (Core Day) Policy* is made under section 14 of the *Corrections Management Act 2007* (Corrections policies and operating procedures). The policy:

... provides parameters for a Core Day that seeks to maximise the opportunities for detainees to access services and activities which enable and support successful reintegration into the community; and

... requires correctional centres to establish an operating procedure(s) and other operational arrangements for day-to-day delivery of the core day. The policy also requires correctional centres to establish a regime management plan to ensure amendments to day schedules are facilitated in a safe, secure, decent and humane manner during periods when resources and operational requirements do not permit delivery of the core day.

Core day

2.20 There is a commitment under the *Corrections Management (Core Day) Policy* to:

... maximising the time out of cell for detainees, to providing activities and supports to enhance a detainee's desire and ability to reintegrate successfully into the community and lead a law abiding and constructive life.

2.21 To this end the *Corrections Management (Core Day) Policy* provides for the establishment of:

... a core day operating procedure which allows all detainees, who are not subject to specific management regimes the opportunity for a minimum of 9 (nine) hours' time out of cell per day.

2.22 The *Corrections Management (Core Day) Policy* provides for detainees not subject to specific management regimes:

... the opportunity to engage in a minimum of five and a half (5.5) hours of constructive activity each weekday ...

Detainees will have access to organised recreational and other activities based on schedules that take into account detainee classification levels and other factors to ensure the safety and security of detainees and the correctional centre.

2.23 The *Corrections Management (Core Day) Policy* provides the Assistant Commissioner Custodial Operations the authority 'to adjust the Core Day and reduce the time out of cell hours on a given day or for a specific period where necessary and reasonable'. The policy states:

Circumstances that may justify an adjustment to the Core Day include but are not limited to:

- a. critical staff training required to ensure the safe and humane operation of the centre
- b. all-staff meetings
- c. management of maintenance issues required to ensure safe and humane conditions of detention
- d. critical incident management
- e. infectious disease control
- f. emergency management under the AMC Emergency Management Plan.

2.24 The *Corrections Management (Core Day) Policy* provides the Duty Manager or Officer in Charge the authority to authorise unit lock-ins:

Unit (or portions thereof) lock-ins should only occur where necessary to maintain health, safety, security and/or humane conditions of detention. The Duty Manager or Officer in Charge (OIC) may authorise unit lock-ins under circumstances including, but not limited to:

- a. insufficient staffing to maintain the safety and security of the centre
- b. management of maintenance issues required to ensure safe and humane conditions of detention
- c. protection of health, e.g., control of an infectious disease
- d. emergency management under the AMC Emergency Management Plan
- e. to maintain safety, security and good order, e.g., to facilitate a targeted search, to prevent an escape, or to manage a serious incident.

Regime Management Plan

2.25 The *Corrections Management (Core Day) Policy* also establishes the requirement for a Regime Management Plan:

The Assistant Commissioner Custodial Operations will establish a Regime Management Plan [RMP] which establishes the services and activities to be delivered and associated staffing resources ...

The Regime Management Plan must include:

- a. a clear overview of the regime at each stage of the RMP, including constructive activities and services to be maintained
- b. the staffing profile required to maintain safety and security and safely and effectively provide the identified activities and services at each stage of the RMP.

Core Day Operating Procedure

2.26 The *Corrections Management (Core Day) Policy* is supported by the Core Day Operating Procedure, which outlines the structure of the Core Day activities for detainees at the AMC. The core day commences at 7:00 am with a handover from the night shift staff and concludes at 7:30 pm when the night shift commences. The operating procedure covers the scheduling of activities for detainees, visits, musters, meals and scheduled lock-ins.



2.27 The *Corrections Management (Core Day) Policy* and Core Day Operating Procedure outline requirements for the day-to-day operation of the AMC. The Policy provides a commitment to 'maximising the time out of cell for detainees, to providing activities and supports to enhance a detainee's desire and ability to reintegrate successfully into the community and lead a law abiding and constructive life'. The Policy also provides for detainees 'to engage in a minimum of five and a half (5.5) hours of constructive activity each weekday' and 'have access to organised recreational and other activities'. The Policy acknowledges that there may be a need 'to adjust the Core Day and reduce the time out of cell hours on a given day or for a specific period where necessary and reasonable'. In practice any shortfalls in Custodial Officer staffing will impact on the Core Day and detainee services and activities.

Regime Management Plan

2.28 The Regime Management Plan is a requirement of the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* (Enterprise Agreement) and the *Corrections Management (Core Day) Policy*. The Plan:

... is a documented plan which clearly sets out amendments to the core day to maintain safety and security during periods in which resources and operational requirements do not permit delivery of the core day. The [Regime Management Plan] will identify the types of services and activities that will be delivered within the centre at the different stages of the [Regime Management Plan] and minimum staffing requirements for each stage.

2.29 The Regime Management Plan in use at the AMC is unsigned and undated. It has not been endorsed by the ACT Corrective Services Commissioner, as required under the *Corrections Management (Core Day) Policy*.

2.30 The Regime Management Plan states:

The Regime Management Plan has been premised on the assumption that each accommodation unit is populated and at capacity. Should an accommodation unit not be populated or be significantly below capacity, the required posts will be reduced accordingly.

2.31 The Regime Management Plan states:

The [Regime Management Plan] has been developed in a way to afford the highest level of flexibility to the Area Managers on a daily basis to ensure the obligations of the Corrections Management Act are met, while ensuring that health, safety and security obligations are prioritized.

2.32 The Regime Management Plan operates on a traffic light system to identify whether services and activities can be delivered with associated staffing resources. The system is described as follows:

- Green – ‘full delivery of activities and services’;
- Amber – ‘reduced delivery of activities and services (including health, visits, programs, education and all employment’; and
- Red – ‘basic delivery of activities and services (including health, visits, programs, education and all employment’.

2.33 The Regime Management Plan provides the staffing profile of Custodial Officers required for each of the ‘Green’, ‘Amber’ and ‘Red’ categories. For example, for the AMC to achieve ‘Green’ – full delivery of services and activities the staffing profile should be between 59 Custodial Officers and a ‘full roster’. A ‘full roster’ is not defined or described further in the Plan. The concept of a ‘full roster’ is discussed further in paragraphs 3.5 to 3.7.

2.34 The Regime Management Plan is primarily used by CO4 Operations Managers at the AMC as a workforce management tool to:

- help make decisions about the day-to-day running of the prison; and in doing so
- balance the safe running of the site with the needs of detainees.

2.35 In some instances, the CO4 will make recommendations to the Assistant Commissioner, Operations with regards to the daily operations, recommending any necessary adjustments.



2.36 The Regime Management Plan is a requirement of the Enterprise Agreement and the *Corrections Management (Core Day) Policy*. The Regime Management Plan ‘clearly sets out amendments to the core day to maintain safety and security during periods in which resources and operational requirements do not permit delivery of the core day’. The Regime Management Plan in use at the AMC is unsigned and undated. It has not been endorsed by the ACT Corrective Services Commissioner, as required under the *Corrections Management (Core Day) Policy*.



2.37 The Regime Management Plan operates on a traffic light system to identify whether services and activities can be delivered with associated staffing resources. The Regime Management Plan provides the staffing profile of Custodial Officers required for each of the ‘Green’, ‘Amber’ and ‘Red’ categories. The Regime Management Plan is primarily used by CO4 Operations Managers at the AMC as a workforce management tool to: help make decisions about the day-to-day running of the prison; and in doing so balance the safe running of the site with the needs of detainees. In practice, any management action in response to shortfalls in Custodial Officer staffing should be guided by the Regime Management Plan.

Operational guidance to support rostering

2.38 The *Corrections Management (Core Day) Policy*, Operating Procedure and Regime Management Plan necessarily intersect with staffing and rostering practices at the AMC.

2.39 There are limited policy documents to support the broader operational planning and administration of Custodial Officer rosters at the AMC and CTU. Notwithstanding an absence of overarching policies to plan and administer Custodial Officer rosters, ACT Corrective Services has developed operational guidance to assist with specific aspects of planning and administering rosters.

Managing Leave in KRONOS operating procedure

2.40 The *Managing Leave in KRONOS* operating procedure provides instructions to ACT Corrective Services staff on leave management in KRONOS with the aim of supporting better practice in roster management. The operating procedure covers leave applications for planned and unplanned leave, leave approval processes and managing mandatory Custodial

Officer training. The procedure is dated March 2024 and has not been updated to reflect that ACT Corrective Services has switched to using UKG Pro instead of KRONOS.

Overtime Call List Process Map

- 2.41 This is a flowchart procedure for the purpose of allocating overtime shifts in KRONOS (the fore-runner system to UKG Pro). It provides for different administrative steps to be followed, depending on the number of shifts and officers available. It provides for an action to 'check fatigue for officers exceeding 90 hours'. It provides no further guidance or instruction on this. It has not been updated to reflect that ACT Corrective Services has switched to using UKG Pro instead of KRONOS.

Leave Processing Procedure

- 2.42 This document provides guidance on the processing of leave, including the type of evidence needed to support different types of leave. The procedure states that the Workforce Planning Team is not to refuse any leave application and that 'it is at the manager's discretion whether to approve application'. The procedure requires an 'impact rating' to be assigned in relation to requests for future annual leave, i.e. whether there are multiple requests for annual leave.

Shift Swaps Process for AMC and CTU

- 2.43 This is an operational process flowchart for the Workforce Planning Team for the processing of shift swaps in KRONOS that have been requested by Custodial Officers. It provides for specific checks to be made and actions to be taken within KRONOS and also allows for manual processing of shift swaps via email. It has not been updated to reflect that ACT Corrective Services has switched to using UKG Pro instead of KRONOS.

Filling Short Term Vacancies Procedure

- 2.44 This provides guidance to supervisors, managers and the Workforce Planning Team for filling AMC short-term vacancies (up to 28 days) for CO1 to CO4 roles. It provides for a hierarchy of considerations to fill a role, from the use of 'relief employees through over rostering' to 'staff already on shift being offered a double shift at level subject to the restrictions regarding fatigue management'.
- 2.45 Other than the *Managing Leave in KRONOS* operating procedure, there are no specific or tailored policies and procedures in relation to some fundamental rostering practices. These include:
- compliance with elements of the Enterprise Agreement (such as the mandatory training requirements) and any other legislative obligations;
 - staff rotation;

- shift swaps; and
- staff availability and leave.

2.46 Developing and implementing specific policies and procedures tailored to the needs and circumstances of ACT Corrective Services and its operating environment, which clearly outline their scope and purpose (including mandatory review dates) along with compliance obligations and accountability, would:

- provide formality and promote consistent practices and understanding across the AMC and CTU;
- promote fairness and equity in rostering practices;
- help minimise risks and disputes associated with Custodial Officer rostering; and
- help ensure that all legal and regulatory requirements are adhered to.



2.47 There are shortcomings in the policies and procedures that support the broader operational planning and administration of Custodial Officer rosters at the AMC and CTU. Other than the *Managing Leave in KRONOS* operating procedure, there are no specific or tailored policies and procedures in relation to some fundamental rostering issues such as: compliance with elements of the Enterprise Agreement (such as the mandatory training requirements) and any other legislative obligations; staff rotation; shift swaps; and staff availability and leave. In the absence of specific and tailored policy and procedural guidance the Workforce Planning Team and Custodial Officers do not have a common understanding of agreed practices. This may lead to perceived unfairness and inequity and mistrust.



Recommendation 1

Rostering policies and procedures

ACT Corrective Services should develop and implement specific and tailored policies and procedures to address rostering issues such as:

- a) compliance with the Enterprise Agreement (including fatigue management and mandatory training requirements) and any other legislative obligations; and
- b) staff rotation, shift swaps and staff availability and leave.

Governance for the oversight of rosters

2.48 ACT Corrective Services has a variety of governance structures in place for the oversight of Custodial Officer rosters.

ACT Corrective Service Executive Leadership Team

- 2.49 The ACT Corrective Services Executive Leadership Team establishes strategic direction and oversees operational performance. The group meets quarterly and discusses various matters at the Executive Leadership level, as required by its terms of reference.
- 2.50 The group has a standard agenda item on 'ACTCS Quarterly Blueprint for Change Program Board Report' as a feature of its meetings, which includes staffing and roster related issues, amongst other things.
- 2.51 A review of meeting minutes of the Executive Leadership Team for January 2024 to June 2025 shows the group has considered some strategic issues in relation to the rostering of Custodial Officers. Some examples include:
- a pilot 10-hour CTU roster and its financial implications (24 June 2025) (refer to paragraphs 3.67 to 3.76);
 - Custodial Officer training – budgetary issues and upskilling of officers as part of the *Blueprint for Change* program (24 June 2025). The program is discussed in further detail in paragraphs 5.51 to 5.63);
 - strategic and operational risk registers which control and mitigate risks relating to rostering of Custodial Officers (November 2024); and
 - updates on the *Roster Review Project* vote (24 September 2024). The project is discussed in further detail in paragraphs 5.19 to 5.50.
- 2.52 The meeting minutes show that the ACT Corrective Services Executive Leadership Team has some level of senior management oversight of the issues associated with Custodial Officer rostering.

Workplace Consultative Committee

- 2.53 The ACT Corrective Services Workplace Consultative Committee (WCC) provides a forum for discussion between management and ACT Corrective Services employees and union representatives to discuss and address workplace issues, policies and practices. The ACT Corrective Services Commissioner is the Chair of the Committee and membership consists of various senior executive level staff, union representatives and nominated staff members.
- 2.54 A review of meeting minutes for the Workplace Consultative Committee for 2024 (and two meetings held in the first half of 2025) shows that the Committee discussed matters relating to the *Roster Review Project* and vacant posts at the AMC. In relation to vacant posts some relevant observations from the March 2025 meeting include:

... a concern on behalf of officers at the AMC on posts not being filled on a regular basis. The Blueprint for change has created additional posts, however these positions remain unfilled, resulting in certain activities and programs not taking place. There is concern that AMC staff may be at risk as inmates become bored due to lack of activities.

2.55 As part of the discussion on this issue it was noted that 'sickness and unplanned leave are contributing factors to the vacant posts which are unavoidable'.

2.56 Another issue arising from this meeting was 'the burden placed on existing staff who consistently turn up and cover shifts is weighing on certain staff'. Following discussion on this issue it was noted:

Managers (CO2, CO3, CO4's) are responsible for overseeing staffing and must take a more active role in identifying and addressing individual concerns and manage this without regular payment of additional overtime.

... rosters will always plan to fully staff the AMC when forward planning the daily roster and management would never knowingly put staff at risk.

Local Consultative Committee

2.57 The ACT Corrective Services Local Consultative Committee (LCC) considers issues relating to staffing and workplace conditions. The Enterprise Agreement specifically requires that the development of the Regime Management Plan be facilitated through the Committee and in accordance with the provision of Section F1 (relating to the need for effective consultation with employees and their representatives, including union representatives, on workplace matters).

2.58 The February and May 2024 meeting minutes identify the Assistant Commissioner, Custodial Operations as the Chair of the Committee with the Committee composition made up of senior staff members.

2.59 Between January 2024 and June 2025, the Local Consultative Committee met three times (in February, May and October 2024). The May and October meetings did not reach a quorum. The February 2024 meeting did not discuss rostering arrangements or the Regime Management Plan. It comprised a roundtable discussion as no agenda items were provided for the meeting.

2.60 The Local Consultative Committee has not considered the Regime Management Plan as required, or rostering issues more broadly. This is a missed opportunity for the Committee to participate in, and provide effective input towards, rostering arrangements at the AMC and their impact, and intersection with, the Regime Management Plan. In response to the draft proposed report, ACT Corrective Services advised that the Committee is being reviewed as a part of the ACTCS Committee Governance review led by the Project Management Office.

Safety, Health and Wellbeing Committee

- 2.61 The ACT Corrective Services Safety, Health and Wellbeing Committee seeks to examine:
- work, health and safety matters that affect ACT Corrective Services staff collectively; and
 - localised matters that have not been resolved at the lower committee levels or within the work group.
- 2.62 The meeting minutes for March 2025 identify the Commissioner as Chair of the Committee with the Committee made up of various senior staff members.
- 2.63 The Committee has standing agenda items relating to work, health and safety reporting, wellbeing, workplace safety inspections, occupational violence and the management of hazards.
- 2.64 A review of meeting minutes between January 2024 and March 2025 shows that rostering of Custodial Officers is not actively considered at these meetings although there is some discussion around work, health and safety risk registers which do consider rostering arrangements.

AMC Senior Management Meeting

- 2.65 There was one AMC Senior Management Team meeting scheduled between January 2024 and June 2025. There are no Terms of Reference for the group. A review of the meeting minutes from the meeting held in May 2025 suggest that the purpose of the AMC Senior Management Team meeting is to discuss, amongst other things, issues relating to people and culture, wellbeing, finances and operational matters.
- 2.66 At the May 2025 meeting there was discussion in relation to the CTU and that the CTU is overspending in relation to overtime for Custodial Officers. The meeting also noted the issues experienced when transitioning to the new rostering platform UKG Pro as part of the wellbeing agenda item. The May 2025 minutes also note that 'staffing continues to be an issue' in relation to detainee services, but there is no further insight as to what this means, the implications of the statement or actions or solutions to be undertaken.



- 2.67 ACT Corrective Services has a range of governance and oversight groups that consider matters of strategic and operational interest, including Custodial Officer staffing and roster related issues. These groups include the Executive Leadership Team, the Workplace Consultative Committee, the Local Consultative Committee and the Safety, Health and Wellbeing Committee. There is evidence that the Executive Leadership Team and the Workplace Consultative Committee consider rostering and roster related issues. The Local Consultative Committee, however, has not convened on a regular basis to consider the Regime Management Plan (as it is required to do) or rostering issues more broadly. This is a missed opportunity for the Committee to participate in, and provide effective input

towards, rostering arrangements at the AMC and their impact, and intersection with, the Regime Management Plan.



Recommendation 2

Governance for the oversight of rosters

ACT Corrective Services should:

- a) review its existing governance forums and determine where oversight of Custodial Officer rostering and roster-related issues are most effectively considered;
- b) specifically and explicitly reflect this requirement in the governance forum's terms of reference; and
- c) implement a standing agenda item for the consideration of rosters and roster-related issues to enable appropriate management oversight and decision-making to occur.

Managing rostering risks

- 2.68 It is important for ACT Corrective Services to assess, document and mitigate risks to ensure its Custodial Officer workforce is well-managed and responsive to the needs of the operating environment.
- 2.69 If rosters are not well managed, the following risks may arise to the health and safety of Custodial Officers:
- the health and safety of Custodial Officers is compromised as they experience fatigue and burnout. This may also lead to an increase in workers compensation claims being lodged; and
 - Custodial Officers do not complete mandatory training, as required by the Enterprise Agreement, which creates a flow-on risk to operations and the health and safety of Custodial Officers (and detainees).
- 2.70 If rosters are not well managed, the following risks may arise to the health and safety of detainees:
- ACT Corrective Services is unable to effectively manage the health and safety of detainees (and Custodial Officers) by appropriately responding to, and de-escalating, incidents when they arise;
 - ACT Corrective Services is forced to undertake detainee lock-ins more frequently and cancel scheduled activities for detainees compromising their human rights; and
 - ACT Corrective Services is unable to deliver 'a structured day of purposeful activity for detained people at the AMC, as an overarching strategy to promote rehabilitation,

reduce reoffending, improve the motivation and wellbeing of detained people, and reduce demand for illicit drugs' as recommended by the ACT Inspector of Corrections.

- 2.71 A further organisational risk if rosters are not well-managed is that costly expenditure associated with overtime shifts is incurred and becomes the cultural norm.

ACT Corrective Services Strategic Risk Register

- 2.72 The *ACT Corrective Services Strategic Risk Register (April 2025)* outlines nine strategic risks for the organisation and controls in place to mitigate these risks. Strategic Risk 4 is relevant to staffing and rostering practices at the AMC and CTU:

Work, Health and Safety policies and procedures not maintained, adhered to or inconsistent with legislation, ACT Government or JACS requirements.

- 2.73 Some examples of relevant controls listed to address this risk include:

- establishment of Safety, Health and Wellbeing Committees;
- the use of the Safety Portal reporting tool for work, health and safety incidents; and
- peer support and counselling services.

- 2.74 The risk rating assigned to Strategic Risk 4 is 'medium' with the effectiveness of controls rated as 'medium'.

ACT Corrective Services Operational Risk Register (April 2025)

- 2.75 The *ACT Corrective Services Operational Risk Register (April 2025)* includes the following relevant risk in relation to Custodial Officers:

Risk 1 - There is a chance that accidents will occur at AMC, 2CA [2 Constitution Avenue] or on work sites [affecting safety] leading to an impact on people, assets / infrastructure and compliance / regulation.

- 2.76 Relevant controls listed against this risk include:

AMC WHS risk register [Owner: Assistant Director, SHW, People & Culture.]

All Custodial Staff scheduled for training, Defibrillator (annually) and First Aid (3 year requirement) [Owner: Senior Director, Organisational Capability Unit].

- 2.77 Risk 2 in the Operational Risk Register relates to detainee self-harm and a listed control is that all Custodial Officers have the opportunity to undertake 'At Risk', Sexual Assault and Sexual Harassment (SASH) and First Aid training with completion being monitored by the Organisational Capability Unit and reported monthly to the Executive Governance Committee.

- 2.78 Risk 5 in the Operational Risk Register relates to detainee violence and the impact this may have on people, assets/infrastructure, reputation and compliance/regulation. A control to address this risk is Custodial Officer training to guide their response to detainee violence.

AMC and CTU WHS Risk Registers

- 2.79 In addition to the strategic and operational risk registers, ACT Corrective Services has AMC and CTU specific work, health and safety risk registers in place. Controls listed to respond to risks specifically relate to the need to undertake a range of relevant training, including for all staff and Custodial Officers specifically. Training is discussed in further detail at paragraphs 4.18 to 4.54.



- 2.80 ACT Corrective Services has both strategic and operational risk registers in place. Both registers consider risks that extend to the rostering of Custodial Officers. Strategic Risk 4 in the Strategic Risk Register covers work, health and safety matters that relate to risks associated with the rostering of Custodial Officers. The *ACT Corrective Services Operational Risk Register (April 2025)* places importance on Custodial Officers undertaking the relevant training to ensure they can respond to risks – especially in relation to accidents, detainee self-harm and detainee/offender violence. Both strategic and operational risk registers note the requirement for an AMC-specific work, health and safety risk register.

3 Custodial Officer rosters

- 3.1 This chapter discusses the rostering arrangements for Custodial Officers at the AMC and CTU. It discusses rostering practices and roster patterns and arrangements for the management of Custodial Officer leave.

Summary



Conclusions

ACT Corrective Services has not developed and implemented effective Custodial Officer rostering arrangements that meet the needs of the organisation, its staff and detainees.

There are different roster patterns in place for the different Custodial Officer levels (and different roles). ACT Corrective Services has not documented why the range of roster patterns in place for AMC and CTU Custodial Officers roster patterns are used and whether they are optimal and appropriate. The roster patterns that are in place do not:

- provide for a consistent and predictable staff base or readily support Custodial Officer rotation across roles, which is an important mechanism for staff development and risk management; or
- support a team-based approach to rostering. Because of the different roster cycles there is no consistency between the shifts worked by supervisors and staff and the alignment of teams with supervisors does not occur. This makes supervision and performance management more difficult.

The rostering of Custodial Officers is necessarily impacted by unplanned leave, which may result in a shortfall of Custodial Officers available for work. To manage the risks of unplanned leave ACT Corrective Services identifies a day target for the number of CO1s rostered as the number of Custodial Officers required to occupy posts on any given day plus 15. The use of the 'plus 15' contingency reflects an understanding and acknowledgement of the level of unplanned leave that occurs in the AMC and the need to roster accordingly. A review of CO1 roster patterns shows that the roster patterns provide for the day target of CO1 staff to be consistently exceeded every day across the six-week period. Notwithstanding this, unplanned leave and unauthorised leave continue to impact ACT Corrective Services' operations.



Key findings

Overview of rostering arrangements

Paragraph

Custodial Officers at the AMC are rostered using roster patterns that seek to ensure continuous staffing of the AMC 24 hours per day, seven days per week. Rostering arrangements at the AMC seek to achieve different coverage requirements depending on the day and time of the week, e.g. the highest number of Custodial Officers required is between Wednesday and Friday (when visits to the AMC are scheduled) and very few Custodial Officers are required overnight (when detainees are locked in their cells).

3.9

The term 'full roster' is used in the AMC Regime Management Plan and refers to the number of Custodial Officers needed to meet operational requirements to enable full delivery of activities and services at the AMC. ACT Corrective Services identified that a 'full roster' varied from 63 Custodial Officers on a weekend through to 74 from Wednesday to Friday. ACT Corrective Services has not specifically identified or documented its staffing needs to determine what constitutes a 'full roster' either in the Regime Management Plan or elsewhere. ACT Corrective Services advised that these numbers were likely arrived at based on funding and/or risk calculations.

3.10

In February 2023, the consultant engaged for the *Roster Review Project* prepared a draft 'Post Assessment' for ACT Corrective Services. This work also considered staffing needs and the implication of adding new posts to maintain service and Custodial Officer safety. The work identified there was a need for more posts and Custodial Officers to fill them. The draft document was not finalised and there is no evidence that ACT Corrective Services has drawn on this analysis to determine 'full roster' numbers.

3.11

Custodial Officers at the CTU work eight-hour shifts from Monday to Friday (except for overtime and Saturday shifts where required). The Enterprise Agreement specifically identifies the CTU establishment: 25 permanent Custodial Officer 1 positions; 1 Custodial Officer 2 position; and 1 Custodial Officer 3 position. In practice, the number of Custodial Officers required to meet the daily operational needs of the CTU may be different (greater or fewer) to the approved establishment in the Enterprise Agreement. Additional coverage is provided as needed on a daily basis through assigning relief Custodial Officers.

3.15

The rostering of ACT Corrective Services' Custodial Officers at the AMC and CTU is facilitated through the use of the UKG Pro IT platform (a cloud based human resource and workforce management system), a Master Roster and Daily Rosters. The Master Roster is an Excel spreadsheet managed by the Workforce Planning Team in the People and Culture Team. Its primary purpose is to facilitate the forecasting of coverage needs for the various posts in the AMC and, through its incorporation into UKG Pro, the time and attendance management of Custodial Officer staff. The Daily Roster shows the specific roster arrangements at the AMC and CTU on any given day. The Daily Roster is a visual tool for the AMC Staff Officer and Operations Managers to identify which Custodial Officers are assigned to the AMC and CTU posts. Creating the Daily Roster involves a series of manual (rather than automated) steps.

3.24

AMC Custodial Officer rosters

A roster pattern represents sequences of days on, night shifts and rest days for a cohort of staff. Roster patterns have been developed across all the Custodial Officer grades. Custodial Officer roster patterns are currently documented in the Master Roster Excel spreadsheet. The Master Roster is typically copied and 'rolled-over' from the previous year and updated as necessary. The Master Roster spreadsheet does not adequately identify what roster patterns are being used (and how frequently) or the rationale for their use, nor does it provide assurance that Custodial Officers are being rostered in accordance with the requirements in the Enterprise Agreement. ACT Corrective Services does not have documentation that demonstrates which roster patterns are optimal and why they best support the operational needs of the AMC. 3.33

CO1 roster patterns include a 48-week roster cycle that results in 19 shifts over six weeks and an average of 38 hours per week at the end of the 48-week roster cycle (based on 150 12-hour shifts and three 8-hour shifts that are allocated for training). Some of the roster patterns enable long breaks between shifts of up to nine days off before any leave, absenteeism or shift swaps are factored in. A review of CO1 roster patterns for coverage against the number of CO1s required for a six-week period shows that the roster patterns provide for the day target of CO1 staff to be consistently exceeded every day across the six-week period. This means that CO1 roster patterns consistently exceed the requirements of the day target, which itself has a built-in contingency of 15 additional officers. 3.42

The use of six-week wide roster patterns results in variation within the period and makes it more difficult to balance staffing across the AMC. The use of six-week wide roster patterns creates instances of longer breaks within the patterns and results in periods of higher hours in some weeks more than others. Six-week wide roster patterns promote misalignment in shifts worked and shifts off, which means it is easier for imbalances in Custodial Officer coverage to occur. 3.47

The CO1 roster works to a 48-week roster cycle, while the CO2, CO4 and new CO3 trial rosters work to an 18-week roster cycle. This leads to a lack of team-based rostering and scheduling gaps. Because of the different roster cycles there is inconsistency between the shifts worked by supervisors and staff and the alignment of teams with supervisors does not occur. Some pre-approved roster patterns result in a Custodial Officer having a nine-day break before any absence or shift swap is factored in. Operationally, when absences and shift swaps are taken into account, the 48-week and 18-week rosters are erratic and do not provide for a consistent and predictable staffing base due to the number of different roster patterns applied. 3.57

Rotating Custodial Officers between posts supports sound work, health and safety planning. The AMC and CTU Work, Health and Safety Risk Registers identify the rotation of officers as being a control to managing the demanding nature of the Custodial Officer working environment. The 2015 roster patterns do not readily support Custodial Officer rotation. Custodial Officers do not frequently rotate between the different posts across the AMC as a standard practice. A yearly expression of interest process provides a fixed point for consultation with Custodial 3.63

Officer staff on potential rotations, but rotation can also occur throughout the year if requested by Custodial Officers or management.

CTU Custodial Officer rosters

Historically, the CTU has operated on a standard eight-hour Monday-Friday roster as it provides coverage between 6:30am and 6:00pm, with overtime available on Saturdays and public holidays when bail court matters are heard. There is a Master Roster identifying the rostering patterns for the CTU, similar to the AMC. Similar to the AMC, the roster patterns are not documented other than in the Master Roster Excel spreadsheet and UKG Pro. This creates human risk and version control issues. 3.75

In April 2024, ACT Corrective Services approved a pilot 10-hour roster (including for weekdays and Saturdays) for interested CO1 staff working at the CTU. The aim of the trial was to promote the CTU as more attractive to applicants and bring wage and work/life balance in line with conditions at the AMC. The pilot 10-hour roster ceased in October 2025. ACT Corrective Services determined that there had not been any significant changes in overtime, overall labour costs, absenteeism or sharing of AMC resources to provide additional support and staff during gaps in the required coverage. 3.76

Leave arrangements

Under the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, Custodial Officers have a range of leave entitlements including, but not limited to, annual and personal leave. Annual leave is generally planned and approved in advance, while personal leave is for specific reasons, such as being unfit for work due to personal illness or personal injury or caring for an immediate family member. Unplanned leave is leave that an employee takes from work without prior approval. The management of unplanned leave is highly reactive and, notwithstanding best efforts, may mean a shortfall of Custodial Officers in attendance. To manage the risks of unplanned leave ACT Corrective Services identifies a day target for the number of CO1s rostered as the number of Custodial Officers required to occupy posts on any given day plus 15. The use of the 'plus 15' contingency reflects an understanding and acknowledgement of the level of unplanned leave that occurs in the AMC and the need to roster accordingly. 3.83

Unauthorised leave is time away from work without approval (either prior to or after the taking of leave). There is a high number of unauthorised whole-shift absences for CO1s; an average of 49 unauthorised absences per month over the period January 2024 to June 2025. There is also a high number of part-shift absences; an average of 28-part shift absences per month between January 2024 and June 2025. The practice of taking unauthorised leave necessarily impacts the administration of the rosters. 3.106

When unplanned (and potentially unauthorised leave) has been taken, Custodial Officers are requested to provide satisfactory documentation for the absence within three days of returning to work. Where no evidence is provided, ACT Corrective Services advised that unauthorised absences are processed in arrears as a payroll 3.107

deduction, thereby ensuring that staff are not paid for the absence. Despite Custodial Officers having three days on return to work to provide satisfactory documentation, there has been much more leniency based on the leave reconciliation period being six weeks. This becomes problematic where officers are taking multiple unauthorised absences in a six-week period as effectively managing and accounting for such absences becomes difficult and creates risks that officers may either be under or over paid. ACT Corrective Services advised that since April 2026 staff leave audits are now being undertaken on a four-week basis rather than six-week basis.

ACT Corrective Services advised that three individuals' use of unauthorised leave had been further considered and two of these employees had received a 'formal direction'. It is apparent that ACT Corrective Services is not managing unauthorised absences as a form of employee misconduct. The number of Custodial Officers being managed for unauthorised leave (three in total) appears to be low.

3.108

Overview of rostering arrangements

3.2 Custodial Officers are rostered using roster patterns that seek to:

- ensure continuous staffing of the AMC 24 hours per day, seven days per week; and
- meet the varied operational needs of the CTU.

AMC

3.3 Custodial Officers are assigned to 'posts' (i.e. work locations) within the AMC as follows:

- Accommodation;
- Sentenced cell block and cottages;
- Remand cell block and cottages;
- Health;
- Special Care Centre;
- Management Unit;
- Crisis Unit;
- Admissions;
- Gate/Gate Searching;
- Rover;
- Visits; and
- Women's Unit.

3.4 Custodial Officer rostering arrangements at the AMC seek to achieve four different coverage requirements depending on the day and time of the week:

- Monday to Tuesday coverage. There are no visitors to the AMC on these days and fewer Custodial Officers are required;
- Wednesday to Friday coverage. Visits and educational programs are intended to be run on these days and more Custodial Officers are required;
- Weekend. There are no educational programs being run on the weekend and fewer Custodial Officers are required; and
- Night shift. This requires reduced coverage and fewer Custodial Officers are required.

3.5 Table 3-1 shows the number of Custodial Officers required at the AMC to achieve a ‘full roster’.

Table 3-1 Number of Custodial Officers required to achieve a ‘full roster’ at the AMC

	Monday - Tuesday	Wednesday - Friday	Weekend	Night shift
Custodial Officer Grade 1	55	60	49	10
Custodial Officer Grade 2	10	10	10	1
Custodial Officer Grade 3	3	3	3	-
Custodial Officer Grade 4	1	1	1	-
Total	70	74	63	11

Source: ACT Audit Office, based on information from ACT Corrective Services.

3.6 A review of the ‘full roster’ requirements shows:

- weekdays necessarily require the greatest number of Custodial Officers to be rostered on – 70 on Monday and Tuesday and 74 from Wednesday to Friday;
- fewer Custodial Officers are required to be rostered on a weekend (63); and
- even fewer Custodial Officers are required to be rostered on an overnight shift (11).

3.7 The term ‘full roster’ is referenced in the AMC Regime Management Plan but is not explicitly or implicitly defined other than stating that a ‘full roster’ enables the full delivery of activities and services at the AMC. ACT Corrective Services has not specifically identified or documented its staffing needs to determine what constitutes a ‘full roster’. ACT Corrective Services advised that these numbers were likely arrived at based on funding and/or risk calculations.

3.8 In February 2023, the consultant engaged for the *Roster Review Project* prepared a draft 'Post Assessment' for ACT Corrective Services. Whilst this work predominately focused on evaluating the performance of current rosters and developing alternative considerations, it also extended to consideration of staffing needs and the implication of adding new posts to maintain service and Custodial Officer safety. The work covered post establishment numbers and the number of Custodial Officers needed to deliver the roster for both day, relief and night shifts. The work identified a need for more posts and Custodial Officers to fill them. The draft document was not finalised and there is no evidence that ACT Corrective Services has drawn on this analysis to determine 'full roster' numbers.



3.9 Custodial Officers at the AMC are rostered using roster patterns that seek to ensure continuous staffing of the AMC 24 hours per day, seven days per week. Rostering arrangements at the AMC seek to achieve different coverage requirements depending on the day and time of the week, e.g. the highest number of Custodial Officers required is between Wednesday and Friday (when visits to the AMC are scheduled) and very few Custodial Officers are required overnight (when detainees are locked in their cells).



3.10 The term 'full roster' is used in the AMC Regime Management Plan and refers to the number of Custodial Officers needed to meet operational requirements to enable full delivery of activities and services at the AMC. ACT Corrective Services identified that a 'full roster' varied from 63 Custodial Officers on a weekend through to 74 from Wednesday to Friday. ACT Corrective Services has not specifically identified or documented its staffing needs to determine what constitutes a 'full roster' either in the Regime Management Plan or elsewhere. ACT Corrective Services advised that these numbers were likely arrived at based on funding and/or risk calculations.



3.11 In February 2023, the consultant engaged for the *Roster Review Project* prepared a draft 'Post Assessment' for ACT Corrective Services. This work also considered staffing needs and the implication of adding new posts to maintain service and Custodial Officer safety. The work identified there was a need for more posts and Custodial Officers to fill them. The draft document was not finalised and there is no evidence that ACT Corrective Services has drawn on this analysis to determine 'full roster' numbers.

CTU

3.12 Custodial Officers at the CTU work eight-hour shifts from Monday to Friday (except for overtime and Saturday shifts where required).⁵

⁵ At the time of audit fieldwork the CTU was trialling a pilot 10-hour shift roster with the intention of attracting new recruits, minimising turnover and ensuring that entitlements and work/life balance are comparable to Custodial Officers working in the AMC. This is discussed further in paragraphs 3.74 to 3.77.

3.13 The *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026* specifically identifies the CTU establishment as follows:

- 25 permanent Custodial Officer 1 positions;
- 1 Custodial Officer 2 position; and
- 1 Custodial Officer 3 position.

3.14 The CTU staffing complement is rostered according to operational requirements within the CTU and wider ACT Corrective Services. It can change on a day-to-day basis. In practice, the number of Custodial Officers required to meet the daily operational needs of the CTU may be different (greater or fewer) to the approved establishment in the Enterprise Agreement. Additional coverage is provided as needed through assigning relief Custodial Officers to the CTU.

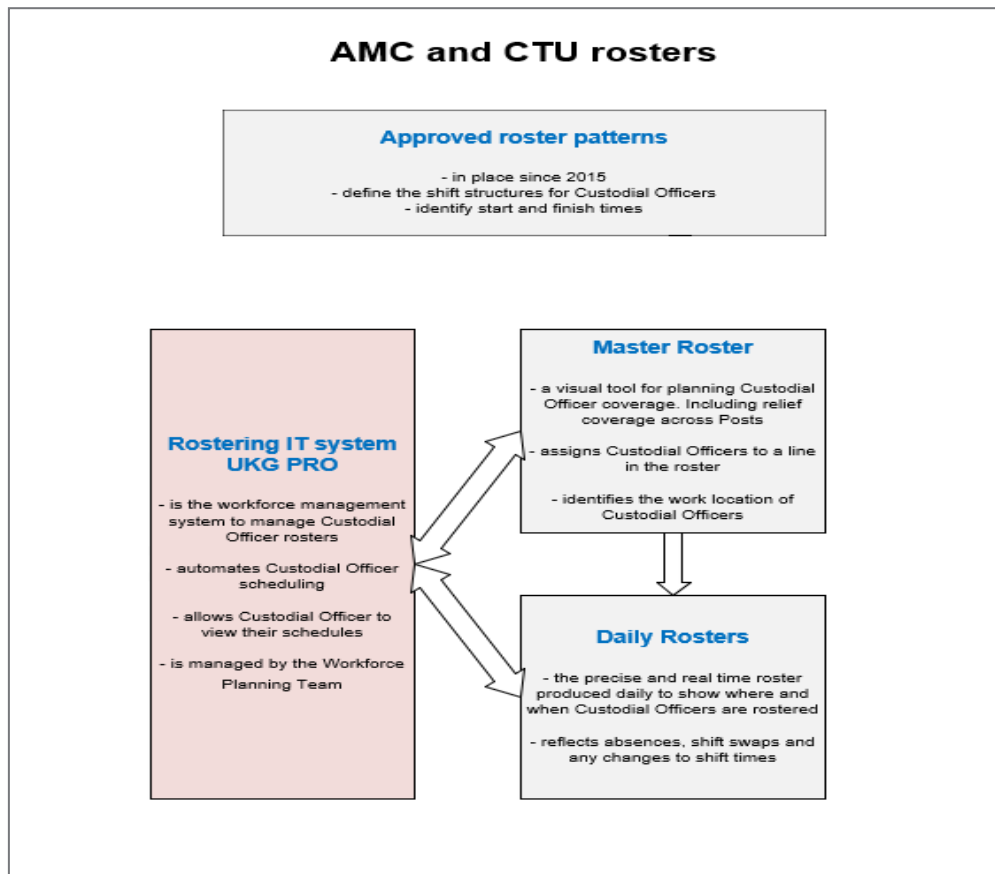


3.15 Custodial Officers at the CTU work eight-hour shifts from Monday to Friday (except for overtime and Saturday shifts where required). The Enterprise Agreement specifically identifies the CTU establishment: 25 permanent Custodial Officer 1 positions; 1 Custodial Officer 2 position; and 1 Custodial Officer 3 position. In practice, the number of Custodial Officers required to meet the daily operational needs of the CTU may be different (greater or fewer) to the approved establishment in the Enterprise Agreement. Additional coverage is provided as needed on a daily basis through assigning relief Custodial Officers.

Custodial Officer roster administrative arrangements

3.16 Figure 3-1 provides an overview of ACT Corrective Services' Custodial Officer roster administrative arrangements.

Figure 3-1 Overview of AMC and CTU roster administrative arrangements



Source: ACT Audit Office, based on information from ACT Corrective Services.

Electronic rostering platform (UKG Pro)

3.17 The ongoing and day to day management of Custodial Officer rosters is currently achieved through UKG Pro (a cloud based human resource and workforce management system). At the time of audit fieldwork, ACT Corrective Services was transitioning to UKG Pro from the former system, KRONOS.

3.18 UKG Pro is a live tool which assists with the management of rosters by providing the following functionality:

- identifies Custodial Officer leave and training allocations;
- shows any restrictions Custodial Officers may have in terms of where they could be posted due to physical limitations or injury, or conflicts with detainees or family members; and
- assigns vacant or open shifts to Custodial Officers as relief shifts – a relief shift is a temporary assignment designed to fill in for an absent employee, covering roster shortfalls due to leave, illness or training to enable operations to continue uninterrupted.

Master Roster

- 3.19 The approved roster patterns for both AMC and CTU are reflected in the Master Roster. The Master Roster is an Excel spreadsheet managed by the Workforce Planning Team in the People and Culture Team. Its primary purpose is to facilitate the forecasting of coverage needs for the various posts in the AMC and, through its incorporation into UKG Pro, the time and attendance management of Custodial Officer staff. This includes planning coverage for relief staff to cover leave or other temporary absences to ensure the continuous operation of the AMC and CTU.
- 3.20 Custodial Officers are assigned to specific 'lines' within the Master Roster. In practice, the Master Roster shows that Custodial Officers are rostered to work the same 'lines' within the same post unless they are working an overtime shift, shift swap or a relief shift. The Master Roster includes detail on whether Custodial Officers are working day shifts, night shifts or are on a rostered day off.
- 3.21 The Master Roster also shows the rostering arrangements for those Custodial Officers working on a flexible working agreement. A flexible working arrangement is where a Custodial Officer has negotiated a change to the standard roster pattern, e.g. they may not work nights or weekends because of family or care responsibilities.

Daily Roster

- 3.22 The Daily Roster shows the detailed and specific roster arrangements at the AMC and CTU on any given day. It is based on data that is exported from UKG Pro. It shows any changes to expected staffing arrangements due to absences, shift swaps or changes to start times. The Daily Roster is a visual tool for the AMC Staff Officer and Operations Managers to identify which Custodial Officers are assigned to the AMC and CTU posts. Creating the Daily Roster involves a series of manual (rather than automated) steps.
- 3.23 The Workforce Planning Team generates Daily Rosters at noon every Monday, Wednesday and Friday for the following two days, except on Friday whereby Daily Roster sheets will be created for three days (Saturday, Sunday and Monday). Operations Managers are responsible for manually updating any changes after these Daily Roster sheets are generated. Manual updates may be made to factor in overtime shifts, de-manning of posts and/or hospital escorts.



- 3.24 The rostering of ACT Corrective Services' Custodial Officers at the AMC and CTU is facilitated through the use of the UKG Pro IT platform (a cloud based human resource and workforce management system), a Master Roster and Daily Rosters. The Master Roster is an Excel spreadsheet managed by the Workforce Planning Team in the People and Culture Team. Its primary purpose is to facilitate the forecasting of coverage needs for the various posts in the AMC and, through its incorporation into UKG Pro, the time and attendance management of Custodial Officer staff. The Daily Roster shows the specific roster

arrangements at the AMC and CTU on any given day. The Daily Roster is a visual tool for the AMC Staff Officer and Operations Managers to identify which Custodial Officers are assigned to the AMC and CTU posts. Creating the Daily Roster involves a series of manual (rather than automated) steps.

AMC Custodial Officer rosters

Roster patterns in use at the AMC

- 3.25 A roster pattern represents sequences of days on, night shifts and rest days for a cohort of staff. Roster patterns have been developed for all the Custodial Officer grades.

Number of roster patterns

- 3.26 There are 15 approved roster patterns for CO1s, which are copied and pasted into the Master Roster. These patterns were voted on by staff and formally approved in 2015. They are sometimes referred to as the 'base patterns'. Some of these base patterns are replicated in the Master Roster to meet the expanding staffing requirements of the AMC. Nine to ten of these patterns are regularly used as they are seen as the most optimal patterns for the 6-week scheduling cycle.
- 3.27 There is a lack of documentation to explain why some CO1 roster patterns have been determined as more optimal than others and used more frequently and replicated. This is particularly important as the AMC has expanded since 2015 and the operating environment would have likely changed.

Revisions to roster patterns

- 3.28 ACT Corrective Services advised that updates to two of the approved CO1 roster patterns had been made since 2015 to ensure those patterns comply with relevant risk management criteria. However, there is no evidence to demonstrate when these changes occurred and if the new versions were officially approved.

Suitability of roster patterns

- 3.29 ACT Corrective Services does not have documentation that demonstrates which roster patterns are optimal and why they best support the operational needs of the AMC.
- 3.30 The Master Roster is a spreadsheet that is produced on an annual basis that is broken down to show the planned six weekly rostering arrangements. The Master Roster is an operational planning tool, which lists Custodial Officers' names against their respective roster pattern. The Master Roster is typically copied and 'rolled-over' from the previous year and updated as necessary.

3.31 Maintaining Custodial Officer roster patterns solely in a Master Roster spreadsheet poses a risk to ACT Corrective Services. The Master Roster Spreadsheet does not:

- adequately identify what roster patterns are being used (and how frequently) or the rationale for their use; or
- provide assurance that Custodial Officers are being rostered in accordance with the requirements in the Enterprise Agreement.

3.32 As the Master Roster does not provide high-level description of roster patterns, nor a legend key to explain the colours, symbols or abbreviations used, it is difficult to understand the various patterns worked or the rationale for their use.



3.33 A roster pattern represents sequences of days on, night shifts and rest days for a cohort of staff. Roster patterns have been developed across all the Custodial Officer grades. Custodial Officer roster patterns are currently documented in the Master Roster Excel spreadsheet. The Master Roster is typically copied and 'rolled-over' from the previous year and updated as necessary. The Master Roster spreadsheet does not adequately identify what roster patterns are being used (and how frequently) or the rationale for their use, nor does it provide assurance that Custodial Officers are being rostered in accordance with the requirements in the Enterprise Agreement. ACT Corrective Services does not have documentation that demonstrates which roster patterns are optimal and why they best support the operational needs of the AMC.



Recommendation 3

Documentation of Custodial Officer roster patterns

ACT Corrective Services should clearly identify and document the roster patterns for each Custodial Officer classification level and the rationale for their use.

Custodial Officer Grade 1 (CO1) roster patterns

3.34 The majority of Custodial Officers at the AMC are Custodial Officer Grade 1 (CO1) (211 in total as of July 2025). The features of CO1 roster patterns include:

- a 48-week roster cycle that is six weeks wide and eight lines deep (this refers to the duration of the roster and the names of Custodial Officers assigned to posts). This results in 19 shifts over six weeks;
- an average of 38 hours per week at the end of the 48-week roster cycle (based on 150 12-hour shifts and three 8-hour shifts that are allocated for training);
- work cycles of two to four shifts in a row and a minimum of two days off between work cycles; and

- unless they are on an approved flexible working arrangement, all CO1s are expected to work 21 weekends (44 percent of all shifts) and 21 night shifts (14 percent of all shifts) in the 48-week period.

3.35 Some of the roster patterns enable long breaks between shifts of up to nine days off before any leave, absenteeism or shift swaps are factored in.

Coverage of CO1 roster patterns

3.36 The audit sought to understand whether the CO1 roster patterns allowed for the operational requirements of the AMC to be met. The audit considered CO1 roster patterns because CO1s represent the significant majority of Custodial Officers employed by ACT Corrective Services (approximately 85 percent). Orkest Consulting reviewed the roster patterns for CO1s for coverage against the number of CO1s required for a six-week period.

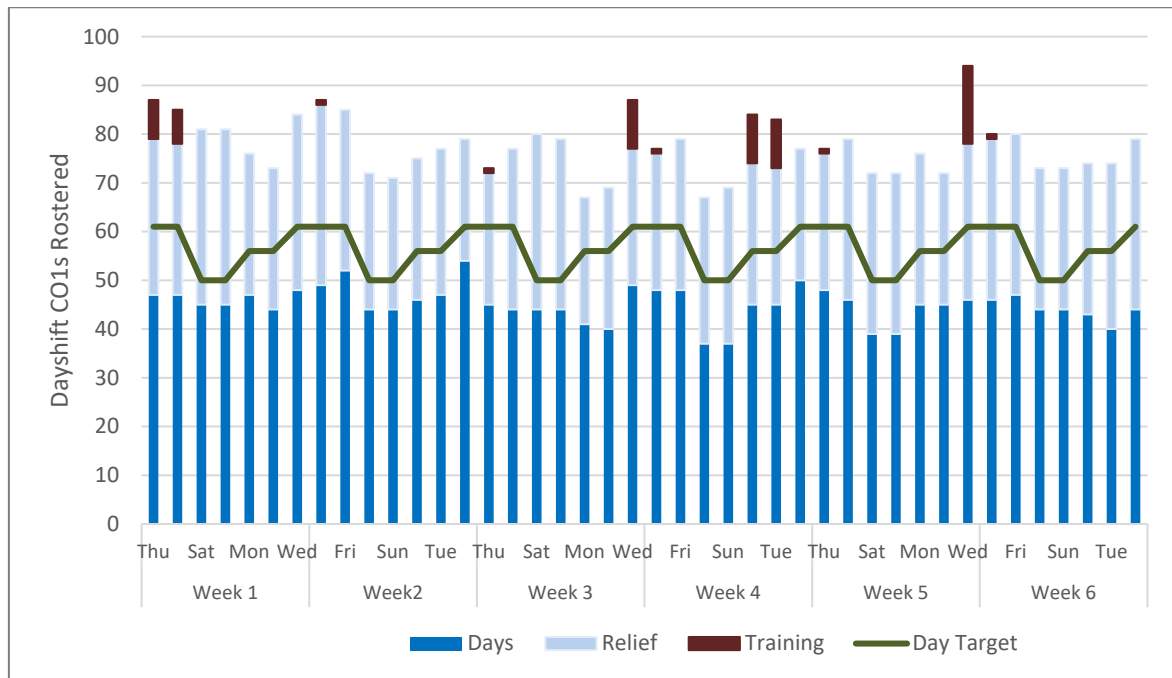
3.37 Figure 3-2 shows the results of this analysis for a six-week roster pattern that started on 27 July 2025. Figure 3-2 shows:

- CO1 staff rostered on dayshift in accordance with their normal roster patterns;
- CO1 staff rostered as relief; and
- the day target of CO1 staff across the six-week period.

3.38 The day target refers to the number of Custodial Officers required on any given day plus 15. ACT Corrective Services advised that the 'plus 15' contingency is a historical average of unplanned leave over a 12-month period, but that this calculation was not formally documented. The contingency is a number used for planning and does not necessarily reflect the actual leave and absences taken on any given day. Actual attendance and coverage on any given day is tracked through UKG Pro.

3.39 The analysis does not take into account specialist units (e.g. Canine) or additional requirements for hospital escorts or CTU coverage.

Figure 3-2 Rostering of CO1s across a six-week period



Source: Orkest Consulting, on behalf of the ACT Audit Office, based on analysis of ACT Corrective Services Master Roster spreadsheet.

Note: Data indicates the staffing variation of CO1s on dayshift – before leave and absenteeism, scheduled training courses or secondments. The training in Figure 3-2 is where the 8-hour shifts are built into the rosters – not the training courses scheduled by Organisational Development Unit.

3.40 Figure 3-2 shows:

- depending on the day (particularly if it is a weekday or weekend) the day target of CO1 staff is between 50 and 60 officers. This aligns with the number of CO1s required for the ‘full roster’ as discussed in Table 3-1;
- the CO1 roster patterns provide for the rostering of between 37 and 54 CO1 staff to be rostered on dayshift; and
- the CO1 roster patterns provide for the rostering of an additional 25 to 37 CO1 staff to be rostered as relief.

3.41 Figure 3-2 also shows that the roster patterns provide for the day target of CO1 staff to be exceeded every day across the six-week period.



3.42 CO1 roster patterns include a 48-week roster cycle that results in 19 shifts over six weeks and an average of 38 hours per week at the end of the 48-week roster cycle (based on 150 12-hour shifts and three 8-hour shifts that are allocated for training). Some of the roster patterns enable long breaks between shifts of up to nine days off before any leave, absenteeism or shift swaps are factored in. A review of CO1 roster patterns for coverage against the number of CO1s required for a six-week period shows that the roster patterns provide for the day target of CO1 staff to be consistently exceeded every day across the six-

week period. This means that CO1 roster patterns consistently exceed the requirements of the day target, which itself has a built-in contingency of 15 additional officers.

Complexity of six-week wide roster patterns

3.43 The use of six-week wide roster patterns results in variation within the period and makes it more difficult to balance staffing across the AMC. As shown in Figure 3-2 the use of six-week wide roster patterns:

- creates instances of longer breaks within the patterns; and
- results in periods of higher hours in some weeks more than others.

3.44 Six-week wide roster patterns tend to promote misalignment in shifts worked and shifts off, which means it is easier for imbalances in Custodial Officer coverage to occur. In this respect, the distribution between days on and days off work can be lengthy and this may impact work-life balance. For example, the roster patterns provide for Custodial Officers to work multiple shifts in a row before having a week or more off.

3.45 The variation of staffing levels within the six-week period also means it is more complex for managers to understand the overall impact of requests for future annual leave or a flexible working arrangement that may be requested by staff. This risk is mitigated by future requests for leave and flexible work arrangements being assessed using real time data in UKG Pro.

3.46 According to Orkest Consulting:

When the approved base roster patterns were initially designed in 2015, the allocation of shifts across the prison was not optimised for operational requirements with the focus being on weekend and night shift equity for staff, and patterns that contribute to officer wellbeing and work/life balance.

The number of posts required, and their allocation across the 7 days of the week has significantly changed over the years. As such, repeated use of the original 6 week wide base patterns in 48 week blocks has created a staffing profile that varies every week and is not aligned to the operational staffing needs of the prison.



3.47 The use of six-week wide roster patterns results in variation within the period and makes it more difficult to balance staffing across the AMC. The use of six-week wide roster patterns creates instances of longer breaks within the patterns and results in periods of higher hours in some weeks more than others. Six-week wide roster patterns promote misalignment in shifts worked and shifts off, which means it is easier for imbalances in Custodial Officer coverage to occur.

Custodial Officer Grade 2 (CO2) roster patterns

3.48 There are ten different roster patterns for CO2s. The key features of the CO2 roster patterns are:

- an 18-week roster cycle that results in 19 shifts over six weeks;
- an average of 38 hours per week (every six weeks). All shifts are 12-hour shifts;
- no training shifts built into the roster; and
- all CO2s work six weekends and either 5-night shifts or 7-night shifts.

Custodial Officer Grade 3 (CO3) roster patterns

3.49 There are seven CO3s – four in Accommodation and three in Security. Key features of the CO3 roster patterns are:

- twelve 11-hour and two 10-hour shifts every four weeks (or 14 shifts in four weeks) for the four CO3s in Accommodation. These four CO3s worked more shifts and more hours than all other officers; and
- nineteen 12-hour shifts and nine weekends every six weeks for the three CO3s in Security.

3.50 ACT Corrective Services advised that a trial roster pattern for CO3s came into force in August 2025. Key features of this trial pattern are:

- all CO3s work nineteen 12-hour shifts every six weeks (the same as CO2s and CO4s) with two weekends out of every six;
- at least three CO3s are rostered every day;
- all Security CO3s work eight weekends over an 18-week period; and
- Accommodation CO3s work seven weekends and one Accommodation CO3 works half of all weekends over an 18-week period.

Custodial Officer Grade 4 (CO4) roster patterns

3.51 There are three CO4 staff that are employed as Operations Managers at the AMC. The CO4 roster provides for one or two staff to be rostered every day. The key features of the CO4 roster patterns are:

- 18-week roster cycle;
- nineteen 12-hour shifts every six weeks averaging 38 hours per week;
- no additional training shifts built into the roster; and
- all CO4s work six weekends every 18-weeks and no night shifts.

Misalignment of Custodial Officer rostering cycles

3.52 The CO1 roster works to a 48-week roster cycle, while the CO2, CO4 and new CO3 trial rosters work to an 18-week roster cycle. This leads to:

- a lack of team-based rostering; and
- scheduling gaps.

Team-based rostering

3.53 Because of the different roster cycles (i.e. 48-week for CO1s and 18-week for CO2s, CO3s and CO4s) there is no consistency between the shifts worked by supervisors and staff on any given day. This means that the alignment of teams with supervisors does not always occur. The six-week blocks inevitably result in frequent scheduling gaps.

3.54 Not having team-based rosters can affect performance management and training, as well as the management of any absenteeism patterns or other attendance issues for individual Custodial Officers.

3.55 ACT Corrective Services advised that this issue has been partially addressed through a new performance and development plan (PADP) process which aligns staff to consistent supervisors. While useful, it is noted that supervisors may not oversee Custodial Officer staff on a regular basis due to team-based rosters not being in place.

Scheduling gaps

3.56 Some pre-approved roster patterns result in a Custodial Officer having a nine-day break before any absence or shift swap is factored in. Operationally, when absences and shift swaps are taken into account, the 48-week and 18-week rosters are erratic and do not provide for a consistent and predictable staffing base due to the number of different roster patterns applied.



3.57 The CO1 roster works to a 48-week roster cycle, while the CO2, CO4 and new CO3 trial rosters work to an 18-week roster cycle. This leads to a lack of team-based rostering and scheduling gaps. Because of the different roster cycles there is inconsistency between the shifts worked by supervisors and staff and the alignment of teams with supervisors does not occur. Some pre-approved roster patterns result in a Custodial Officer having a nine-day break before any absence or shift swap is factored in. Operationally, when absences and shift swaps are taken into account, the 48-week and 18-week rosters are erratic and do not provide for a consistent and predictable staffing base due to the number of different roster patterns applied.

Rotation of Custodial Officers and the approved roster patterns

3.58 Rotation of staff helps ensure fairness in shifts, enables flexibility, prevents burnout, enhances cross fertilisation and skill development and enables 24-hours per day, seven days per week coverage. Rotation can and should include rotation within the same shift or rotation to a new and different role the following shift.

3.59 The importance of having staff rotation policies is recognised in the 2025 Strategic Threat Assessment for the AMC:

Rotating staff between areas or roles can minimise the risk of conditioning and bribery.

3.60 Both the AMC and CTU Work, Health and Safety Risk Registers outline expectations concerning the rotation of Custodial Officers between posts, and both list the following control to treat the demanding nature of the Custodial Officer working environment:

Rotation of Correctional Officers (e.g. AMC and CTU) across the Service.

3.61 Regular rotation is also noted as a control to managing intense work demands in *A Guide for Employers: Work Related Fatigue* prepared by WorkSafe Victoria (2022).

... introduce job rotation to limit buildup of mental, emotional and physical fatigue.

3.62 The 2015 roster patterns and management practices do not readily support Custodial Officer rotation. Custodial Officers do not frequently rotate between the different posts across the AMC as a standard practice. A yearly expression of interest process provides a fixed point for consultation with Custodial Officer staff on potential rotations, but rotation can also occur throughout the year if requested by Custodial Officers or management. Management can also facilitate forced moves out of certain posts for work, health and safety reasons.



3.63 Rotating Custodial Officers between posts supports sound work, health and safety planning. The AMC and CTU Work, Health and Safety Risk Registers identify the rotation of officers as being a control to managing the demanding nature of the Custodial Officer working environment. The 2015 roster patterns do not readily support Custodial Officer rotation. Custodial Officers do not frequently rotate between the different posts across the AMC as a standard practice. A yearly expression of interest process provides a fixed point for consultation with Custodial Officer staff on potential rotations, but rotation can also occur throughout the year if requested by Custodial Officers or management.

CTU Custodial Officer rosters

- 3.64 Historically, the CTU has operated on a standard eight-hour Monday-Friday roster as it provided coverage between 6:30am and 6:00pm, with overtime available on Saturdays and public holidays when bail court matters are heard.
- 3.65 Similar to the AMC there is a Master Roster Excel spreadsheet identifying the rostering patterns for the CTU. The Master Roster identifies that there are 14 officers on approved flexible working arrangements.
- 3.66 Similar to the AMC, the precise roster patterns are not otherwise documented other than in the Master Roster Excel spreadsheet, which is then built into UKG Pro for administration, coverage and forecasting.

Pilot 10-hour CTU roster

- 3.67 In April 2024, the Acting Commissioner of ACT Corrective Services approved a pilot 10-hour roster (including for weekdays and Saturdays) for interested CO1 staff working at the CTU.
- 3.68 The Executive Brief supporting the pilot 10-hour roster advised that eight staff in total – four AMC staff ‘approved for transfer’ to the CTU and four CTU staff – took part in the trial. The aim of the trial was to promote the CTU as more attractive to applicants and bring wage and work/life balance in line with conditions at the AMC. 10-hour rosters are appealing to some staff as it means 20 percent less shifts worked to accommodate increased hours on any given day.
- 3.69 The Brief for the pilot also provided approval for a CO3 rotational roster based on the same roster pattern used by CO4s at the AMC to enable coverage for the weekend bails court and the need to make the CO3 position more attractive and in line with its AMC counterpart.

Proposed permanent change to CTU roster

- 3.70 An Executive Brief was prepared for the Acting Commissioner of ACT Corrective Services in July 2024 that requested the permanent approval of the 10-hour roster for CO1 officers at the CTU. The Executive Brief noted the following positive aspects of the 10-hour roster trial:
- reduction in staff fatigue and unscheduled leave due to larger gaps between shifts;
 - improved work life balance;
 - reduction in the need for overtime; and
 - staff can work across both CTU and AMC sites.

3.71 The Acting Commissioner of ACT Corrective Services disagreed with the recommendation to implement permanent changes to the CO1 and CO3 rosters, but granted a further six-month extension until 27 August 2025.

3.72 In March 2025, ACT Corrective Services reviewed UKG Pro data for coverage of CO1 Custodial Officers at the CTU and found that the pilot 10-hour roster may not be optimal as the number of rostered staff exceeded the base complement of staff needed on any given day. The following was noted:

The pilot might actually negatively impact the running of CTU and may increase our projected overtime and leave liability.

Excessive staffing

3.73 A review of CTU rosters for the purpose of the audit shows that the number of CO1s rostered at the CTU under the 10-hour pilot was higher than the approved CTU staffing establishment. For example, the number of CO1s identified in the CTU Master Roster is 40 but the approved CTU staffing establishment, as per the Enterprise Agreement, is for 25 permanent CO1 staff. Notwithstanding this, the Enterprise Agreement does specify that the CTU can be rostered according to operational requirements within the CTU and wider ACT Corrective Services.

3.74 The pilot 10-hour roster ceased in October 2025. ACT Corrective Services determined that there had not been any significant changes in overtime, overall labour costs, absenteeism or sharing of AMC resources to provide additional support and staff during gaps in the required coverage. Officers who were on the pilot returned to eight-hour shifts (notwithstanding some flexible working arrangements being agreed and implemented) as of 9 October 2025.



3.75 Historically, the CTU has operated on a standard eight-hour Monday-Friday roster as it provides coverage between 6:30am and 6:00pm, with overtime available on Saturdays and public holidays when bail court matters are heard. There is a Master Roster identifying the rostering patterns for the CTU, similar to the AMC. Similar to the AMC, the roster patterns are not documented other than in the Master Roster Excel spreadsheet and UKG Pro. This creates human risk and version control issues.



3.76 In April 2024, ACT Corrective Services approved a pilot 10-hour roster (including for weekdays and Saturdays) for interested CO1 staff working at the CTU. The aim of the trial was to promote the CTU as more attractive to applicants and bring wage and work/life balance in line with conditions at the AMC. The pilot 10-hour roster ceased in October 2025. ACT Corrective Services determined that there had not been any significant changes in overtime, overall labour costs, absenteeism or sharing of AMC resources to provide additional support and staff during gaps in the required coverage.

Leave arrangements

Leave entitlements

3.77 Under the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, Custodial Officers have a range of leave entitlements including, but not limited to, annual leave and personal leave. Annual leave is generally planned and approved in advance, while personal leave is for specific reasons, such as being unfit for work due to personal illness or personal injury or caring for an immediate family member.

Annual leave

3.78 Custodial Officers are entitled to 152 hours of annual leave (equating to 21 days based on a 7.21 standard day) for each full year worked based on a 38-hour working week. In situations where Custodial Officers are regularly rostered on and work more than ten Sundays over the course of a year, an additional five days of annual leave are granted.

Personal leave

3.79 Custodial Officers are entitled to 136.8 hours of personal leave (equating to 3.6 weeks) per annum, based on a 38-hour working week. Employees must give notice to their manager or supervisor of their intention to take personal leave and must provide documentary evidence (such as a medical certificate or a statutory declaration) for personal leave on a timely basis. The application and approval of planned leave for Custodial Officers is managed by the Workforce Planning Team, which forecasts leave up to 18 months in advance.

Unplanned leave

3.80 Unplanned leave is leave that an employee takes from work without prior approval. The management of unplanned leave is highly reactive and, notwithstanding best efforts, may mean a shortfall of Custodial Officers rostered on shift.

3.81 High levels of unplanned leave have been occurring for some time. For instance, the *Blueprint for Change* report noted:

Poor culture is evidenced through the level of overtime driven by unscheduled leave and resultant understaffing.

Over-rostering to account for unplanned leave

3.82 As noted in paragraph 3.38 the day target for the number of CO1s rostered refers to the number of Custodial Officers required to occupy posts on any given day plus 15. ACT Corrective Services advised that the 'plus 15' contingency is a historical average of unplanned leave over a 12-month period, but that this calculation was not formally documented. The use of the 'plus 15' contingency reflects an understanding and

acknowledgement of the level of unplanned leave that occurs in the AMC and the need to roster accordingly.



3.83 Under the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*, Custodial Officers have a range of leave entitlements including, but not limited to, annual and personal leave. Annual leave is generally planned and approved in advance, while personal leave is for specific reasons, such as being unfit for work due to personal illness or personal injury or caring for an immediate family member. Unplanned leave is leave that an employee takes from work without prior approval. The management of unplanned leave is highly reactive and, notwithstanding best efforts, may mean a shortfall of Custodial Officers in attendance. To manage the risks of unplanned leave ACT Corrective Services identifies a day target for the number of CO1s rostered as the number of Custodial Officers required to occupy posts on any given day plus 15. The use of the 'plus 15' contingency reflects an understanding and acknowledgement of the level of unplanned leave that occurs in the AMC and the need to roster accordingly.

Unauthorised leave

3.84 Unauthorised leave is time away from work without approval (either prior to or after the taking of leave). Unauthorised leave also includes absences that have been notified but for which no leave application has been submitted and/or approved, such as an employee taking sick or personal leave without a supporting medical certificate or a statutory declaration.

3.85 Section 9 of the *Public Sector Management Act 1994* provides the legislative framework for any disciplinary action of ACT Government employees that may be taken when an employee fails to fulfill their duty as an officer.

3.86 The *JACS Leave and Attendance Guideline* (October 2020) provides information on unauthorised absences:

It is the manager's responsibility to ensure that both attendance and absences are accounted for on attendance records and by approved leave. If an absence is not approved, it is unauthorised.

An unauthorised absence may include but is not limited to:

- an absence that has not been approved via the correct process and delegate;
- an absence, other than personal leave (which is notified at the time of absence) not approved in advance, and a satisfactory explanation for the absence is not provided;
- where an employee is unable to attend work and does not notify their absence to the relevant officer in their work area;
- an absence where an employee does not seek approval in the correct manner, e.g. fails to submit a leave application following an absence for personal illness;

- industrial action;
- where a requested period of leave has not been approved and the staff member absents themselves from duty; and
- absence where evidence is required and the evidence can reasonably be considered not satisfactory.

3.87 The *JACS Leave and Attendance Guideline* (October 2020) further states that:

Unauthorised absences will normally result in forfeiture of salary. However, at the discretion of the Manager, make up of time may be authorised. Unauthorised absences may also result in disciplinary action.

3.88 Under Section G4 'Misconduct and Discipline' of the Enterprise Agreement, unauthorised absences, without a satisfactory reason, are considered a form of employee misconduct.

Use of unauthorised leave

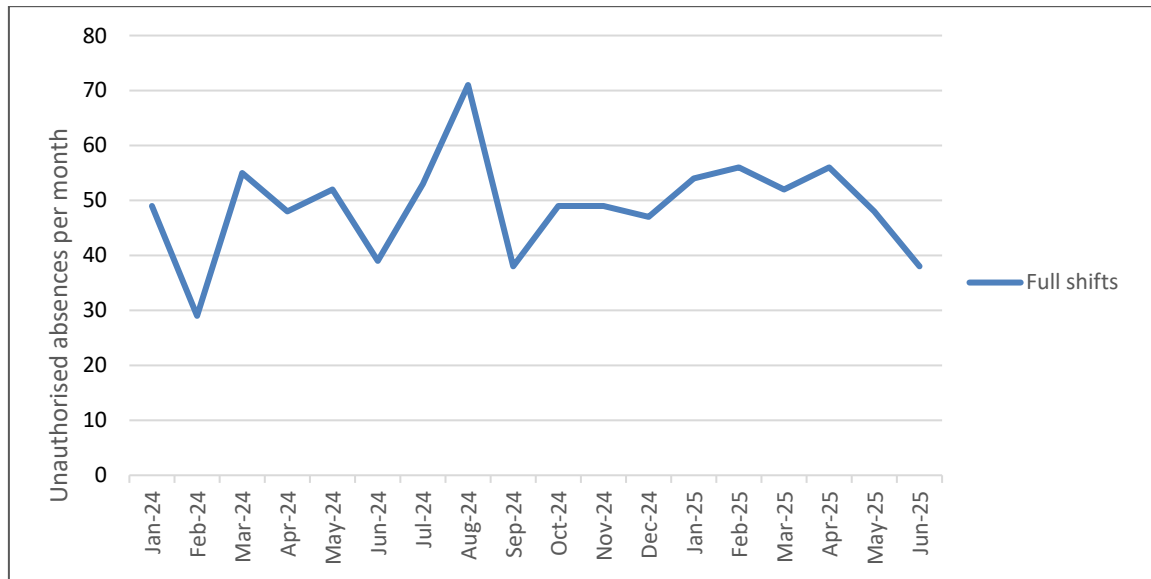
3.89 The practice of Custodial Officers taking unauthorised leave occurs frequently. This practice necessarily impacts the administration of the rosters. ACT Corrective Services advised that the AMC Staff Officer role was created, in part, to address unauthorised absences and increase accountability in relation to leave arrangements.

3.90 The audit considered data on unauthorised leave taken by Custodial Officers for the audit period from January 2024 to June 2025. Fewer instances of unauthorised leave are taken by CO2 to CO4 officers, and as such, are excluded from this analysis.

Whole-shift absences

3.91 Figure 3-3 shows the number of whole shifts taken as unauthorised absences by CO1s each month.

Figure 3-3 Total unauthorised absences for CO1s (January 2024 to June 2025)



Source: ACT Audit Office analysis of ACT Corrective Services data.

3.92 Figure 3-3 shows that there are a high number of unauthorised whole-shift absences for CO1s. Figure 3-3 shows:

- the number of unauthorised absences has ranged from 29 in February 2024 to 71 in August 2024; and
- there have been an average of 49 unauthorised absences per month over the period January 2024 to June 2025.

3.93 The average number of unauthorised whole-shift absences is high. Given that there are approximately 243 CO1s employed by ACT Corrective Services, on average, one out of five CO1s take a shift as an unauthorised absence on a monthly basis. This is in addition to annual and personal leave already being taken.

Part-shift absences

3.94 Figure 3-3 only shows unauthorised absences for a whole shift. There are more unauthorised absences that are only for parts of rostered shifts. There were 512 part-shift absences (resulting in an average of 28-part shift absences per month) between January 2024 and June 2025 for CO1 officers. Part shift absences vary from minutes (e.g. seven minutes) to almost a full eight- or 12-hour shift.

3.95 ACT Corrective Services asserted that part-shift unauthorised absences are mainly attributable to Custodial Officers swiping into shifts late or out of shifts early. This data is necessarily recorded as a part-shift unauthorised absence in the UKG Pro system.

- 3.96 ACT Corrective Services advised that Custodial Officers are required to provide satisfactory documentation for unauthorised absences and submit leave forms, regardless of the period of time absent.

Management of unauthorised leave

- 3.97 When unplanned (and potentially unauthorised leave) has been taken, ACT Corrective Services advised that Custodial Officers are requested (via an email from the Workforce Planning Team Leader) to provide satisfactory documentation for the absence within three days of returning to work. This requirement is reflected in the operating procedure *Managing Leave in KRONOS*⁶ which states:

Where a leave form is not submitted within three (3) days of the staff member returning to duty, the unscheduled absence may be treated as an unauthorised absence and payroll notified for salary adjustment.

Administration of unauthorised leave

- 3.98 Where no evidence is provided, ACT Corrective Services advised that unauthorised absences are processed in arrears as a payroll deduction, thereby ensuring that staff are not paid for the absence.

- 3.99 Advice from ACT Corrective Services in November 2025 in relation to the administration of unauthorised leave indicates:

The leave reconciliation for unauthorised leave is slightly less than 6 weeks. In some cases, the absence is processed outside these timeframes ...

While the policy states 3 days, due to the nature of shift work, these timeframes give officers the opportunity to return to shift prior to the unauthorised absence being recorded...

If the officer has not returned to work within the reconciliation period, the absence is escalated to the CO4s to follow up in the first instance.

- 3.100 Despite Custodial Officers having three days on return to work to provide satisfactory documentation, there is much more leniency based on the leave reconciliation period being six weeks. This becomes problematic where officers are taking multiple unauthorised absences in a six-week period as effectively managing and accounting for such absences becomes difficult and creates risks that officers may either be under or over paid. ACT Corrective Services advised that since April 2026 staff leave audits are now being undertaken on a four-week basis rather than six-week basis.

⁶ ACT Corrective Services advised that the *Managing Leave in KRONOS* operating procedure needs to be updated for UKG PRO but is otherwise still current and in force.

Performance management

3.101 The Audit Office sought to understand how unauthorised leave is managed by ACT Corrective Services where no satisfactory documentation is provided.

3.102 ACT Corrective Services advised that:

... advice sought in relation to specific individuals and their circumstances has occurred for 3 individual employees, 2 of which received a formal direction.

3.103 Given the high number of monthly unauthorised absences, as shown in Figure 3-3, it is apparent that ACT Corrective Services is not managing unauthorised absences as a form of employee misconduct. The number of Custodial Officers being managed for unauthorised leave (three in total) appears to be low.

3.104 Unauthorised leave impacts staff availability and roster coverage on any given day. It can create shortfalls in staffing and the resultant need to offer more overtime shifts to Custodial Officers not otherwise rostered on for that day. Unauthorised leave exacerbates the challenges already posed by the variation in staffing levels of CO1s. It may also impact the closure of certain posts at the AMC if there are insufficient staff available and may increase the workload of the existing rostered Custodial Officers.

3.105 In response to the draft proposed report ACT Corrective Services advised:

Unauthorised absences are managed in line with the Enterprise Agreement, including assessment and investigation as required. Only a small number of matters have escalated to a formal process; however, this reflects the application of proportionate management responses rather than a lack of oversight or action.



3.106 Unauthorised leave is time away from work without approval (either prior to or after the taking of leave). There is a high number of unauthorised whole-shift absences for CO1s; an average of 49 unauthorised absences per month over the period January 2024 to June 2025. There is also a high number of part-shift absences; an average of 28-part shift absences per month between January 2024 and June 2025. The practice of taking unauthorised leave necessarily impacts the administration of the rosters.



3.107 When unplanned (and potentially unauthorised leave) has been taken, Custodial Officers are requested to provide satisfactory documentation for the absence within three days of returning to work. Where no evidence is provided, ACT Corrective Services advised that unauthorised absences are processed in arrears as a payroll deduction, thereby ensuring that staff are not paid for the absence. Despite Custodial Officers having three days on return to work to provide satisfactory documentation, there has been much more leniency based on the leave reconciliation period being six weeks. This becomes problematic where officers are taking multiple unauthorised absences in a six-week period as effectively managing and accounting for such absences becomes difficult and creates risks that officers

may either be under or over paid. ACT Corrective Services advised that since April 2026 staff leave audits are now being undertaken on a four-week basis rather than six-week basis.



- 3.108 ACT Corrective Services advised that three individuals' use of unauthorised leave had been further considered and two of these employees had received a 'formal direction'. It is apparent that ACT Corrective Services is not managing unauthorised absences as a form of employee misconduct. The number of Custodial Officers being managed for unauthorised leave (three in total) appears to be low.



Recommendation 4 Comprehensive review of staffing needs

ACT Corrective Services should undertake a comprehensive review of its Custodial Officer staffing needs at both the AMC and CTU. Following the review ACT Corrective Services should identify and document the minimum requirements for Custodial Officers at different classifications to fill posts and roles.



Recommendation 5 Identification and documentation of rosters

Following the comprehensive review of Custodial Officer staffing needs, ACT Corrective Services should develop and document rostering patterns that meet the staffing needs of the AMC and CTU. The rostering patterns should:

- a) clearly identify and demonstrate how the rostering patterns are meeting the staffing needs of the CTU;
- b) clearly and separately identify what contingencies have been built into the rostering patterns to account for unscheduled and unauthorised absences;
- c) accommodate training requirements for all Custodial Officer classifications; and
- d) support:
 - i) team-based rostering for the purpose of supervision and performance management; and
 - ii) rotation of Custodial Officers across posts and roles to minimise integrity risks.

4 Custodial Officer rostering issues

4.1 This chapter discusses the implications of not having a sufficient number of Custodial Officers rostered to work at the AMC. The chapter discusses:

- the practice of de-manning posts and cancelling Custodial Officer training, which reflects the need to prioritise the deployment of Custodial Officers to essential posts; and
- the use and management of overtime to ensure the maintenance of staffing levels and delivery of services. In discussing the use and management of overtime the chapter also discusses the management of fatigue risks, which may arise from Custodial Officers working additional hours to ensure the maintenance of staffing levels and delivery of services.

Summary



Conclusions

The resulting impact of unplanned leave and unauthorised leave is a shortfall of Custodial Officers available for work. In response to a shortfall of Custodial Officers ACT Corrective Services must make decisions to maintain the operation of the AMC, such as:

- de-manning posts and re-allocating working Custodial Officers to priority posts;
- cancelling pre-planned Custodial Officer training and re-allocating working Custodial Officers to priority posts; or
- engaging Custodial Officers to work longer shifts at overtime rates.

The de-manning of posts necessarily involves the re-allocation of Custodial Officers to posts that ensure the safe and continuous operation of the prison. The posts identified as being of a lower priority include education, programs and activities posts. Not allowing these activities to go ahead impacts the rehabilitation of detainees.

In the 18 months to July 2025 a high proportion of scheduled training was cancelled (27 percent). The major reason cited was 'operational requirements', meaning there were insufficient Custodial Officers to cover the required posts at the AMC. The cancellation of pre-planned training compromises the learning and development of Custodial Officers and their capacity to undertake their roles effectively.

High overtime levels were identified as an issue in the *Blueprint for Change* report in 2022, which identified that more than 35,000 hours of overtime were worked in 2021-22. Since December 2024 ACT Corrective Services has attempted to implement controls over the use of overtime, through a

pre-approved limit of five overtime shifts per day at the AMC and a requirement for Operations Managers to seek approval from a Senior Director for any additional shifts. ACT Corrective Services has also reduced overtime shifts from 12 hours to eight hours. Since the introduction of the new overtime arrangements there has been a downward trend in overall overtime expenditure and cost savings have been achieved through shorter overtime shifts.



Key findings

De-manning of posts

Paragraph

A resultant impact from unplanned and unauthorised leave is a shortfall of Custodial Officers. A shortfall of Custodial Officers means that operational managers at the AMC must make daily decisions to de-man posts and may mean that detainees are not afforded access to programs and activities. This limits detainee rehabilitation, such as through reduced program or activity schedules, restricts detainees attending non urgent medical appointments and compromises the safety and security of the prison.

4.16

In instances where the AMC is short staffed Custodial Officers need to be prioritised to posts, and associated roles and responsibilities, that ensure the safe and continuous operation of the prison. Under these circumstances lower-priority posts are 'de-manned'. The Regime Management Plan outlines considerations for the de-manning of posts. The posts identified as having to be filled in the Regime Management Plan are necessarily those that relate to key security requirements of the AMC. The posts identified as being of a lower priority include education, programs and activities posts.

4.17

Cancellation of training

Clause M of the Enterprise Agreement outlines mandatory training that all Custodial Officers must undertake to maintain minimum standards of competency. Training includes CPR, fire awareness (including breathing apparatus), fire drills and use of force. This training must be undertaken annually. Additional training in first aid and mental health needs to be completed by all Custodial Officers every second year. In addition to the training outlined in the Enterprise Agreement, there are a range of other training requirements including those identified as a priority by the Commissioner, ACT Corrective Services and specialist training for higher level Custodial Officers.

4.24

Training for Custodial Officers is built into CO1 roster patterns. CO1s are allocated three training days per annum to undertake mandatory training and any other training that is relevant to their role. Given the breadth of training priorities and the increase in requirements since 2015, it is unlikely that three days per annum is sufficient to meet requirements. The Organisational Capability Unit advise that a minimum of five 8-hour training days is required to ensure that Custodial Officers comply with training requirements.

4.33

Custodial Officers above the CO1 grade (CO2 to CO4) do not have a training component built into their rosters. Where CO2 to CO4 staff are allocated training days their positions need to be backfilled by Custodial Officers on relief shifts. Not building mandatory training into rostering arrangements may lead to one, or likely both, of two key issues:

4.34

- it immediately requires the use of relief shifts or overtime arrangements to cover CO2 to CO4 staff that attend training. This comes at an increased financial cost to ACT Corrective Services and, potentially, leads to higher fatigue for staff who are undertaking additional shifts; and
- it creates the risk that training will not be routinely accommodated and undertaken by Custodial Officers. In a high-risk and volatile environment where maintaining competency in mandatory training is crucial, training must be viewed as a priority for all Custodial Officers.

Analysis of training data for the 18 months between January 2024 and July 2025 shows that a high proportion of scheduled training is cancelled; 27 percent of scheduled training sessions were cancelled. The major reason cited for training to be cancelled is because of 'operational requirements'. Seventy-seven percent of training that is cancelled is identified as due to this reason. 'Operational requirements' means that there are insufficient Custodial Officers to cover the required posts at the AMC and management has decided, often at very short notice, that officers assigned to training are required to fulfill operational roles to ensure the safe and effective functioning of the AMC.

4.46

There are a range of systemic challenges and practical barriers to ensuring Custodial Officers undertake and complete mandatory training. Systemic challenges relate to the rostering arrangements, including time for training not being built-in to CO2 to CO4 rosters and the number of roster patterns not allowing for flexibility to accommodate training requirements. Practical constraints and considerations including:

4.53

- Custodial Officers may be deterred from undertaking training as a 12-hour shift may be preferred to a shorter training 8-hour shift; and
- training is often scheduled on days that Custodial Officers are not rostered on to attend work. This is a disincentive to attend training.

Use of overtime

High overtime levels and inadequate staff resources were reported as an issue in the *Blueprint for Change* report in 2022. The *Blueprint for Change* report identified that more than 35,000 hours of overtime were worked in 2020-21. The *Blueprint for Change* report identified a need for the 'AMC and CTU [to] maintain sustainable staffing resources that meet operational requirements and promote safe practice and officer wellbeing' and that the success of this measure would be a 'reduction in overtime and vacant posts by ten per cent and increase in staffing by ten per cent in first twelve months and then as per post analysis within three years'.

4.66

Prior to December 2024, ACT Corrective Services had minimal controls in place to manage overtime arrangements. Prior to December 2024, ACT Corrective Services had no policy or procedural guidance relevant to the administration of overtime arrangements. There was no policy or procedural guidance that identified Enterprise Agreement requirements, Custodial Officer eligibility, process(es) for approving overtime or roles and responsibilities. 4.73

On 13 December 2024, email instructions were provided to AMC Area Managers and AMC Operations Managers in relation to a new AMC Daily Roster and overtime process. Further instruction was provided on 7 February 2025. The new procedure provided for a pre-approved limit of a maximum of five overtime shifts per day at the AMC. In the event that more than five overtime shifts were needed, the new procedure required the Operations Managers to seek approval from a Senior Director. The new procedure also required that all overtime was to be allocated through the use of KRONOS so that it would be 'fully auditable'. These measures were put in place to reduce the overreliance on overtime and increase fairness and equity in overtime arrangements. 4.82

ACT Corrective Services advised that the basis for a maximum of five pre-approved overtime shifts was to allow limited autonomy for the Custodial Officer Grade 4 to use their existing delegation for approval of overtime. ACT Corrective Services advised that the reasoning for this decision was not recorded but was agreed to and discussed at an executive meeting. There is no evidence that ACT Corrective Services has undertaken any business planning to determine whether five overtime shifts are commensurate with the need to fill roster gaps created by leave and other vacancies or to match the operational requirement for the number of posts to be filled on the day. 4.83

The audit considered data from ACT Corrective Services on the number of overtime shifts between January 2025 and July 2025. Between January 2025 and July 2025 there was an average of 60 overtime shifts worked each month. These 60 shifts are in addition to the five pre-approved overtime shifts that are available. Additional overtime shifts are permitted where required for operational reasons. The initial impact of the new overtime arrangements implemented from December 2024 was a decrease in overtime usage for the first three months of 2025. Since then, however, overtime usage has again increased and for the period April 2025 to July 2025, there were 19 days each month where overtime usage exceeded the pre-approved daily limit of five overtime shifts. ACT Corrective Services asserted that this was primarily due to an unprecedented number of hospital watches and other operational demands and that 'they have remained lower than they would have been in the absence of the new arrangements'. 4.88

ACT Corrective Services has progressively reduced its overall overtime expenditure between mid-2024 and mid-2025. Since the introduction of the new overtime arrangements in December 2024 there has been a downward trend in overall overtime expenditure. Cost savings have been made as overtime shifts have reduced from 12-hours in duration to 8-hours in duration. 4.94

Fatigue management requirements for the rostering of Custodial Officers are outlined in the Enterprise Agreement. Amongst other things, Custodial Officers must not work more than ten shifts a fortnight (including overtime) and rostered days off must be at least two consecutive days in a fortnight. The approved base pattern rosters adhere to these requirements. 4.101

The requirements may be circumvented, however, when Custodial Officers work overtime shifts or swap shifts with colleagues. The potential for fatigue to accumulate during these instances is high. ACT Corrective Services advised that any arrangements under these circumstances are supported by risk mitigation activities such as fatigue impacts, employee consent and operational oversight and management. 4.102

De-manning of posts

- 4.2 In instances where the AMC is short staffed Custodial Officers need to be prioritised to posts, and associated roles and responsibilities, that ensure the safe and continuous operation of the prison. Under these circumstances lower-priority posts are 'de-manned'.
- 4.3 There are also other circumstances, such as the need for medical escorts to accompany a detainee to and from hospital and the need to transfer Custodial Officers to the CTU to meet operational needs, which may also mean that AMC posts need to be de-manned.
- 4.4 An alternative to de-manning posts is the use of overtime arrangements. Overtime is discussed in further detail in paragraphs 4.55 to 4.94.

Provision of programs and activities

- 4.5 The *Human Rights Principles for ACT Correctional Centres* (2019) state that:

Programs and activities must be provided that meet the diverse needs and interests of the detainee population... Detainees should be afforded as much time out of their cell as possible, and be able to access and engage in purposeful activity, including recreation with others.

- 4.6 Whilst in custody detainees can access work such as cleaning accommodation areas, grounds keeping and maintenance and horticulture. Furthermore, detainees are offered educational opportunities such as literacy and numeracy support and vocational training. Programs for detainees are offered to address offender behaviour, alcohol and drug issues and wellbeing.

Policy and procedural guidance for the de-manning of posts

Regime Management Plan

- 4.7 The Regime Management Plan outlines considerations for the de-manning of posts. These are considerations only and not mandatory courses of action when making daily staffing decisions:

The RMP [Regime Management Plan] has been developed in a way to afford the highest level of flexibility to the Area Managers on a daily basis to ensure the obligations of the Corrections Management Act are met, while ensuring that health, safety and security obligations are prioritised.

- 4.8 For instance, the AMC is identified as optimally staffed when its staffing profile is 'between Full Roster and 59 [CO1s and CO2s]'. The full delivery of activities and services is envisaged (i.e. a 'green state') and the Regime Management Plan outlines 'essential' and 'non-essential' posts. These posts are to be considered by operational managers in the event they need to make resourcing decisions for any reason.
- 4.9 Considerations are also documented in the Regime Management Plan for when the Centre is operating in the 'amber state' and 'red state'. The 'amber state' is described as 'reduced delivery of activities and services (including health, visits, programs, education and all employment)'. A total of 38 posts are identified as having to be filled in an 'amber state'. The 'red state' is described as 'basic delivery of activities and services (including health, visits and essential employment)'. A total of 24 posts are described as having to be filled in a 'red state'.
- 4.10 The posts identified as having to be filled in the Regime Management Plan are necessarily those that relate to key security requirements of the AMC. The posts identified as being of a lower priority include education, programs and activities posts.

Order of Posts to remove if short staffed procedure

- 4.11 ACT Corrective Services has developed a document to guide operational managers with a preferred order of posts to be de-manned where there are staff shortfalls: *Order of Posts to remove if short staffed*. This document ranks posts that can function with less staff when required.
- 4.12 The procedure only came into effect on 3 July 2025, at the same time the audit fieldwork was being undertaken. Prior to this there was no procedure (other than the overarching Regime Management Plan). Prior to the procedure, it is understood that each operational manager decided what posts to de-man given the resources available.

Posts de-manned at the AMC

4.13 Table 4-1 shows the posts that were de-manned most frequently and the number of times the post was de-manned over an eight-week period before the *Order of Posts to remove if short staffed* document came into effect.

Table 4-1 Most frequently de-manned AMC posts (13 February 2025 to 9 April 2025)

Post	Number of times de-manned
Special Care Centre (SCC) Rover – a rover assists with escorting detainees from place to place often by line of sight. The SCC Rover is positioned in the Special Care Centre which manages movements from this area.	38
2 nd Education Officer	33 <i>(**includes two days where both Education Officer roles were de-manned)</i>
2 nd Programs Officer	32 <i>(**includes three days where both Programs Officer roles were de-manned)</i>
2 nd Health Officer	31
4 th Visits Officer	20 <i>(**includes three days with two Visits Officers off)</i>

Source: ACT Audit Office analysis of AMC Daily Roster Sheets.

4.14 In addition to these posts most of the other posts at the AMC were also de-manned over the eight-week period. Other key posts that were de-manned were:

- the Activities post (18 days); and
- the Reception post (11 days).

4.15 The Programs post had no staff for three days and the Education post had no staff for two days meaning the AMC was unable to run education services or programs on these days to address offender behaviour, alcohol and drug issues and wellbeing.⁷ This negatively impacts detainee rehabilitation and does not support the overall goal of the AMC as a human rights prison.



4.16 A resultant impact from unplanned and unauthorised leave is a shortfall of Custodial Officers. A shortfall of Custodial Officers means that operational managers at the AMC must make daily decisions to de-man posts and may mean that detainees are not afforded access

⁷ ACT Corrective Services has not developed post duty statements for those posts listed in Table 4-1 or in paragraph 3.3 except for the position of 'Reception'. Amongst other things, the key duties of the CO1 Reception Post is to maintain the security of the area, conduct daily security inspections and conduct area searches, as required.

to programs and activities. This limits detainee rehabilitation, such as through reduced program or activity schedules, restricts detainees attending non urgent medical appointments and compromises the safety and security of the prison.



- 4.17 In instances where the AMC is short staffed Custodial Officers need to be prioritised to posts, and associated roles and responsibilities, that ensure the safe and continuous operation of the prison. Under these circumstances lower-priority posts are 'de-manned'. The Regime Management Plan outlines considerations for the de-manning of posts. The posts identified as having to be filled in the Regime Management Plan are necessarily those that relate to key security requirements of the AMC. The posts identified as being of a lower priority include education, programs and activities posts.

Cancellation of training

Enterprise Agreement requirements for Custodial Officer training

- 4.18 Custodial Officer training requirements are outlined in the *ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026*. The requirements apply to permanent and casual Custodial Officers.

- 4.19 Clause M14.5 of the Enterprise Agreement states:

All COs Class 1, 2, 3 and 4 are required to maintain minimum standards of competence, as assessed on an annual basis in each of the following:

M14.5.1 CPR;

M14.5.2 Fire Awareness (including Breathing Apparatus);

M14.5.3 Fire Drills; and

M14.5.4 Use of Force.

- 4.20 Clause M14.6 of the Enterprise Agreement states:

All COs Class 1, 2, 3 and 4 are required to maintain minimum standards of competence as assessed on a triennial basis in each of the following:

M14.6.1 First Aid (Senior or equivalent); and

M14.6.2 Mental Health (inclusive of Suicide and Self Harm).

- 4.21 Clause M14.9 of the Enterprise Agreement states:

Employees will be given training, guidance and opportunities necessary to assist them in gaining the competencies and qualifications required under this clause.

4.22 In 2024-25, additional training priorities were determined by the Commissioner, ACT Corrective Services. These included:

- crowd control;
- verbal de-escalation;
- ‘Working mind for first responders’; and
- ‘Five-minute interventions’ – this training concluded in 2024 and was then incorporated into the verbal de-escalation training.

4.23 In addition to Custodial Officer training that is mandated in the Enterprise Agreement, ACT Corrective Services advised that additional specialist training is offered, as required, as follows:

- Incident Controller training – for CO2 and above;
- Tactical Leader training; and
- Grenadier training.



4.24 Clause M of the Enterprise Agreement outlines mandatory training that all Custodial Officers must undertake to maintain minimum standards of competency. Training includes CPR, fire awareness (including breathing apparatus), fire drills and use of force. This training must be undertaken annually. Additional training in first aid and mental health needs to be completed by all Custodial Officers every second year. In addition to the training outlined in the Enterprise Agreement, there are a range of other training requirements including those identified as a priority by the Commissioner, ACT Corrective Services and specialist training for higher level Custodial Officers.

Planning for Custodial Officer training

4.25 ACT Corrective Services advised that:

- three days of training is allocated for each Custodial Officer each year; and
- training shifts are set at eight hours duration (for CO1s).

4.26 ACT Corrective Services also advised that four days per annum is allocated for those Custodial Officers that are required to undertake specialist training.

4.27 Given the breadth of training priorities and the increase in requirements since 2015, it is unlikely that three days per annum is sufficient to meet requirements. The Organisational Capability Unit advise that a minimum of five 8-hour training days is required to ensure that Custodial Officers comply with training requirements.

4.28 Training days are incorporated into the CO1 rosters. The process involves the Workforce Planning Team Leader consulting with the Organisational Capability Unit to determine the

training needs of AMC officers. Training is scheduled in advance, with approximately 15 officers assigned to each course. The Organisational Capability Unit is ultimately responsible for tracking attendance and ensuring that Custodial Officers undertake mandatory training.

4.29 The CTU does not have training days incorporated into its roster because of its highly operational environment. Nevertheless, ACT Corrective Services advised that two allocated spots for CTU Custodial Officers are reserved on a daily basis to accommodate mandatory training. So, although the rosters do not identify training days for officers, on any given day two CTU Custodial Officers are planned to be released for training.

4.30 Custodial Officers above the CO1 classification (CO2 to CO4) do not have a training component built into their rosters. The exception to this is the CO3 Security role, which has three training days built into the roster. Only three Custodial Officers occupy the role and under the new trial roster for CO3 Security this training component has been removed.

4.31 Where CO2 to CO4 staff are allocated training days their positions need to be backfilled by Custodial Officers on relief shifts. ACT Corrective Services could not identify why training for CO2 to CO4 staff is not built into rosters. One assertion is that three days training for each 18-week roster cycle is too frequent and training days do not otherwise fit into the pre-existing 11 and 12-hour shift patterns.

4.32 Not building mandatory training into rostering arrangements may lead to one, or likely both, of two key issues:

- it immediately requires the use of relief shifts or overtime arrangements to cover CO2 to CO4 staff that attend training. This comes at an increased financial cost to ACT Corrective Services and, potentially, leads to higher fatigue for staff who are undertaking additional shifts; and
- it creates the risk that training will not be routinely accommodated and undertaken by Custodial Officers. In a high-risk and volatile environment where maintaining competency in mandatory training is crucial, training must be viewed as a priority for all Custodial Officers.



4.33 Training for Custodial Officers is built into CO1 roster patterns. CO1s are allocated three training days per annum to undertake mandatory training and any other training that is relevant to their role. Given the breadth of training priorities and the increase in requirements since 2015, it is unlikely that three days per annum is sufficient to meet requirements. The Organisational Capability Unit advise that a minimum of five 8-hour training days is required to ensure that Custodial Officers comply with training requirements.



4.34 Custodial Officers above the CO1 grade (CO2 to CO4) do not have a training component built into their rosters. Where CO2 to CO4 staff are allocated training days their positions need to be backfilled by Custodial Officers on relief shifts. Not building mandatory training into rostering arrangements may lead to one, or likely both, of two key issues:

- it immediately requires the use of relief shifts or overtime arrangements to cover CO2 to CO4 staff that attend training. This comes at an increased financial cost to ACT Corrective Services and, potentially, leads to higher fatigue for staff who are undertaking additional shifts; and
- it creates the risk that training will not be routinely accommodated and undertaken by Custodial Officers. In a high-risk and volatile environment where maintaining competency in mandatory training is crucial, training must be viewed as a priority for all Custodial Officers.

Findings of previous reviews and evaluations

4.35 Issues with Custodial Officer training date back to the *Blueprint for Change* initiative. The *Blueprint for Change* report (March 2022) stated:

Staff training and professional development is inadequate in opportunity and scope in its current form.

4.36 The *Blueprint for Change* report further stated:

... enabling staff access to training is a consistent challenge and staff perceive an inequity in training opportunities. High operational demand, COVID-19 restrictions, limited training resources and no online operational training options have all limited training delivery.

4.37 Recommendation Ten of the *Blueprint for Change* report stated:

Design a staffing and/or rostering solution for both AMC and CTU that enables regular and sustainable staff access to training and ensure the training program:

- responds to the prioritised skill needs in the operational environment
- is of high quality of content and delivery, and
- has limited impact or dependency on operations.

4.38 The subsequent *Blueprint for Change* evaluation report (November 2024) identified that Custodial Officer access to training continued to be a challenge:

Unfortunately, there remains a logistical challenge regarding giving staff the time to attend training due to staff shortages, and a lack of dedicated training blocks within the current roster. This is reflected in the completion rate of scheduled training sessions which still sits below 85 per cent for several types of training. Operational requirements are consistently the biggest barrier to missing training, followed by unplanned leave.

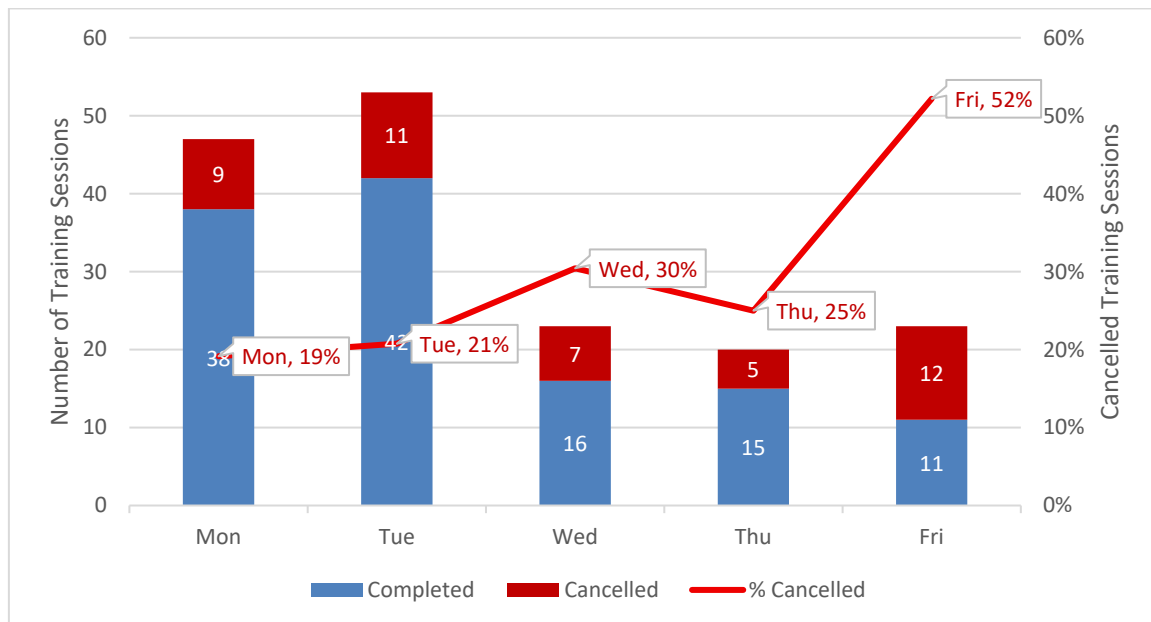
4.39 The *Blueprint for Change* evaluation report noted that the absence of 'dedicated training hours/blocks' were also an impediment to Custodial Officer training completion.

Cancellation of Custodial Officer training

4.40 The audit analysed training data for the 18 months between January 2024 and July 2025 to identify rates of completion and cancellation. Training is commonly scheduled on a Monday or Tuesday with the exclusion of school holiday periods, Easter and Christmas. Over the period of January 2024 to July 2025, 27 percent of scheduled training sessions were cancelled.

4.41 Figure 4-1 shows the proportion of scheduled training that was completed or cancelled over this period. The data relates to the following training courses – Use of Force, Crowd Control, Fire Awareness and First Aid Refresher. These are core training requirements of Custodial Officers.

Figure 4-1 Custodial Officer mandatory training (January 2024 to July 2025)



Source: ACT Audit Office analysis of ACT Corrective Services data.

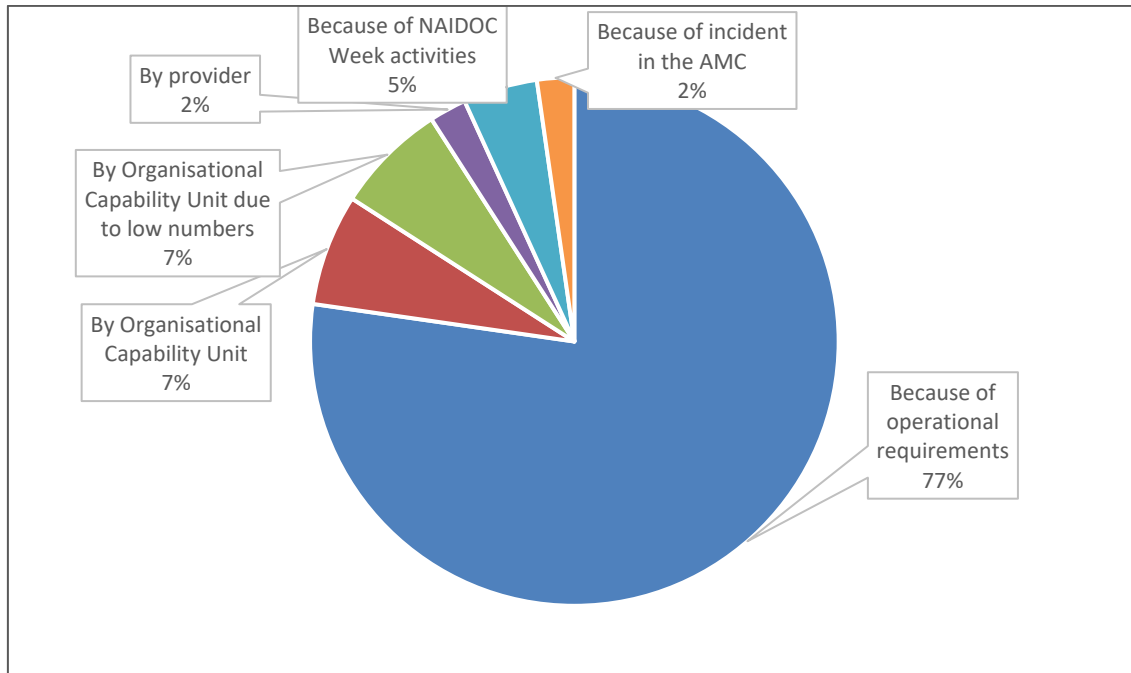
4.42 Figure 4-1 shows that a high proportion of scheduled training is cancelled. Figure 4-1 shows:

- 60 percent of the training days are allocated to either a Monday or Tuesday to take advantage of these days not having visitors at the AMC, which means fewer Custodial Officers are required to be rostered for operational coverage. Notwithstanding this, an average of 20 percent of training courses on a Monday or Tuesday were still cancelled; and
- 40 percent of the training days were allocated to a Wednesday, Thursday or Friday, despite these days being of highest operational demand in the prison. Thirty-six percent of these training days were cancelled.

Reasons for the cancellation of training

4.43 Figure 4-2 shows the reasons given for the cancellation of training between January 2024 and July 2025.

Figure 4-2 Reasons for cancellation of Custodial Officer training (January 2024 to July 2025)



Source: ACT Audit Office analysis of ACT Corrective Services data.

4.44 Figure 4-2 shows that the major reason cited for training to be cancelled is because of 'operational requirements'. Seventy-seven percent of training that is cancelled is identified as being due to this reason.

4.45 'Operational requirements' means that there are insufficient Custodial Officers to cover the required posts at the AMC and management has decided, often at very short notice, that officers assigned to training are required to fulfill operational roles to ensure the safe and effective functioning of the AMC.



4.46 Analysis of training data for the 18 months between January 2024 and July 2025 shows that a high proportion of scheduled training is cancelled; 27 percent of scheduled training sessions were cancelled. The major reason cited for training to be cancelled is because of 'operational requirements'. Seventy-seven percent of training that is cancelled is identified as due to this reason. 'Operational requirements' means that there are insufficient Custodial Officers to cover the required posts at the AMC and management has decided, often at very short notice, that officers assigned to training are required to fulfill operational roles to ensure the safe and effective functioning of the AMC.

Barriers to ensuring Custodial Officers complete training

4.47 As noted in the preceding paragraphs, there are systemic challenges to ensuring that all Custodial Officers undertake and complete mandatory training, relating to rostering arrangements, including:

- the number of roster patterns does not allow for flexibility to accommodate training requirements; and
- there are no built-in training days for CO2 to CO4 staff in their rosters.

4.48 A further consideration is the cancellation of training due to 'operational requirements', which reflects insufficient numbers of Custodial Officers.

4.49 The Audit Office was also advised that there are practical barriers to ensuring that Custodial Officers undertake and complete mandatory training. These include practical constraints and considerations including:

- Custodial Officers may be deterred from undertaking training as a 12-hour shift may be preferred to a shorter training 8-hour shift; and
- training is often scheduled on days that Custodial Officers are not rostered to attend work. This is a disincentive to attend training.

4.50 Custodial Officers consulted during the audit asserted that not being certified due to training not occurring (or being cancelled at the last minute) before they could complete the necessary re-certification requirements poses a significant risk.

4.51 In addition to challenges with training actually taking place, it is apparent that there are also issues in relation to coordination of training across ACT Corrective Services. Issues with coordination of Custodial Officer training between business units in ACT Corrective Services have been reported in Executive Group Committee meeting minutes:

ELT [Executive Leadership Team] members fully supported business areas within ACTCS collaborating with OCU [Organisational Capability Unit] for the purposes of coordinating training.

4.52 A lack of coordination can mean that Custodial Officers are not aware of their requirements and what training should take priority.



4.53 There are a range of systemic challenges and practical barriers to ensuring Custodial Officers undertake and complete mandatory training. Systemic challenges relate to the rostering arrangements, including time for training not being built-in to CO2 to CO4 rosters and the number of roster patterns not allowing for flexibility to accommodate training requirements. Practical constraints and considerations including:

- Custodial Officers may be deterred from undertaking training as a 12-hour shift may be preferred to a shorter training 8-hour shift; and

- training is often scheduled on days that Custodial Officers are not rostered on to attend work. This is a disincentive to attend training.

4.54 The implementation of Recommendation 5, which includes the accommodation of training requirements for all Custodial Officer classifications into new roster patterns, is expected to provide a stronger basis for the scheduling of Custodial Officer training. Non-attendance at scheduled training by Custodial Officers should then be addressed as needed.

Use of overtime

4.55 Overtime is work undertaken by Custodial Officers that is above and beyond their normal hours of work.

4.56 Overtime is used at the AMC and CTU to cover staffing shortages and unanticipated hospital and medical escorts.

4.57 The operational environment at the CTU can be more unpredictable than the AMC as resourcing requirements need to be responsive to what support is needed at the courts on any given day.

ACT Public Sector Correctional Officers Enterprise Agreement 2023-2026

4.58 Overtime arrangements are outlined in the Enterprise Agreement. Clause 9 of the Enterprise Agreement defines overtime as:

An employee may be required or requested to work reasonable additional hours of duty, subject to the payment for overtime in accordance with the conditions set out in this clause, and the reasonable additional hours provisions of the FW [Fair Work] Act.

Overtime rates are payable for duty that the head of service requires an employee to perform on any day from Monday to Friday inclusive, during the following times...In the case of a shift worker only, beyond the employee's ordinary hours of work and which is not worked under the provisions of clause B16.

4.59 The minimum attendance time for overtime is four hours. Overtime payment rates are in accordance with the following:

- Monday to Saturday - time and a half for the first three hours worked on a day/shift;
- Monday to Saturday - double time for any further overtime worked on that day/shift; and
- Sunday and Public Holidays - double time for all overtime hours worked for that day/shift.

- 4.60 After a Custodial Officer works an overtime shift they must have a continuous period of eight hours off duty (plus reasonable travel time) between ceasing overtime duty and commencing ordinary hours of work the following day.
- 4.61 ACT Corrective Services advised that, in response to high levels of overtime, overtime shifts occurring during the day are for eight hours duration as much as possible. This may require switching of Custodial Officers on standard 12-hour shifts to a new post to ensure allocation of the eight-hour overtime shifts where they would be most appropriate. Overtime for nightshifts is generally offered as a 12-hour shift.

Findings from the *Blueprint for Change* report

- 4.62 The *BluePrint for Change* report (March 2022) identified high levels of overtime. The report stated:

The overtime figures for 2020-21 totalled more than 35,000 hours at AMC and included 11,442 hours of overtime for hospital watches, representing almost 6 FTE daily for this activity. Overtime reduced slightly in 2021 compared with 2020 (by 1635 hours) and average FTE increased between the two years from 217.96 in 2020 to 235.05 in 2021.

- 4.63 The *BluePrint for Change* report found that poor culture was a driver of the level of overtime, which was necessitated by unscheduled leave and resultant understaffing.

- 4.64 An outcome identified in the *BluePrint for Change* report was:

AMC and CTU maintain sustainable staffing resources that meet operational requirements and promote safe practice and officer wellbeing.

- 4.65 The measure to achieve this outcome was:

Reduction in overtime and vacant posts by ten per cent and increase in staffing by ten per cent in first twelve months and then as per post analysis within three years.



- 4.66 High overtime levels and inadequate staff resources were reported as an issue in the *Blueprint for Change* report in 2022. The *Blueprint for Change* report identified that more than 35,000 hours of overtime were worked in 2020-21. The *Blueprint for Change* report identified a need for the 'AMC and CTU [to] maintain sustainable staffing resources that meet operational requirements and promote safe practice and officer wellbeing' and that the success of this measure would be a 'reduction in overtime and vacant posts by ten per cent and increase in staffing by ten per cent in first twelve months and then as per post analysis within three years'.

Management of overtime

4.67 ACT Corrective Services implemented controls in late 2024 to reduce the number of overtime hours worked by Custodial Officers. Furthermore, in early 2025 ACT Corrective Services put in place an additional requirement that overtime arrangements for the AMC and the CTU to be managed together by the Workforce Planning Team. In doing so ACT Corrective Services sought to reduce overall expenditure on overtime.

Controls to manage overtime (prior to December 2024)

4.68 Prior to December 2024, ACT Corrective Services had minimal controls in place to manage overtime arrangements. There were some specific procedural documents to support the allocation of overtime in the former KRONOS system:

- the *Overtime Call List*; and
- the *Overtime Call List Process Map*.

4.69 The *Overtime Call List* outlines how managers are to send text messages to Custodial Officers in the former IT platform, KRONOS, to fill open shifts. The document does not provide detail on how and when overtime shifts should be offered to staff.

4.70 The *Overtime Call List Process Map* advises staff to use the KRONOS schedule planner when assigning overtime shifts and guides staff in terms of Custodial Officer availability and eligibility for overtime. The Process Map also prompts staff to check for fatigue levels where an officer has worked more than 90 hours.

4.71 Prior to December 2024, ACT Corrective Services had no policy or procedural guidance relevant to the administration of overtime arrangements. There was no policy or procedural guidance that identified Enterprise Agreement requirements, Custodial Officer eligibility, process(es) for approving overtime or roles and responsibilities.

4.72 In the absence of policy or procedural guidance there is a high risk that the use and allocation of overtime is not fair, equitable or transparent for Custodial Officers. There is also an increased risk that decisions to grant overtime are made (rather than de-manning posts or re-allocating Custodial Officers to posts in most need) which result in overtime expenditure that is higher than needed.



4.73 Prior to December 2024, ACT Corrective Services had minimal controls in place to manage overtime arrangements. Prior to December 2024, ACT Corrective Services had no policy or procedural guidance relevant to the administration of overtime arrangements. There was no policy or procedural guidance that identified Enterprise Agreement requirements, Custodial Officer eligibility, process(es) for approving overtime or roles and responsibilities.

Controls to manage overtime (since December 2024)

Instructions on new overtime arrangements (December 2024)

- 4.74 On 13 December 2024, instructions were provided to AMC Area Managers and AMC Operations Managers in relation to a new AMC Daily Roster and overtime process. The instructions were in the form of an email. In relation to overtime, the email stated:

I asked the Senior Directors to review the processes around the AMC Daily Roster and overtime, to make sure things are being done by the person with the right delegations and we're using the best systems and processes.

This has been done to make sure we're monitoring and are aware of where the overtime is being worked and that there is accountability for how ACTCS [ACT Corrective Services] and ACT Government finances are assigned.

- 4.75 To manage overtime, the email identified that:

Up to 5 overtime shifts will be filled/pre-filled for any known roster vacancies by the roster team or CO4 (nightshift is not included in the 5);

CO3's will continue to identify staffing needs and let the Senior Director or Duty Manager know of any additional staffing needs – the SD [Senior Director] or DM [Duty Manager] has delegation to approve overtime;

Any roster vacancies over the 5 will need to be discussed and approved by the Senior Director or Duty Manager;

Consideration should be given to operational needs, including prioritising a shorter shift, 8 hours if that will cover the needs of the centre;

Kronos has a process to make sure the most appropriate person is being assigned overtime;

Kronos has two functions to call staff in for overtime, the preference is to use the 'Assign by match order' function as this assigns the rules and processes to who has priority and considers fatigue management;

For CO3s or CO4s to work overtime at CO1 level, this must have prior approval by a Senior Director.

- 4.76 If needed, the first five overtime shifts are intended to cover any shortfalls and absenteeism for posts on a first come first served basis (other than specialist units like the dog squad). Once these first five overtime shifts have been filled, managers are to then look at alternative additional options such as approving more overtime shifts, de-manning posts or cancelling training, activities or other events.

- 4.77 There was no evidence to show why a maximum of five pre-approved overtime shifts for filling roster vacancies was identified as appropriate, nor was there any financial assessment of the appropriateness of identifying five overtime shifts per day. In response to the draft proposed report, ACT Corrective Services advised that the basis for a maximum of five pre-approved overtime shifts was to allow limited autonomy for the Custodial Officer Grade 4

to use their existing delegation for approval of overtime. ACT Corrective Services advised that the reasoning for this decision was not recorded but was agreed to and discussed at an executive meeting.

- 4.78 There is no evidence that ACT Corrective Services has undertaken any business planning to determine whether five overtime shifts are commensurate with the need to fill roster gaps created by leave and other vacancies or to match the operational requirement for the number of posts to be filled on the day.

New processes to manage reliance on overtime (February 2025)

- 4.79 On 7 February 2025, further instruction was sent to all AMC Area Managers and AMC Operations Managers. The further instruction was in the form of a follow-up email with the title 'Instructions for overtime at AMC'. The email sought to clarify the initial instructions sent on 13 December 2024.

- 4.80 The email identified that there is a pre-approved limit of a maximum of five overtime shifts per day at the AMC. This includes overtime shifts scheduled by both the Workforce Planning Team and the AMC Operations Managers. If more than five overtime shifts are required at the AMC, the Operations Managers must seek approval from a Senior Director.

- 4.81 The email further identified:

As always, all overtime must be allocated via Kronos (fully auditable). There has been an increasing number of staff calling in to Operations asking for overtime. Do not ever allocate overtime in any other format than Kronos. Inform the Officers calling in for overtime to keep their phone handy and wait for any Kronos overtime opportunities (just like any other staff member).

...This makes the overtime system fair, equitable, compliant with EBA conditions and able to be fully audited.

With a reduction in overtime availability staff will be scrutinising who is performing overtime and how it was given to them. If you have not followed the above process, it will be up to you to justify your decisions as I am sure there will be further scrutiny.



- 4.82 On 13 December 2024, email instructions were provided to AMC Area Managers and AMC Operations Managers in relation to a new AMC Daily Roster and overtime process. Further instruction was provided on 7 February 2025. The new procedure provided for a pre-approved limit of a maximum of five overtime shifts per day at the AMC. In the event that more than five overtime shifts were needed, the new procedure required the Operations Managers to seek approval from a Senior Director. The new procedure also required that all overtime was to be allocated through the use of KRONOS so that it would be 'fully auditable'. These measures were put in place to reduce the overreliance on overtime and increase fairness and equity in overtime arrangements.

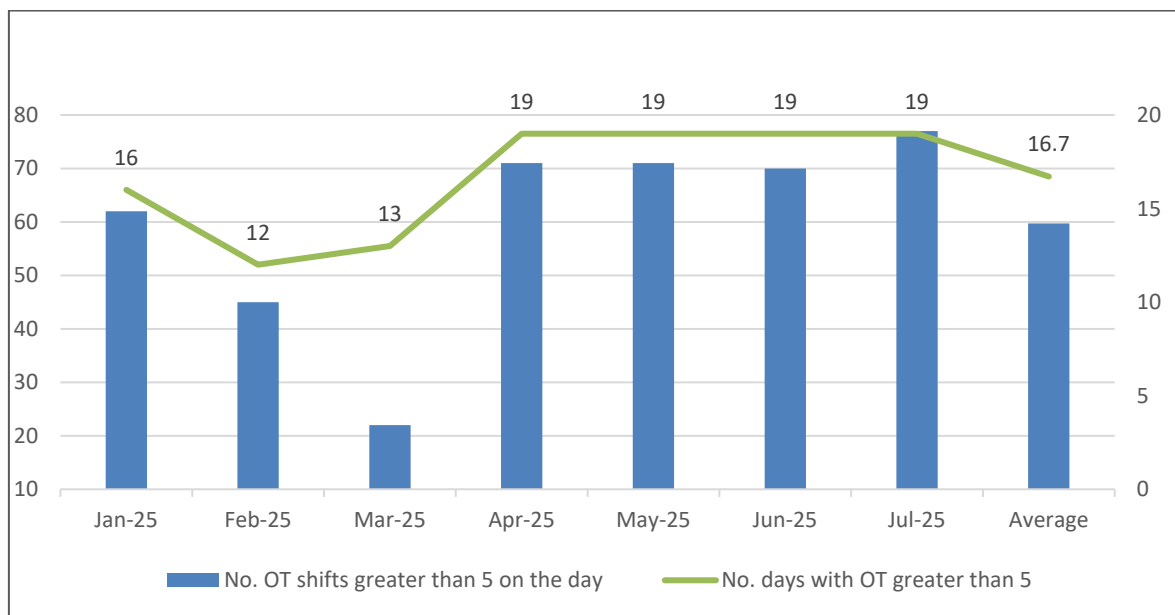


4.83 ACT Corrective Services advised that the basis for a maximum of five pre-approved overtime shifts was to allow limited autonomy for the Custodial Officer Grade 4 to use their existing delegation for approval of overtime. ACT Corrective Services advised that the reasoning for this decision was not recorded but was agreed to and discussed at an executive meeting. There is no evidence that ACT Corrective Services has undertaken any business planning to determine whether five overtime shifts are commensurate with the need to fill roster gaps created by leave and other vacancies or to match the operational requirement for the number of posts to be filled on the day.

Approval of overtime shifts above and beyond the pre-approved five shifts

4.84 The audit considered data from ACT Corrective Services on the number of overtime shifts between January 2025 and July 2025. Figure 4-3 shows the number of shifts worked as overtime shifts for each month and the number of days where there were more than five shifts worked as overtime shifts.

Figure 4-3 Number of shifts where more than five overtime shifts allocated



Source: ACT Audit Office analysis of ACT Corrective Services data.

4.85 Figure 4-3 shows that between January 2025 and July 2025 there was an average of 60 overtime shifts worked each month. These 60 shifts are in addition to the five pre-approved overtime shifts that are available. Additional overtime shifts are permitted where operationally required such as for hospital escorts and security operations, for example.

4.86 The initial impact of the new overtime arrangements implemented from December 2024 was a decrease in overtime usage for the first three months of 2025. Since then, however, overtime usage has again increased and for the period April 2025 to July 2025, there were 19 days each month where overtime usage exceeded the pre-approved daily limit of five

overtime shifts. ACT Corrective Services advised that this was due to an unprecedented number of hospital watches and other operational demands. This figure excludes nightshifts.

- 4.87 By mid-2025 overtime usage has again increased calling into question the effectiveness of the new overtime arrangements. Without consistent and proactive management oversight and enforcement there is a risk that overtime liabilities will increase and long-term change to reduce reliance on overtime will not be achieved. In response to the draft proposed report ACT Corrective Services advised:

Following implementation of the new overtime arrangements, overtime initially decreased. While overtime levels later increased (primarily due to an unprecedented amount of hospital watches and other operational requirements) they remained lower than they would have been in the absence of the new arrangements. Overall, the trend has been downward.

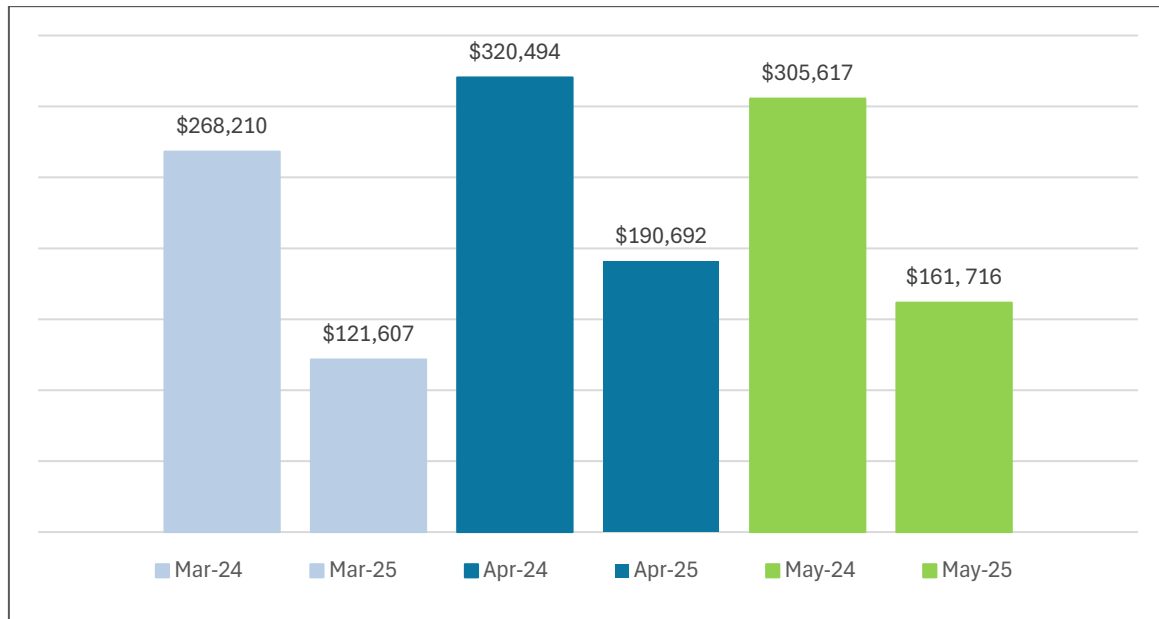


- 4.88 The audit considered data from ACT Corrective Services on the number of overtime shifts between January 2025 and July 2025. Between January 2025 and July 2025 there was an average of 60 overtime shifts worked each month. These 60 shifts are in addition to the five pre-approved overtime shifts that are available. Additional overtime shifts are permitted where required for operational reasons. The initial impact of the new overtime arrangements implemented from December 2024 was a decrease in overtime usage for the first three months of 2025. Since then, however, overtime usage has again increased and for the period April 2025 to July 2025, there were 19 days each month where overtime usage exceeded the pre-approved daily limit of five overtime shifts. ACT Corrective Services asserted that this was primarily due to an unprecedented number of hospital watches and other operational demands and that ‘they have remained lower than they would have been in the absence of the new arrangements’.

Expenditure on overtime

- 4.89 Given the revised arrangements for overtime from December 2024, it would be expected that overall expenditure on overtime has decreased.
- 4.90 Figure 4-4 shows a comparison of overtime expenditure in the three months to May 2024 compared to the three months to May 2025.

Figure 4-4 Overtime expenditure (March to May 2024 and March to May 2025)

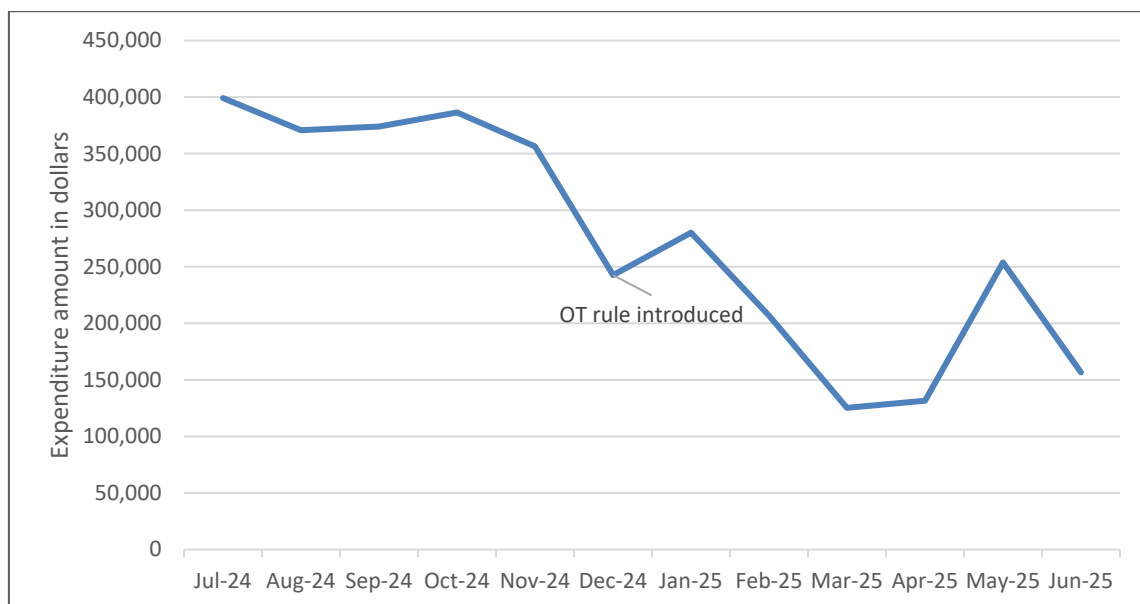


Source: ACT Audit Office analysis of ACT Corrective Services data.

4.91 Figure 4-4 shows that for the two three-month periods of March 2024 to May 2024 and March 2025 to May 2025 ACT Corrective Services achieved reductions in overtime expenditure. It should also be noted that overtime shifts are now reduced to 8-hours in duration compared with the previous 12-hours and that this would also likely account for the reduced financial expenditure.

4.92 Figure 4-5 shows monthly expenditure on overtime between July 2024 and June 2025.

Figure 4-5 Overtime expenditure (July 2024 to June 2025)



Source: ACT Audit Office analysis of ACT Corrective Services data.

4.93 Figure 4-5 shows that since the introduction of the new overtime arrangements in December 2024 there has been a downward trend in overall overtime expenditure. For example, in July 2024 overtime expenditure was \$399,140 compared with overtime expenditure of \$156,671 in June 2025.



4.94 ACT Corrective Services has progressively reduced its overall overtime expenditure between mid-2024 and mid-2025. Since the introduction of the new overtime arrangements in December 2024 there has been a downward trend in overall overtime expenditure. Cost savings have been made as overtime shifts have reduced from 12-hours in duration to 8-hours in duration.



Recommendation 6

Policy and procedural guidance on the administration and use of overtime

ACT Corrective Services should:

- a) review the effectiveness of overtime arrangements implemented since December 2024 and determine whether the arrangements are operating effectively and fit for purpose as a longer-term arrangement; and
- b) (following this review) develop formal policy and procedural guidance on the administration and use of overtime, which seeks to:
 - i) recognise and manage fatigue risks associated with working too many overtime shifts; and
 - ii) ensure fairness and equity in the allocation of overtime shifts.

Management of fatigue risks

4.95 Closely related to the use of overtime is the risk of fatigue. There are a variety of documented requirements (both specific to ACT Corrective Services and derived from better practice) in relation to fatigue management that need to be considered when rostering Custodial Officers. These include:

- *Clause M26 Fatigue Management of the Enterprise Agreement* – employees that work 10 to 12-hour shifts at the AMC may work up to ten shifts per fortnight (including overtime) and must have two consecutive days off within a fortnight;
- *Safe Work Australia: Guide for Managing the Risk of Fatigue at Work (November 2013)*⁸ – the number of successive night shifts should be restricted to no more than three to four, where possible and allow for at least two full night's sleep after the last night shift and avoid keeping workers on permanent night shifts. Higher risk occurs for sequential night shifts where there are four or more 12-hour shifts; and

⁸ <https://www.safeworkaustralia.gov.au/doc/guide-managing-risk-fatigue-work>

- *WorkSafe Victoria A guide for employers: Work Related Fatigue (August 2020)*⁹ - keep sequential night shifts to a minimum (where possible, no more than three nights in a row) and introduce job rotation to limit buildup of mental, emotional and physical fatigue.
- 4.96 The approved base pattern rosters adhere to these requirements. The requirements may be circumvented, however, when Custodial Officers work overtime shifts, swap shifts with colleagues or have a flexible working arrangement in place that does not adhere to fatigue guidelines. The potential for fatigue to accumulate during these instances is high.
- 4.97 The previous IT rostering platform, KRONOS, had the functionality to appropriately manage fatigue requirements for AMC officers and minimum hour requirements. However, the new rostering platform (UKG Pro) did not have automated minimum and maximum hour checks built into its functionality when initially rolled out. At that time, a manual check was undertaken by the Workforce Planning Team. This presented a risk as ACT Corrective Services is unable to effectively oversight fatigue issues where Custodial Officers are using overtime and shift swap arrangements. ACT Corrective Services advised that functionality to monitor fatigue in UKG Pro was implemented in April 2026.

Flexible working arrangements

- 4.98 In addition, and as mandated under Part B.11 of the Enterprise Agreement, Custodial Officers can request a flexible working arrangement. Flexible working arrangements enable employees to vary their ordinary working hours to assist with work life balance and family and caring responsibilities. Part B.11 states:

The ACTPS is committed to providing flexible working arrangements which allow employees to manage their work and personal commitments. This must be balanced against the operational requirements for the ACTPS to deliver services to the Canberra community.

- 4.99 As of 24 July 2025, the Audit Office was advised that flexible working arrangements were in place for:
- 29 Custodial Officers working at the AMC; and
 - 14 Custodial Officers working at the CTU.
- 4.100 The audit considered the roster patterns that have been agreed as part of the flexible working arrangements. Six of the agreed flexible working arrangements exceeded the risk control outlined in the AMC WHS Risk Register that a Custodial Officer can work a maximum of four shifts in a row. For example:
- one approved flexible working arrangement (through to January 2028) enables sixteen 12-hour shifts (192 hours) in a 22-day period. This arrangement also has

⁹ <https://www.worksafe.vic.gov.au/work-related-fatigue-guide-employers>

84 working hours in a 7-day period, and a stretch of nine 12-hour shifts (108 hours) in an 11-day period; and

- other flexible working arrangements allow seven 12-hour shifts in a row (including seven nights) which results in 84 hours worked in a 7-day period.



4.101 Fatigue management requirements for the rostering of Custodial Officers are outlined in the Enterprise Agreement. Amongst other things, Custodial Officers must not work more than ten shifts a fortnight (including overtime) and rostered days off must be at least two consecutive days in a fortnight. The approved base pattern rosters adhere to these requirements.



4.102 The requirements may be circumvented, however, when Custodial Officers work overtime shifts or swap shifts with colleagues. The potential for fatigue to accumulate during these instances is high. ACT Corrective Services advised that any arrangements under these circumstances are supported by risk mitigation activities such as fatigue impacts, employee consent and operational oversight and management.



Recommendation 7 Fatigue management arrangements

ACT Corrective Services should:

- a) review its fatigue management arrangements, including policy and procedural guidance and WHS Risk Register controls, for compliance with better practice requirements for the management of fatigue; and
- b) (following this) review all existing flexible working arrangements for compliance with the better practice requirements for the management of fatigue.

5 Custodial Officer roster reform

- 5.1 Rostering arrangements can be contentious at the AMC and CTU as there is a need to meet business and operational needs and objectives while at the same time providing a safe and balanced workplace for employees who work in a high-risk, stressful and often unpredictable environment. Challenges with proposing and enacting changes to Custodial Officer rosters date back to at least 2018.
- 5.2 This chapter provides contextual information about ACT Corrective Services' reform initiatives to address Custodial Officer rostering arrangements including the *Blueprint for Change* initiative and Roster Review Project.

Summary



Conclusions

Since 2015, there have been various attempts to reform Custodial Officer rostering arrangements. The mechanisms for changing rosters are governed by the Enterprise Agreement and there is a high bar for making any changes to a roster, irrespective of the merits or otherwise of the change.

Reforms to staffing and rostering were proposed as part of ACT Corrective Services' 2021 *Blueprint for Change* initiative. The report identified many issues in relation to staffing shortages and rostering arrangements. Recommendation 10 of the *Blueprint for Change* report provided for a staffing and/or rostering solution for both AMC and CTU. This led to the *AMC Roster Project 2022 – Roster for the Future* (the Roster Review Project) which commenced in October 2021. Roster packages were developed and considered by Custodial Officers, but not agreed to.



Key findings

Blueprint for Change initiative

Paragraph

Reforms to staffing and rostering arrangements were proposed as part of ACT Corrective Services' 2021 *Blueprint for Change* initiative. The March 2022 *Blueprint for Change* report identified that 'a broad-based investigation into staffing-related matters, including rosters, overtime, leave, workplace injuries, policy, training and service delivery' had been undertaken. Six key findings were made, aspects of which related to staffing and rostering. The report identified there was a shortage of staff and noted 'areas of resource drain are evident in the high volume of hospital escorts and absenteeism, causing high levels of overtime, vacant posts and increasing cost burden of excess annual leave'. The report identified work underway in relation to rostering arrangements and that 'the Rostering team is chairing a consultative project to formally review the roster'.

5.18

Roster Review Project

The *Blueprint for Change* initiative provided further impetus for reform to rostering arrangements for Custodial Officers. Specifically, Recommendation 10 of the *Blueprint for Change* report provided for ‘a staffing and/or rostering solution for both AMC and CTU that enables regular and sustainable staff access to training and ensure the training program:

- responds to the prioritised skill needs in the operational environment;
- is of high quality content and delivery;
- has limited impact or dependency on operations’.

The *AMC Roster Project 2022 – Roster for the Future* (the Roster Review Project) commenced in October 2021. The purpose of the project was to revise Custodial Officer rosters to ‘better meet operational requirements while at the same time improving staff development opportunities and wellbeing’.

In April 2024 the consultant engaged for the Roster Review Project prepared two detailed roster packages for ACT Corrective Services; a CO1 and CO2 roster package; and a CO3 and CO4 roster package. The roster packages provided information on the shortcomings of the current rosters including that:

- they did not factor in, or specifically allocate time for, training needs and requirements of Custodial Officers;
- were inconsistent and inequitable in their approach; and
- provided for reduced coverage at various points in the roster cycle.

The roster packages identified different options for future rosters, including:

- two weeks of training blocks of nine-hour days built into the roster;
- improvements to inconsistency of staffing levels between night and day shift;
- more equity in scheduling of day, night and relief shifts; and
- group-based or team-based rosters, which sought to better align the rosters of CO1s and CO2s into groups or teams.

The mechanisms for changing rosters are governed by the Enterprise Agreement. For a new roster to be introduced, a simple majority of 50 percent plus one is required to satisfy the requirements of the Enterprise Agreement. An employee that does not participate in a roster vote is regarded as having responded with a ‘no’ to any roster change. This means that a high bar is set for there to be any changes to a roster, irrespective of the merits or otherwise of the change.

In September 2024 Elections ACT, on behalf of ACT Corrective Services, commenced a voting process for CO1 and CO2 staff for the proposed new roster. Eighty-one percent of CO1s voted in the process (179 out of 221 CO1s), with 40 officers in favour of the roster and 139 not in favour. For the purpose of the voting requirements of

the Enterprise Agreement, only 18 percent of CO1s were identified as in favour of the proposed rosters. Seventy-two percent of CO2s voted in the process (23 out of 32 CO2s), with seven officers in favour of the roster and 16 officers not in favour. For the purpose of the voting requirements of the Enterprise Agreement, only 22 percent of CO2s (seven from a total of 32) were identified as in favour of the proposed rosters.

A Project Closure Report was prepared in November 2024 by the Project Manager. The Project Closure Report was not specific or explicit in its review and analysis of why the proposed rosters were not agreed to, but noted ‘anecdotal post-ballot feedback from AMC staff varied, indicating that some preferred the current roster, some saw positive elements to the proposed rosters, but wanted more time to consider the changes’. The Project Closure Report identified a number of key lessons, many of which related to communication and engagement. 5.50

Future rostering arrangements

ACT Corrective Services commissioned a program evaluation of the *Blueprint for Change* in 2024. The evaluation confirms that there were numerous challenges with the Roster Review Project including contractual issues with the supplier, the limitations of the Enterprise Agreement for introducing any proposed changes to the roster and a lack of staff trust to support amended rosters. The evaluation also found that two years since the *Blueprint for Change* the current rosters and management of overtime remains unsustainable. This presents a key risk to ACT Corrective Services operating environment as there is a high likelihood that rostering of staff is not optimal, effective or meeting operational needs. 5.63

Blueprint for Change initiative

5.3 Reforms to staffing and rostering arrangements were proposed as part of ACT Corrective Services’ 2021 *Blueprint for Change* initiative.

5.4 The *Blueprint for Change* initiative involved the establishment of a Blueprint for Change Oversight Committee for the purpose of ‘[addressing] reforms for staffing matters in the Alexander Maconochie Centre (AMC) and Court Transport Unit (CTU)’. The objective of the Committee was to:

... look at ongoing issues around training and development, staffing levels, rosters, workforce culture and environmental issues to develop a blueprint for change.

5.5 The Terms of Reference for the *Blueprint for Change* initiative provided for an Oversight Committee to be established in early 2021. One function of the Oversight Committee relating to operational service delivery included:

Reviewing current staffing levels and rostering practices, leveraging expertise and knowledge from other jurisdictions.

5.6 In March 2022 the Blueprint for Change Oversight Committee finalised its report: *A new future for custodial services, ACT Corrective Services Blueprint for Change* (the Blueprint for Change report). The report stated:

The Committee undertook a broad-based investigation into staffing-related matters, including rosters, overtime, leave, workplace injuries, policy, training and service delivery.

5.7 Six key findings were made in the *Blueprint for Change* report. These are shown in Table 5-1.

Table 5-1 Key findings from the *Blueprint for Change* report

Finding #	Finding	Additional context
1	Inadequate staffing resources	Poor staff wellbeing (due to high overtime levels), lack of access to training opportunities, reduced safety on site and increased detainee tension (due to increased lock-ins).
2	Poor staff culture and sense of value	Poor culture was evidenced through the level of overtime driven by unscheduled leave and resultant understaffing. Factors that contributed to staff's perception included: <ul style="list-style-type: none"> - lack of required equipment to ensure safety; - poorly designed and ill-fitting uniform items and limited allocation; - lack of communication and engagement on operational matters; - lack of trust and a punitive culture from management; and - disinterest and lack of action on staffing concerns by management.
3	The service structure and lack of management skills at the AMC and CTU promote negativity	There was negativity between custodial and non-custodial staff at the AMC, between the AMC and CTU and with ACT Corrective Services head office staff.
4	Security of the environment contributes to safety concerns of staff	A reported concern was that the detainee profile has changed over time, resulting in a more volatile and higher risk environment and that the facility no longer meets the more contemporary demands of operational practice. A key area of concern is accommodation pressures with the facility regularly operating at full capacity with limited options for detainee movement.
5	Staff training and professional development is inadequate in its current form	High operational demand, COVID-19 restrictions, limited training resources and no online operational training options have all limited training delivery. Across 112 sessions of the eight mandatory types of courses run in 2021, there were 120 instances of staff who did not attend training due to unscheduled leave. There were also 243 instances of staff scheduled to attend training, but who were recalled due to operational needs.
6	Detainee tension is a contributing factor to staff stress and dissatisfaction	Staff commonly reported the apparent power of detainees where disciplinary actions were applied inconsistently, thereby failing to influence behaviour change. Staff expressed

Finding #	Finding	Additional context
		reluctance to use force due to the belief that senior management would not support the decision.

Source: ACT Audit Office, based on the *Blueprint for Change* report.

Staffing arrangements

5.8 In relation to staffing arrangements the *Blueprint for Change* report identified that inadequate staffing levels was a challenge:

Both the staff feedback and data collection reflected that inadequate staffing numbers contributes to several issues, including poor staff wellbeing (due to high overtime levels), lack of access to training opportunities, reduced safety on site and increased detainee tension (due to increased lock ins).

5.9 The *Blueprint for Change* report noted there was a lack of clarity associated with the actual number of staff needed:

The Committee was unable to establish a clear understanding of the actual resource demand, or total funded positions. There could be many factors contributing to this lack of clarity including:

- changed detainee risk profile since AMC was established
- impact of damage to accommodation areas
- changes to agency structure and operational practice over time (e.g., changes to 'posts')
- impact of COVID-19 on recruitment, operational practices and available staffing.

5.10 The *Blueprint for Change* report identified that at the end of February 2022 there were 224 Custodial Officer FTE, with a further 30 on leave of various kinds. The report suggested there was a shortage of Custodial Officers:

At a raw data level, simply considering overtime suggests a staff shortage of at least nineteen people. However, this does not consider staff attrition, unplanned absences (especially long absences), coverage needed to release staff for training and development, or coverage for absences due to staff moving into non-custodial roles.

5.11 The *Blueprint for Change* report further noted that a high volume of hospital escorts along with staff absenteeism was a continuing drain on staffing levels:

Despite recruitment in the last twelve months exceeding a reported rate of attrition of six per cent, staffing levels at the AMC remain under strain, particularly with the ongoing impact of COVID-19. Areas of resource drain are evident in the high volume of hospital escorts and absenteeism, causing high levels of overtime, vacant posts and increasing cost burden of excess annual leave.

Rostering arrangements

5.12 The *Blueprint for Change* report identified that improvements had been made to rostering arrangements and these were ‘promoting a more cohesive relationship between custodial staff and the Rostering team’. These improvements included:

- improved coverage of posts
- better continuity of officers within areas of the AMC
- better visibility for staff of longer roster periods
- an increase to nightshift posts and staffing levels, enhancing nightshift safety and operations
- a noticeable decrease in errors, supporting improved coordination and management of the roster and
- significantly improved turnaround time for leave notifications.

5.13 The *Blueprint for Change* report identified work underway in relation to rostering arrangements and that ‘the Rostering team is chairing a consultative project to formally review the roster’. This is discussed further in paragraphs 5.19 to 5.50 relating to the *AMC Roster Project 2022 – Roster for the Future*.

Recommendations

5.14 From the six key findings, a total of 15 recommendations were agreed-in-principle by the then Minister for Corrections when the report was released in 2022. Recommendations 1 and 10 were key recommendations relevant to staffing and rostering arrangements.

5.15 Recommendation 1 of the *Blueprint for Change* report stated:

Engage an external expert to determine operational demand and required staffing of custodial correctional officers (including associated supports) to meet that demand within the next six months.

The review should deliver:

- correct current operational demand for both AMC and CTU (number of posts and FTE)
- consider the use of “floaters” and other approaches to address issues identified around single person posts
- identify criteria to trigger future reviews
- review the recruitment process and propose improvements

In the interim period, immediately increase funding for staffing resources for fifteen people to alleviate existing staff pressures and conduct a safety audit of all AMC posts to identify areas that require additional staffing resources to ensure staff safety.

5.16 Recommendation 10 of the *Blueprint for Change* report stated:

Design a staffing and/or rostering solution for both AMC and CTU that enables regular and sustainable staff access to training and ensure the training program:

- responds to the prioritised skill needs in the operational environment;
- is of high quality content and delivery;
- has limited impact or dependency on operations.

5.17 As of November 2024, ACT Corrective Services reported that progress has been made against all 15 recommendations (except Recommendation 8 which refers to establishing a maximum capacity for the AMC and considering options to reduce overcrowding). ACT Corrective Services has reported that three of the 15 recommendations have been fully implemented.



5.18 Reforms to staffing and rostering arrangements were proposed as part of ACT Corrective Services' 2021 *Blueprint for Change* initiative. The March 2022 *Blueprint for Change* report identified that 'a broad-based investigation into staffing-related matters, including rosters, overtime, leave, workplace injuries, policy, training and service delivery' had been undertaken. Six key findings were made, aspects of which related to staffing and rostering. The report identified there was a shortage of staff and noted 'areas of resource drain are evident in the high volume of hospital escorts and absenteeism, causing high levels of overtime, vacant posts and increasing cost burden of excess annual leave'. The report identified work underway in relation to rostering arrangements and that 'the Rostering team is chairing a consultative project to formally review the roster'.

Roster Review Project

5.19 The *Blueprint for Change* initiative provided further impetus for reform to rostering arrangements for Custodial Officers.

5.20 The *AMC Roster Project 2022 – Roster for the Future* (the Roster Review Project) commenced in October 2021. The project was limited to examining Custodial Officer rosters at the AMC. Rostering arrangements at the CTU were excluded from scope.

Objectives of the Roster Review Project

5.21 According to the Project Plan, the aim of the Roster Review Project was to revise Custodial Officer rosters to:

... better meet operational requirements while at the same time improving staff development opportunities and wellbeing.

5.22 The intended impact of the Roster Review Project was to improve:

- staff wellbeing;
- occupational fatigue;
- staff motivation;
- overtime and associated costs;
- ownership of posts due to more regular shifts;
- opportunities for skill acquisition and staff development; and
- leadership lines and accountability.

Roles and responsibilities and governance arrangements

5.23 The Project Plan outlined roles and responsibilities and the governance arrangements for the Roster Review Project. A Project Steering Committee was established which comprised a Sponsor/Chair, Deputy Chair, Project Assurance role and four other members. It was intended that the Steering Committee would meet monthly throughout the Project.

5.24 The Project was also supported by Focus Group discussions with nominated Custodial Officers, union representatives from the Community and Public Sector Union (CPSU) and AMC Senior Directors.

Engagement of consultant (October 2023)

5.25 On 19 October 2023, ACT Corrective Services engaged a consultant for the project. Services under the contract commenced on 1 November 2023 for a six-month contract term.

5.26 The deliverables under the contract included:

- a minimum of two roster options for each Custodial Officer rank;
- briefings to senior managers and officers detailing the key features of each option and conducting a cast of preferences by affected officers and reporting of the results;
- refinement of the preferred roster option/s; and
- conduct of a ballot of affected officers in compliance with the conditions of the Enterprise Agreement and the collation and reporting of the results.



5.27 The *Blueprint for Change* initiative provided further impetus for reform to rostering arrangements for Custodial Officers. Specifically, Recommendation 10 of the *Blueprint for Change* report provided for 'a staffing and/or rostering solution for both AMC and CTU that enables regular and sustainable staff access to training and ensure the training program:

- responds to the prioritised skill needs in the operational environment;
- is of high quality content and delivery;

- has limited impact or dependency on operations’.



5.28 The *AMC Roster Project 2022 – Roster for the Future* (the Roster Review Project) commenced in October 2021. The purpose of the project was to revise Custodial Officer rosters to ‘better meet operational requirements while at the same time improving staff development opportunities and wellbeing’.

Roster packages

5.29 The consultant prepared two detailed roster packages for ACT Corrective Services in April 2024:

- a Custodial Officer Grade 1 (CO1) and Custodial Officer Grade 2 (CO2) Roster Package; and
- a Custodial Officer Grade 3 (CO3) and Custodial Officer Grade 4 (CO4) Roster Package.

5.30 The roster packages included:

- explanatory information on the current Custodial Officer rosters;
- future roster options across Custodial Officer levels;
- roster comparison tables based on the different options modelled; and
- feedback and comment fields for Custodial Officers to provide feedback.

Shortcomings of current rosters

5.31 The roster packages provided information on the shortcomings of the current rosters including that they:

- did not factor in, or specifically allocate time for, training needs and requirements of Custodial Officers;
- were inconsistent and inequitable in their approach, for example:
 - there were nine different CO2 rosters, which resulted in variability in the allocation of day, night and relief shifts;
 - eight of the CO2 rosters were for an 18-week period, while one was for a 12-week period;
 - across the different CO1 and CO2 rosters there was variability and inequity in the number of ‘long breaks’ between shifts;
 - some CO2 rosters received up to six breaks of five days or more over an 18-week period, while some rosters only received two breaks of five days or more over the 18-week period; and
 - some CO1 rosters received up to 15 breaks of five days or more over a 48-week period, while some rosters only received nine breaks of five days or more over the 48-week period;
 - across the two fortnightly CO4 rosters there was inequity in the rostering:

- one of the two CO4 teams had a 2-day weekend, while the other had a 3-day weekend; and
 - one of the two CO4 teams was rostered on a Wednesday and never on a Monday, while the other was vice versa;
- across the different CO1 and CO2 rosters there was variability and inequity in the length and occurrence of ‘shift runs’, i.e. the number of days worked in a row. There were different proportions of 2-day, 3-day and 4-day ‘shift runs’ across the rosters;
- provided for reduced coverage at various points in the roster cycle:
 - across the fortnightly CO3 rosters there was reduced coverage for Friday, Sunday and Tuesday of one week and Friday of the other week;
 - across the fortnightly CO4 rosters there was reduced coverage every second Monday for the Accommodation Roster and every second Friday for the Operations roster.

5.32 These observations are similar to the observations made in Chapter 3 of the report.

5.33 The roster packages identified different options for future rosters. Key features of the proposed changes were:

- two weeks of training blocks of nine-hour days built into the roster;
- improvements to inconsistency of staffing levels between night and day shift;
- more equity in scheduling of day, night and relief shifts (such as ensuring that all Custodial Officers are offered the same number of days off in their work patterns); and
- group-based or team-based rosters, which sought to better align the rosters of CO1s and CO2s into groups or teams.



5.34 In April 2024 the consultant engaged for the Roster Review Project prepared two detailed roster packages for ACT Corrective Services; a CO1 and CO2 roster package; and a CO3 and CO4 roster package. The roster packages provided information on the shortcomings of the current rosters including that:

- they did not factor in, or specifically allocate time for, training needs and requirements of Custodial Officers;
- were inconsistent and inequitable in their approach; and
- provided for reduced coverage at various points in the roster cycle.



5.35 The roster packages identified different options for future rosters, including:

- two weeks of training blocks of nine-hour days built into the roster;
- improvements to inconsistency of staffing levels between night and day shift;
- more equity in scheduling of day, night and relief shifts; and

- group-based or team-based rosters, which sought to better align the rosters of CO1s and CO2s into groups or teams.

Custodial Officer voting

5.36 In August 2024, the Commissioner, ACT Corrective Services approved Elections ACT to facilitate the roster ballot for CO1s.

Enterprise Agreement requirements to change rosters

5.37 The mechanisms for changing rosters are governed by Clauses 15.7, 15.8 and 15.9 in the *ACT Public Sector Correctional Officers Enterprise Agreement 2023 – 2026*:

B15.7 After consulting with the employees affected and the employees' representatives and following agreement of a majority of employees affected, the head of service may introduce any of the following:

B15.7.1 Shift work.

B15.7.2 A new roster.

B15.7.3 An arrangement of shift cycles.

B15.8 Subject to subclause B15.9 rosters setting out the start times, finish times, and rotation of shifts over at least a 28 day period must be posted at least 14 calendar days prior to the commencement of the roster.

B15.9 Amendments may be made to rosters to meet the operational or business needs of a particular business unit. These amendments must be made available as soon as practicable.

5.38 For a new roster to be introduced, a simple majority of 50 percent plus one is required to satisfy the requirements in the Enterprise Agreement. ACT Corrective Services works on the principle that if an employee does not cast a vote, it is taken as non-agreement. An employee who does not participate in a roster vote is regarded as having responded with a 'no' to any roster change. This means that a high bar is set for there to be any changes to a roster, irrespective of the merits or otherwise of the change.



5.39 The mechanisms for changing rosters are governed by the Enterprise Agreement. For a new roster to be introduced, a simple majority of 50 percent plus one is required to satisfy the requirements of the Enterprise Agreement. An employee that does not participate in a roster vote is regarded as having responded with a 'no' to any roster change. This means that a high bar is set for there to be any changes to a roster, irrespective of the merits or otherwise of the change.

Custodial Officer Grade 1 voting

- 5.40 A 'Call for Voting' email was issued on 2 September 2024 with a two-week voting period that was to close on 16 September 2024. A report by the ACT Electoral Commissioner to the then Acting Commissioner of ACT Corrective Services identified the outcomes of the vote.
- 5.41 Eighty-one percent of CO1s voted in the process (179 out of 221 CO1s). The results were:
- Yes (40 votes) – 22 percent of those that voted; and
 - No (139 votes) – 78 percent of those that voted.
- 5.42 For the purpose of the voting requirements of the Enterprise Agreement, only 18 percent of CO1s (40 from a total of 221) were identified as in favour of the proposed rosters, which was significantly less than the 50 percent plus one required to approve the rosters.

Custodial Officer Grade 2 voting

- 5.43 Due to the smaller pool of voting officers, a Survey Monkey voting tool was used for CO2s. A total of 23 out of 32 CO2s that were eligible to vote (72 percent) responded to the survey with results as follows:
- Yes (7 votes) – 30 percent of those that voted; and
 - No (16 votes) – 70 percent of those that voted.
- 5.44 For the purpose of the voting requirements of the Enterprise Agreement, only 22 percent of CO2s (seven from a total of 32) were identified as in favour of the proposed rosters. Similar to the outcome of the CO1 vote, this was significantly less than the 50 percent plus one that was required to approve the rosters.

Custodial Officer Grade 3 and 4 voting

- 5.45 In relation to CO3s and CO4s ACT Corrective Services advised:

The CO3 and CO4 roster review was removed from the project before the voting stage. This was due to poor feedback from the proposed models and the executive decided to take these two cohorts offline and review at a later date.



- 5.46 In September 2024 Elections ACT, on behalf of ACT Corrective Services, commenced a voting process for CO1 and CO2 staff for the proposed new roster. Eighty-one percent of CO1s voted in the process (179 out of 221 CO1s), with 40 officers in favour of the roster and 139 not in favour. For the purpose of the voting requirements of the Enterprise Agreement, only 18 percent of CO1s were identified as in favour of the proposed rosters. Seventy-two percent of CO2s voted in the process (23 out of 32 CO2s), with seven officers in favour of the roster and 16 officers not in favour. For the purpose of the voting requirements of the Enterprise Agreement, only 22 percent of CO2s (seven from a total of 32) were identified as in favour of the proposed rosters.

Project Closure Report

5.47 A Project Closure Report was prepared in November 2024 by the Project Manager. The Project Closure Report evaluated issues associated with cost, governance, scope, quality, human resources, communication and risk.

5.48 The Project Closure Report was not specific or explicit in its review and analysis of why the proposed rosters were not agreed to. The report stated:

Anecdotal post-ballot feedback from AMC staff varied, indicating that some preferred the current roster, some saw positive elements to the proposed rosters, but wanted more time to consider the changes. This indicates a possibility of future negotiated change. Project products have been handed over to People and Culture.

5.49 Nevertheless, the Project Closure Report identified a number of key lessons, many of which related to communication and engagement, including:

A number of communications opportunities were identified:

- More direct emails from the Project Manager to staff (rather than mainly executive messages through the comms team, which caused some delay and were too formal, less frequent than desired, and impacted by release coordination requirements).
- More regular updates from the Project Manager should be sent directly to affected staff to inform them of project progress, even when delayed.
- SMS text messages were well received and effective.
- Staff indicated they would prefer presentations to be conducted by AMC staff rather than by the external consultant, which they believed would contribute to increasing trust and engagement.
- Update the SharePoint page frequently even if no new information (to indicate the continuity and progress of the project).

...

Ensure roster models presented to staff are in a format that is familiar and understandable to them.

Consistent Steering Committee member visibility, attendance and commitment to the project. Better alignment of Sponsor to the key project stakeholders. Ensure operational managers engage and promote the project effectively to staff.

Ensure that sufficient time is provided between presentation of information and staff decision or vote. Project team to be available on site to answer questions and clarify any issues.

...

Change management - operational staff may respond better to incremental change, rather than multiple changes presented all at once..



5.50 A Project Closure Report was prepared in November 2024 by the Project Manager. The Project Closure Report was not specific or explicit in its review and analysis of why the proposed rosters were not agreed to, but noted ‘anecdotal post-ballot feedback from AMC staff varied, indicating that some preferred the current roster, some saw positive elements to the proposed rosters, but wanted more time to consider the changes’. The Project Closure Report identified a number of key lessons, many of which related to communication and engagement.

Future rostering arrangements

Blueprint for Change Program Evaluation Report 2025

5.51 In November 2024, ACT Corrective Services commissioned an evaluation of the *Blueprint for Change* and its implementation. The evaluation report necessarily included commentary on the rostering of Custodial Officer staff.

5.52 The *Blueprint for Change* evaluation report noted:

Significant effort has been invested to execute the recommendations of the Blueprint Oversight Committee...

It is important to note, however, that morale, trust, and safety were very low at the AMC and CTU at that time, and much of the work of the Blueprint program has been focused on lifting the operating environment to meet an acceptable standard. The evidence available to this evaluation, including feedback from extensive consultation with staff at all levels, demonstrates that an acceptable standard is now consistently in place, and across a number of domains, has been surpassed. The outlook is now far more optimistic, despite some ongoing issues and recent challenges.

Implementation of Recommendation 10

5.53 Recommendation 10 of the *Blueprint for Change* report stated:

Design a staffing and/or rostering solution for both AMC and CTU that enables regular and sustainable staff access to training and ensure the training program:

- responds to the prioritised skill needs in the operational environment;
- is of high quality content and delivery;
- has limited impact or dependency on operations.

5.54 In relation to Recommendation 10, the *Blueprint for Change* evaluation report noted the following key achievements:

Staff consultation and rostering models developed, which include dedicated posts to support additional training hours.

5.55 However, the *Blueprint for Change* evaluation report noted the following identified gaps:

Significant industrial issues with the implementation of a new roster, which appear likely to persist.

5.56 In relation to the Roster Review Project, the *Blueprint for Change* evaluation report stated:

An external analysis of operational demand and posts was, in part, intended to help identify potential rostering solutions. This analysis faced significant challenges, with delays due to competing priorities, availability of stakeholders and data all impacting on the capacity of the external provider to meet the expected scope of work within the proposed timeframes.

5.57 In relation to the Roster Review Project, the *Blueprint for Change* evaluation report stated:

The current Correctional Officers' Enterprise Agreement requires the agreement of a majority of affected employees in order to implement a new roster. Where an individual employee does not cast a vote, this is taken as non-agreement. This means that introducing a change requires a high level of staff engagement in the voting process, along with a majority of staff seeing value in the proposed change.

5.58 In relation to the Roster Review Project, the *Blueprint for Change* evaluation report stated:

Historic organisational distrust made it difficult for the project team to actively engage COs and promote the benefits of a change in roster. There is an inherent concern amongst COs that any change would worsen their working conditions.

5.59 The *Blueprint for Change* evaluation report presciently noted the forthcoming vote for the proposed rosters (discussed in paragraphs 5.35 to 5.45) and noted:

A vote for a new AMC roster has commenced and will conclude mid-September 2024. The project team has conducted significant consultation with COs in an attempt to overcome issues with trust and to inform COs of the benefits of the proposed roster, however this has been a difficult undertaking. There is still a common perception that the proposed roster models will not be successful amongst a vote of COs. The Roster Project must remain cognisant of this possibility and ACTCS consider alternative solutions to address the underlying issues that led to the recommendation for a new roster.

Sustainability of rostering practices

5.60 The *Blueprint for Change* evaluation report posed the question:

To what extent has sustainable rostering and management of overtime been achieved?

5.61 In response to this question the *Blueprint for Change* evaluation report evaluation report stated:

Two years since the Committee's report, the current roster and management of overtime remains unsustainable.

...

Total annual leave balances have also risen each year since 2020. Staff with excess balances (more than 2.5 years) steadily increased between 2020 and 2023 but has reduced significantly in 2024 (48 per cent reduction). Payroll data indicates that issues identified with overtime have not been resolved. In fact, total overtime across AMC and CTU have continued to trend up since 2020. There have not been notable changes in personal leave usage data across the CTU or AMC, with these remaining relatively stable as FTE has grown over time.

5.62 The *Blueprint for Change* evaluation report identified that staff ‘generally recognised that current staffing levels are not sufficient’ and identified several reasons as follows:

Despite improvements in recruitment, the cohort still faces a historical under-staffing issue, which means the CO cohort still operates below the necessary levels of required staff.

Available overtime means staff can work excessive hours, and face burnout. This can become cyclical, with staff working overtime, and then needing to take more time off on unplanned leave. Staff fatigue also impacts decision making capability, particularly during times of heightened stress such as responding to detainees with challenging behaviours and incident management.

There are concerns that this system is being exploited. With limited disincentives, there was anecdotal evidence that some COs will purposely take unplanned leave for the day, knowing they can work an overtime shift on their upcoming rostered day off and be paid a higher amount in overtime rather than ordinary rostered hours. The extent to which this actually occurs is unclear, however this was frequently raised as an issue of concern by COs in consultations for this report.



5.63 ACT Corrective Services commissioned a program evaluation of the *Blueprint for Change* in 2024. The evaluation confirms that there were numerous challenges with the Roster Review Project including contractual issues with the supplier, the limitations of the Enterprise Agreement for introducing any proposed changes to the roster and a lack of staff trust to support amended rosters. The evaluation also found that two years since the *Blueprint for Change* the current rosters and management of overtime remains unsustainable. This presents a key risk to ACT Corrective Services operating environment as there is a high likelihood that rostering of staff is not optimal, effective or meeting operational needs.

Audit reports

Reports Published in 2025-26	
Report No. 05 - 2026	Concession, rebate and social support schemes
Report No. 04 - 2026	Implementation of the Carers Recognition Act 2021
Report No. 03 - 2026	University of Canberra financial governance arrangements
Report No. 02 - 2026	Management of the Home Buyer Concession Scheme
Report No. 01 - 2026	Diversity, equity and inclusion in the ACT Public Service
Report No. 07 - 2025	2024-25 Financial Audit Program – Overall Results
Report No. 06 - 2025	Annual Report 2024-25
Report No. 05 - 2025	Specialist assessment services for dementia and cognitive decline
Reports Published in 2024-25	
Report No. 04 - 2025	Gaming machine licensee regulation
Report No. 03 - 2025	ACT Government long-term plans and strategies
Report No. 02 - 2025	Energy efficiency standard for rental properties
Report No. 01 - 2025	Management of the Growing and Renewing Public Housing Program
Report No. 14 - 2024	Facilities management and support services for ACT Courts
Report No. 13 - 2024	Invoicing and payments for Digital Health Record hosting services
Report No. 12 - 2024	2023-24 Financial Audits – Financial Results and Audit Findings
Report No. 11 - 2024	Governing boards of selected ACT Government entities
Report No. 10 - 2024	Safer Families Levy
Report No. 09 - 2024	2023-24 Financial Audits – Overview
Report No. 08 - 2024	Annual Report 2023-24
Report No. 07 - 2024	Reusable Facility Services Procurement
Report No. 06 - 2024	Business Transformation Program: ICT renewal activities

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