

MEDIA RELEASE

18 June 2026

ACT Corrective Services rostering

ACT Auditor-General, Mr Ajay Sharma PSM, today presented a report on **ACT Corrective Services rostering** to the Speaker for tabling in the ACT Legislative Assembly.

The audit considered ACT Corrective Services' management of rostering arrangements for Custodial Officers including the planning and administration of rosters and implementation of controls to mitigate fraud and integrity risks.

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

The rostering of Custodial Officers has been impacted by unplanned leave, which results in a shortfall of Custodial Officers available for work. In these circumstances, ACT Corrective Services must make decisions to maintain the operation of the AMC. This includes:

- de-manning posts (typically education, programs and activities 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 report makes seven recommendations for actions to be taken by the Justice and Community Safety Directorate.

The summary of 'Report 6-2026 – ACT Corrective Services rostering', with audit conclusions and key findings, is attached to this media release.

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.

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

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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.

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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.

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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).

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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

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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.

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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'.

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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.

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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.

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

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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.