

TOWN *of* CLAREMONT

# Integrity Framework



## Our vision and mission

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### OUR VISION

The Town is a progressive, respectful, sustainable local government supporting a connected, flourishing community.

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### OUR MISSION

We exist to deliver quality services for Claremont today and to build the foundation for the future.

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## Commitment to Integrity

*“Integrity is an absolute imperative for a strong government sector that is resistant to misconduct and corruption, and maintains the trust of the community it serves.”*

Public Sector Commission, Integrity Strategy for WA Public Authorities 2024-2028

This Integrity Framework outlines the Town of Claremont’s (**Town**) commitment to integrity and ensuring it:

1. Operates with integrity using powers responsibly for the purpose and in the manner for which they were intended.
2. Acts with honesty and transparency; makes reasoned decisions without bias by following fair and objective processes.
3. Prevents and addresses improper conduct, disclosing facts without hiding or distorting them, and not allowing decisions or actions to be influenced by personal or private interests.

The main objectives of this Framework are for the Town to plan and act to continually improve integrity, model and embody a culture of integrity, learn and develop integrity knowledge and skills and be accountable for integrity.

This Framework applies to all Town employees and Council Members who are expected to:

- Know where to find the framework and be familiar with its contents;
- Contribute to cultivating integrity in the organisation;
- Report integrity breaches they see or become aware of; and
- Demonstrate their commitment to integrity in their daily work.

The Town has adopted the Public Sector Commission, Integrity Strategy for WA Public Authorities 2024-2028 (**Annexure 1**) in developing this Framework, utilising the Integrity Framework Maturity Self-Assessment Tool (**Annexure 2**) to assess its approach to integrity and identify areas of improvement.

# 01

## Plan and Act to Improve Integrity

Effective governance systems and frameworks are established

### Roles and Responsibilities

Each employee and Council Member is responsible for integrity in the organisation. The below table details the specific roles and responsibilities relevant to this Framework.

| Role                             | Responsibilities   |
|----------------------------------|--|
| <b>Chief Executive Officer</b>   | <ul style="list-style-type: none"> <li>Implement and administer the Employee Code of Conduct.</li> <li>Drive a culture of integrity through the active demonstration of Town values and by communicating the importance of meeting integrity standards.</li> <li>Promote a culture of integrity through collaboration, employee training and other activities.</li> <li>Exhibit leadership in preventing, detecting and responding to misconduct.</li> <li>Administer the Town's Risk Management Framework.</li> <li>Provide advice to Council regarding integrity and administer the Code of Conduct for Council Members, Committee Members and Candidates.</li> <li>Provide appropriate inductions and training for Council Members in accordance with the Code of Conduct for Council Members, Committee Members and Candidates.</li> <li>Act as the Town's Complaints Officer under the Code of Conduct for Council Members, Committee Members and Candidates and section 5.120 of the <i>Local Government Act 1995</i>.</li> <li>Notify the Corruption and Crime Commission (major misconduct) or the Public Sector Commission (minor misconduct) of any suspected incidences of misconduct as required by the <i>Corruption, Crime and Misconduct Act 2003</i>.</li> </ul> |
| <b>Executive Leadership Team</b> | <ul style="list-style-type: none"> <li>Drive a culture of integrity through active demonstration of the Town's values and by communicating the importance of meeting integrity standards.</li> <li>Embody and promote a culture of integrity through collaboration, employee training and other activities.</li> <li>Exhibit leadership in preventing, detecting and responding to misconduct.</li> <li>Administer the Town's Risk Management Framework and review the Town's Risk Profile regularly including business unit specific and integrity risks.</li> <li>A member of the Executive Team acts as the Town's Public Interest Disclosure Officer.</li> </ul>   |
| <b>Governance Business Unit</b>  | <ul style="list-style-type: none"> <li>Assist with the development and review of the Integrity Framework.</li> <li>Keep apprised of legislative changes and implement as required.</li> <li>Act as the Town's Freedom of Information Officer.</li> <li>Support inductions and training for Council Members in accordance with the Code of Conduct for Council Members, Committee Members and Candidates.</li> <li>Administer Primary and Annual Returns and Related Party Disclosures for Council Members and designated employees.</li> <li>Facilitate staff refresher training on integrity matters.</li> <li>Facilitate biennial election process including training, support and disclosure requirements.</li> </ul>   |

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|  | <ul style="list-style-type: none"> <li>• Provide reports and advice to the Audit, Risk and Improvement Committee on risk and integrity matters.</li> </ul>   |
| <b>Human Resources Business Unit</b>       | <ul style="list-style-type: none"> <li>• Commit to follow a thorough and unbiased recruitment practice and to recruit individuals who are closely aligned with the Town's values.</li> <li>• Ensure pre-employment screening is conducted for new employees including: <ul style="list-style-type: none"> <li>○ Police Clearances</li> <li>○ 100 points of Identification</li> <li>○ Qualification Checks</li> <li>○ Reference Checks</li> <li>○ Working With Children Check (where required)</li> </ul> </li> <li>• Ongoing review of police clearances, identification and qualifications for existing employees.</li> <li>• Prepare and publish policies and procedures to ensure integrity in human resources practices.</li> <li>• Administer Annual Employee Declaration and Change in Circumstances forms for employees.</li> <li>• Ensure the CEO, Directors, employees in the Finance Team and positions involved in high level procurement obtain a police clearance at least every two years. All staff outside of this are required to obtain a police clearance every four years.</li> <li>• Monitor expiry of licences, qualifications, certificates and Working With Children Check.</li> <li>• Provide appropriate inductions and training for employees in accordance with the Employee Code of Conduct.</li> <li>• Regularly review and update Human Resources Procedures to ensure currency.</li> </ul> |
| <b>Business Unit Managers/Coordinators</b> | <ul style="list-style-type: none"> <li>• Demonstrate commitment to integrity through active demonstration of the Town's values and by building an accountable workplace culture.</li> <li>• Commit to follow a thorough and unbiased recruitment practice and to recruit individuals who are closely aligned with the Town's values.</li> <li>• Ensure specific behaviours relating to integrity are addressed in the Performance Assessment Cycle process.</li> <li>• Ensure all employees are aware of the Town's policies and procedures and understand their responsibilities.</li> </ul>  |
| <b>All Employees</b>                       | <ul style="list-style-type: none"> <li>• Demonstrate an awareness and understanding of: <ul style="list-style-type: none"> <li>○ the Town's Integrity Framework;</li> <li>○ the Employee Code of Conduct;</li> <li>○ the Town's policies and procedures; and</li> <li>○ the employee's role.</li> </ul> </li> <li>• Report any suspected instances of misconduct through the Town's misconduct reporting process.</li> <li>• Take responsibility for decisions and actions to ensure they are in the public interest.</li> <li>• Seek information from supervisor about, and advice on, situations where integrity matters arise.</li> </ul>   |
| <b>Council</b>                             | <ul style="list-style-type: none"> <li>• Adopt the Town's Integrity Framework.</li> <li>• Adopt the Code of Conduct for Council Members, Committee Members and Candidates.</li> <li>• Appoint a Complaints Officer and Complaints Committee to receive and manage Behaviour Complaints made under the Code of Conduct.</li> <li>• Receive reports from the Audit, Risk and Improvement Committee in</li> </ul>   |

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|  | relation to integrity risks, audit activities and other integrity controls.  |
| <b>Council Members</b>                       | <ul style="list-style-type: none"> <li>• Model leadership and conduct that align with: <ul style="list-style-type: none"> <li>○ the Town's Integrity Framework;</li> <li>○ the Code of Conduct for Council Members, Committee Members and Candidates;</li> <li>○ the <i>Local Government Act 1995</i>; and</li> <li>○ Council policies.</li> </ul> </li> </ul> |
| <b>Complaints Committee</b>                  | <ul style="list-style-type: none"> <li>• Manage Behaviour Complaints made under Division 3 of the Town of Claremont's Code of Conduct for Council Members, Committee Members and Candidates.</li> </ul>  |
| <b>Audit Risk, and Improvement Committee</b> | <ul style="list-style-type: none"> <li>• Receive reports from the Administration in relation to reviews of the Integrity Framework, integrity risks, audit activities and other integrity controls.</li> <li>• Receive and review internal and external audits.</li> </ul>   |

### Legislation and Regulations

The principle legislation governing the operation of the Town is the *Local Government Act 1995 (Act)* and its subsidiary legislation, which incorporate four fundamental aims:

- better decision-making by local governments;
- greater community participation in the decisions and affairs of local governments;
- greater accountability of local governments to their communities; and
- more efficient and effective local government.

The Town is bound by various other legislation including but not limited to the *Freedom of Information Act 1992*, *Public Sector Management Act 1994* and *Public Interest Disclosure Act 2003*.

### Risk Analysis and Planning for Integrity

Council Policy LG534 Risk Management outlines the Town's approach to risk management.

Council has adopted a Risk Management Framework that sets out the Town's approach to the identification, assessment, management, reporting and monitoring of risks. The Administration utilises Risk Profiles to capture risks across various operational areas including misconduct risk.

The risk profile is reviewed and updated quarterly by the executive team with input from managers and employees as action items are completed or new risks are identified.

The Town has self-assessed its integrity practices using the Integrity Framework Maturity Self Assessment Tool (**Annexure 2**) to identify measures in place to support integrity and areas for development.

### Internal Controls, Audit and Governance

Detailed below are the core documents that form the Town's governance systems and frameworks aiding integrity across the organisation. The Town will continue to review and amend its suite of corporate documents relating to integrity management.

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### Codes of Conduct

The *Local Government Act 1995 (Act)* requires:

- Council to adopt a Model Code of Conduct for Council Members, Committee Members and Candidates; and
- The CEO to implement an Employee Code of Conduct.

The Code of Conduct for Council Members, Committee Members and Candidates sets out integrity

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principles, behaviour requirements and rules of conduct.

The Employee Code of Conduct promotes the Town's values and provides expected standards of behaviour. It is regularly reviewed and is available to all staff and on the Town's website. Staff undergo regular refresher training.

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### **Council Policies**

A function of Council under the Act is to determine policies guiding the Town's operation and decision making. The policies span various business areas and responsibilities of the Town and are reviewed on a triannual basis. Council policies are published on the Town's website in accordance with the Act.

Employees and Council Members are responsible for acting in accordance with Council policies.

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### **Public Registers**

The Town is required to maintain and publish certain registers to its website in accordance with the Act including:

- Register of Gifts;
- Register of Public Minor Breaches;
- Register of Council Member Training;
- Register of Council Member Fees, Allowances and Expenses;
- Register of Financial Returns.

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### **Freedom of Information**

The Western Australian *Freedom of Information Act 1992* gives individuals the right to apply for access to documents held by the Town. The Town has a designated Freedom of Information Officer to deal with freedom of information applications.

An Information Statement, updated annually, provides details about the Town's operations, the kinds of documents it holds and the procedures for accessing them.

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### **Public Interest Disclosures**

The *Public Interest Disclosure Act 2003* facilitates the disclosure of public interest information and provides protection for those making such disclosures and those who are the subject of disclosures. The Town is committed to the aims and objectives of the Act and does not tolerate corrupt or other improper conduct.

Every public authority is required to have a Public Interest Disclosures (**PID**) officer to receive disclosures of public interest information. The Director Governance and People is the Town's PID officer.

Information about how to make a public interest disclosure is available on the Town's website.

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### **Delegations**

Council may delegate the exercise of some of its functions and powers to the Chief Executive Officer in accordance with provisions of the Act. The Act also permits the CEO to delegate or sub-delegate any powers to another employee. Delegators may place conditions on delegations. A written record is required to be kept when a delegation is exercised by the CEO or an employee.

Delegations must be made in writing and the CEO is required to keep a register of delegations which is published on the Town's website. Delegations are to be reviewed by the delegator at least once every

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financial year.

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### **Authorisations**

Legislation applicable to the Town vests certain powers and duties to 'Authorised Officers'.

The Chief Executive Officer authorises certain officers under appropriate legislative provisions by way of a certificate of authorisation and identity card. Authorisations cease upon termination of employment at the Town.

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### **Compliance Audit Return**

Under the *Local Government (Audit) Regulations 1996* local governments are required to complete an internal compliance audit each calendar year in addition to external audits. The Compliance Audit Return is a statutory reporting tool that seeks to evaluate the Town's compliance with targeted sections of the Act.

The Compliance Audit Return is completed by the Administration and is required to be accepted by the Audit, Risk and Improvement Committee and Council before being submitted to the Department of Local Government, Industry Regulation and Safety.

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### **Regulation 17 Review**

The *Local Government (Audit) Regulations 1996* require the Chief Executive Officer to, every three years, review the appropriateness and effectiveness of the Town's systems and procedures in relation to risk management, internal control and legislative compliance. The CEO is required to report the results of the review to the Audit, Risk and Improvement Committee.

The Regulation 17 Review is outsourced to a consultant to provide an independent assessment of the Town's performance in these areas. The consultant provides a report with recommendations for process improvements. Updates are provided to the Audit, Risk and Improvement Committee in relation to progress on the recommendations.

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### **Fraud and Corruption Detection Systems**

Council Policy LG537 Fraud Prevention confirms the Town's commitment to integrity and zero tolerance of fraud, corruption and bribery in all forms.

The Town utilises the following controls to detect fraud, corruption, integrity breaches and other errors and irregularities:

- Integrity Snapshot Tool
- Internal and external audits such as Compliance Audit Return, Regulation 17 Review and Annual Financial Audit
- Systems and processes through software detection applications
- Assessments of vulnerable areas such as finance and procurement
- Regular review of conflicts of interest and disclosure of gifts
- Payroll, timesheet and leave audits
- Physical security access
- IT systems access audits
- Analysis of complaints and feedback from stakeholders
- Auditing of police clearances, qualifications and identification for all employees

## 02 Model and embody a culture of integrity

A culture of integrity exists and is reinforced and communicated by leaders

This Framework is underpinned by the Town's values, vision and mission.

### Our Values

|                       |  |
|-----------------------|--|
| RESPECT               | We are responsible for how we behave in our workplace and will show respect and courtesy to all of customers and colleagues. |
| INTEGRITY             | We are open, accountable and honest.   |
| QUALITY COMMUNICATION | We demonstrate our respect for our community and each other through timely, accurate and understandable communication.       |
| CUSTOMER SERVICE      | Every contact with a customer is important and an opportunity to demonstrate our commitment.                                 |
| EXCELLENCE            | Our focus is quality outcomes achieved on time and on budget.  |

### Our Vision

The Town is a proud, progressive, sustainable local government supporting a connected, flourishing community.

### Our Mission

We exist to deliver quality services for Claremont today and to build the foundation for the future.

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The Town's Executive Management Team comprises of the Chief Executive Officer and three Directors who lead the organisations business units. Each business unit has a Manager or Director responsible for its functions.

The Town adopts a model of lead by example. The CEO and Executive Management Team are required to demonstrate Town's values, transparency and integrity at all times.

The Employee Code of Conduct sets standards of behaviour and reporting pathways for non-compliance. The Town has established public interest disclosure procedures available on it's website.

A culture of transparency is demonstrated by:

- Weekly communications from the CEO to employees.
- Weekly communications from the CEO to Council Members.
- Monthly staff meetings which include time for employees to ask questions and provide feedback.
- Regular team meetings.
- Monthly management meetings
- Fortnightly Executive meetings.
- Regular Council Member briefings and workshops.
- Monthly reports to Council from the CEO.

# 03

## Learn and develop integrity knowledge and skills

Individual and authority integrity knowledge, skills and competence are grown

### **Induct and Train Staff**

The Town places importance on integrity during recruitment, commencement and throughout an employee's tenure at the Town.

Job advertisements include a description of the Town's vision and values, integrity expectations and application of the Employee Code of Conduct.

Upon commencement at the Town, staff undertake an induction with Human Resources where they receive training and advice regarding their responsibilities including their obligation to report improper conduct, misconduct and corruption and the requirement to disclose conflicts of interest, secondary employment and the receipt of gifts. New employees are required to acknowledge they agree to be bound by the Town's Employee Code of Conduct and HR procedures.

Staff also receive inductions from the Finance and Records Management teams to assist in their role and ensure staff are aware of their responsibilities.

Information and training about conduct, integrity and performance are communicated to existing staff via:

- Employee inductions;
- Weekly staff newsletters;
- Monthly staff meetings;
- One on one meetings; and
- The Town's intranet site.

Training and development completed by employees is recorded in a centrally maintained register.

Employees participate in an Annual Performance Achievement Cycle where behaviours relating to integrity can be discussed and addressed.

### **Induct and Train Council Members**

Upon appointment new Council Members are provided with an Induction Manual and training on their role and responsibilities, particularly in relation to integrity matters such as conflicts of interest and disclosure of gifts.

New Council Members are required to complete compulsory training via the Western Australian Local Government Association within 12 months of election to provide the skills and knowledge to perform their role.

A budget is available for training expenditure each year. Council Policy LG540 Council Member Training and Continuing Professional Development permits Council Members to request training and development that assists in their role or professional development. The Administration regularly informs Council Members of available courses.

Training is also provided by way of regular Council Member Forums and information about conduct and integrity is communicated to Council Members as required via weekly newsletters.

# 04

## Be accountable for integrity

Prevention, detection and response to integrity matters are everyone's personal and professional responsibility

### Response to Integrity Breaches

The Town takes a zero tolerance approach to misconduct and corruption.

The Town's Workplace Investigations Procedure and Grievance Resolution Procedure detail the processes to be followed for investigation of reports of misconduct and resolution of workplace grievances.

If a suspected conduct matter is raised, it will be treated seriously with prompt and appropriate action.

Employees and Council Members have a duty to report suspected misconduct. The following methods are available for the reporting of misconduct:

|  |   |
|--|---|
| <b>Notification to Supervisor</b>                  | <p>The Town encourages notification to an employee's immediate supervisor in the first instance, however, employees can also notify a member of the Executive Management Team at any time.</p> <p>All reports of misconduct will be investigated confidentially.</p>  |
| <b>Notification to the Chief Executive Officer</b> | <p>Notifications of suspected misconduct may be made to the Chief Executive Officer by email (to the email address of the CEO) or in writing for investigation.</p> <p>Where correspondence is addressed to the Chief Executive Officer and marked 'Private and Confidential' it will not be opened by anyone other than the Chief Executive Officer.</p> <p>The Chief Executive Officer is designated as the Complaints Officer for complaints made under the Code of Conduct for Council Members, Committee Members and Candidates.</p> |
| <b>Public Interest Disclosure</b>                  | <p>A Public Interest Disclosure may be made in writing to the Town's PID Officer.</p> <p>The Town will take all reasonable steps to provide protection to anyone who makes such disclosures from any detrimental action in reprisal for the making of a public interest disclosure.</p>   |
| <b>External agencies</b>                           | <p>Depending on the nature of the suspected misconduct the matter may be reported to agencies such as the:</p> <ul style="list-style-type: none"> <li>• Public Sector Commission</li> <li>• Corruption and Crime Commission</li> <li>• Department of Local Government, Industry Regulation and Safety</li> <li>• WA Police</li> </ul>   |

### Integrity Framework Review

The Town's Integrity Framework will be reviewed:

1. Annually by way of a desktop review;
2. Biennially to the Audit, Risk and Improvement Committee for endorsement to Council; and

3. Following the release of the follow up to the Integrity Strategy for WA Public Authorities 2024-2028.

Documents referenced within this Framework have differing review schedules.

| Document Control Box              |                         |  |                           |      |
|-----------------------------------|-------------------------|--|---------------------------|------|
| Owner:                            | Chief Executive Officer |  | Business Unit:            | Risk |
| Legislation and Other References: |                         | Public Sector Commission, Integrity Strategy for WA Public Authorities 2024-2028 |                           |      |
| Document Management:              |                         |  |                           |      |
| Review Frequency:                 | Annually                |  | Next Review Date          | 2026 |
| Version Control                   | Approval Date           |  | Reference                 |      |
| 1.                                | 25 October 2022         |  | Council Resolution 146/22 |      |
| 2.                                | 12 December 2023        |  | Council Resolution 170/23 |      |
| 3.                                | 28 October 2025         |  | Council Resolution 153/25 |      |



Public Sector  
Commission

# Embedding Integrity

Integrity Strategy for  
WA Public Authorities 2024-28

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September 2024



## From the Commissioner

**Integrity is an absolute imperative for a strong government sector that is resistant to misconduct and corruption, and maintains the trust of the community it serves.**

But it cannot be left to chance. Integrity has to be actively managed and improved especially as new technologies come to the fore, the pace of change accelerates, and different operating environments and risks emerge.

Each person who works in the Western Australian government sector is responsible for integrity – for their own actions and decisions, for being honest and respectful, and for doing the right thing even behind closed doors. More than this, each person has responsibility for taking their commitments and their work seriously, and for understanding their responsibilities and obligations as a public officer.

In essence integrity must be the common frame of reference for how we operate and deliver services for Western Australians.

Embedding Integrity is my second integrity strategy since being appointed Public Sector Commissioner in 2018. The first strategy focused on getting the foundations in place through an integrity framework supported by a toolkit of resources.

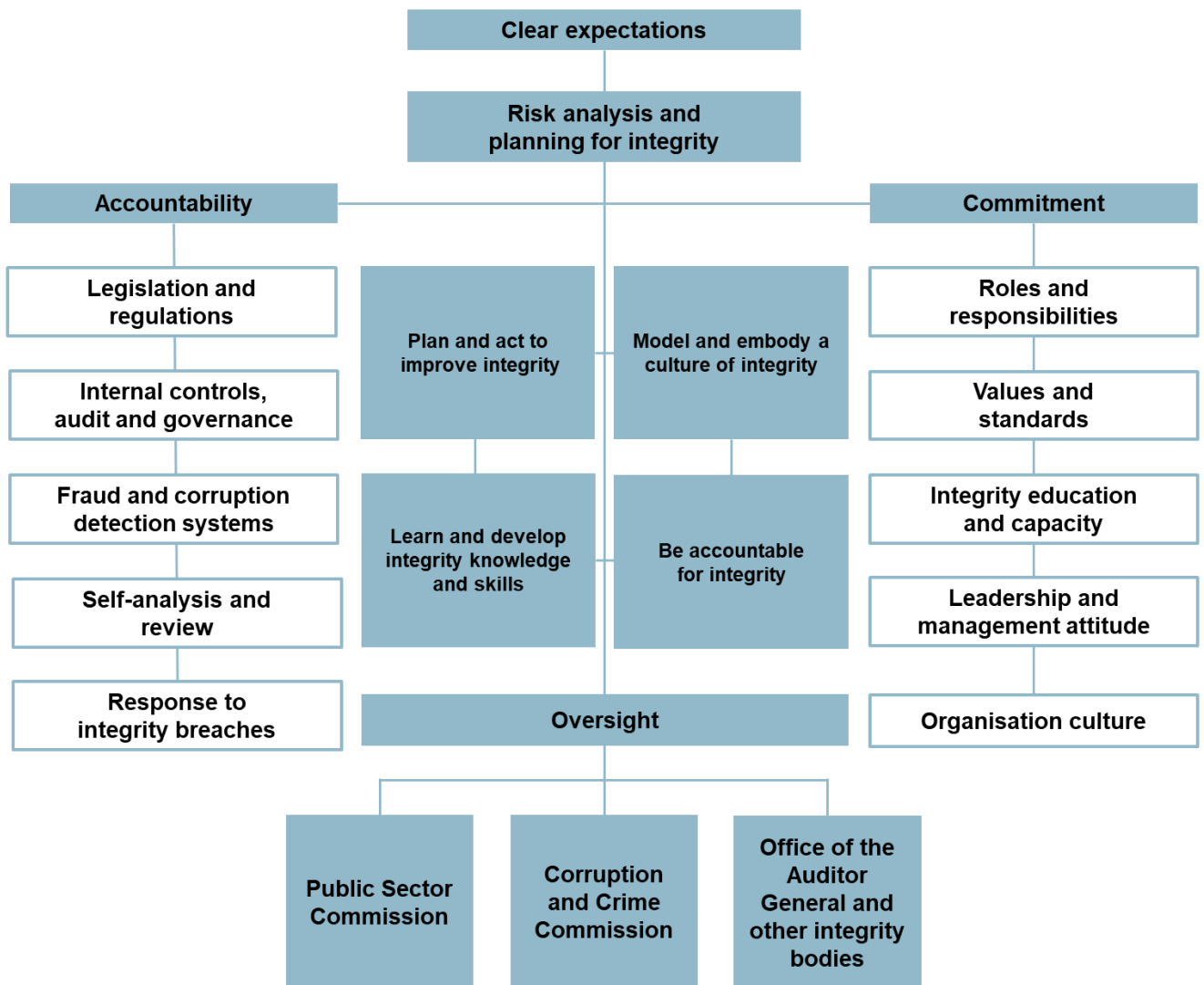
Now we must embed integrity which means having it running through everything we do as a matter of course.

In this strategy we look at further supporting authorities to use the toolkit of resources through formal education opportunities, community of practice sessions and targeted support for identified authorities. We pick up on specific aspects of integrity that can deliver value for the government sector such as pre-employment screening, speaking up and reporting, managing discipline processes, and better use of data to monitor the integrity environment. We also continue our series of thematic reviews examining specific aspects of integrity policy and practice to drive tangible improvements.

While the Commission can – and will – play its part as a key integrity agency, the actions of authorities are paramount to embed integrity. I expect every authority head to implement this strategy to strengthen integrity across the entire government sector.

**Sharyn O'Neill PSM**  
**Public Sector Commissioner**

## Integrity model for WA public authorities



## A focus on improvement through action

This strategy focuses on the 4 improvement areas in the integrity model to promote integrity and prevent misconduct and corruption.

Each improvement area has actions for the Commission, public authorities and individuals.

**Actions for the Commission** reflect its leadership in helping to prevent misconduct by informing, consulting with and making recommendations to the sector; providing advice and training; and analysing systems in authorities to prevent misconduct.

**Actions for public authorities** support and build on Commission actions, recognising that each authority needs to prioritise and tailor the actions for its particular operating context, remit and risk profile.

**Actions for individuals** are for those appointed to, employed by and contracted to public authorities to contribute to integrity in their authorities.

This tiered approach across the 4 improvement areas reflects the responsibilities of all those in the government sector. Actions at any one tier or actions in only one improvement area are not enough – it is the combined effort of the 3 tiers working together across the 4 improvement areas that can have the most impact.

### Terms used

In this strategy, 'public authorities' refers to WA public sector bodies (including agencies, and government boards and committees), local governments, public universities and government trading enterprises.

'Staff' refers to employees, board and committee members, and contractors.

# 1 Plan and act to improve integrity

Effective governance systems and frameworks are established.

|     | Actions for Commission  | Actions for public authority   | Actions for individual  |
|-----|---|--|---|
| 1.1 | <b>Support integrity framework implementation</b><br>Identify authorities that do not have an integrity framework, and provide practical advice and information to support them to develop one.                                   | <b>Implement a framework</b><br>Develop and implement an <a href="#">integrity framework</a> <sup>1</sup> to ensure a comprehensive and coordinated approach to integrity.   | <b>Understand and act</b><br>Understand and act in accordance with the authority's integrity framework by following the code of conduct, policies and procedures. |
| 1.2 | <b>Drive a continuous improvement approach</b><br>Identify authorities that have not completed the <a href="#">Integrity Framework Maturity Self Assessment Tool</a> and provide practical advice to support them to complete it. | <b>Continue to improve</b><br>Use the <a href="#">Integrity Framework Maturity Self Assessment Tool</a> to assess the maturity of the authority's approach to integrity, and use results to develop and implement improvement actions. | <b>Contribute to improvement</b><br>Contribute ideas to improve your authority's integrity framework.   |
| 1.3 | <b>Raise awareness about misconduct risks</b><br>Publish insights, develop guidance and provide advice to inform authorities about misconduct risks and contemporary practices to manage them.                                    | <b>Take a risk based approach</b><br>Check that specific misconduct risks, vulnerable functions and activities are identified, controls are implemented and their effectiveness is monitored.  | <b>Identify risks and opportunities</b><br>Inform the authority of any gaps or weaknesses that provide opportunities for misconduct or corruption to occur.       |
| 1.4 | <b>Strengthen integrity pre-employment screening</b><br>Examine integrity pre-employment screening options and share information with authorities to strengthen their approaches.   | <b>Recruit with integrity in mind</b><br>Screen potential staff having regard to their roles and risks.  | <b>Implement screening requirements</b><br>Implement the authority's screening requirements and undertake appropriate checks.                                     |

<sup>1</sup> Under [Commissioner's Instruction 40: Ethical Foundations](#), each public sector agency is required to have an integrity framework.

## 2 Model and embody a culture of integrity

A culture of integrity exists and is reinforced and communicated by leaders.

|     | Actions for Commission   | Actions for public authority   | Actions for individual  |
|-----|--|--|---|
| 2.1 | <b>Support speaking up</b><br>Explore ways and make recommendations to support reporting across the government sector and at an authority level.                   | <b>Strengthen reporting</b><br>Review reporting processes to ensure a clear tone from the top that promotes staff confidence to report, and helps leaders understand how they support staff to speak up. | <b>Contribute to cultural health</b><br>Speak up when you suspect misconduct, and respectfully challenge conduct not aligned to the authority's values and code of conduct. |
| 2.2 | <b>Target engagement</b><br>Develop an engagement plan and provide tailored integrity guidance and support to specific authorities.                                | <b>Collaborate to improve approach</b><br>Collaborate with the Commission, other integrity agencies and peers to ensure the authority is equipped to prevent misconduct.                                 | <b>Contribute to prevention</b><br>Champion a pro-integrity message.  |
| 2.3 | <b>Promote an integrity mindset</b><br>Conduct promotions and provide resources to help authorities raise staff awareness of integrity and what it means for them. | <b>Shape mindsets</b><br>Use Commission resources in conjunction with authority initiatives to raise staff awareness of integrity and shape attitudes towards it.  | <b>Adopt an integrity mindset</b><br>Demonstrate integrity in all actions and decisions.  |

### 3 Learn and develop integrity knowledge and skills

Individual and authority integrity knowledge, skills and competence are grown.

|     | Actions for Commission   | Actions for public authority   | Actions for individual   |
|-----|--|--|--|
| 3.1 | <b>Increase capability</b><br>Deliver formal integrity education for specified authority staff to increase their capability to promote integrity and prevent misconduct.   | <b>Increase the capability of others</b><br>Target key staff to attend formal Commission education opportunities and provide ways for these staff to share their learnings in the authority.   | <b>Increase knowledge</b><br>Attend authority education opportunities to build integrity knowledge and skills.   |
| 3.2 | <b>Share information</b><br>Work with integrity practitioners, integrity agencies and experts to deliver community of practice sessions on investigation and review findings, and share lessons learned and examples of good practice. | <b>Provide opportunities to apply learning</b><br>Have key staff attend community of practice sessions run by the Commission and other integrity agencies to build their integrity knowledge and networks, and give these staff opportunities to share ideas in the authority on how to improve processes and practices. | <b>Apply learning in practice</b><br>Apply the knowledge and skills gained from attending community of practice sessions to improve processes and practices. |

## 4 Be accountable for integrity

Prevention, detection and response to integrity matters are everyone's personal and professional responsibilities.

|     | Actions for Commission   | Actions for public authority  | Actions for individual  |
|-----|--|---|---|
| 4.1 | <b>Promote good practice</b><br>Pilot a workshop initially for public sector staff conducting or managing discipline processes to build capacity to respond to misconduct.   | <b>Skill practitioners</b><br>Make knowledge available in the authority to conduct or manage discipline processes and adopt a lesson learned approach to inform improvements. | <b>Apply practice</b><br>Apply good practice when undertaking or managing discipline processes.   |
| 4.2 | <b>Enhance reporting</b><br>Trial a platform for anonymous reporting of minor misconduct to the Commission.  | <b>Take action</b><br>Have clear processes to support staff and community reporting and guide action to be taken.   | <b>Lead at all levels</b><br>Contribute to creating an environment where everyone knows the reporting avenues and is confident to report. |
| 4.3 | <b>Review performance</b><br>Conduct thematic reviews to identify and share areas of good practice and areas for improvement.  | <b>Learn and improve</b><br>Use learnings from Commission reviews to evaluate systems, processes and practices, and make improvements.  | <b>Improve continuously</b><br>Implement improvements made by the authority.  |
| 4.4 | <b>Encourage an insights approach</b><br>Provide guidance about internal and external data sources and information that help authorities monitor their integrity environment and inform their approach to misconduct prevention. | <b>Use insights to inform prevention approach</b><br>Leverage data and information from internal and external sources to identify emerging issues and areas for improvement.  | <b>Use collected data</b><br>Use data collected by the authority to support improvements.   |
| 4.5 | <b>Collaborate for improvement</b><br>Participate with integrity practitioners, integrity agencies and others in research and projects that strengthen approaches to misconduct prevention.                                      | <b>Apply findings</b><br>Use research insights to evaluate prevention methods used and make improvements.   | <b>Adopt new approaches</b><br>Adopt changes to prevention methods.   |

## Measuring success

Monitoring the success of the strategy for both the Commission and authorities is important in further embedding integrity across the government sector.

The table below has signs of success for the Commission and examples of signs of success for authorities.

| Commission signs of success   | Public authority signs of success   |
|---|---|
| <ul style="list-style-type: none"> <li>Approaches to integrity are maturing across authorities over time as demonstrated by reviews conducted and data collected by the Commission.</li> <li>Authority leaders and staff understand and value the work of the Commission and the assistance provided, as demonstrated by their positive feedback and requests for advice and collaboration.</li> <li>Surveys and collections conducted by the Commission indicate there is growing confidence by individuals to report integrity breaches.</li> <li>Authorities use the resources and tools provided by the Commission to improve integrity.</li> <li>Commission sessions are well attended and evaluations indicate knowledge has increased because of attendance.</li> <li>Commission reporting mechanisms assist the detection of misconduct in the sector.</li> </ul> | <ul style="list-style-type: none"> <li>The authority's leaders are satisfied that the levels of maturity assessed through the Integrity Framework Maturity Self Assessment Tool are appropriate to their operating context and risk profile.</li> <li>Findings from reviews and audits indicate the authority's approach to integrity is improving.</li> <li>Staff survey results show a positive perception of integrity in the authority.</li> <li>Staff survey results show staff have a good understanding of integrity requirements that apply to them and are confident to report integrity breaches.</li> <li>Stakeholder survey results indicate confidence that the authority operates with integrity.</li> <li>Training and information sessions related to integrity are well attended and evaluations indicate knowledge has increased because of attendance.</li> <li>Time taken to resolve integrity matters is reasonable and results in improvements where necessary.</li> <li>Notifications and reports to integrity bodies are timely.</li> </ul> |
| Commission progress against these measures is reported periodically over the life of the strategy.  | Consider other internal measures that may indicate integrity is improving in the authority.   |

# Integrity Framework Maturity Self Assessment Tool

Helping WA public authorities assess and improve their approach to integrity

## Element 1: Clear expectations

The authority head clearly describes and communicates their integrity expectations

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing   | Embedded  | Excelling  |
|--|--|---|--|
| <ul style="list-style-type: none"> <li>Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>Integrity is not defined or well understood by staff.</li> <li>Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>Accounting for integrity only relates to meeting compliance obligations.</li> </ul>  | <ul style="list-style-type: none"> <li>Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>   | <ul style="list-style-type: none"> <li>Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>   | <ul style="list-style-type: none"> <li>Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>                          |
| Characteristics  |  |   |  |
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Expectations, if documented, are only in the code of conduct.</li> <li><input type="checkbox"/> The authority head rarely communicates their expectations.</li> <li><input type="checkbox"/> Line managers check staff understanding of expectations only after an integrity breach.</li> <li><input type="checkbox"/> There are limited specific expectations communicated to external stakeholders (e.g. those who do business with the authority or use its services).</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Expectations are in the code of conduct, being documented in integrity policies and procedures, and included in job descriptions for some positions of trust when they are updated.</li> <li><input type="checkbox"/> The authority head occasionally reinforces their expectations (e.g. face to face, staff communications).</li> <li><input checked="" type="checkbox"/> Line managers explain expectations at induction. Some reinforce them during employment (e.g. through staff performance processes).</li> <li><input type="checkbox"/> Specific expectations for external stakeholders are being developed.</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The integrity framework, code of conduct, integrity policies and procedures, and most business processes reflect the authority head's expectations.</li> <li><input checked="" type="checkbox"/> The authority head frequently reinforces their expectations and there is clear "tone from the top".</li> <li><input type="checkbox"/> Line managers consistently model and reinforce the "tone from the top". This is demonstrated in part by staff understanding expectations and being able to explain what these are when asked.</li> <li><input checked="" type="checkbox"/> Expectations are communicated to external stakeholders (e.g. through a statement of business ethics).</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> New policies and procedures are written consistently to reflect the authority head's expectations.</li> <li><input type="checkbox"/> The leadership group demonstrates the "tone from the top". It is visible and well known inside and outside the authority.</li> <li><input type="checkbox"/> Staff model and support the "tone from the top" which is assessed through staff performance processes.</li> <li><input type="checkbox"/> External stakeholders who do not meet communicated expectations are held to account (e.g. through appropriate legislative or contractual mechanisms).</li> </ul> |

# Element 2: Roles and responsibilities

Roles and responsibilities are assigned to ensure a coordinated approach to managing integrity.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging  | Developing  | Embedded  | Excelling  |
|---|---|---|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul>   | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul>   |
| Characteristics   |   |   |  |
| <ul style="list-style-type: none"><li><input type="checkbox"/> Some roles and responsibilities are assigned. These are documented to meet compliance obligations (e.g. role of the audit committee).</li><li><input type="checkbox"/> Some delegations are documented; these mainly relate to finance and human resources.</li><li><input type="checkbox"/> Information and data requests from external integrity bodies are responded to in an ad hoc way.</li><li><input type="checkbox"/> Staff think integrity is someone else's responsibility. Individual and shared responsibility is not well understood.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Roles and responsibilities are being assigned as the integrity framework is developed (e.g. to positions, teams, groups and committees) and in job descriptions when they are updated.</li><li><input type="checkbox"/> Delegations are being considered across functions and activities and being documented in an accessible schedule.</li><li><input type="checkbox"/> Responsibility has been assigned to a position or team to coordinate information and data requests and interactions with external integrity bodies.</li><li><input checked="" type="checkbox"/> Staff are becoming aware that integrity is everyone's responsibility. This is being communicated in the integrity framework, code of conduct, integrity policies and procedures.</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Roles and responsibilities – including the authority head's accountability for integrity – are documented in the integrity framework.</li><li><input checked="" type="checkbox"/> Relevant roles and responsibilities (e.g. between the governing board chair or mayor/shire president, chancellor and authority head and staff) are clear and documented in the integrity framework.</li><li><input checked="" type="checkbox"/> Delegations for all legislative and high risk functions are covered (e.g. regulation, approvals, human resources, finance).</li><li><input checked="" type="checkbox"/> Requests from external integrity bodies are planned for and scheduled so they can be responded to in a timely and fulsome way.</li><li><input type="checkbox"/> Staff are aware that integrity is everyone's responsibility and can explain what this means when asked.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Leaders and staff with key assigned roles and responsibilities in the integrity framework regularly discuss challenges and identify opportunities to improve the framework. These improvements feed into self-analysis and review of the framework.</li><li><input type="checkbox"/> The delegations schedule is monitored and updated in real time.</li><li><input type="checkbox"/> A dedicated position, team or committee is tasked with engaging with external bodies, promoting integrity, and helping to prevent misconduct and corruption, and providing specialist advice to the leadership group on trends and improvement actions.</li><li><input type="checkbox"/> Staff are provided with a formal avenue to suggest changes to the integrity framework.</li></ul> |

# Element 3: Legislation and regulations

Legislation, regulations and external policy obligations are identified and accounted for.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging  | Developing  | Embedded  | Excelling  |
|---|---|---|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul>                         | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul> |
| Characteristics   |   |   |  |
| <ul style="list-style-type: none"><li><input type="checkbox"/> Legislative, regulatory and external policy obligations (e.g. those required by enabling legislation and those set by central bodies) are not fully identified.</li><li><input type="checkbox"/> Compliance gaps, if any, are mostly unknown.</li><li><input type="checkbox"/> Staff understanding of their powers, functions and obligations – and how they apply these in practice – relies on their knowledge and capability.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Legislative, regulatory and external policy obligations are being identified. An accountability map or similar is being completed.</li><li><input type="checkbox"/> Any compliance gaps identified are being addressed.</li><li><input type="checkbox"/> Staff are becoming aware of the power, functions and obligations relevant to their role (e.g. acting in line with operating procedures). Line managers are taking a more active role in this.</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> All obligations are documented and accounted for (e.g. reflected in internal controls, roles and responsibilities, compliance calendars).</li><li><input checked="" type="checkbox"/> Compliance gaps are addressed as identified.</li><li><input checked="" type="checkbox"/> Staff understand the power, functions and obligations relevant to their role (e.g. delegations) and can explain how these apply in practice.</li><li><input checked="" type="checkbox"/> Line managers support their staff to comply with obligations and oversight compliance. They demonstrate they have taken action on non-compliance (e.g. through staff performance and discipline processes).</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> All obligations are monitored to track changes to legislation, regulations and external policy. Changes are communicated and updates made (e.g. to internal controls).</li><li><input type="checkbox"/> Proactive monitoring identifies compliance gaps.</li><li><input type="checkbox"/> Passive and active monitoring is undertaken to check if staff are carrying out powers, functions and obligations as expected (e.g. discretionary powers are appropriately exercised and staff act in line with delegations).</li></ul>  |

## Element 4: Risk analysis and planning for integrity

Integrity risks are identified and analysed, and plans are made to manage them.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging  | Developing  | Embedded   | Excelling   |
|---|---|--|---|
| <ul style="list-style-type: none"> <li>Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>Integrity is not defined or well understood by staff.</li> <li>Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>Accounting for integrity only relates to meeting compliance obligations.</li> </ul>   | <ul style="list-style-type: none"> <li>Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>  | <ul style="list-style-type: none"> <li>Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>  | <ul style="list-style-type: none"> <li>Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>   |
| Characteristics   |   |  |   |
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Integrity risks are narrowly defined. Little consideration is given to functions and activities that give rise to integrity risks. The priority is material financial risk.</li> <li><input type="checkbox"/> There is limited agreement about the value of, and approach to, managing integrity risks among the leadership group.</li> <li><input type="checkbox"/> Managing integrity risks associated with functions and activities relies on the judgement of line managers. There are limited methodologies, tools and guidance to assist them, other than processes to manage financial risks.</li> <li><input type="checkbox"/> Some but not all staff are able to explain the integrity risks associated with their work or the importance of managing them.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Integrity risks, including those relating to high risk functions, activities and any outsourced programs and activities, are being identified, adequately defined, analysed and documented in risk registers.</li> <li><input type="checkbox"/> The authority head communicates the value of managing integrity risks to the leadership group. A shared understanding of risk management is being developed.</li> <li><input checked="" type="checkbox"/> Risk owners are being identified and assigned for high risk functions and activities. They are provided with methodologies, tools and guidance (e.g. risk management policies and procedures) to help analyse and manage risks.</li> <li><input checked="" type="checkbox"/> Staff are becoming familiar with the integrity risks associated with their work and what they need to do to manage them (e.g. comply with policies and procedures).</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Integrity risks from internal and external sources have been identified. Risk owners are assigned for all identified risks in risk registers. Integrity risks are reflected in broader planning processes (e.g. strategic, operational, project and business continuity).</li> <li><input checked="" type="checkbox"/> Integrity risks are regularly monitored, reviewed, updated and reported on, and take account of changes impacting the risk profile.</li> <li><input type="checkbox"/> The authority head regularly reinforces the value of managing integrity risks (e.g. face to face, in staff communications).</li> <li><input type="checkbox"/> Risk owners are provided with methodologies, tools and guidance that take into account better practice outlined in <a href="#">Australian Standards 31000-2018: Risk Management Guidelines</a> and <a href="#">8001-2021: Fraud and Corruption Control</a>.</li> <li><input type="checkbox"/> Staff understand the integrity risks associated with their work and identified shared risks, and can explain how they manage these in practice.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Assessment of integrity risk considers behavioural factors (e.g. what makes individuals more vulnerable to engaging in misconduct and corruption from internal and external sources).</li> <li><input type="checkbox"/> Advanced tools are used to monitor and report on integrity risks (e.g. automated dashboards and data analytics). They help inform decisions to improve risk management.</li> <li><input type="checkbox"/> The leadership group takes a positive and proactive approach to managing all risks including shared risk (e.g. inter-authority or multi-jurisdictional projects).</li> <li><input type="checkbox"/> Risk owners champion risk management.</li> <li><input type="checkbox"/> Staff consistently identify, analyse and manage integrity risks associated with their work. Where new and emerging risks are identified, they are raised via established pathways.</li> </ul> |

# Element 5: Internal controls, audit and governance

Integrity risks are managed through sound internal controls, and audit is used to evaluate the adequacy and effectiveness of controls.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing  | Embedded  | Excelling  |
|--|---|---|--|
| <ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>  | <ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>  | <ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>   | <ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>  |
| Characteristics  |   |   |  |
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Limited or basic internal controls (e.g. policies and procedures) are directed towards managing financial risks.</li> <li><input type="checkbox"/> Accuracy and currency of policies and procedures relies on individuals updating them. There is no assigned responsibility.</li> <li><input type="checkbox"/> Audit scopes and programs focus on the adequacy of financial controls rather than broader integrity issues (e.g. use of confidential information).</li> <li><input type="checkbox"/> The relationships between those with responsibility for audit are undefined.</li> <li><input type="checkbox"/> Applying internal controls associated with functions and activities relies on the line managers explaining to staff why internal controls exist and their importance. There is no standard approach; staff knowledge varies.</li> <li><input type="checkbox"/> Staff are unaware of the need to report unmanaged risks and internal control weaknesses.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Internal controls (e.g. core and complementary integrity policies and procedures) are being developed and implemented to manage identified integrity risks.</li> <li><input type="checkbox"/> A position or team has been assigned to develop a policy register to record what policies and procedures exist, who owns them and their currency.</li> <li><input type="checkbox"/> Integrity risks and the adequacy of internal controls are being included in the audit scopes and programs.</li> <li><input type="checkbox"/> The relationship between the internal audit function, audit committee and accountable authority and any external audit body is being defined and good practices are being developed (e.g. communication of reports and recommendations from external integrity bodies).</li> <li><input type="checkbox"/> Line managers are starting to understand and communicate the importance of applying internal controls consistently to manage integrity risks.</li> <li><input type="checkbox"/> Staff rely on managers informing them of how to report internal control weaknesses.</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Internal controls (e.g. preventative, detective and corrective) are proportionate to specific integrity risks.</li> <li><input checked="" type="checkbox"/> A position or team manages the policy register to ensure policy owners are undertaking scheduled reviews.</li> <li><input checked="" type="checkbox"/> Different types of audits are used to explore integrity risks (e.g. random audits, focus area, forensic, compliance and quality audits).</li> <li><input checked="" type="checkbox"/> The importance of audit is well understood across the authority. Line managers readily accept and participate in audits. Recommendations for improvement from internal and external audits are assigned to ensure they are implemented.</li> <li><input checked="" type="checkbox"/> Line managers understand their supervision and monitoring role is an internal control. Staff understand the risks associated with their work and apply internal controls to manage these.</li> <li><input checked="" type="checkbox"/> Staff know how to report internal control weaknesses via established pathways.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Internal controls are monitored, reviewed (including pressure tested) and improved continuously. Internal controls keep pace with lessons learnt from integrity breaches, changing business processes, risks and other operating conditions and reduce vulnerabilities and unintended consequences.</li> <li><input type="checkbox"/> Risk owners raise, and internal audit records, changes to internal controls and treatment plans in risk registers. Advanced tools automatically update those who need to know of changes.</li> <li><input type="checkbox"/> Evaluation of the adequacy and effectiveness of internal controls to manage integrity risks is conducted in targeted integrity audits and integrity is included as part of most audit scopes.</li> <li><input type="checkbox"/> A combined assurance model (e.g. with activities that are coordinated and planned) is in place to ensure integrity is practiced, managed and accounted for.</li> </ul> |

# Element 6: Fraud and corruption detection systems

Systems and activities are in place to detect events different to those considered standard, normal or expected.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging  | Developing   | Embedded   | Excelling  |
|---|--|--|--|
| <ul style="list-style-type: none"> <li>Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>Integrity is not defined or well understood by staff.</li> <li>Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>Accounting for integrity only relates to meeting compliance obligations.</li> </ul>   | <ul style="list-style-type: none"> <li>Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>   | <ul style="list-style-type: none"> <li>Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>  | <ul style="list-style-type: none"> <li>Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>  |
| Characteristics   |  |  |  |
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Basic detection systems and activities are in place for internal threats (e.g. some financial activities) but relies heavily on the manual effort of individuals (e.g. manual checks, excel spreadsheets).</li> <li><input type="checkbox"/> Detection systems and activities are directed towards managing internal threats. Some basic controls are in place to prevent external fraud and corruption threats (e.g. firewalls to prevent cyber-attacks).</li> <li><input type="checkbox"/> Internal data holdings are unstructured and not easily analysed.</li> <li><input type="checkbox"/> Beyond basic reporting, there is no or limited use of data for detection purposes.</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Planning is underway to develop a detection strategy or plan; this is being supported by the leadership group. The plan considers internal and external threats (e.g. cyber security, third parties seeking to exploit individual officers), information and data holdings, people and capability requirements, tools for validation and reporting, and governance arrangements including data sharing and confidentiality.</li> <li><input checked="" type="checkbox"/> Changes are being made to how existing data is captured, providing more structure for easier analysis.</li> <li><input checked="" type="checkbox"/> Data is mainly used for reporting rather than responding to identified errors and irregularities.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> A detection strategy or plan is in place to help control internal and external threats. It takes into account better practice outlined in <a href="#">Australian Standards 31000-2018: Risk Management Guidelines and 8001-2021: Fraud and Corruption Control</a> including speaking up and staff and contactor screening.</li> <li><input type="checkbox"/> Data holdings to inform detection have been cleansed, are structured and can be analysed easily.</li> <li><input type="checkbox"/> Fit for purpose data tests are in place and repeatable, usually with consistent results that provide useful insights. These are supported by procedures to respond to and address identified errors and irregularities, and escalate issues for investigation as appropriate.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Detection systems and activities inform the internal audit scopes and program; insights show areas for further examination.</li> <li><input type="checkbox"/> Detection systems and activities support continuous improvement to strategic and operational planning and misconduct and corruption prevention approaches.</li> <li><input type="checkbox"/> Internal and external data holdings, where they can be shared and are relevant, are leveraged to inform detection approaches.</li> <li><input type="checkbox"/> Automated processes are in place to identify and escalate red flags. Processes for prompt escalation, investigation and resolution are in place.</li> </ul> |

# Element 7: Values and standards

Values and standards (code of conduct) are in place and describe what acceptable workplace behaviour looks like in practice.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing  | Embedded   | Excelling  |
|--|---|--|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul> |

| Characteristics  |  |   |  |
|--|--|---|--|
| <ul style="list-style-type: none"><li><input type="checkbox"/> Values have been discussed by the leadership team but have not progressed beyond this.</li><li><input type="checkbox"/> A code of conduct is in place to meet compliance obligations (e.g. legislative, external policy) but it is not widely promoted by the leadership group.</li><li><input type="checkbox"/> Any discussions about the code of conduct relies on individual line managers.</li><li><input type="checkbox"/> Monitoring of compliance with the code of conduct occurs ad hoc.</li><li><input type="checkbox"/> Staff have limited awareness of the code of conduct. They are unsure where to find it, how it applies to them and their obligations under it.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Values and other direction setting statements (e.g. vision, mission and remit) are being developed and are consistent.</li><li><input type="checkbox"/> A code of conduct exists but does not fully take account of relevant legislation, regulation and policy (e.g. internal and external) obligations or integrity risks specific to the operating context.</li><li><input type="checkbox"/> Most leaders and line managers understand their role to promote the code of conduct, support its implementation and their role to monitor and support compliance with it.</li><li><input type="checkbox"/> Strategies to monitor compliance with the code of conduct are being planned for as integrity policies and procedures are being developed.</li><li><input type="checkbox"/> Most staff are aware of the code of conduct, can explain its purpose and know where to find it.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Values and codes of conduct focus on the behaviours expected to achieve objectives with integrity. Values and standards are reflected in relevant documents and processes (e.g. policies, strategic and operational plans, job advertisements and descriptions, recruitment processes).</li><li><input type="checkbox"/> The code of conduct incorporates the views of key internal stakeholders and accounts for relevant obligations and identified risks. It provides guidance to support ethical decision making.</li><li><input type="checkbox"/> Leaders and line managers consistently promote the code of conduct (e.g. during team meetings, 'integrity moments', standing item on the leadership group agenda) to support its implementation.</li><li><input type="checkbox"/> Compliance with the code of conduct is monitored (e.g. through staff performance processes, analysis of discipline processes and complaints) and reasons for non-compliance addressed.</li><li><input type="checkbox"/> Staff know about the code of conduct, understand its importance and can describe how it guides their behaviour.</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Values and codes of conduct are regularly promoted to all stakeholders (e.g. published on the internet, in recruitment information) and there is a process for annual acknowledgment.</li><li><input checked="" type="checkbox"/> The code of conduct has been developed taking into account the views of the authority's key external stakeholders.</li><li><input checked="" type="checkbox"/> Values and the code of conduct are discussed at leadership meetings. Data around non-compliance is being used by this group to inform improvements to internal controls. Discussions and information feeds into self analysis and review processes to continuously improve the integrity framework.</li><li><input checked="" type="checkbox"/> Staff are confident holding each other to account for expectations set in the code of conduct (e.g. respectfully calling out behaviour that does not align, reporting unethical behaviour).</li></ul> |

# Element 8: Leadership and management attitude

Leaders are aware of and understand their role to model behaviours consistent with expectations, values and standards; and to take action addressing behaviour that is inconsistent with these.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing  | Embedded   | Excelling  |
|--|---|--|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul> |

| Characteristics  |  |   |  |
|--|--|---|--|
| <ul style="list-style-type: none"><li><input type="checkbox"/> The leadership group’s role to support integrity (e.g. to model, reinforce, promote, communicate and enforce) is informal; it relies on individual’s views of what their role is.</li><li><input type="checkbox"/> In the absence of any formal approach, it is left to individual leaders and line managers to interpret and model values and standards.</li><li><input type="checkbox"/> The role of leaders to support and demonstrate integrity – and if this is reflected in recruitment practices and staff performance processes – relies on those undertaking those processes.</li><li><input type="checkbox"/> There is little recognition that leadership roles are positions of trust. Employment screening processes (e.g. police clearances, verification of qualifications) are rarely, if ever, undertaken.</li><li><input type="checkbox"/> Development of leaders and line managers occurs as a result of individual development discussions with those who conduct the process.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> A statement is being developed (e.g. terms of reference, charter) that explains the leadership group’s role to support integrity.</li><li><input checked="" type="checkbox"/> Some leaders and line managers can explain what integrity looks like, its importance, and their role to promote, reinforce it and take action when behaviours are inconsistent with obligations.</li><li><input type="checkbox"/> The role of leaders to support and demonstrate integrity is being reflected in recruitment and performance documents and processes.</li><li><input type="checkbox"/> There is a growing recognition that leadership roles are positions of trust. Employment screening is being implemented for these roles.</li><li><input type="checkbox"/> Development of leaders and line managers includes building their skills to deal with integrity matters effectively (e.g. having difficult conversations about conduct).</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The leadership group has a shared understanding of its role to support integrity. The group consistently demonstrates and supports this through its actions.</li><li><input type="checkbox"/> Leaders and line managers have a shared understanding and can explain how they shape culture, what integrity looks like, its importance, and their role to promote and reinforce it (e.g. taking action when behaviours are inconsistent with obligations).</li><li><input checked="" type="checkbox"/> Integrity forms part of the recruitment and performance processes for leadership roles. Leaders demonstrate how they support integrity through their actions and decisions (e.g. in their performance processes).</li><li><input checked="" type="checkbox"/> Leadership roles are identified positions of trust. Employment screening occurs for all new leadership roles.</li><li><input checked="" type="checkbox"/> Development of leaders and line managers includes building their skills to support integrity and prevent misconduct and corruption (e.g. recognise red flags, address issues early and make proportionate decisions when issues occur).</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> The leadership group’s cohesive approach to integrity is recognised externally. The authority head and leadership group are often sought to provide advice to their peers on integrity matters as a result.</li><li><input type="checkbox"/> Leaders and line managers have a good understanding of their role to uphold the reputation of their authority and the broader sector in which they work.</li><li><input type="checkbox"/> Performance processes assess both <u>what</u> leaders achieve and <u>how</u> they achieve it (e.g. projects delivered effectively manage internal and external risks).</li><li><input type="checkbox"/> Development of leaders and line managers incorporates mentorships and coaching designed to grow their personal capability, insights and skills to lead with integrity.</li></ul> |

# Element 9: Organisation culture

Integrity is part of organisation culture. It is actively managed to ensure integrity is sustained.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing  | Embedded   | Excelling   |
|--|---|--|---|
| <ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>  | <ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>  | <ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>  | <ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>   |
| Characteristics  |   |  |   |
| <ul style="list-style-type: none"> <li><input type="checkbox"/> There are few actions and initiatives (e.g. clear expectations, values, communication about integrity, integrity education) to build and sustain integrity.</li> <li><input type="checkbox"/> There is little understanding about recruiting for integrity (e.g. values based recruitment). Staff employment screening (e.g. police clearances, previous disciplinary matters, verification of qualifications) is rarely, if ever, undertaken.</li> <li><input type="checkbox"/> Reporting pathways exist to meet compliance obligations (e.g. public interest disclosure) but are not widely promoted and confidence in them is low.</li> <li><input type="checkbox"/> Integrity communications only occur in response to a significant integrity breach.</li> <li><input type="checkbox"/> Some staff can describe 'how we do things around here', but they are unable to link this to expectations or the code of conduct.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Actions and initiatives to build and sustain integrity are being developed. This includes evaluation activities (e.g. staff surveys to test reporting confidence).</li> <li><input type="checkbox"/> Recruiting for integrity and the requirement for staff employment screening is being documented and promoted to recruiting managers.</li> <li><input type="checkbox"/> Reporting pathways are being developed for staff and external stakeholders. These are clear and concise, include external avenues and strong statements about protection for those who speak up.</li> <li><input checked="" type="checkbox"/> An integrity communications plan is being developed. Key integrity messages are communicated periodically (e.g. for International Anti-Corruption Day).</li> <li><input checked="" type="checkbox"/> Most staff can describe 'how we do things around here' as it relates to their immediate work environment referencing the code of conduct, and policies and procedures relevant to their role.</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Actions and initiatives to build and sustain integrity are in place. Evaluation activities are conducted regularly and improvements implemented.</li> <li><input checked="" type="checkbox"/> Recruiting for integrity and staff employment screening occurs for all new staff. The type of screening is proportionate to the position and integrity risks.</li> <li><input checked="" type="checkbox"/> Reporting pathways are in place and well known by staff. These provide for external stakeholders to also report integrity matters and for anonymous reporting.</li> <li><input type="checkbox"/> An integrity communications plan is in place and messages are sent to staff regularly (e.g. dedicated web/intranet site, campaigns on integrity topics run throughout the year).</li> <li><input type="checkbox"/> Staff can describe 'how we do things around here' from an authority wide perspective and can link this to expectations, values, standards and the need to follow policies and procedures.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Data and information that might indicate issues with integrity are identified, monitored and action taken (e.g. business units with high reports of integrity breaches are supported to make better decisions).</li> <li><input type="checkbox"/> There is a process in place to ensure identified positions are rescreened periodically.</li> <li><input type="checkbox"/> Data and information on the use of reporting pathways are analysed to inform continuous improvement (e.g. absence of reporting from certain teams or employment groups).</li> <li><input type="checkbox"/> De-identified data from reporting is used to inform integrity communication messages.</li> <li><input type="checkbox"/> Staff can consistently describe 'how we do things around here', referencing authority and sector wide expectations, values, standards, policies and procedures.</li> </ul> |

# Element 10: Integrity education and capacity

Integrity education helps build staff capacity to act with integrity.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing  | Embedded   | Excelling  |
|--|---|--|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul> | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul> |

| Characteristics  |  |   |   |
|--|--|---|---|
| <ul style="list-style-type: none"><li><input type="checkbox"/> Induction, if conducted, relies on the knowledge of individual line managers.</li><li><input type="checkbox"/> Some integrity education occurs beyond induction to meet compliance obligations.</li><li><input type="checkbox"/> Leaders and line managers rarely follow up if their staff have attended integrity education provided.</li><li><input type="checkbox"/> Whether other actions and initiatives (e.g. staff performance processes) to educate and reinforce integrity are undertaken relies on individual line managers.</li><li><input type="checkbox"/> Staff are unsure about who provides advice about integrity matters as it is not documented. If provided by individual line managers, the quality of advice relies on their knowledge.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> An induction program is being developed to incorporate expectations, standards, policies and procedures and guide ethical decision making.</li><li><input checked="" type="checkbox"/> Integrity education is being developed to help manage key integrity risks (e.g. conflicts of interest, information management). The integrity education and training plan includes what is provided, to whom and when, which high risk positions need additional training, and how activities are evaluated (e.g. how participation is tracked).</li><li><input checked="" type="checkbox"/> Most leaders and line managers are active in attending any integrity education provided, encourage their staff to do the same and follow up with staff on mandatory education requirements.</li><li><input type="checkbox"/> Additional actions and initiatives to educate and reinforce integrity (e.g. staff performance processes and raising integrity consciousness) are being developed or reviewed.</li><li><input checked="" type="checkbox"/> Staff know that line managers and certain functional area leaders (e.g. finance, human resources) provide advice about integrity matters. Quality still relies on an individual's knowledge.</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Induction is regularly updated to ensure it is contemporary, accounts for lessons learned from integrity breaches and reflects any changes to operating conditions (e.g. new policies, changed risks).</li><li><input type="checkbox"/> An integrity education and training plan is in place and includes specific education on individual and organisational factors (red flags) for those in high risk roles. Participation in and feedback from sessions are collected and analysed to inform improvements.</li><li><input type="checkbox"/> Leaders and line managers support and champion integrity education. They reinforce the importance of attending integrity education sessions.</li><li><input checked="" type="checkbox"/> Staff performance processes and actions and initiatives to raise integrity consciousness reinforce key integrity messages and support good decision making.</li><li><input type="checkbox"/> It is well documented in the code of conduct, policies and procedures who provides expert advice on integrity matters. Leaders and line managers understand their role to provide general advice and how to escalate matters as required.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Integrity education is, where relevant, also in place for external stakeholders (e.g. labour hire staff, contractors and suppliers).</li><li><input type="checkbox"/> Individuals are followed up (e.g. randomly and periodically) to determine if and how knowledge gained during integrity education is being applied in practice in the workplace.</li><li><input type="checkbox"/> Leaders and line managers support practitioners attending external learning opportunities. A process is in place to ensure this learning is shared with others with roles and responsibilities under the integrity framework.</li><li><input type="checkbox"/> Those who provide advice about integrity matters meet periodically to discuss advice being sought and provided, helping ensure a consistent approach with policies and procedures and advice from external integrity bodies.</li></ul> |

# Element 11: Response to integrity breaches

Integrity breaches are responded to in a timely and proportionate way to ensure integrity is sustained.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging  | Developing   | Embedded   | Excelling  |
|---|--|--|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul>   | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul>   |
| Characteristics   |  |  |  |
| <ul style="list-style-type: none"><li><input type="checkbox"/> If procedures exist, they are in place to meet compliance obligations; they provide insufficient guidance.</li><li><input type="checkbox"/> The quality of processes and decisions varies. Basic case information (e.g. number of processes started and completed) is used for reporting.</li><li><input type="checkbox"/> The use of data, lessons learnt from past cases and the findings of external bodies are rarely, if ever, considered.</li><li><input type="checkbox"/> Whether integrity breaches are responded to relies on the knowledge and skills of individual line managers.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Procedures and guidance on responding to breaches – including awareness raising resources to inform those responding to integrity breaches – are being developed to promote better quality processes and consistent decision making.</li><li><input checked="" type="checkbox"/> Central recording of case information is being developed to streamline reporting.</li><li><input checked="" type="checkbox"/> The use of data, lessons learnt from past cases and findings of external bodies are being considered as procedures are being developed.</li><li><input checked="" type="checkbox"/> Most line managers have an understanding of what a breach looks like and how to respond.</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Procedures, guidance and awareness raising materials inform those involved in responding to integrity breaches, and support quality processes and consistent decision making.</li><li><input type="checkbox"/> A quality assurance process is in place to check for consistent application of procedures.</li><li><input type="checkbox"/> A central register captures detailed case information. It is used to monitor the progress of processes, analyse trends and outcomes, and for reporting.</li><li><input type="checkbox"/> The use of data, lessons learnt from past cases and findings of external bodies are used to inform process improvements.</li><li><input type="checkbox"/> Decision makers, line managers and staff conducting processes have the required knowledge and skills. They are confident to respond to, manage and escalate matters as needed.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Procedures, guidance and awareness raising materials are updated regularly. This reflects results of the quality assurance process, compliance changes, contemporary practice and advice from external integrity bodies.</li><li><input type="checkbox"/> Detailed case information is captured in a central system with advanced features such as live analytics and dashboards. It provides useful intelligence to inform trend analysis and prevention strategies.</li><li><input type="checkbox"/> Individual (e.g. motivations) and organisational (e.g. control weaknesses) factors that might have contributed to a breach are analysed to help prevent future breaches.</li><li><input type="checkbox"/> Decision makers, line managers and staff conducting processes proactively build their own capacity where required (e.g. staying up to date with contemporary practice, industrial decisions).</li><li><input type="checkbox"/> Those who provide information as part of a process are followed up regarding their experience of the process and any suggestions for improvement.</li></ul> |

# Element 12: Self analysis and review

Analysis and review activities of actions to support integrity are undertaken as part of continuous improvement.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging   | Developing   | Embedded   | Excelling  |
|--|--|--|--|
| <ul style="list-style-type: none"><li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li><li>• Integrity is not defined or well understood by staff.</li><li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li><li>• Accounting for integrity only relates to meeting compliance obligations.</li></ul>   | <ul style="list-style-type: none"><li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li><li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li><li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li><li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li></ul>  | <ul style="list-style-type: none"><li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li><li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li><li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li><li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li></ul>   | <ul style="list-style-type: none"><li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li><li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li><li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li><li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li></ul>   |
| Characteristics  |  |  |  |
| <ul style="list-style-type: none"><li><input type="checkbox"/> Analysis and review activities of actions to support integrity rarely occurs unless it relates to compliance.</li><li><input type="checkbox"/> Little thought has been given to whether there is value in sourcing external help with analysis and review activities.</li><li><input type="checkbox"/> Where analysis and review activities are conducted, findings and recommendations are not always implemented.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Analysis and review activities of actions to support integrity are sometimes undertaken beyond compliance. Available tools are used (e.g. snapshot tool and maturity self assessment tool).</li><li><input checked="" type="checkbox"/> Further consideration of requirements – including the value of sourcing external help with analysis and review – are being developed as part of the integrity framework.</li><li><input type="checkbox"/> Processes for coordinating the implementation of findings from self analysis and reviews, and recommendations from the reviews of external integrity bodies are being developed. This considers how monitoring and follow up occur.</li></ul> | <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Review of the integrity framework is scheduled. Analysis and review activities are aligned to or part of risk analysis and audit processes. Analysis is undertaken to recommend improvements to the framework considering changes in legislative and operating conditions (e.g. structural and legislative).</li><li><input type="checkbox"/> External assistance to undertake a review is sourced where needed (e.g. where a greater level of expertise and objectivity is required).</li><li><input checked="" type="checkbox"/> A position or team is assigned to coordinate implementation of findings and recommendations from self analysis and reviews, and recommendations from the reviews of external integrity bodies (related to the authority or not) of the integrity framework (and its component parts). Progress is reported to the leadership group.</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> Analysis and review of the integrity framework and reporting on implementation of improvement actions align with strategic and operational planning and budget cycles.</li><li><input type="checkbox"/> Results from self analysis and review, and recommendations from the reviews of external integrity bodies (related to the authority or not) inform improvements to the integrity framework (and its component parts). Revisions (where relevant) are shared with the workforce.</li><li><input type="checkbox"/> Benchmarking of the integrity framework and sharing of ideas occurs (where relevant and possible) with similar types of authorities to identify whether any further improvements can be made.</li></ul> |

# Element 13: Oversight

Oversight is about providing the authority head assurance that the authority's approach to integrity is working as intended.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| Emerging  | Developing   | Embedded  | Excelling   |
|---|--|---|---|
| <ul style="list-style-type: none"> <li>Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>Integrity is not defined or well understood by staff.</li> <li>Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>Accounting for integrity only relates to meeting compliance obligations.</li> </ul> | <ul style="list-style-type: none"> <li>Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul> | <ul style="list-style-type: none"> <li>Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul> | <ul style="list-style-type: none"> <li>Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul> |

## Characteristics

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|--|---|--|--|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> The authority head relies on informal reports about how integrity is being practiced, managed and accounted for (approach to integrity).</li> <li><input type="checkbox"/> Monitoring of the approach to integrity relies on members of the leadership group ensuring it is undertaken in their respective areas, rather than any formal process.</li> <li><input type="checkbox"/> As required, the audit committee assures finance processes and reports are sent to the authority head.</li> <li><input type="checkbox"/> Any oversight activities are ad hoc and focussed internally.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> The authority head is directing the development of processes and structures to obtain the information needed for oversight of the approach to integrity. This is being documented in an integrity framework.</li> <li><input type="checkbox"/> The leadership group understands their role to monitor the approach to integrity in their respective areas and provide data on request to support assurance and oversight.</li> <li><input type="checkbox"/> As the integrity framework is being developed, the collection and provision of information (beyond that required for compliance) to the authority head for assurance, is being identified and documented.</li> <li><input checked="" type="checkbox"/> Internally focused oversight activities are routinely performed and documented.</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Processes and structures are in place to provide the authority head with information to assist their oversight of the approach to integrity (e.g. reports).</li> <li><input checked="" type="checkbox"/> The leadership group are aware of their assurance and oversight obligations for their respective areas and are well prepared to provide updates at leadership group meetings.</li> <li><input checked="" type="checkbox"/> A committee has been established (or the role of an existing committee has been expanded) with specific responsibilities to oversight the integrity framework (and its component parts) and report to the authority head.</li> <li><input type="checkbox"/> Oversight activities associated with outsourced programs and services are being identified and documented.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> The authority head can provide assurance to external integrity bodies and other stakeholders (e.g. board, council, minister) that the approach to integrity is sound.</li> <li><input type="checkbox"/> The leadership group is well versed in assurance and oversight. Members are able to provide information and insights about the authority's approach to integrity and can discuss how this compares to other similar authorities (if benchmarking has been conducted).</li> <li><input type="checkbox"/> A committee provides the authority head with regular and fulsome reports about the integrity framework (and its component parts).</li> <li><input type="checkbox"/> Oversight extends to outsourced programs and services to ensure they are adequately controlled and reported on.</li> </ul> |
|--|---|--|--|