



CITY OF SOUTH PERTH  
INTEGRITY  
FRAMEWORK



City of  
South Perth



# Contents

1. COMMITMENT TO INTEGRITY .....	2
2. PLAN AND ACT TO IMPROVE INTEGRITY .....	4
2.1 Roles and responsibilities .....	4
2.2 Legislation and regulations .....	7
2.3 Risk analysis and planning for integrity .....	7
2.4 Internal controls, audit and governance .....	7
3. MODEL AND EMBODY A CULTURE OF INTEGRITY .....	11
3.1 Values and standards .....	11
3.2 Leadership and management attitude .....	11
3.3 Organisation culture .....	11
4. LEARN AND DEVELOP INTEGRITY KNOWLEDGE AND SKILLS .....	12
4.1 Integrity education and capacity .....	12
5. BE ACCOUNTABLE FOR INTEGRITY .....	15
5.1 Fraud and corruption detection systems .....	15
5.2 Response to integrity breaches .....	15
5.3 Self analysis and review .....	15
ANNEXURE	
A. Integrity Framework Maturity Self Assessment Tool .....	18

# 1. 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**

The City of South Perth (the City) Integrity Framework is modelled on the Integrity Strategy for WA Public Authorities 2024 – 2028 published by the Public Sector Commission Western Australia.

Operating with integrity means using powers responsibly for the purpose and in the manner for which they were intended. It means acting with honesty and transparency; and making reasoned decisions without bias by following fair and objective processes. It also means preventing and addressing improper conduct, disclosing facts without hiding or distorting them and not allowing decisions or actions to be influenced by personal or private interests.

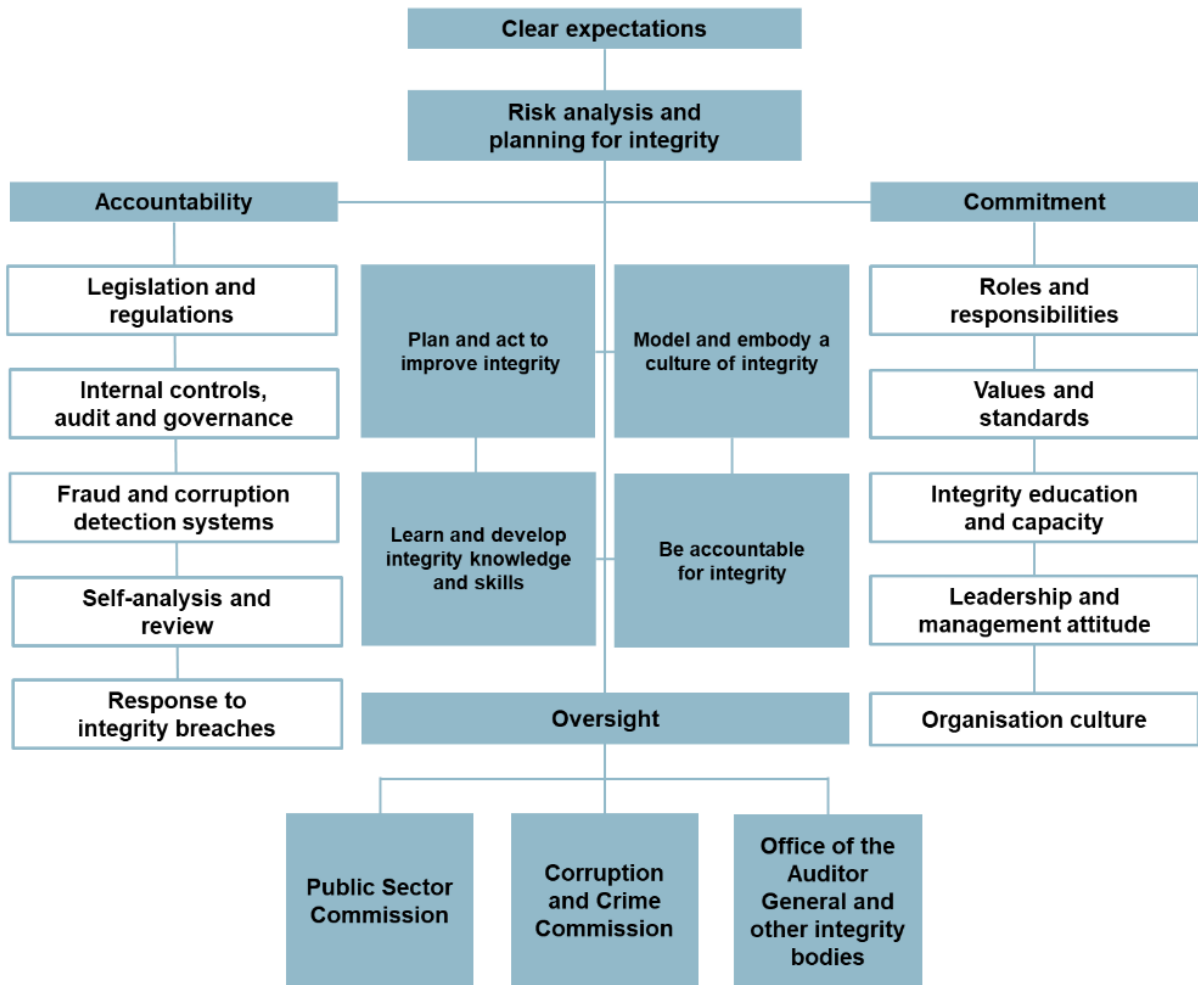
This Integrity Framework outlines the policies, mechanisms and responsibilities that help the City of South Perth deliver on the Strategic Community Plan 2021-2031 through high levels of honesty, objectivity, ethics and accountability.

## **Why is integrity important to the City?**

Increasing the ethical capacity of the City and managing risks appropriately assists in establishing an ethical organisational culture. The culture of the organisation is the most influential factor on the behaviour of our employees. It has the potential to make an ethical person act unethically or an unethical person behave ethically (Independent Commission Against Corruption (NSW), 1998).

Although the City has Codes of Conduct, policies and management practices, these alone will not guarantee the ethical behaviour of people. An ethical and professional workplace is the best safeguard against risks to integrity, including improper conduct, misconduct and corruption.

## Integrity model for WA public authorities



## 2. PLAN AND ACT TO IMPROVE INTEGRITY

*Effective governance systems and frameworks are established.*

### 2.1 ROLES AND RESPONSIBILITIES

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

ROLE	RESPONSIBILITY
<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 City 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 City’s Risk Management Framework.</li> <li>• Provide advice to Council regarding integrity and administer the Code of Conduct for Elected Members, Committee Members and Candidates.</li> <li>• Provide appropriate inductions and training for Elected Members in accordance with the Code of Conduct for Elected Members, Committee Members and Candidates.</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 Management Team</b>	<ul style="list-style-type: none"> <li>• Drive a culture of integrity through active demonstration of the City’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 City’s Risk Management Framework and undertake reviews of the City’s systems and processes for managing risk and reporting the outcome to the Audit, Risk and Improvement Committee.</li> <li>• At least one member of the Executive Management Team is appointed as the City’s Public Interest Disclosure Officer.</li> </ul>

<p><b>Governance Business Unit</b></p>	<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>● Fulfill the City's Freedom of Information function.</li> <li>● Support inductions and training for Elected Members in accordance with the Code of Conduct for Elected Members, Committee Members and Candidates.</li> <li>● Administer Primary and Annual Returns and Related Party Disclosures for Elected Members and designated employees.</li> <li>● Facilitate employee refresher training on integrity matters.</li> <li>● Facilitate biennial election process including training, support and disclosure requirements.</li> <li>● Provide reports and advice to the Audit, Risk and Improvement Committee on risk and integrity matters.</li> </ul>
<p><b>People and Performance Business Unit</b></p>	<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 City's values.</li> <li>● Ensure pre-employment screening is conducted for new employees including: <ul style="list-style-type: none"> <li>○ Current Police Clearances (required for all employees)</li> <li>○ 100 points of Identification</li> <li>○ Qualification Checks – professional qualifications and Machinery tickets/ Licenses</li> <li>○ Pre-employment medicals</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, management practices and procedures to ensure integrity in human resources processes.</li> <li>● Administer Annual Employee Declaration and Change in Circumstances forms for employees.</li> <li>● All employees require a National Police Clearance upon commencement of work.</li> <li>● Monitor expiry of licenses, 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>● Refresher training of the Employee Code of Conduct each year, which includes a quiz to test knowledge of the subjects.</li> </ul>

<b>Business Unit Managers/ Coordinators</b>	<ul style="list-style-type: none"> <li>• Demonstrate commitment to integrity through active demonstration of the City’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 City’s values.</li> <li>• Ensure specific behaviours relating to integrity are addressed in the Employee Performance Review process.</li> <li>• Ensure all employees are aware of the City’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 City’s Integrity Framework;</li> <li>○ the Employee Code of Conduct;</li> <li>○ the City’s policies and procedures; and</li> <li>○ the employee’s role.</li> </ul> </li> <li>• Report any suspected instances of misconduct through the City’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 City’s Integrity Framework.</li> <li>• Adopt the Code of Conduct for Elected Members, Committee Members and Candidates.</li> <li>• Appoint a Complaints Officer to receive and manage Behaviour Complaints made under the Code of Conduct.</li> <li>• Receive reports from the Audit, Risk and Improvement Committee in relation to integrity risks, audit activities and other integrity controls.</li> </ul>
<b>Elected Members</b>	<ul style="list-style-type: none"> <li>• Model leadership and conduct that align with: <ul style="list-style-type: none"> <li>○ the City’s Integrity Framework;</li> <li>○ the Governance Framework,</li> <li>○ the Code of Conduct for Elected Members, Committee Members and Candidates;</li> <li>○ the <i>Local Government Act 1995</i>; and</li> <li>○ Council policies.</li> </ul> </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>

## 2.2 LEGISLATION AND REGULATIONS

The principle legislation governing the operation of the City is the *Local Government Act 1995* (Act) and its subsidiary legislation, which incorporates 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 City is bound by various other legislation including but not limited to the *Freedom of Information Act 1992*, *Corruption, Crime and Misconduct Act 2003* and *Public Interest Disclosure Act 2003*.

## 2.3 RISK ANALYSIS AND PLANNING FOR INTEGRITY

Council Policy P695 Risk Management outlines the City's approach to risk management. Council has adopted a Risk Management Framework that sets out the City's approach to the identification, assessment, management, reporting and monitoring of risks.

The City's Risk Assessment and Acceptance Criteria are applied in accordance with Council Policy P695 Risk Management and Management Practice M695 Risk Management. As part of the quarterly reporting process, the Management Team and Executive Management Team review risks within their respective areas of responsibility and monitor the effectiveness of mitigating controls and treatments. A quarterly activity report is provided to the Audit, Risk and Improvement Committee providing an update on risk management activities.

## 2.4 INTERNAL CONTROLS, AUDIT AND GOVERNANCE

Detailed below are the core documents that form the City's governance systems and frameworks aiding integrity across the organisation.

### Codes of Conduct

The Act requires:

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

The Code of Conduct for Elected Members, Committee Members and Candidates set out integrity principles, behaviour requirements and rules of conduct applying to Elected Members.

The Employee Code of Conduct is regularly reviewed and is available to all employees as well as being published on the City's website. Employees complete annual refresher training on the Employee Code of Conduct, which includes a knowledge-based quiz with a required pass mark.

## **Governance Framework**

The City of South Perth Governance Framework has been prepared to ensure compliance with all relevant legislation, including the Act and the pursuit of best practice as a democratic local government.

The Governance Framework provides an overview of the governance program in place at the City so that Elected Members and employees can meet their governance responsibilities. It also enables the community and stakeholders to have an understanding of governance and demonstrates how all people associated with the City can participate.

## **Council Policies**

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

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

## **Public Registers**

The City is required to maintain and publish certain registers to the City's website. These include:

- Declarations of Interest Register
- Elected Member fees, expenses or allowances
- Register of Gifts
- Contribution to Travel Register
- Elected Members' Professional Development Register
- Primary and Annual Returns Register
- Minor Breaches Register
- Elected Member Contact with Developers and Lobbyists Register
- Parking Cash-in-lieu Register
- Elected Member Disclosure of Political Party Associations Register
- Elected Member Attendance at City Facilitated Committees/Groups Register

- Council Resolution Status Register

## **Freedom of Information**

The *Freedom of Information Act 1992* (FOI Act) gives members of the public the right to apply for access to documents held by the City of South Perth.

Under the FOI Act, the City is required to help people to make an application, to obtain access to documents at the lowest reasonable cost and ensure that personal information held by the City is accurate.

An Information Statement is made available to the public which provides details about the history, demographics, government structure, administration and statutory responsibilities of the City of South Perth, as well as information regarding freedom of information applications.

## **Public Interest Disclosures**

The *Public Interest Disclosures 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 City is committed to the aims and objectives of the Act and does not tolerate corrupt or other improper conduct.

This Act applies to public authorities such as the City of South Perth and provides a system for the matters disclosed to be investigated and for appropriate action to be taken.

Every public authority is required to have a Public Interest Disclosures (PID) officer to receive disclosures of public interest information. The City has three PID Officers being the Director Corporate Services, the Manager People and Performance and the Manager Governance.

## **Authorisations**

The City has many functions and duties that are prescribed by legislation. Various legislation may assign specified powers and duties to “Authorised Persons”. The CEO authorises certain officers to undertake these specific duties via a formal authorisation certificate and identity card. An authorised person may also be referred to as an “authorised employee” or “authorised officer”. The City keeps an updated Register of these Authorisations which are regularly reviewed.

## **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 and other legislation. These delegations must be approved by an absolute majority of Council.

The Act also permits the CEO to delegate or sub-delegate any powers to another employee.

Delegators may place conditions on delegations. Delegations must be made in writing, and the CEO is required to keep a register of delegations which is published on the City's website.

Delegations under the Act are to be reviewed by the delegator at least once every financial year.

## **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 City'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 Local Government Inspector.

## **Regulation 17**

The *Local Government (Audit) Regulations 1996* require the Chief Executive Officer to, every four financial years, review the appropriateness and effectiveness of the City'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 carried out by an external consultant and forms part of the Strategic Internal Audit Plan. Quarterly updates are provided to the Audit, Risk and Improvement Committee in relation to progress on the recommendations.

## 3. MODEL AND EMBODY A CULTURE OF INTEGRITY

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

### 3.1 VALUES AND STANDARDS

This Framework is underpinned by the City's values and vision.

#### Our Values



#### Our Vision

A city of active places and beautiful spaces. A connected community with easily accessible, vibrant neighbourhoods and a unique, sustainable natural environment.

### 3.2 LEADERSHIP AND MANAGEMENT ATTITUDE

The City's Executive Management Team (EMT) comprises of the Chief Executive Officer and three Directors who lead the organisations business units. Each business unit has a Manager responsible for its functions. The EMT are responsible for leading the ethical tone of the City to build a professional and respectful workplace. The EMT communicates to the Management Team, and other employees of the City, on ethical conduct and integrity issues whilst modelling the expected standards of behaviour. This demonstrates a commitment to the City's values and is consistent with the level of professional leadership that is expected.

### 3.3 ORGANISATION CULTURE

A culture of transparency is demonstrated by:

- Weekly communications from the CEO to employees
- Weekly communications from the CEO to Elected Members
- Quarterly All of Staff Meeting
- Fortnightly management meetings
- Fortnightly Executive meetings
- Monthly Leadership meetings

- Regular Elected Member briefings and workshops
- Monthly reports to Council from the CEO

### **Clear expectations**

Expectations are discussed with all new employees during their onboarding with the City. This includes their roles and responsibilities, expectations and professional standards. This is reinforced with new employees through the City’s online induction program and at any probation review meeting and with existing employees during the performance review process.

### **Decision making**

Ethical leadership is characterised by transparency and accountability in the decisions that are made. Decision making is timely and based on consideration of the public value. Decisions are fair, unbiased and able to withstand public scrutiny.

### **Value employees**

Employees are regularly reminded about the positive and important contribution they make to the community, and how their individual conduct helps to build and maintain community partnerships. The City provides an employee recognition program where recipients are publicly acknowledged for the contribution they make to the workplace.

## **4. LEARN AND DEVELOP INTEGRITY KNOWLEDGE AND SKILLS**

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

### **4.1 INTEGRITY EDUCATION AND CAPACITY**

#### **Induct and train employees**

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

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

Upon commencement at the City, employees undertake an induction with People and Performance 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 City's Employee Code of Conduct and People and Performance procedures. Employees also receive inductions from the Finance and Records Management teams to assist in their role and ensure employees are aware of their responsibilities.

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

- Employee inductions
- Weekly employee newsletters
- All of Staff meetings
- One on one meetings
- The City's intranet site

This includes information about employee obligations to report improper conduct, misconduct and corruption, and the requirement to disclose conflicts of interest, secondary employment, the receipt of gifts and benefits, and any association with organisations who conduct business in the City, or in a district adjoining the City.

Training and development completed by employees is recorded in a centrally maintained register. Employees participate in an Annual Performance Review where behaviours relating to integrity can be discussed and addressed.

### **Induct and train elected members**

Upon election, new Elected Members are provided with an Elected Member Guide and training on their role and responsibilities, particularly in relation to integrity matters such as conflicts of interest and disclosure of gifts.

New Elected Members are required to complete Council Member Essentials Training 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 P669 Elected Member Continuing Professional Development confirms an annual allocation to each Elected Member to attend conferences, seminars, training development programs and courses, professional development luncheons and networking events. The Administration regularly informs Elected Members of available courses.

Training is also provided by way of regular Elected Member Briefings and Workshops. Information about conduct and integrity is communicated to Elected Members via weekly newsletters.

## **Management tools**

The City uses a number of resources to manage employees, monitor team performance, build group cohesion and set the strategic direction. For example, the City's Performance Management Framework outlines how the City systematically manages employee performance to ensure performance standards are met and outcomes support the achievement of the City's vision. This includes a Performance Management Guide and a checklist for employees, supervisors and managers.

The City also has a focus on supporting and encouraging effective leadership and people management so that employees are positioned to realise their full potential. Therefore, the City runs a series of targeted learning and development experiences throughout the year. Providing meaningful and relevant learning and development opportunities to continually develop the skills and knowledge of our employees is important to the City.

## **Knowing our employees**

The City values the contribution of all employees and understands the workforce is one of our most valuable resources. Employee performance is critical to the delivery of high-quality services to the community and the City's overall success and sustainability. Therefore, the City uses a robust recruitment framework to ensure that the right people are selected for the right jobs. This includes having correct policies and management practices in place, reference checks are completed, conflict of interest declarations are sought, and police clearances are obtained for identified positions. Performance review processes are also undertaken every year with each employee with this process being reported on through a number of different auditing avenues.

## **Complaint Management**

The City recognises that complaints provide a valuable source of feedback on the performance of the City's functions. The City values complaints as they provide feedback on operations which allows for continuous improvement. This includes identifying trends in behaviours, helping to identify poor performance, training deficiencies or misconduct and to help identify any weaknesses in internal controls.

## **Identifying potential issues**

As a good practice measure, the City monitors the health and wellbeing of employees and acts early when concerns are identified. Through the City's Employee Assistance Provider, employees and their immediate family members (de facto partner, spouse, and dependent children under 25 years) are entitled up to six confidential counselling sessions per year.

## 5. BE ACCOUNTABLE FOR INTEGRITY

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

### 5.1 FRAUD AND CORRUPTION DETECTION SYSTEMS

Council Policy P694 Fraud and Corruption Control confirms the City's commitment to integrity and zero tolerance of fraud, corruption and bribery in all forms.

Fraudulent and corrupt conduct can be detected through the City's robust internal control systems and mechanisms. These include:

- Governance Framework (including Gift Register, Conflict of Interest notifications and delegations)
- Risk Management Framework
- Internal and external audits
- City of South Perth Integrity Framework
- Procurement Framework
- Audit, Risk and Improvement Committee
- Strategic Audit Plan
- Public Interest Disclosure Officer

### 5.2 RESPONSE TO INTEGRITY BREACHES

The City has a number of processes and procedures in place to encourage and enable reporting of integrity concerns. This includes a grievance process, Public Interest Disclosures and the ability to raise concerns with supervisors and managers. Other external avenues for employees to report integrity concerns include the Public Sector Commission, the Corruption and Crime Commission and WA Police.

### 5.3 SELF ANALYSIS AND REVIEW

#### Act to prevent

Acting with integrity means that employees must act with honesty and with moral strength and courage. The City fosters and supports an environment where employees feel comfortable to speak up and intervene when needed. This includes encouraging employees to prevent colleagues from making poor or unethical decisions, providing constructive feedback on their conduct or performance and eliminating negative or destabilising influences in the workplace.

## **Shared responsibility**

All employees have a responsibility to ensure the ethical health and professional standards of the workplace are upheld. This includes employees having the courage to raise integrity concerns with colleagues, to report improper conduct and to support colleagues. The City supports and maintains a safe reporting environment in which employees feel confident to report any integrity concerns.

## **Reinforce policies**

Employees are regularly consulted to review and update workplace policies and management practices. Policies are regularly reviewed with feedback invited from internal stakeholders prior presentation to Council for endorsement. All policies and management practices are well documented, reviewed and made available to employees on the intranet.

## **Audits and risk assessments**

The City engages Auditors to conduct regular workplace audits to ensure that employees are complying with their obligations under organisational policies, and that procedures in relation to risk management areas are being adhered to. In addition, the Office of the Auditor General also conducts annual financial audits to ensure the City's processes are consistent with good practice.

The City has a robust risk management framework to assess risks in the workplace. The Risk Register identifies potential risks, prioritise these risks, and implements ways to minimise or prevent the risk from eventuating. Audit reports and risk matters are presented to the Audit, Risk and Improvement Committee prior to being adopted by Council.

## **Review and monitor**

The City regularly reviews and monitors its internal processes and systems to ensure they meet the needs of the organisation, the community and stakeholders. The following areas are routinely monitored and reviewed:

- Consultation process
- Integrity risk register
- Delegations and authorisations
- Systems and processes through software detection applications
- Assessments of vulnerable areas such as finance and procurement
- Measuring employee conduct and attitudes
- Evaluation of integrity awareness

The City will self-assess its integrity practices using the Integrity Framework Maturity Self-Assessment Tool (Annexure A) to identify measures in place to support integrity and areas for development.

# 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>
<b>Characteristics</b>			
<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 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 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 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 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>

### Comments

Add your text here

## 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 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 type="checkbox"/> Roles and responsibilities – including the authority head's accountability for integrity – are documented in the integrity framework.</li> <li><input 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 type="checkbox"/> Delegations for all legislative and high risk functions are covered (e.g. regulation, approvals, human resources, finance).</li> <li><input 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> |
|--|---|---|---|

### Comments

Add your text here

## 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 type="checkbox"/> All obligations are documented and accounted for (e.g. reflected in internal controls, roles and responsibilities, compliance calendars).</li> <li><input type="checkbox"/> Compliance gaps are addressed as identified.</li> <li><input 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 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>

### Comments

Add your text here

# 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 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 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 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 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"/> Risks 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 and 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>
---	---	---	---

## Comments

Add your text here

# 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 type="checkbox"/> Internal controls (e.g. preventative, detective and corrective) are proportionate to specific integrity risks.</li> <li><input type="checkbox"/> A position or team manages the policy register to ensure policy owners are undertaking scheduled reviews.</li> <li><input 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 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 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 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>
--	---	---	--

## Comments

Add your text here

# 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 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 type="checkbox"/> Changes are being made to how existing data is captured, providing more structure for easier analysis.</li> <li><input 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>
---	---	--	--

## Comments

Add your text here

# 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 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 type="checkbox"/> The code of conduct has been developed taking into account the views of the authority's key external stakeholders.</li> <li><input 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 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>
--	--	---	---

## Comments

Add your text here

## 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 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 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 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 type="checkbox"/> Leadership roles are identified positions of trust. Employment screening occurs for all new leadership roles.</li> <li><input 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> |
|--|---|---|---|

### Comments

Add your text here

# 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 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 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 type="checkbox"/> Actions and initiatives to build and sustain integrity are in place. Evaluation activities are conducted regularly and improvements implemented.</li> <li><input 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 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> |
|--|---|---|---|

## Comments

Add your text here

# 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			

- Induction, if conducted, relies on the knowledge of individual line managers.
- Some integrity education occurs beyond induction to meet compliance obligations.
- Leaders and line managers rarely follow up if their staff have attended integrity education provided.
- Whether other actions and initiatives (e.g. staff performance processes) to educate and reinforce integrity are undertaken relies on individual line managers.
- 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.

- An induction program is being developed to incorporate expectations, standards, policies and procedures and guide ethical decision making.
- 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).
- 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.
- Additional actions and initiatives to educate and reinforce integrity (e.g. staff performance processes and raising integrity consciousness) are being developed or reviewed.
- 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.

- 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).
- 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.
- Leaders and line managers support and champion integrity education. They reinforce the importance of attending integrity education sessions.
- Staff performance processes and actions and initiatives to raise integrity consciousness reinforce key integrity messages and support good decision making.
- 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.

- Integrity education is, where relevant, also in place for external stakeholders (e.g. labour hire staff, contractors and suppliers).
- 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.
- 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.
- 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.

## Comments

Add your text here

# 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 type="checkbox"/> Central recording of case information is being developed to streamline reporting.</li> <li><input 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 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 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> |
|--|--|---|--|

## Comments

Add your text here

# 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 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 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 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> |
|--|---|--|--|

## Comments

Add your text here

# 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

<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 type="checkbox"/> Internally focused oversight activities are routinely performed and documented.</li> </ul>	<ul style="list-style-type: none"> <li><input 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 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 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>
--	--	---	--

## Comments

Add your text here

9474 0777

#discoversouthperth | [southperth.wa.gov.au](http://southperth.wa.gov.au)

