CITY OF SOUTH PERTH
INTEGRITY FRAMEWORK

JANUARY 2020

City of
South Perth

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PART 1: INTEGRITY IN LOCAL GOVERNMENT

1.1 Purpose

This Integrity Framework outlines the policies, mechanisms and responsibilities that help the City of South Perth deliver on our Strategic Community Plan 2017-2027 through high levels of honesty, objectivity, ethics and accountability.

The Integrity Framework is underpinned by the City's values and visions for the future.

1.2 The City of South Perth Values

1.3 Our Vision for the future

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

1.4 What is integrity?

The Integrity Strategy for WA Public Authorities 2020-2023 published by the Public Sector Commission, provides the following:

"Integrity is a non-negotiable to assure Western Australians that public authorities act in the interest of the community each and every day through the decisions we make and the actions we take".

Operating with integrity means using our 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.

Earning and maintaining community trust is essential for us to deliver the services that families, individuals, businesses and industry need for them to prosper – and for the State to grow.

1.5 What does integrity look like?

Integrity involves developing and maintaining a professional and respectful workplace. It involves ethical leadership, active management and supervision, the right people, effective processes and confident professional reporting.

Workplace integrity is about creating a workplace that fosters the development of high professional standards, and demonstrates the values of the organisation.
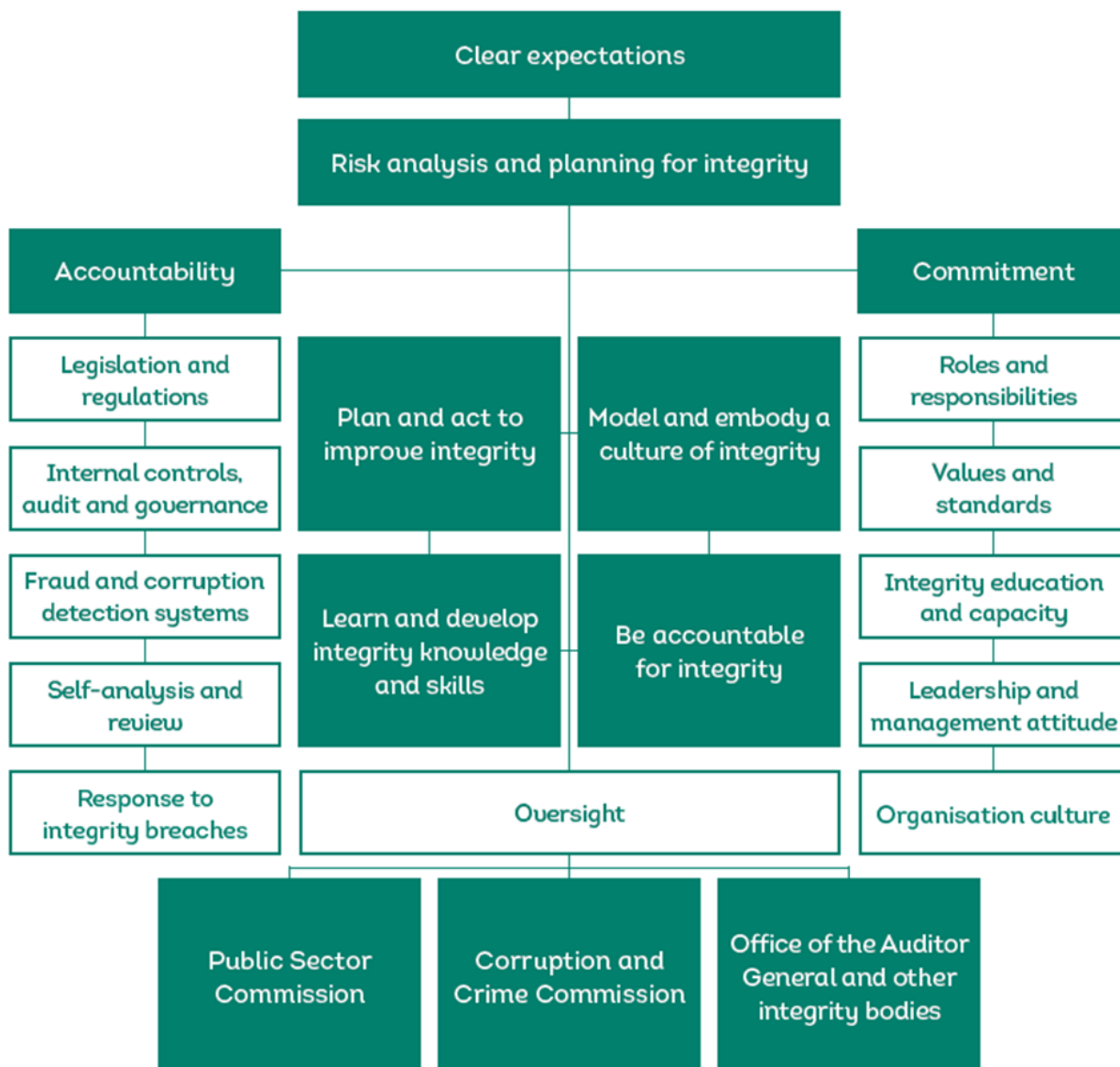
An ethical and professional workplace is the best safeguard against risks to integrity, including improper conduct, misconduct and corruption.

1.6 How much does integrity cost?

The delivery of publicly funded infrastructure, facilities and services for the City of South Perth occurs in a complex political and operational environment. The community rightly expects that these are delivered in a responsible and ethical manner that delivers value for money.

The City's resources will be managed with integrity and transparency in accordance with our values and vision for the future. This Integrity Framework provides the first step in being accountable and ensuring our services are delivered in accordance with community expectations.

1.7 The City of South Perth Integrity Model

Clear expectations

Risk analysis and planning for integrity

Accountability

Commitment

Legislation and regulations

Plan and act to improve integrity

Model and embody a culture of integrity

Roles and responsibilities

Internal controls, audit and governance

Values and standards

Fraud and corruption detection systems

Learn and develop integrity knowledge and skills

Be accountable for integrity

Integrity education and capacity

Self-analysis and review

Leadership and management attitude

Response to integrity breaches

Oversight

Organisation culture

Public Sector Commission

Corruption and Crime Commission

Office of the Auditor General and other integrity bodies

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

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PART 2: INTEGRITY STATEMENT

The City of South Perth Integrity Framework is modelled on the "Integrity Strategy for WA Public Authorities 2020-2023" published by the Public Sector Commission Western Australia and "A Guide to Building Workplace Integrity" published by the Office of Police Integrity Victoria. In accordance with these documents, our Integrity Framework is based on the following principles:

2.1 Plan and act to improve integrity

Effective governance systems and frameworks are established.

"The attitudes, behaviours and responses of staff demonstrate a commitment to organisational values and goals. Ethical conduct prevails in the workplace, and staff take responsibility for building a professional workplace. Staff at all levels take action when needed. They act to prevent misconduct and improper behaviour, they raise integrity concerns, and they do not support destabilising attitudes and behaviours. Staff know what the organisation expects of them, and carry out their duties in accordance with these expectations. Staff feel valued and supported in the workplace".

Code of Conduct

The City of South Perth Code of Conduct is regularly reviewed and is available to all staff. Staff undergo refresher training every 12 months with a required pass mark for completion. The Code of Conduct promotes the City's organisational values and provides expected standards of behaviour. The Code is required by regulations made under the *Local Government Act 1995* to contain certain requirements. Beyond those specified requirements, the Code also includes a number of other requirements in relation to the conduct of Council Members and Employees. They have been formulated on the basis that they express standards of conduct which are appropriate to the context of local government and the roles and functions that Council Members and Employees have and perform, and that compliance with them will make a significant contribution to the provision of good and sound local government, and to the effective and efficient performance by the City of South Perth of its functions to the betterment of the community it serves.

Governance Framework

The City of South Perth Governance Framework 2016 has been prepared to ensure our compliance with all relevant legislation, including the *Local Government Act 1995* and the pursuit of best practice as a democratic local government.

It is an overview of the governance program that has been put in place so that Elected Members and employees can meet their governance responsibilities. It also enables our community and stakeholders to have an understanding of governance and demonstrates how all people associated with our Council can participate.

Public Registers

The City is required to maintain and publish certain registers to the City's website for public inspection in accordance with the Act. These include a Gifts Register, a Contribution to Travel Register, a Minor Breaches Register, Declarations of Interest Register and an Electoral Gifts Register.

Freedom of Information

The Western Australian *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 is accurate.

A public Information Statement, updated annually, provides details about the history, demographics, government structure, administration and statutory responsibilities of the City of South Perth, as well as facts regarding freedom of information and schedules and forms.

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.

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 two PID officers – The Manager Human Resources 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" and "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 in the *Local Government Act 1995* (LG Act). These delegations must be approved by an absolute majority of Council.

Similarly the LG Act provides that the CEO may delegate the exercise of some of those functions and powers to employees of the City. Such a delegation may be made subject to conditions, qualifications, limitations or exceptions as the person so delegating may specify. Further, a delegation may be made to a specified person or to persons of a specified class, or may be made to the holder or holders for the time being of a specified office or class of office.

Under the LG Act, these delegations must be reviewed every 12 months.

Shared responsibility

Staff receive ongoing training on their, and others, roles and responsibilities in the workplace which engenders a mutual understanding of how positions contributes to the overall functioning of the City. This is a deliberate approach to actively contribute to and support a positive and professional work environment.

All staff are encouraged to take responsibility for professional development, to raise any integrity concerns, to identify ways to improve how things are done, to actively participate in team meetings and performance management, and to develop partnerships with the community.

Ethical responsibilities

Upon induction, and on regular intervals, staff receive regular briefings and/or training to ensure they understand their ethical responsibilities in the workplace. This includes their obligation 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.

2.2 Model and embody a culture of integrity

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

"Managers demonstrate integrity and professionalism, and serve as important role models in the organisation. Managers lead by example and take responsibility for building a professional and respectful workplace. They are motivated by public rather than private interests, and inspire a willingness in others to act ethically. Managers understand the strategic benefits of workplace integrity – and its relevance to the organisation's capacity to achieve its objectives, to resist misconduct, and to retain quality people. Professional managers enjoy the trust and confidence of staff".

Lead by example

The Executive Management Team (EMT) have taken responsibility for leading the ethical tone of the City to build a professional and respectful workplace. The EMT communicate to the Leadership Team, and other members of the City, on ethical conduct and integrity issues whilst modelling the expected standards of behaviour. This demonstrates the City's commitment to our values and is consistent with the level of professional leadership that is expected.

Clear expectations

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

Communicate with staff

The City uses a number of forums to communicate regularly with staff about ethical conduct, integrity and performance. This includes regular staff or operational meetings, leadership meetings, a monthly electronic newsletter to all staff, and an 'all of staff' meeting that is held quarterly. In addition, regular communications are distributed to staff via email and a CEO Update is provided four times per year.

Value staff

Staff 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.

2.3 Learn and develop integrity knowledge and skills

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

"Managers are proactive in their management of staff and monitor staff performance by making use of a range of resources available to them. Effective managers know their staff and how they carry out their duties. They support the professional development of staff, and foster a continuous learning environment. Managers do not shy away from difficult discussions about staff performance, well being or integrity concerns. They take appropriate action when needed in the interests of the staff member, their colleagues, the organisation, and the wider community."

Management tools

The City uses a number of resources to manage staff, 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.

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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 staff

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 our functions and that this is of value to our customers. The City values complaints as they provide feedback on our operations which allows us to continuously improve. 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 staff 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 (6) confidential counselling sessions per year. Sessions are one (1) hour in duration and may be held face to face, via telephone or via Skype.

2.4 Be accountable for integrity

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

"*Staff accept their responsibility to report misconduct. They are familiar with the reporting process and are confident that something will be done about the matter. Staff are supported in the workplace, and know they can make reports without fear of intimidation, reprisal or pressure from others not to do so. A strong internal reporting culture serves to maintain high professional standards within the organisation, and contribute to its continuous improvement. Integrity concerns are managed in the interests of the individual, the organisation, and the public*".

Act to prevent

Acting with integrity means that staff must act with honesty and with moral strength and courage. The City fosters and supports an environment where staff feel comfortable to speak up and intervene when needed. This includes encouraging staff 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 staff have a responsibility to ensure the ethical health and professional standards of the workplace are upheld. This includes staff 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 staff feel confident to report any integrity concerns.

Enable reporting

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 staff to report integrity concerns include the Public Sector Commission, the Corruption and Crime Commission and WA Police.

Reinforce policies

Staff are regularly consulted to review and update workplace policies and management practices. The City conducts an annual policy review process and invites comments from affected stakeholders prior to the policy being presented to Council for endorsement. All policies and management practices are well documented, reviewed and made available to all staff on the intranet.

Audits and risk assessments

The City engages Auditors to conduct regular workplace audits to ensure that staff 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 audits to ensure the City's processes are consistent with good practice. The City also has a robust risk management framework to assess risks in the workplace.   The Risk Register identifies potential risks, prioritise these risks, and implement ways to minimise or prevent the risk from eventuating.   Audit reports and risk matters are presented to the Audit Risk and Governance Committee prior to being adopted by Council.

PART 3: MEASURES OF SUCCESS

To know how the City is progressing towards building and sustaining a high integrity culture across the organisation, we need to be able to measure and evaluate our processes.

3.1 Signs of success

The Public Sector Commission has provided the following signs of success for public authorities:

- Public authority has implemented or exceeded the requirements of the integrity framework
- Commission evaluation and benchmarking tools indicate the public authority is well positioned in regards to governance, culture, education and accountability
- Survey data shows high staff perception of integrity in the public authority
- Survey data shows staff have a good understanding of policies, procedures and ethical codes
- Training and information sessions related to integrity are well attended
- Time taken to resolve integrity matters is reasonable and results in improvements where necessary
- Evaluations of reports to integrity bodies indicates reports are timely
- Responses to integrity matters and results of reviews and audits are considered and implemented.

3.2 Corporate objectives

For the City's Integrity Framework to be successful, the following corporate objectives are embedded within our normal business processes:

1. Integrity matters are incorporated into all aspects of the business as a standing item.
2. Integrity risks are incorporated into the City's Risk Register and are constantly monitored and reviewed.
3. Integrity risks are presented to the Audit Risk and Governance Committee.
4. Integrity checks are conducted as a normal recruitment process.
5. Regular networking opportunities with other local governments and public organisations on integrity matters.
6. The City continues the use of formal notification processes such as newsletters, emails and meetings.
7. Integrity reporting processes are advertised and encouraged.
8. The roles and responsibilities of leadership team is to include a focus on integrity management.
9. The City is committed to learn from internal and external reports on integrity management.

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3.3 Corporate documents

The City will continue to review and amend our suite of corporate documents relating to integrity management. This includes:

- City of South Perth Code of Conduct
- City of South Perth Policies
- City of South Perth Management Practices
- Public Interest Disclosures
- Freedom of Information Register
- Delegations
- Authorisations
- Risk Management Register
- Complaint Register
- Gifts & Benefits Register

3.4 Training and development

The City is committed to ensuring our staff are afforded the correct training and development opportunities to undertake their role. Training includes:

- Integrity management
- Policies, procedures and systems
- Procurement training
- Code of Conduct
- Public Interest Disclosure
- Accountable and Ethical Decision Making (AEDM training)

3.5 Review and monitor

The City regularly reviews and monitors our internal processes and systems to ensure they are meeting 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 staff conduct and attitudes
- Evaluation of integrity awareness
- Collected data is analysed and reported to EMT

APPENDIX – Integrity Snapshot Tool

The snapshot tool supports the Integrity Strategy for WA Public Authorities 2020-23. It gives public authorities a clear view of what they have in place to support integrity, and can help them identify areas for development or more focus that should feature in their planning. The snapshot tool is not meant to be an exhaustive list of things to consider and should be used by public authorities in a manner that best suits their contexts. It is not intended to replace more detailed or specific risk management activities.

The tool can:

- help public authorities evaluate their approaches to promoting integrity and reducing misconduct risks
- identify any gaps in the current approaches to integrity by public authorities that could be actioned.

01 Plan and act to improve integrity

Effective governance systems and frameworks are established.

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has developed and implemented a Code of Conduct that sets out its standards of conduct and integrity, and incorporates code requirements into policies and procedures to reinforce conduct expectations *For public sector agencies, the Code of Conduct should reflect Commissioner's Instruction No. 7: Code of Ethics, and comply with Commissioner's Instruction No.8: Codes of Conduct and Integrity Training.*	☐	☐	☐	
has identified its integrity risks considering its work and operating context, and records those risks (e.g. in a risk register, fraud and corruption control plan)	☐	☐	☐	
enacts controls to address identified risks	☐	☐	☐	
identifies and links policies that relate to risks to ensure they have consistent principles and objectives, and are clear and easy to follow (e.g. fraud and corruption, use of public resources, record keeping and use of information, conflicts of interest, gifts and benefits)	☐	☐	☐	
has an organisation structure that provides clear lines of accountability and responsibility for integrity and misconduct functions (including the role of leaders and managers)	☐	☐	☐	
has documented delegation schedules in place that align to organisation structure and legislative obligations	☐	☐	☐	
reviews delegation schedules regularly to ensure they remain current and operate with appropriate levels of authority	☐	☐	☐	

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01 Plan and act to improve integrity (continued)

Assess if your authority:	In place	In progress	Not in place	Proposed actions and comments
has a position, team or committee with documented responsibility to consider findings and recommendations from integrity audits, assessments, reviews and investigations	☐	☐	☐	
assigns accountability and responsibility for monitoring and oversighting risks and controls (e.g. in authority's structure, job descriptions)	☐	☐	☐	
has an internal audit committee with an independent chair	☐	☐	☐	
uses tools and templates provided by the Commission or other sources to support its approach to managing integrity risks	☐	☐	☐	
has a process to review regularly its integrity risk profile to ensure it is responsive to emerging risks and recommendations made by integrity bodies (e.g. policy and practice review, process improvements)	☐	☐	☐	
evaluates and refines any processes, systems and controls that are in place or may be introduced to inform its detection and prevention of irregularities and corrupt practice (e.g. detection software, data analytics)	☐	☐	☐	
conducts regular assessments of business areas and functions that are, or may be, vulnerable to integrity risks (e.g. procurement and contracting; use of and access to confidential information; recruitment)	☐	☐	☐	
connects and collaborates with other authorities to seek or share expertise and advice on integrity matters (e.g. conducting investigations, policy development and process improvements)	☐	☐	☐	

02 Model and embody a culture of integrity

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

Assess if your authority:	In place	In progress	Not in place	Proposed actions and comments
has values that include integrity integrated into all aspects of its business (e.g. in policies, processes and systems)	☐	☐	☐	
promotes integrity in and outside the authority (e.g. website, publications, staff newsletters, division meetings, annual reports and everyday practices)	☐	☐	☐	
has leaders who role model integrity and demonstrate zero tolerance for breaches of ethical codes and misconduct	☐	☐	☐	
has a consultation mechanism to engage with and involve staff when reviewing integrity policies, procedures and information to gain shared commitment and understanding	☐	☐	☐	
has human resource policies and practices that reflect a commitment to recruiting staff who demonstrate a strong alignment to its values	☐	☐	☐	
ensures recruitment materials include information on values and conduct expectations	☐	☐	☐	
conducts integrity checking, including qualification and employment history checks, as a normal part of selection and recruitment practices, particularly for positions of trust (e.g. integrity officers, finance and procurement staff)	☐	☐	☐	
uses staff performance processes to discuss and reinforce its values and conduct expectations	☐	☐	☐	
measures staff confidence and attitudes about its integrity, including confidence in speaking up about misconduct and integrity matters (e.g. through staff perception surveys) and identifies steps to address any findings	☐	☐	☐	

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Model and embody a culture of integrity (continued)

Assess if your authority:	In place	In progress	Not in place	Proposed actions and comments
has staff formally acknowledge that they have read its code of conduct at appointment/induction	☐	☐	☐	
encourages staff to report misconduct (e.g. in policies, codes of conduct, staff communication)	☐	☐	☐	
makes information available about public interest disclosure processes and other reporting mechanisms to staff and stakeholders	☐	☐	☐	
has reporting policies or codes in place that includes a statement that reprisal action is not tolerated against those who speak up about misconduct and integrity matters	☐	☐	☐	

03 Learn and develop integrity knowledge and skills

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

Assess if your authority:	In place	In progress	Not in place	Proposed actions and comments
ensures integrity training programs are up to date (e.g. reflects its code, legislative and policy requirements)	☐	☐	☐	
maintains records of staff who attend induction and integrity training	☐	☐	☐	
follows up with staff where necessary to ensure learnings from integrity training are embedded	☐	☐	☐	
has a process for communicating with staff about integrity matters including updating them about changes to policies, processes and systems (e.g. through newsletters, emails, meetings)	☐	☐	☐	
has a formal induction process in place for all new staff and contractors that includes a clear focus on integrity	☐	☐	☐	
delivers Accountable and Ethical Decision Making (AEDM) training (or equivalent) and refresher training to staff that:				
• is aligned to its Code of Conduct	☐	☐	☐	
• is customised to its context and business, and covers its specific integrity risks	☐	☐	☐	
• is up to date and reflects changes to systems and processes	☐	☐	☐	
• includes information on its integrity framework, policies, processes and systems	☐	☐	☐	
• includes information on how to recognise, respond to and report misconduct	☐	☐	☐	
• records attendance and completion rates which can be provided to the Commission and other integrity bodies as required	☐	☐	☐	

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03 Learn and develop integrity knowledge and skills (continued)

Assess if your authority:	In place	In progress	Not in place	Proposed actions and comments
provides specific integrity training to staff working in high risk roles (e.g. finance, procurement, integrity) in relation to fraud and corruption, accountability requirements and reporting suspected misconduct	☐	☐	☐	
evaluates staff awareness of its integrity requirements (e.g. through staff perception surveys) and acts on any knowledge deficits	☐	☐	☐	
encourages, supports and provides a mechanism for staff to seek advice on integrity matters when they are unsure	☐	☐	☐	
makes staff aware of the process of identifying integrity risks and contributing to the risk register	☐	☐	☐	
ensures staff who respond to and investigate integrity matters are suitably skilled (e.g. have Certificate IV in Government Investigations or higher qualification and/or relevant experience)	☐	☐	☐	
exercises due diligence when engaging contractors to deal with integrity matters to ensure they have the necessary qualifications, skills and/or experience (e.g. through reference and qualification checks)	☐	☐	☐	
seeks opportunities for further learning about integrity matters by identifying key staff to attend events and forums provided by the Commission and other bodies	☐	☐	☐	
establishes networks with other integrity practitioners	☐	☐	☐	

04 Be accountable for integrity

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

Assess if your authority:	In place	In progress	Not in place	Proposed actions and comments
has a clear and documented process to assess potential misconduct that guides decision making about when to notify the Public Sector Commission and Corruption and Crime Commission of minor misconduct and serious misconduct (respectively), using their online reporting tools	☐	☐	☐	
articulates the roles and responsibilities of the leadership team in overseeing integrity	☐	☐	☐	
has a documented and active process to review and learn from internal and external reports, including focusing on individual conduct as well as system, cultural and capability weaknesses that may have provided the opportunity for misconduct to occur	☐	☐	☐	
monitors, reviews and addresses its approach to changing and emerging risks (e.g. due to restructure, introduction of technology and legislative change) and ensures: • a new integrity risk assessment is completed • its risk register is updated • internal policies, processes and systems are updated to reflect the new operating context	☐	☐	☐	
collected data is analysed and reported to the leadership team (e.g. reports of integrity breaches, complaints, grievances, staff survey results, training records, conflicts of interest, gifts and benefits register)	☐	☐	☐	
has integrity as a standing agenda item for its leadership team to provide a forum to interrogate data, and identify and respond to emerging trends (e.g. data about breaches of Code of Conduct or policy, allegations of misconduct, complaints received, and recommendations from self-assessments and audits)	☐	☐	☐	

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