



Public Sector
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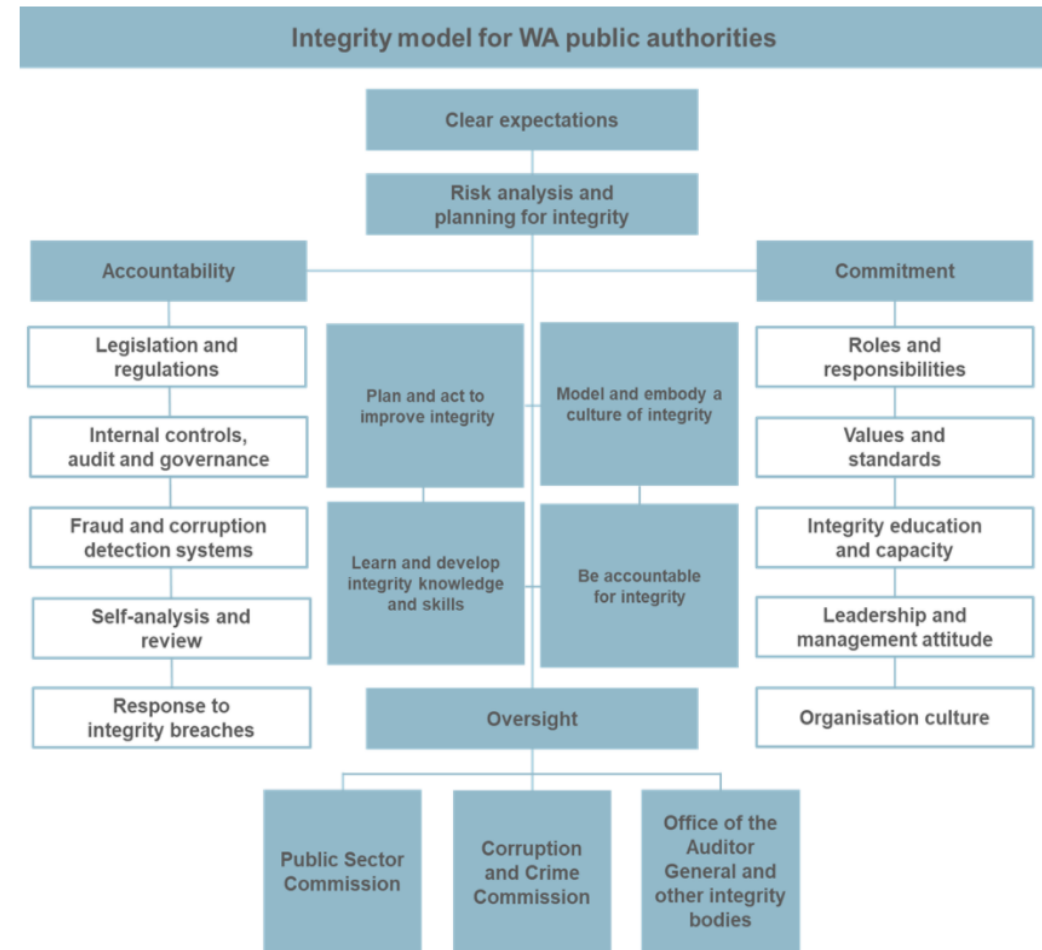
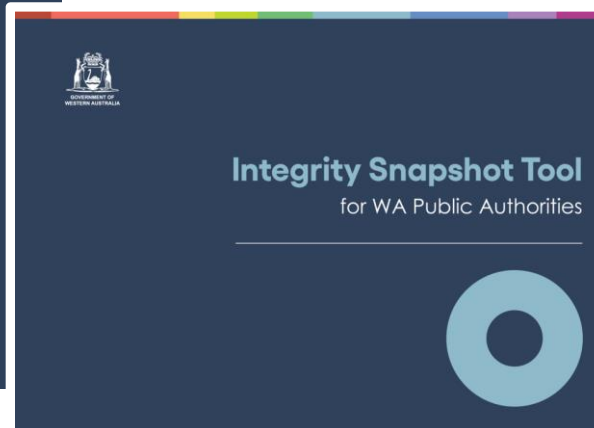
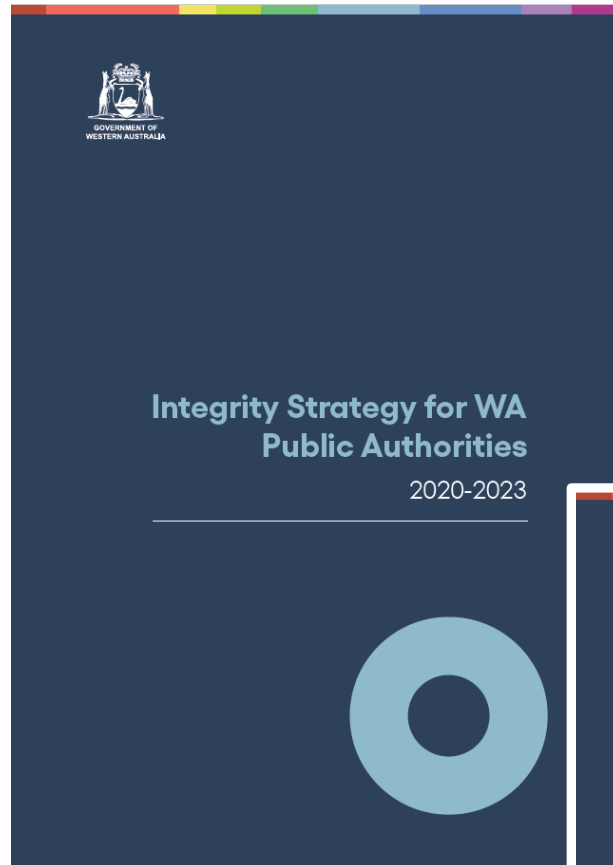


Building a high performing, future fit sector

Integrity and Accountability: Building a resilient public service

Public Sector Commission

Integrity Strategy



Integrity Framework

Integrity Framework Guide

Helping WA public authorities develop or strengthen their integrity framework

An integrity framework describes the instruments, structures and cultural factors that guide how an authority and its officers practice, manage and account for integrity.

A comprehensive, well-coordinated and implemented framework helps an authority:

- manage identified integrity risks
- prevent misconduct and corruption
- develop a culture built on integrity
- have leadership oversight
- build robust planning, performance, monitoring and review processes
- continuously improve its approach to integrity
- inform stakeholders, including integrity bodies, about its approach to integrity.

While the authority head is accountable for the framework, all officers are responsible for helping to prevent misconduct and corruption in their authority.

The underlying assumption is that the effectiveness of integrity management depends as much on the synergies between the instruments as on the effects of the individual instruments separately. An ethics code by itself will not have much impact; an integrity training session will not really make a difference; one inspection will probably not leave a lasting impression. It is the combination of such measures that will have a significant effect, a joint effect that is much larger than the mere sum of the effects of the individual instruments.

Organisation for Economic Co-operation and Development

Integrity Framework Guide >

- 1 Clear expectations
- 2 ▲ Plan and act to improve integrity
 - 2.1 Roles and responsibilities
 - 2.2 Legislation and regulations
 - 2.3 Risk analysis and planning for integrity
 - 2.4 Internal controls, audit and governance
 - 2.5 Fraud and corruption detection systems
- 3 ▲ Model and embody a culture of integrity
 - 3.1 Values and standards
 - 3.2 Leadership and management attitude
 - 3.3 Organisation culture
- 4 ▲ Learn and develop integrity knowledge and skills
 - 4.1 Integrity education and capacity
- 5 ▲ Be accountable for integrity
 - 5.1 Response to integrity breaches
 - 5.2 Self-analysis and review
- 6 Oversight

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Assessment Tool



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
- Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant. - Integrity is not defined or well understood by staff. - Integrity actions and initiatives tend to be unplanned, inconsistent and reactive. - Accounting for integrity only relates to meeting compliance obligations.	- Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant. - What integrity means is becoming clearer to staff as the tone from the top is being communicated. - Integrity actions and initiatives are being planned for and coordinated but not yet integrated. - Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.	- Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant. - Integrity is well communicated by leaders, understood by staff and integrated into business practices. - Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined. - Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.	- Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning. - Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations. - Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks. - 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.
Characteristics			
☐ Expectations, if documented, are only in the code of conduct. ☐ The authority head rarely communicates their expectations. ☐ Line managers check staff understanding of expectations only after an integrity breach. ☐ There are limited specific expectations communicated to external stakeholders (e.g. those who do business with the authority or use its services).	☐ 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. ☐ The authority head occasionally reinforces their expectations (e.g. face to face, staff communications). ☐ Line managers explain expectations at induction. Some reinforce them during employment (e.g. through staff performance processes). ☐ Specific expectations for external stakeholders are being developed.	☐ The integrity framework, code of conduct, integrity policies and procedures, and most business processes reflect the authority head's expectations. ☐ The authority head frequently reinforces their expectations and there is clear "tone from the top". ☐ 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. ☐ Expectations are communicated to external stakeholders (e.g. through a statement of business ethics).	☐ New policies and procedures are written consistently to reflect the authority head's expectations. ☐ The leadership group demonstrates the "tone from the top". It is visible and well known inside and outside the authority. ☐ Staff model and support the "tone from the top" which is assessed through staff performance processes. ☐ External stakeholders who do not meet communicated expectations are held to account (e.g. through appropriate legislative or contractual mechanisms).

Integrity Resources



News story: 7 September 2023

New Developing Code of Conduct Training guide released >

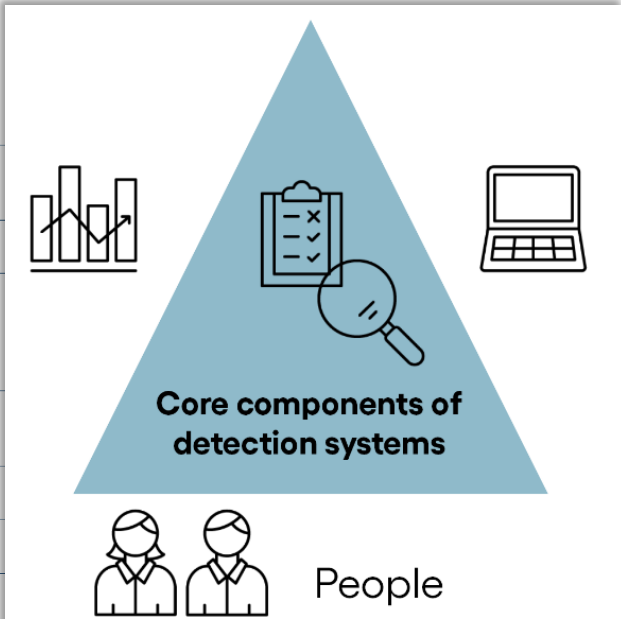
Commissioner’s Instruction 40: Ethical Foundations requires each public sector agency to provide formal and planned integrity training.



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	☐	☐	☐	
<i>For public sector agencies, the Code of conduct should comply with Commissioner’s Instruction 40: Ethical Foundations.</i>				
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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Thank you

Integrity Advisory Service

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