A review of how agencies promote integrity

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Commissioner's foreword

Organisational and personal integrity is the foundation of the ethical landscape that applies to the WA public sector. Strong leadership, appropriate operational strategies and a management environment that regards integrity with the suitably high priority it deserves are essential for establishing an organisational culture of integrity.

As Public Sector Commissioner, one of my functions under the *Public Sector Management Act 1994* (PSM Act) is to assist public sector agencies and their employees to adhere to the principles of conduct outlined in the PSM Act. I have a strong commitment to this area, personally delivering Accountable and Ethical Decision Making (AEDM) training to chief executive officers (CEOs) and boards, and clearly articulating my expectations of the sector.

As a member of the Integrity Coordinating Group (ICG), I regularly meet with my counterparts to discuss ways to strengthen and promote integrity within the WA public sector. It is essential that this commitment is shared by CEOs in order to support employees to make accountable and ethical decisions in all aspects of their work.

This review shines a spotlight on the subject of integrity for all of us. The trust that the wider community places in the sector is maximised when organisational cultures of integrity prevail. Put simply, agencies that function with integrity function more efficiently and effectively. I understand that promoting integrity is an ongoing process through which lessons can be continually learnt.

I wish to thank those agencies who participated in the review process, and encourage all CEOs to reflect on the findings in this report and consider what more they could be doing to raise the importance of workplace integrity amongst their employees.

M C Wauchope
PUBLIC SECTOR COMMISSIONER

August 2013

Summary

Overview

How agencies promote integrity is fundamental to accountability in the WA public sector. Section 9 of the PSM Act requires all public sector bodies and employees to comply with applicable codes of conduct and standards and to act with integrity when performing official duties.

This review was conducted under section 24B of the PSM Act, which provides for the Public Sector Commissioner to initiate a review in relation to part or all of the functions, management or operations of one or more 'public sector' bodies.[1]

This report outlines to what extent public sector agencies generally, and a number of selected agencies, are promoting integrity to their employees.

We examined five agencies against an integrity assessment framework which reviewed organisational culture, operational strategies, management environment, and review and evaluation processes in relation to promoting integrity.

- Department of Commerce (DOC)
- Department of Racing, Gaming and Liquor (RGL)
- Department of State Development (DSD)
- Disability Services Commission (DSC)
- Health and Disability Services Complaints Office (HADSCO).

Details of the framework can be found at Appendix 2.

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[1] Under the PSM Act, the definition of 'public sector' excludes entities listed in Schedule 1 of the PSM Act (e.g. local government authorities, universities and government trading enterprises).

Key findings

- Regardless of size, demographics or functions, the reviewed agencies share common challenges in promoting a culture of integrity, particularly in establishing and engendering a shared understanding of integrity and ensuring that there is access to integrity training.

- All of the reviewed agencies demonstrated that they are working towards building and enhancing a culture that promotes integrity and encourages ethical behaviour, however only two agencies have implemented three of the four elements of the framework. There is a reliance on providing training, and all of the reviewed agencies have, to varying degrees, implemented an integrity training program. However not all conduct training regularly enough to capture all new employees. At a sector wide level, almost three quarters of agencies provided integrity training to their staff during 2011/12. The collection of pre and post training data, and the surveying of staff to assess agency culture in relation to integrity, would enhance this work.

- Agency operational strategies are sound. All of the reviewed agencies have (or will soon implement) a comprehensive set of integrity related policies appropriate for their operating environments.

- All of the reviewed agencies demonstrated that their respective management environments attach importance to promoting integrity, although only one agency had implemented all the elements of the assessment framework. In all agencies staff regard senior managers and leaders as positive role models who actively encourage ethical behaviour through facilitated discussions and team meetings. Newsletters, posters, emails and information on agency intranets raise employee awareness of integrity issues and policies, and codes of conduct articulate agency expectations in relation to standards of behaviour.

- Potential misconduct risks are identified, recorded and monitored in all of the reviewed agencies. At the sector wide level over 95 per cent of agencies monitored their compliance with *Commissioner's Instruction No. 7 – Code of Ethics* (*Commissioner's Instruction No. 7)* during 2011/12, as did all the reviewed agencies. However while compliance monitoring is prevalent there is room for all agencies to increase the variety of mechanisms used.

- Agencies could do more to ensure they are meeting their obligations under the *Public Interest Disclosure Act 2003* (PID Act). Although the majority of agencies at the sector wide level (95 per cent in 2011/12) make their internal procedures accessible to staff, only 83 per cent of agencies published the names of their PID officers in that same year.

- All but one of the reviewed agencies regularly reviews integrity related policies to ensure relevance. None are evaluating the impact of their integrity policies or training programs with a view towards enhancement or improvement to meet changing needs.

Conclusion

The evidence obtained from the five reviewed agencies and the information provided to the Commission through survey responses, indicate that agencies are actively fostering cultures of integrity despite facing a range of challenges. Most demonstrated they have, or soon will have, the minimum set of integrity-related policies appropriate for their respective operating contexts. Each provided evidence affirming how their respective management environments promote integrity but there is room for improvement. The agencies have identified and monitored risks, but policy and integrity training review and evaluation processes could be enhanced.

At the sector-wide level, the review found that agencies are consistently working towards meeting the expectations of the Commission in relation to promoting integrity. However, there are opportunities for agencies to develop a more robust culture of integrity by:

- meeting integrity training obligations under *Commissioner's Instruction No. 8—Codes of conduct and integrity training* (Commissioner's Instruction No. 8)

- ensuring that methods of assessing compliance with ethical codes are sufficiently broad

- meeting accessible information obligations under the PID Act.

What needs to be done

The following recommendations are designed to assist agencies to build and sustain a culture of integrity. All CEOs are encouraged to use the assessment framework (Appendix 2) to assess how well their agency promotes integrity and should ensure:

- compliance with *Commissioner's Instruction No. 8* which establishes the requirement for public sector bodies to develop a code of conduct and provide accountable and ethical decision-making training to employees and board members

- CEOs and senior executives lead by example and act as role models in relation to demonstrating ethical conduct, undertaking AEDM training and encouraging and facilitating discussions among staff about integrity matters

- integrity training is conducted (including the AEDM program developed by the Commission) periodically rather than as a one-off or infrequent event to ensure staff awareness and knowledge of integrity related matters remains current

- online integrity training is not used in isolation, but supplemented with face-to-face activities in order to explore integrity matters interactively, ensuring a common understanding of integrity and confirmed learning

- integrity training is evaluated to determine the impact on employees' perceptions of integrity matters, in particular whether there is a shared understanding of integrity

- employees are periodically surveyed to assess organisational culture and values with a view to gathering information to enhance existing initiatives or introduce new ones to build a strong culture of integrity
- an ongoing evaluation program is established to evaluate integrity-related policies (the methodology should depend on agencies' available resources, the associated risks, as well as the scale and profile of each policy).

Agency responses

Commerce is committed to building a strong culture based on integrity and during 2013/14 intends to survey staff to assess culture and values. The effectiveness of integrity training will be evaluated the to determine the impact on employees perceptions of integrity issues, in particular, whether there is a shared understanding of integrity.

RGL regularly aims for all Corporate Executive members and middle managers to attend forums and workshops conducted by the Corruption and Crime Commission (CCC) or the ICG.

DSD appreciates the report and has implemented several new initiatives to ensure integrity in decision making remains key to the activities of the department. DSD believes it has the policies, training systems and culture necessary to actively promote integrity in the workplace. Since the review was conducted, all DSD staff, including directors attended an AEDM training refresher presented by one of the accredited providers. All DSD's integrity policies were reviewed in 2012 and updated policies have been rolled out to staff.

DSC welcomes the reporting findings and thanks the Commission for their work regarding this important issue.

The review highlighted areas for improvement for HADSCO and provided an opportunity to reflect upon how effectively the agency's governance policies are in guiding employees to make accountable and ethical decisions in the course of their work. Since the review HADSCO has worked with all employees to develop a new code of conduct that is meaningful and relevant to the their workplace and which also addresses reporting fraud and corruption.

Background

Rationale for the review

One of the Commissioner's functions under the PSM Act is to assist public sector agencies and their employees adhere to the principles of conduct outlined in the PSM Act. The Commission's strategic priorities include driving public sector reform to increase efficiency, effectiveness and integrity, and broadening and enhancing the Commission's evaluation and reporting of public sector management and administration. Conducting a review on how agencies promote integrity is consistent with those functions and strategic priorities and the review topic is also purposely aligned with the *State of the sector 2012* report's theme, which is 'enhancing professionalism and integrity'.

Defining integrity

Section 9 of the PSM Act requires all public sector bodies and employees to comply with applicable codes of conduct and standards and to act with integrity when performing official duties. *Commissioner's Instruction No. 7* sets out the minimum standards of conduct and integrity to be complied with by all public sector bodies and employees.[2]

The ICG, which comprises of the heads of WA's key accountability bodies, including the Commission, defines 'integrity' as *'…earning and sustaining public trust by*:

- *serving the public interest*
- *using powers responsibly, for the purposes and in the manner for which they were intended*
- *acting with honesty and transparency, making reasoned decisions without bias by following fair and objective processes*
- *preventing and addressing improper conduct, disclosing facts without hiding or distorting them*

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[2] Commissioner's Instructions are instruments issued by the Commissioner under section 22A of the PSM Act which provide directions to public sector bodies and/or employees on matters relating to the Commissioner's functions or the application of the PSM Act.

- *not allowing decisions or actions to be influenced by personal or private interests'.*[3]

Therefore, the values to which all public sector employees need to adhere should address both the means (i.e. processes) and the ends (i.e. outcomes) in order to meet community expectations and maintain public trust[4]. Besides maintaining public trust, organisational integrity has several other benefits for agencies and the whole sector, including that:

- decision-making is easier and more consistent

- staff commitment is enhanced

- turnover is reduced and staff perceive they have more development opportunities

- service to the community is improved

- the agency's reputation is enhanced. (Independent Commission Against Corruption (NSW), 2001)

Increasing the ethical capacity of agencies and managing risks appropriately assists in establishing an ethical organisational culture. The culture of an organisation is the most influential factor on the behaviour of its employees—it has the potential to make an ethical person act unethically or an unethical person behave ethically (Independent Commission Against Corruption (NSW), 1998). While codes of conduct and policies are important such documents alone will not guarantee ethical behaviour. (Bartos, 2012).

An ethical and supportive organisational culture that allows employees to perform their roles efficiently, effectively and honestly is characterised by:

- clarity and consistency of goals and values

- legislative authority that underpins equitable and transparent processes

- systems and processes that are designed to minimise misconduct

- effective training services and reliable advisory services

- efficient investigatory and enforcement processes

- regular monitoring, review and evaluation as a basis for improvement. (Head, 2008)

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[3] The Integrity Coordinating Group website is at: http://icg.wa.gov.au/integrity-public-sector

What we did

The intent of this review was twofold - to gain a broad perspective on how integrity is promoted across the whole public sector, and to undertake a detailed review of a selection of agencies.

For the public sector overall, we examined historical Annual Agency Survey[5] (AAS) data for all public sector agencies[6] to assess to what extent agencies were:

- establishing integrity-related policies and procedures (because documenting standards of conduct is one of the most effective ways to raise awareness of ethical conduct)

- delivering relevant training to their staff to meet obligations under *Commissioner's Instruction No. 8* (because such events facilitate the promotion of integrity)

- regularly conducting compliance assessments (because they are critical to determine if more should be done to raise awareness of ethical conduct)

- meeting compliance obligations under the PID Act.

For the five agencies we selected for a detailed review (see Page 5), we used AAS and Employee perception survey[7] (EPS) data, information from agencies including their policies, procedures and processes, and feedback from agency focus groups.

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[5] The Commission conducts an annual survey to gather data on the state of administration and management of the Public Sector and on compliance or non-compliance of public sector bodies.

[6] Previous *State of the sector* reports indicate that the numbers of public sector agencies (as defined under the PSM Act) have been: 107 (2007/08); 104 (2008/09); 107 (2009/10); 104 (2010/11); and 101 (2011/12).

[7] The Commission conducts an EPS across the WA public sector to establish employees' views of the extent to which behaviour in their agency is consistent with human resource standards, the WA Public Sector Code of Ethics, and equity and diversity principles.

We assessed these agencies against a framework that is consistent with the Commission's promotion of integrity strategies and the CCC's *Misconduct resistance framework*[8].

The framework addressed the following questions:

How well does the agency culture promote professional and ethical behaviour?

- Does the agency conduct and evaluate integrity training?
- Does staff induction address integrity matters?
- Are staff surveys undertaken to assess the agency culture?

To what extent is integrity promoted through operational strategies?

- Are policies covering modules of the AEDM training package in place? (Appendix 2 shows the list of policies)
- Is the promotion of integrity an established role of each agency's leadership group?
- Has a risk register that forms part of an overall risk management plan, been established?
- Is information about integrity-related policies and processes regularly communicated to staff?
- Is the effectiveness of awareness raising communication activities monitored?
- Is the code of conduct consistent with *Commissioner's Instruction No. 7*?
- Have quality assurance mechanisms to monitor compliance with *Commissioner's Instruction No. 7* and its code of conduct been established?

Does the agency regularly review and evaluate integrity training initiatives and key integrity-related policies?

Appendix 2 provides an overview of the framework and agency assessments.

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[8] Although the *Misconduct resistance framework* has a different purpose to the framework developed specifically for the review, it is a useful resource for agencies to measure the adequacy of their misconduct approaches that have been adopted or are being considered. More information about the Misconduct Resistance Framework can be found at:
http://www.ccc.wa.gov.au/Reporting/WhatIsMisconduct/Pages/MisconductResistanceFramework.aspx

What we found

Common challenges

We found that regardless of size, demographics or functions a number of common challenges in promoting integrity were identified by focus groups. Each agency is faced with the challenge of:

- engendering a shared understanding of what acting with integrity means, particularly where employees are transient, culturally diverse and the agency is geographically dispersed
- providing time for staff to attend integrity training and adequately reflect on their actions
- ensuring that integrity training obligations are met when budgets are tight.

There were also some issues that were seen by focus groups as being unique to their agency, including that:

- some customers' expectations can at times pressure staff to behave unprofessionally
- maintaining transparency in decision making despite the confidential nature of some work
- managing potential or perceived conflicts of interest (e.g. shareholdings) because of the nature of the work and the agency's role in the resources industry
- working with interstate and intrastate stakeholders who sometimes operate under different value systems.

Organisational culture

All agencies are actively endeavouring to build a culture of integrity, but only the largest agency (DSC) and the smallest (HADSCO) were found to have implemented three of the four elements that are considered integral to such a culture:

- Staff attend integrity-related training (e.g. AEDM training, values training).
- The induction program encourages staff to act with integrity and in the public interest.
- Pre and post integrity training evaluation data is collected.
- The agency periodically surveys staff to assess agency culture and values.

Integrity training is widespread but there is a need to evaluate its impact

Organisational leaders are role models and influence staff conduct more than any documented policy. Strong and effective leadership sets the 'tone from the top' and provides strategic direction on values and standards to all staff (Corruption and Crime Commission, 2008). Importantly, all members of the Corporate Executive teams at DSD, DOC, and DSC have attended AEDM training (Public Sector Commission, 2012). Four of five members at HADSCO and three of the four members RGL have also attended.

Commissioner's Instruction No. 8, issued in July 2012, requires public sector bodies to provide AEDM training to their employees and board members. Each agency has implemented an integrity training program (generally AEDM training) for employees, however not all new staff are captured. To be effective, integrity training should be regarded as an ongoing process and undertaken regularly rather than be considered as a one-off or infrequent event. Since 2010 when all staff at DSD underwent AEDM training, no follow-up training has been implemented. At the DSC, staff participate in values training rather than AEDM training, although it is planning to introduce online AEDM training shortly. The practical advantages of conducting online training are recognised, however to ensure a common understanding of integrity in the agency environment and for learning to be confirmed it should be not be the only method utilised.

At the sector wide level we found that approximately three-quarters of agencies provide training (usually AEDM) and information sessions annually. There has been strong growth in the number of public sector employees attending AEDM training via private providers since 2008/09,[9] with a 47.3 per cent increase in the first two quarters of 2011/12.[10] In 2010/11, 3 133 public sector employees (2.2 per cent) attended[11] CCC workshops that focus on preventing, identifying and responding to misconduct risks.

Collecting training evaluation data provides valuable feedback on which the impact on employees' perceptions about integrity can be assessed, in particular as to whether employees have a shared understanding of integrity.

None of the agencies currently collect pre or post training evaluation data. Three agencies (RGL, DSC and HADSCO) are considering doing so within the next 12-18 months, but DSD and DOC have no plans to do so.

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[9] Common Use Arrangements (or CUAs) are whole-of-government standing offers, awarded to a single or panel of suppliers to provide goods or services commonly used by government agencies. CUA 40304 covers AEDM training.

[10] Since 2009/10, 42 434 employees (including those in Schedule 1 entities) have completed AEDM training.

[11] When the data was collected only attendance figures to the December quarter of 2011/12 were available.

Induction programs encourage integrity

All five agencies offer an induction program that addresses ethical behaviour and acting with integrity. Focus groups identified that the importance of acting with integrity is a focus of the induction program at RGL and staff at DOC are encouraged to attend the sector wide induction program offered by the Commission. At HADSCO all new staff take an oath of confidentiality and affirmation of office when they commence employment.

Periodically collecting data on organisational culture is not widespread

Although the Commission collects data on organisational cultures through the EPS, it is important for agencies to collect their own data that could be used to enhance their respective cultures of integrity by either improving existing initiatives or introducing new ones because agencies usually participate in the EPS only once every five years.

DSC and HADSCO are the only agencies that periodically survey staff to assess culture and values. DSD has no plans to do so, but DOC and RGL are considering surveying within the next 12 to 18 months.

Operational strategies

Documenting standards of conduct is one of the most effective ways to raise awareness of ethical behaviour. We examined whether each of the agencies have in place a set of policies that cover the seven modules of the AEDM training package, namely:

- personal behaviour
- communication and official information
- fraudulent and corrupt behaviour
- use of public resources
- record keeping and use of information
- conflicts of interest
- reporting suspected breaches of a code of conduct.

Four of the five agencies have (or shortly will have), a comprehensive set of integrity related policies appropriate for their respective operating contexts. HADSCO currently does not have a policy for reporting fraud or corruption but at the time of review it was being developed. The only policy that DSD may wish to consider developing is one on social and political comment.

Operational strategies are comprehensive

To varying degrees, each agency embeds policies within their respective codes of conduct. Larger agencies that could be operating in more complex policy environments may consider it advantageous to have stand-alone policies. Our view is that it is appropriate for each agency to decide on the most suitable approach for its operating

environment. It is critical however that whatever approach is adopted, the policy statement provides adequate guidance to employees about their conduct obligations.

Management environment

While integrity policies are important, such documents alone will not guarantee ethical behaviour by staff (Bartos, 2012). They must be supported by a management environment that gives ethical behaviour and the promotion of integrity a high priority.

All agencies provided evidence affirming their respective management environments attach importance to promoting integrity, although only HADSCO have implemented all the elements the Commission deems important for a management environment to foster integrity.

Potential risks are identified

All of the agencies have established a risk register that is part of the agency's overall risk management plan. These ensure that current and emerging misconduct risks are identified and analysed across all discrete agency functions or operations.

Awareness raising activities are diverse and evident to employees

The behaviour and decisions of organisational leaders are the most influential factors on agencies' cultures, operational strategies and management environments. Focus groups identified a number of examples of the positive and visible impact that managers and leaders are having on the integrity landscape:

- Participants from all groups identified that their agencies have high-quality management teams that act as good role models and provide sound oversight of work processes.

- The high quality and positive impact of the leadership mentoring program at RGL was highlighted.

- Participants from DSD, DSC and RGL identified that managers actively encourage discussion of integrity related issues and policies at team meetings.

- Staff were included in the development of the corporate values at DSD promoting a sense of ownership.

- All agencies use multiple methods to raise awareness of the code of conduct and integrity related issues through newsletters, posters, emails, intranet.

Assessing the effectiveness of awareness raising communication initiatives is only undertaken by HADSCO. Three agencies (DOC, DSC and RGL) plan to do so within the next 12-18 months. Although DSD currently has no plans to assess the effectiveness of its communication initiatives, it was considering doing so as it prepared its workforce development plan.

Documented standards of behaviour are prevalent but quality assurance mechanisms could be strengthened

Each of the agencies has a code of conduct that is consistent with *Commissioner's Instruction No. 7* and have quality assurance mechanisms in place to monitor the agency's compliance with this instruction and its code of conduct.

At the sector wide level we found that there continues to be a high percentage of agencies that have documented the agency's values and the standard of conduct expected of employees—in 2010/11, 99 per cent of agencies had a code of conduct and 91.1 per cent in 2011/12.[12]

All agencies demonstrated that they have a risk management register that is part of an overall risk management plan and that identifies and analyses current and emerging misconduct risks across the agency.

On average, 95 per cent of agencies used one method in any year to assess compliance with *Commissioner's Instruction No.7* and the agency code of conduct and 92.1 per cent used two or more methods. The most common were:

- internal or external reviews
- analysis of complaints about non-compliance
- employee feedback through performance management
- surveys and exit interviews.

At the sector wide level, we also examined agency compliance in relation to their obligations under the PID Act. The Commission provides training for PID officers, and provides a range of products to guide public authorities and those considering making a PID. Since 2009/10, approximately half of all agencies monitored allegations of non-compliance with the PID Act. All agencies should make their internal PID Act procedures accessible to staff and publish the names of their PID officers. In 2011/12, 91.1 per cent of public sector agencies made information about their internal PID procedures accessible and 83.2 per cent published the names of their PID officers.

The six standards that apply to all public sector agencies and their employees outline the minimum standards of integrity to be followed when undertaking activities such as filling a job vacancy. A breach of standard claim allows a person to seek relief if they believe a decision made by a public sector agency has breached a Public Sector Standard and they have been adversely affected by the breach. Between 2007/08 and 2011/12, across all standards, an annual average of 152 claims were lodged. Between 2007/08 and 2011/12, across all six standards, the numbers of successful claims remained consistently low. In any one year no more than 10.4 per cent of all claims have been

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[12] This could be attributed in part to a rise in the number of agencies that did not respond to the question.

successful. While numbers of successful breach of standards claims remain low, employees and the broader community can have confidence in the sector's human resource management practices.

Review and evaluation processes

We assessed the extent to which the five agencies review and evaluate key integrity-related policies and their integrity training initiatives. The policies covered:

- risk management
- hospitality and gifts
- computer and internet usage
- conflicts of interest
- purchasing card usage.

Review processes are adequate for agency needs

Each agency clearly describes the purpose or objective of its stand-alone policies and identifies the target audiences. With the exception of DSD, each agency reviewed their policies on a periodic basis (i.e. every one to two years). DSD advised that no policies have been formally reviewed because they were developed in 2009 when the agency was established, however it is now appropriately considering implementing a program of review. Each agency consults with management as part of the review process—HADSCO also seeks advice on policy changes from agencies such as the Commission and the CCC.

Agencies need to assess the impact of their policies

None of the agencies are evaluating the impact of integrity related policies. There are various methods through which policies can be evaluated. Which method is used will depend on the perceived risk, scale and profile of the policy to be evaluated (HM Treasury, 2011). Some ways through which policies can be evaluated, include:

- surveys
- focus groups or group interviews
- face-to-face interviews with staff and other stakeholders
- statistical analysis of quantitative data related to the policies (HM Treasury, 2011).

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Appendix 2: Assessment framework summary

Elements of **culture**	Commerce	Racing, Gaming and Liquor	State Development	Disability Services	Health and Disability Services
Staff attend integrity-related training (e.g. AEDM training, values training)	✓	✓	✓	✓	✓
The induction program encourages staff to act with integrity and in the public interest	✓	✓	✓	✓	✓
Pre and post integrity training evaluation data is collected	☐	O	☐	O	O
The agency periodically surveys staff to assess agency culture and values	O	O	☐	✓	✓
Elements of **management environment**	Commerce	Racing, Gaming and Liquor	State Development	Disability Services	Health and Disability Services
Risk register established and is part of overall risk management plan	✓	✓	✓	✓	✓
Management widely communicates information about its integrity-related policies and processes	✓	✓	O	✓	✓
Management assesses the effectiveness of the awareness raising communication initiatives	O	O	☐	O	✓
The code of conduct is consistent with *Commissioner's Instruction No. 7*	✓	✓	✓	✓	✓
Quality assurance mechanisms are in place to monitor the agency's compliance with *Commissioner's Instruction No. 7* and its own code	✓	✓	✓	✓	✓

Elements of **operational strategies**	Commerce	Racing, Gaming and Liquor	State Development	Disability Services	Health and Disability Services
Core integrity related policies and procedures are in place:					
Personal behaviour					
Equal opportunity and diversity	✓	✓	✓	✓	✓
Occupational health and safety	✓	✓	✓	✓	✓
Security	✓	✓	✓	✓	✓
Police clearance/working with children	✓	✓	✓	✓	✓
Customer service policy	✓	✓	✓	✓	✓
Agency complaints e.g. grievance	✓	✓	✓	✓	✓
Communication and official information					
Dealing with lobbyists	✓	✓	✓	✓	✓
Media	✓	✓	✓	✓	✓
Social and political comment	✓	✓	✓	□	✓
Policies on intellectual	✓	✓	✓	✓	✓
Privacy	✓	✓	✓	✓	✓
Fraudulent and corrupt behaviour					
Policies to report fraud or corruption	✓	✓	✓	✓	O
Risk management	✓	✓	✓	✓	✓
Use of public resources					
Use of resources (e.g. phone, car)	✓	✓	✓	✓	✓
Official travel	✓	✓	✓	✓	✓
Official hospitality	✓	✓	✓	✓	N/A
Computer and Internet use	✓	✓	✓	✓	✓
Purchasing cards	✓	✓	✓	✓	✓
Record-keeping and use of information					
Record-keeping policy	✓	✓	✓	✓	✓
Freedom of Information policy	✓	✓	✓	✓	✓
Conflicts of interest					
Conflicts of Interest policies/guidelines	✓	✓	✓	✓	✓
Gifts policy	✓	✓	✓	✓	✓
Gifts register established	✓	✓	✓	✓	✓
Secondary employment policy	✓	✓	✓	✓	✓
Reporting suspected breaches of the code of conduct					
Policy/guidelines to report suspected breaches	✓	✓	✓	✓	✓

Legend

✓ the initiative or policy exists

O plans to implement within the next 12–18 months

□ has no current plan to implement within the next 12–18 months