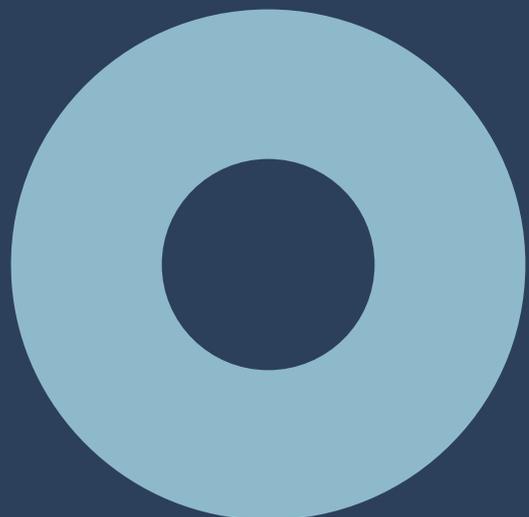




# Integrity Strategy for WA Public Authorities

2020-2023

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# From the Commissioner



**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.

We know that any breach of that trust has wide implications. The impact on our work and reputation affects us all. We also know that integrity goes beyond just legislative compliance – it is about doing the right thing because it is the right thing to do.

Two things are critical for us to understand to see improvement – first, integrity does not happen by chance; and second, we are all responsible for protecting the integrity of public authorities.

That is why a clear and focused approach to integrity must be at the core of our work. When integrity is a common frame of reference, it becomes a unifying force across different functions, different services and different employee groups.

Improved integrity helps minimise the incidence and impact of misconduct, including fraud and corruption. It also brings benefits in relation to performance, productivity and employee engagement.

To ensure our work translates into exceptional public value and high community trust, I expect every public authority – and those within – to commit to implementing this strategy.

*Sharyn O'Neill*

PUBLIC SECTOR COMMISSIONER

# Commitment to improve integrity

**Improved integrity requires sustained effort which is why all public authorities are expected to commit to implementing this strategy and taking action.**

Integrity has to be embedded in all aspects of our work – in governance and administration; systems and controls; culture and attitude; and accountabilities and responses.

Every day. By everyone.

All public authorities and individuals must take an interest in promoting integrity and preventing misconduct and corruption.

While the Commission has a significant role to play, the primary responsibility for preventing misconduct and corruption – and operating with integrity – lies with leaders and individuals in public authorities.

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

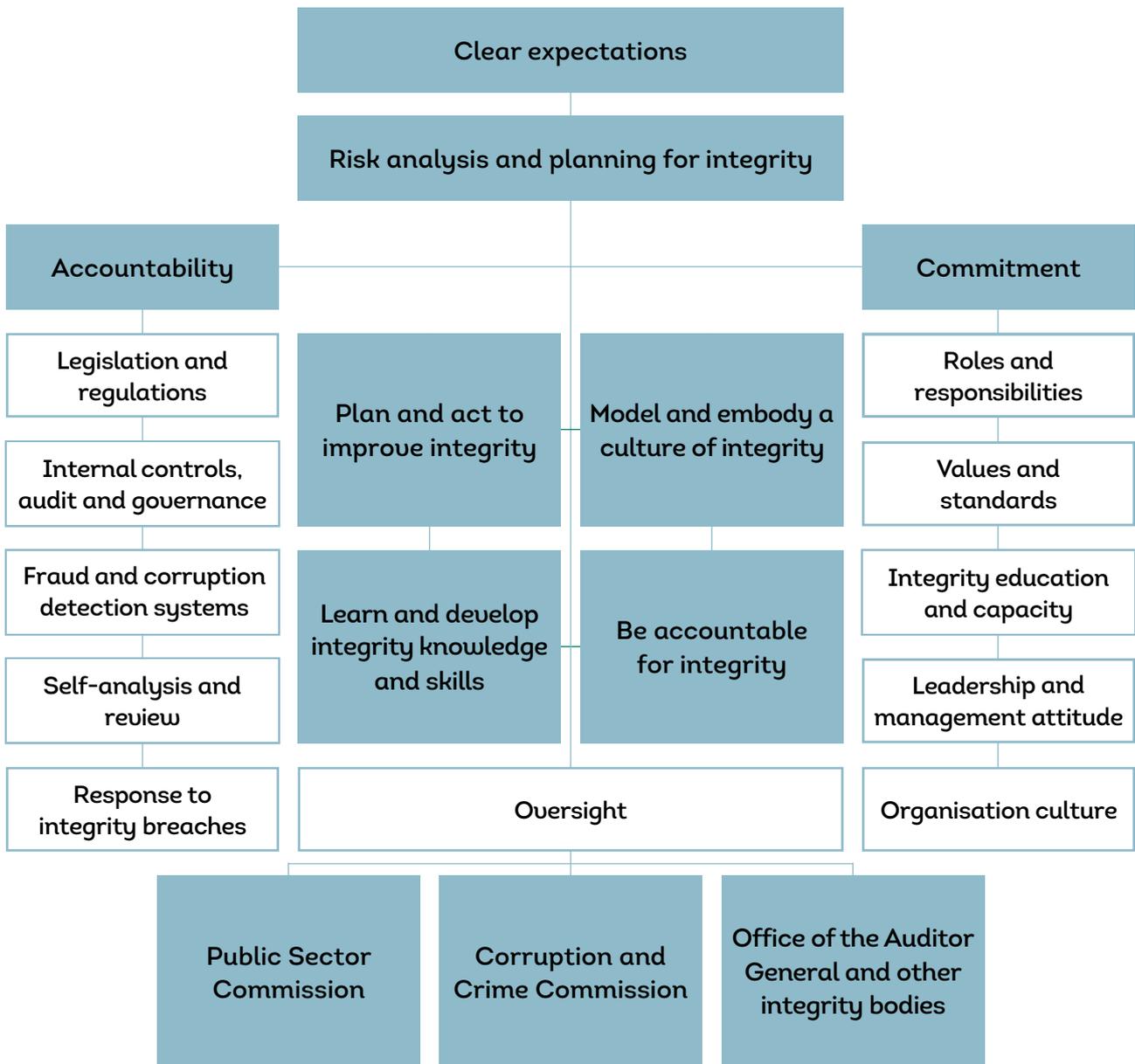
Those appointed to, employed in and contracted to public authorities are all covered by this strategy.

Public authorities should see this strategy as an opportunity to demonstrate to the community that they are serious about integrity.

While there are no additional compliance obligations for public authorities arising from this strategy, changes may be made to the compliance framework to ensure it is contemporary and fit-for-purpose.

Over the life of the strategy, the Commission and its integrity partners will continue to ask leaders to report if and how integrity is improving. This may be through surveys, audits or reviews. Leaders of public authorities should consider how they monitor and evaluate integrity as a priority.

## Integrity model for WA public authorities



# Key actions to achieve our goals

There are many well-documented dimensions needed to ensure strong integrity in public authorities.

This strategy focuses on four key improvement areas with actions and controls to promote integrity and help prevent misconduct and corruption.

Under each of the key improvement areas are actions for the Commission to implement and provide leadership and support to public authorities.

There is also a cohesive suite of practical and achievable actions for public authorities to put in place, and for individuals – those appointed to, employed by and contracted to public authorities – to do.

This three tiered approach across the four improvement areas reflects the responsibilities that every aspect of the government sector has in relation to integrity. Actions at any one tier – or actions in only one area – are not enough. The strength is in the three tiers working together across the four improvement areas.

As public authorities have differing needs and contexts, they should adopt those actions appropriate for their circumstances in a way best suited to their needs.

The strategy also provides a common language for how we talk about integrity across public authorities.

This integrity strategy has four key areas for improvement.

## 01

### PLAN AND ACT TO IMPROVE INTEGRITY

Effective governance systems and frameworks are established.

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## 02

### MODEL AND EMBODY A CULTURE OF INTEGRITY

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

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## 03

### LEARN AND DEVELOP INTEGRITY KNOWLEDGE AND SKILLS

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

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## 04

### BE ACCOUNTABLE FOR INTEGRITY

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

# 01

## Plan and act to improve integrity

Effective governance systems and frameworks are established.

### Actions for the Commission

#### 1.1 PUBLISH FRAMEWORK

Publish an integrity framework which includes instruments, processes, conditions, systems and control requirements that public authorities should have in place to support integrity; and detect, respond to and prevent misconduct, including fraud and corruption.

#### 1.2 ENCOURAGE SELF-ASSESSMENT

Develop a self-assessment tool for public authorities to assess the maturity of their integrity framework to assist in improvement planning.

#### 1.3 USE DATA TO DRIVE CHANGE

Use data collected from public authorities to create an online dashboard with analytics for public authorities to use in planning, including to benchmark their integrity environment against like public authorities.

#### 1.4 PROVIDE PLANNING GUIDANCE

Make exemplar misconduct prevention plans available for use by public authorities.

#### 1.5 INVESTIGATE DETECTION SYSTEMS

Examine detection approaches that identify irregularities and provide early warning including, software to monitor and evaluate data; systems to share intelligence, and a central register of individuals subject to adverse findings to assist with pre-employment screening.

#### 1.6 LINK TO AUDIT AND RISK

Assist public authorities to assess governance controls which help identify, monitor and report on integrity matters.

## 01 – PLAN AND ACT TO IMPROVE INTEGRITY

### Actions for public authorities

- 1.1 **IMPROVE INTEGRITY FRAMEWORK**  
Align approach to the integrity framework (as a minimum).
- 1.2 **CONTINUE TO IMPROVE**  
Use the integrity framework maturity self-assessment tool to assist in improvement planning.
- 1.3 **USE DATA TO DRIVE CHANGE**  
Use tools such as the online data dashboard to benchmark against like public authorities, and use data to assist planning.
- 1.4 **REASSESS APPROACH**  
Review regularly approaches to prevention and develop initiatives for improving integrity.
- 1.5 **EVALUATE DETECTION SYSTEMS**  
Evaluate current systems, including pre-employment checks, and data to inform detection and prevention of irregularities and corrupt practice.
- 1.6 **AUDIT AND RISK CONTROLS**  
Ensure audit and risk controls are in place and aligned to identify integrity vulnerabilities and risks.

### Actions for individuals

- 1.1 **UNDERSTAND AND ACT**  
Ensure you understand your public authority's code of conduct, policies and procedures; and act accordingly.
- 1.2 **IDENTIFY RISKS AND OPPORTUNITIES**  
Alert managers/supervisors of any gaps in your public authority's code of conduct, policies and procedures that may provide opportunities for misconduct.
- 1.3 **BE ACCOUNTABLE**  
Take responsibility for the decisions you make and the actions you take to ensure they are in the public interest.

# 02

## Model and embody a culture of integrity

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

### Actions for the Commission

#### 2.1 PRIORITISE INTEGRITY

Promote and prioritise integrity as a key value across public authorities.

#### 2.2 ENSURE A CONTEMPORARY APPROACH

Review integrity instruments and products to support contemporary approaches to integrity and guide conduct in public authorities.

#### 2.3 LISTEN AND RESPOND

Develop resources to assist public authorities to seek and act on staff perceptions about their public authority's integrity culture.

#### 2.4 GIVE FEEDBACK

Build skills of leaders to set behaviour expectations for their staff, give feedback, manage conduct and have difficult conversations.

#### 2.5 SET CLEAR EXPECTATIONS

Support public authorities to set clear behaviour expectations through codes of conduct, recruitment and performance processes.

#### 2.6 PROMOTE A SPEAK UP CULTURE

Share good practice in managing reporting to facilitate positive outcomes for those who speak up.

#### 2.7 PROMOTE AN INTEGRITY MINDSET

Conduct campaigns to promote an integrity mindset such as "All in a day's work" related to gifts and benefits.

## 02 – MODEL AND EMBODY A CULTURE OF INTEGRITY

### Actions for public authorities

- 2.1 **PRIORITISE INTEGRITY**  
Review corporate values to ensure integrity is included and promote these values internally and externally.
- 2.2 **DEVELOP TOGETHER**  
Involve staff in reviewing ethical codes, values, integrity policies and procedures so shared understanding is achieved.
- 2.3 **EVALUATE AND BUILD**  
Use Commission and other high quality resources to evaluate and build an integrity culture.
- 2.4 **BUILD CAPABILITY**  
Support leaders to promote a high integrity culture through professional learning, setting expectations for behaviour and building skills in having difficult conversations about conduct.
- 2.5 **SET CLEAR EXPECTATIONS**  
Recruit for values alignment and ensure behaviour expectations are clear in codes of conduct and staff performance agreements.
- 2.6 **EMBED PRACTICE**  
Embed good practices and mechanisms to encourage and support staff who speak up.
- 2.7 **ADOPT THE MINDSET**  
Use campaign materials to ensure staff are conscious of misconduct risk areas and how they should respond.

### Actions for individuals

- 2.1 **MODEL VALUES**  
Ensure your daily behaviours, actions and decisions demonstrate your public authority's values.
- 2.2 **CONTRIBUTE TO CULTURAL HEALTH**  
Respectfully challenge conduct that is not in accordance with your public authority's values and code of conduct.
- 2.3 **TAKE ACTION EARLY TO ADDRESS MATTERS**  
Speak up to ensure conduct that does not align with your public authority's values is addressed early and, where possible, take action to avoid escalation or repetition.

# 03

## Learn and develop integrity knowledge and skills

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

### Actions for the Commission

#### 3.1 SHARE AND COLLABORATE

Establish an integrity practitioners' group to collaborate on strategic approaches to detecting and preventing misconduct, and promoting integrity.

#### 3.2 BE A FUNCTIONAL AREA LEADER

Provide practical advice and information to public authorities, including forums and community of practice sessions on integrity matters.

#### 3.3 OFFER ONLINE TRAINING

Introduce online integrity learning modules for use by public authorities.

#### 3.4 INDUCT NEW STAFF

Work with other integrity agencies to develop an online integrity induction program for public authorities to use with their staff.

#### 3.5 SHARE INFORMATION

Publish insights from data and the work of integrity partners to inform public authorities about current and emerging integrity risks and strategies.

#### 3.6 SHARE RESOURCES

Establish an integrity section on [wa.gov.au](http://wa.gov.au) with accessible, practical and up-to-date information and resources.

## 03 – LEARN AND DEVELOP INTEGRITY KNOWLEDGE AND SKILLS

### Actions for public authorities

- 3.1 PARTICIPATE ACTIVELY  
Participate in integrity promotion and misconduct prevention initiatives and share learnings with staff.
- 3.2 INDUCT AND TRAIN STAFF  
Deliver integrity training to new staff early in their employment and implement regular integrity training for all staff.
- 3.3 EDUCATE FOR PREVENTION  
Inform staff about misconduct and their role in reporting and preventing it.
- 3.4 IMPROVE CONTINUOUSLY  
Be proactive in looking for integrity improvements and learning by completing the Integrity Snapshot tool.
- 3.5 CAPABILITY GAPS  
Evaluate the capability of key integrity staff, and identify knowledge and skill gaps that require further training or development.
- 3.6 USE INSIGHTS  
Learn from Commission and other integrity agency insights; and use them to review and reassess the approach to integrity risks, areas of vulnerability and prevention.
- 3.7 ADOPT CONTEMPORARY PRACTICE  
Keep up to date by referring to the integrity section on [wa.gov.au](http://wa.gov.au) when developing and reviewing integrity policies and systems.

### Actions for individuals

- 3.1 PARTICIPATE ACTIVELY  
Participate actively in integrity learning opportunities provided by your public authority.
- 3.2 SUPPORT NEW STAFF  
Inform new colleagues about your public authority's code of conduct, policies and procedures associated with their work.
- 3.3 INFORM YOURSELF  
Seek information about, and advice on, situations where integrity matters arise.

# 04

## Be accountable for integrity

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

### Actions for the Commission

- 4.1 CLARIFY ACCOUNTABILITY**  
Ensure public authority leaders understand their responsibilities for preventing, detecting and responding to integrity matters; and take proactive action.
- 4.2 PROVIDE AUTHORITY**  
Investigate models of misconduct management that enable more local decision making while maintaining appropriate oversight.
- 4.3 IMPROVE ONLINE REPORTING**  
Redevelop existing online misconduct reporting tools to improve the quality and types of notifications and reports made.
- 4.4 REVIEW FOR PERFORMANCE**  
Conduct specific and thematic reviews, and use information from capability reviews to identify areas of good practice and those requiring improvement.
- 4.5 COLLABORATE FOR IMPROVEMENT**  
Partner with external experts to participate in research and projects that identify contemporary approaches, including behavioural insights and technology to enhance detection and prevent misconduct and corruption.
- 4.6 LEVERAGE EXPERTISE**  
Pursue methods that enable greater shared use of expertise and trained investigators across public authorities.

## 04 – BE ACCOUNTABLE FOR INTEGRITY

### Actions for public authorities

- 4.1 **REPORT MISCONDUCT ONLINE**  
Use Commission and Corruption and Crime Commission online reporting tools to notify of misconduct in a timely manner.
- 4.2 **OVERSEE INTEGRITY**  
Have leadership teams lead, own and oversee processes for identifying, detecting, managing and preventing misconduct.
- 4.3 **REVIEW FOR LEARNING**  
Use learnings from Commission reviews to evaluate current practices and make changes.
- 4.4 **RESPOND TO RISKS**  
Understand that specific risks change over time and take steps to ensure these are responded to and addressed.
- 4.5 **TAKE ACTION**  
Put processes in place to support staff and community reporting, and empower leaders to act on reports of misconduct.
- 4.6 **BE ACCOUNTABLE**  
Ensure integrity is a standing agenda item at leadership meetings to provide a forum to interrogate data, and identify and respond to emerging trends.

### Actions for individuals

- 4.1 **REPORT ISSUES**  
Assist your authority to detect misconduct by reporting suspected misconduct either through internal or external reporting processes.
- 4.2 **LEAD AT ALL LEVELS**  
Contribute to creating an environment where everyone is comfortable with and confident to report any suspicions of misconduct.
- 4.3 **RESPONSIBLE TEAMS**  
Take responsibility for operating with integrity in your team and encourage others to do the same.

# Measures of success

To know how we are progressing towards building and sustaining a high integrity culture across public authorities, we need ongoing evaluation of our success. The ultimate success is stamping out misconduct, including fraud and corruption.

## COMMISSION SIGNS OF SUCCESS

- ▶ Approaches to integrity are maturing across public authorities over time, as demonstrated by reviews conducted by the Commission.
- ▶ Public authority leaders acknowledge the value of assistance provided by the Commission and seek to collaborate with the Commission on integrity matters.
- ▶ In surveys conducted by the Commission, staff report perceptions that public authorities and leaders operate in a high integrity culture.
- ▶ There is increased usage of the Commission's products and tools, including online learning modules.
- ▶ Commission forums/sessions are well attended and evaluations indicate knowledge has increased as a result of attendance.
- ▶ Amendments to online reporting tools assist reporting and notification processes, and the quality of reports to the Commission improves over time.

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Monitoring signs of success are commenced from the start of this strategy and reviewed each year. Progress against these measures will be reported periodically over the next four years.

## PUBLIC AUTHORITY SIGNS OF SUCCESS

- ▶ 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.

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Consider what other internal measures may indicate integrity is improving. Evaluations should be shared with staff.