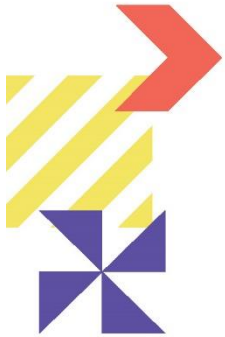




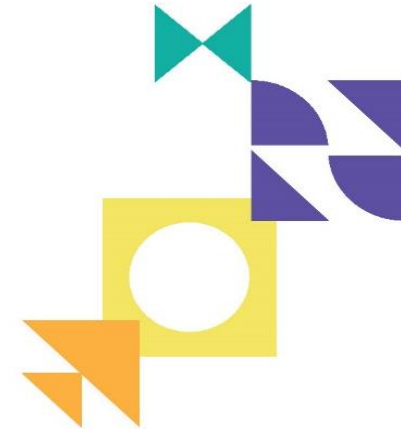
Public Sector
Commission

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Western Australia.*

Integrity Snapshot Tool



FOR WA PUBLIC
AUTHORITIES



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.

How to use the snapshot tool

As this is a self-assessment tool, public authorities can benefit by using it to review the status of their approach to integrity and make decisions about where further or additional work is needed.

Public authorities are encouraged to update their assessments as they progress with actioning items. In this way they capture their assessments on an ongoing basis. It is acknowledged that each public authority has a different risk profile and operating context, and is at varying points of progress in managing integrity risks.

Assessment guide	
Activity	Description
In place	Suggested activity has been addressed or is subject to review.
In progress	Steps are in place to address suggested activity.
Not in place	Steps may be required to address suggested activity.

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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>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.</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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
enacts controls to address identified risks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
has an organisation structure that provides clear lines of accountability and responsibility for integrity and misconduct functions (including the role of leaders and managers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
has documented delegation schedules in place that align to organisation structure and legislative obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
reviews delegation schedules regularly to ensure they remain current and operate with appropriate levels of authority	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

01 Plan and act to improve integrity (continued)

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has a position, team or committee with documented responsibility to consider findings and recommendations from integrity audits, assessments, reviews and investigations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
assigns accountability and responsibility for monitoring and overseeing risks and controls (e.g. in authority's structure, job descriptions)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
has an internal audit committee with an independent chair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
uses tools and templates provided by the Commission or other sources to support its approach to managing integrity risks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

02 Model and embody a culture of integrity

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

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has values that include integrity integrated into all aspects of its business (e.g. in policies, processes and systems)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
promotes integrity in and outside the authority (e.g. website, publications, staff newsletters, division meetings, annual reports and everyday practices)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
has leaders who role model integrity and demonstrate zero tolerance for breaches of ethical codes and misconduct	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
has a consultation mechanism to engage with and involve staff when reviewing integrity policies, procedures and information to gain shared commitment and understanding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
has human resource policies and practices that reflect a commitment to recruiting staff who demonstrate a strong alignment to its values	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ensures recruitment materials include information on values and conduct expectations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
uses staff performance processes to discuss and reinforce its values and conduct expectations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Model and embody a culture of integrity (continued)

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has staff formally acknowledge that they have read its code of conduct at appointment/induction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
encourages staff to report misconduct (e.g. in policies, codes of conduct, staff communication)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
makes information available about public interest disclosure processes and other reporting mechanisms to staff and stakeholders	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

03 Learn and develop integrity knowledge and skills

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

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

03 Learn and develop integrity knowledge and skills (continued)

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
evaluates staff awareness of its integrity requirements (e.g. through staff perception surveys) and acts on any knowledge deficits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
encourages, supports and provides a mechanism for staff to seek advice on integrity matters when they are unsure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
makes staff aware of the process of identifying integrity risks and contributing to the risk register	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
seeks opportunities for further learning about integrity matters by identifying key staff to attend events and forums provided by the Commission and other bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
establishes networks with other integrity practitioners	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

04 Be accountable for integrity

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

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
articulates the roles and responsibilities of the leadership team in overseeing integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
monitors, reviews and addresses its approach to changing and emerging risks (e.g. due to restructure, introduction of technology and legislative change) and ensures: <ul style="list-style-type: none"> • 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 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	