



Government of Western Australia  
Department of Justice

# Justice Integrity Framework 2024/27

Promoting, maintaining and upholding professional standards and ethical conduct in the Department of Justice



March 2024



## Skin Colours



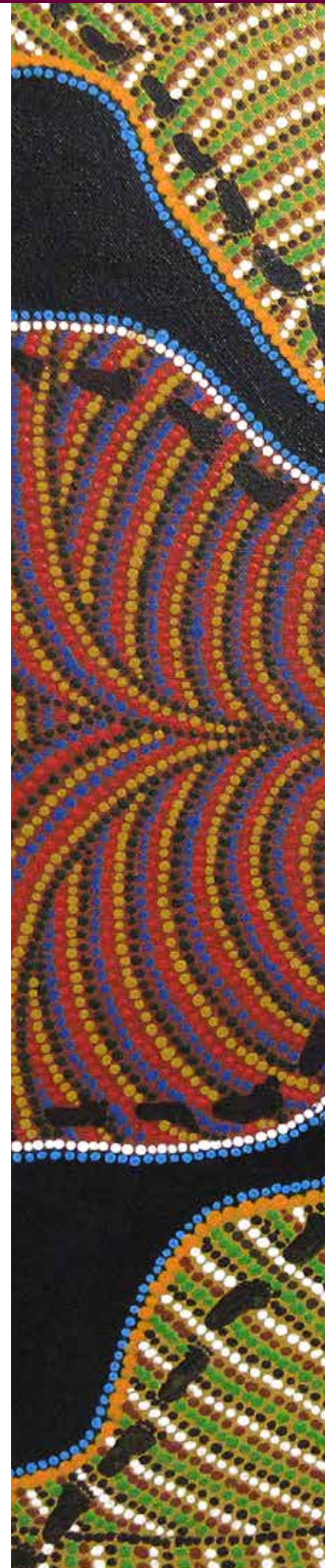
*"Groups coming together to work together."*

Artwork by a Wongatha person.

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# 1. Clear expectations:

## Message from the A/Director General

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I am pleased to introduce the updated Justice Integrity Framework.

Our mission is to provide a fair, just and safe community for all Western Australians. All personnel working for the Department of Justice, including myself, sign up

to the Department's values: respecting rights and diversity; fostering service excellence; and being fair and reasonable. This Integrity Framework outlines how the Department will maintain a high standard of professional and ethical conduct.

The People, Culture and Standards (PCS) Division has a central role to play in auditing our services, promoting ethical conduct, investigating inappropriate or improper behaviour and in providing a safe environment to report unethical and inappropriate conduct across the Department.

However, having this Integrity Framework and a Division focused on professional integrity and the prevention of misconduct is not enough. I expect all employees to share in the collective responsibility to behave ethically and to promote and maintain a culture of integrity in the workplace.

It is a standard I commit myself to meet and I expect all staff to do the same. Under this Integrity Framework, specific responsibilities are also delegated to the Corporate Executive, senior managers and line managers.

We can all be proud of the Department's achievements and our contributions to the State of Western Australia, but we must not be complacent.

Our collective commitment to the implementation of the principles embodied in this revised Integrity Framework will ensure that we retain the public's confidence in the vital services we deliver.

Leadership and stewardship at all levels in the Department will be the key to our success; while the continued regular review and updating of this Integrity Framework will ensure we remain well-placed to maintain standards and to respond to integrity issues in an ever-changing environment. Enhancements will continue to be made to the Department's corporate governance regime to achieve this.

I expect all of you to familiarise yourselves with this Integrity Framework, support its purpose and objectives and make a commitment to always do the right thing.

**Kylie Maj**  
A/Director General  
Department of Justice



## 2. Plan and act to improve integrity

This Justice Integrity Framework<sup>1</sup> describes how the Department of Justice approaches and acts to prevent misconduct, corruption, fraud and theft, taking into account the particular nature of the Department's operating environment.

The Public Sector Commission (PSC) has developed an integrity model for public sector authorities, which outlines how authorities, including the Department, can ensure a clear and consistent approach to managing risk and integrity.

### 2.1 Roles and responsibilities

#### Leadership

Strong and effective leadership is vital in maintaining the ethical health of the Department. It is a core element of ensuring a healthy organisational culture where ethical behaviour is promoted and unethical conduct is prevented, deterred and addressed.

While the Director General has ultimate responsibility for the Department's system of internal controls, leaders, managers and employees are all required to practice, model and encourage personal integrity, accountability and ethical behaviour.

Effective leaders set and maintain appropriate, professional and ethical organisational direction, structures, systems and policy frameworks. The modelling of ethical and appropriate actions and behaviours by the Director General and the Corporate Executive Committee (CEC), reinforced through explicit communication about integrity and misconduct prevention, education and early intervention, are central elements of maintaining an ethical and professional agency.

These behaviours contribute to a culture where ethical behaviour in the Department is the norm. Leaders and managers ensure that employees feel they have support to ask questions when faced with an integrity or ethical dilemma. They support their staff to ensure employees are trained, safe and supported in making the right decisions. They ensure that staff understand their obligations and

<sup>1</sup> [www.wa.gov.au/organisation/public-sector-commission/integrity-framework-resources](http://www.wa.gov.au/organisation/public-sector-commission/integrity-framework-resources) – We acknowledge the resources and guidance provided by the Public Sector Commission in assisting drafting and continual evolution of the Department's Integrity Framework. Several such resources and guidance have been utilised in this publication.

comply with legislation, regulations, policies, procedures, the Code of Conduct (Code) and public sector standards.

#### Roles of managers, business areas and employees

All Department employees are responsible for promoting, modelling and engaging in integrity-based behaviour, including the reporting of concerns through the appropriate channels outlined in this Integrity Framework. A detailed list of key positions and roles within the Department, and their responsibilities in promoting integrity and professional practices, is provided in Appendix 1.

### 2.2 Legislation, regulation and policies and procedures

The primary legislation underpinning the Integrity Framework includes the following:

- *Corruption, Crime and Misconduct Act 2003.*
- *Public Sector Management Act 1994.*
- *The Criminal Code.*
- *Public Interest Disclosure Act 2003.*
- *State Records Act 2000.*
- *Financial Management Act 2006.*

There is a significant body of relevant legislation, regulation, policy and procedural guidelines that underpins how the Department's staff operate appropriately, which intersects with the goals of this Framework. Refer to the Fraud and Corruption Control Plan (FCCP) sections on "Relevant Legislation" and "Relevant Policies and Procedures" for those relating to integrity, as well as the Make a Complaint or Referral intranet page. A comprehensive list of all relevant policies and procedures is available on the Department's JustUs intranet site.

Business units remain responsible for the obligations imposed on them by legislation, regulation, policies and procedures. These obligations are supported by risk registers and the Department's Risk Management Framework. Further, employees need to understand the obligations specific to their roles and, if unsure, seek further advice.

## 2.3 Risk analysis and planning for integrity

The Department's primary risk management guide is the Fraud and Corruption Control Plan (FCCP). The Plan aims to support the development and maintenance of a culture within the Department that prevents and reduces the risk of fraud and corruption. This occurs through planning and resourcing, prevention, detection and response (including investigation, resolution, oversight reporting and compliance). The Framework aligns with:

- AS 8001:2021 Fraud and Corruption Control.
- International Risk Management Standard ISO 31000:2018 – better practice principles.
- Institute of Internal Auditors "Three Lines of Defence in Effective Risk Management and Control".
- Good governance guide for public sector agencies Principle 9: Risk Management.
- Treasurer's Instruction (TI) 825: Risk Management and Security.
- The Department's Enterprise Risk Management Framework and its core components.
- Insurance Commission of WA's Risk Management Guidelines (2016).

## 2.4 Internal controls, audit and governance

The Department has strong internal controls, auditing functions and governance that are designed to identify and reduce the risk of fraud, corruption and misconduct.

The Department and its employees are guided by key control policies and procedures.



## 2.5 Fraud and corruption detection systems

All employees have a responsibility to report suspected fraud and corruption, as well as an entitlement to work in environments reflecting the highest of ethical standards. The Director General has an obligation to act on and report any instances of fraud or corruption.

Key policies and systems involved in detecting fraud, corruption, misconduct and inappropriate behaviour are:

- Justice Integrity Framework.
- Fraud and Corruption Control Plan.
- Code of Conduct.
- JustUs page on making a complaint or referral.
- PCS, including investigations, referrals and early intervention.
- Corporate Services reporting and analysis of high-risk areas, including procurement, purchasing cards, budgets, expenditure and ICT audits.
- Internal audits and the Risk Management and Audit Committee (RMAC).
- Regular reporting (quarterly, half yearly and yearly) to the Director General and the CEC.
- External oversight bodies.
- Statutory reporting requirements.

# 3. Model and embody a culture of integrity

It is a fundamental requirement that all employees conduct themselves in an honest, ethical and professional manner commensurate with the Public Sector Commission (PSC) Commissioner’s Instruction 40 – Ethical Foundations, which includes the Public Sector Code of Ethics. The Department’s own Code of Conduct and this Integrity Framework are key documents for all employees to familiarise themselves with, and set the tone and standards expected for a culture based on integrity.

## OUR MISSION

Our mission is to provide a fair, just and safe community for all Western Australians.

## OUR VALUES

- Respecting rights and diversity.
- Fostering service excellence.
- Being fair and reasonable.

## OUR PRINCIPLES

- High performing and professional.
  - Ethical and accountable.
- Trained, safe and supported.

Our standards are aligned to the Public Sector Code of Ethics covering integrity, impartiality, respect for others and trust and accountability. All employees are required to report suspected breaches of the Code. More information is available on the [make a complaint or referral page](#).

### 3.1 Organisational culture

Our organisational culture is reinforced by:

- The tone from the top, with every manager and leader reinforcing the Director General’s expectations and standards.
- All employees familiarising themselves with the Department’s mission, values, principles, Code of Conduct, the PSC’s Code of Ethics and this Framework.
- All employees being held to the same high standards.
- Performance Planning and Development standards, including a focus on the Code of Conduct, conflicts of interest and other key integrity components.
- All employees having access to and being required to undertake regular mandatory training on the Code of Conduct.
- Staff feeling safe and supported to report any concerns, with the Department making various avenues and options for reporting clear and easily accessible (including information related to Public Interest Disclosures and anonymous reporting channels).
- Regular reminders of integrity-related matters and Department expectations by way of JustUs posts, Director General broadcasts and similar forms of communication.

As the Department’s leadership group, the Corporate Executive Committee (CEC), Deputy Director Generals, Divisional Heads, Executive Directors, Directors and line managers are responsible for ensuring that the Integrity Framework is upheld and reinforced with employees. The Department strives to maintain and continually improve on a culture built around integrity and ethical behaviour.

All employees must behave ethically and promote a culture of integrity in the workplace. Employees must be conscious of the risk of breaches of discipline, fraud and corruption in the activities undertaken in their business area, and identify and report suspected breaches, fraud, corruption or similar concerns. Suspected conduct of this nature **must** be reported.

The Department's culture of integrity will be enforced and enhanced by:

- Promotion and enforcement of misconduct mitigation strategies including regular reminders of integrity-related matters.
- Management taking ownership of integrity within their workplace and committing to work to reduce the risk of fraud, corruption and breaches of discipline.
- Promoting meaningful participation by all stakeholders in the development, enhancement and implementation of key policies.
- Developing effective accountability through collaboration and information sharing across business units.
- Providing clear pathways for reporting suspected breaches of discipline, fraud or corruption; ensuring staff feel safe to report any concerns.
- Addressing integrity concerns openly and transparently within the work environment.
- Providing learning and education opportunities on how to apply integrity standards.

## 4. Learn and develop integrity, knowledge and skills

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All staff must be educated, including regularly updated, in integrity-related training in order to meet expectations and continually improve. PCS has a responsibility to provide training opportunities and all staff have a responsibility to undertake the training opportunities provided.

### **Induction**

At induction, employee handbooks are available, along with a copy of the Code of Conduct. The employee handbook outlines the duties, roles and responsibilities of being a public officer. This includes reporting breaches of discipline and the role of oversight bodies, and provides new employees with an understanding of what is expected of them, including standards and behaviour.

### **Accountable and Ethical Decision Making (AEDM)**

The AEDM is an online course that all employees must complete. It provides information on personal integrity standards, accountability and making ethical decisions. A key part of the course is for staff to demonstrate their understanding of the Code and this Integrity Framework. This course is completed by all staff every two years.

### **Integrity and Ethics Awareness Sessions**

These sessions are conducted face to face in both metropolitan and regional locations (or online where face to face is not practical) and are delivered by staff from Management Engagement and Intervention (MEI). The Director General has mandated that all employees must attend an Integrity and Ethics Awareness session. These sessions cover: the Code of Conduct, this Integrity Framework, the role of PCS, how to make a complaint or report misconduct, the role of oversight bodies and other relevant integrity and ethics related matters.

### **Integrity and Ethics Committee Meetings**

MEI actively engage with all Divisions to chair and conduct regular committee meetings with their senior management. These meetings have a Terms of Reference and standing agenda, which allows a check of integrity risks and areas of concern, a discussion of staff education or training requirements and the potential for early intervention action to reduce the risk or prevent misconduct and/or a breach of the Code of Conduct.

### **Performance Planning and Development**

Having regular performance, planning and development (PPD) discussions is a critical element in building workforce capability and is integral to meeting the Department's strategic goals.

The PPD process involves confidential discussions that all employees must have with their managers, which include components relating to ethics and integrity.



# 5. Be accountable for integrity

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While ultimate accountability for integrity rests with the Director General, there is an obligation on all staff to act with integrity and report matters of integrity concern (including allegations of misconduct, inappropriate behaviour, fraud and corruption). There is a zero-tolerance approach to such conduct.

## 5.1 Response to suspected integrity breaches

The Director General's and the PSC's expectations and standards placed upon employees are clearly set out in the Code of Conduct and the PSC Commissioner's Instruction 40 (Ethical Foundations, including the Code of Ethics).

The assessment, investigation, outcome, lessons learned and reporting functions related to integrity are all the remit of PCS, primarily Professional Standards.

The Department applies part 5 of the *Public Sector Management Act 1994* and the PSC Commissioner's Instructions 3 and 4 in relation to matters of suspected breaches of discipline.

Within PCS, an early intervention approach operates to manage and deal with issues within workplaces by Management Engagement and Intervention (MEI).

Where matters are assessed by PCS as not needing to be treated as a disciplinary matter, but the activities, behaviours, conduct or issues are still of concern or deemed to be inappropriate, MEI will work with local management to undertake appropriate early intervention strategies.

This intervention will generally involve meeting with the employee concerned, discussing the matter and seeking to resolve the issue and improve behaviour and conduct. It is an opportunity to address concerns before they escalate further into more serious matters including breaches of discipline.

These interventions do not form part of a disciplinary investigation. They are designed to guide employees, improve behaviour and ensure their future actions align with those expected in the Code of Conduct and this Integrity Framework.

Some matters reported to PCS become the subject of disciplinary investigations. In these instances, PCS adheres to Part 5 of the *Public Sector Management Act 1994* and the Public Sector Commissioner's guide to the disciplinary provisions contained in the Act.

## 5.2 Self-analysis and review

The Justice Integrity Framework is reviewed every three years to ensure it remains relevant and in-line with community expectations, including whole of public service expectations and standards set by the PSC.

PCS continually review their integrity functions to ensure best practice across employment screening, early intervention, bullying and harassment processes, complaint and allegation assessment and investigation, auditing functions and liaising with oversight bodies.

PCS ensure the Director General and the CEC receive reports relevant to integrity-related functions, including activities, statistics and recommended changes or enhancements.

MEI have the capability to conduct specialist training within high-risk areas, areas of concern or where trends or issues are emerging, as well as undertaking site-based interventions if significant trends or concerns are observed.

These actions, coupled with the oversight and recommendations of key bodies including the Corruption and Crime Commission, PSC, Office of Inspector of Custodial Services, the Ombudsman WA and others, demonstrates the holistic approach and health assessment of the Department's integrity model.

# 6. Oversight

## Internal oversight

The Performance Assurance and Risk (PAR) Directorate of PCS undertakes the Department’s internal audit activities, is responsible for building and embedding risk management capability across the Department, and independently reviews death in custody incidents.

PAR also provides independent, objective assurance and risk management advice to the Director General, CEC and the Risk Management and Audit Committee (RMAC).

PAR manage and oversee the Department’s Enterprise Risk Management Framework, detailing the components and requirements of risk management that apply across the Department. Integrating risk management principles into all operational activities, functions and business strategies supports good decision-making, accountability and transparency and protects the Department, State and community from unnecessary incidents, costs and losses while enhancing the Department’s resilience.

While there are various other internal oversight functions within the Department, some common functions across all business areas undertaken by Corporate Services include:

- Knowledge, Information and Technology – Management of Information and Communications Technology;

- Finance – Controls and updates the Financial Management Manual as a guide for all employees covering every aspect of financial management activities and reporting. This includes procurement, purchasing cards, asset management, contracts, purchasing and all other financial related matters. Finance ensures the Department complies with the *Financial Management Act 2006* and all Treasurer’s Instructions.

## External oversight

Western Australian oversight bodies that are integral to this Integrity Framework and have jurisdiction over the Department’s operations are the:

- Corruption and Crime Commission (CCC)
- Public Sector Commission (PSC)
- Office of the Auditor General
- Office of the Information Commissioner
- Office of the Inspector of Custodial Services
- Ombudsman WA.

# 7. Implementation

Continued implementation and enhancement of the Justice Integrity Framework across the Department of Justice will be achieved through:

- Strong senior management sponsorship of the Framework.
- Integrating the principles of the Framework into operational policies, plans and procedures.
- Reinforcing the importance of ethical practice and behaviour to all Departmental staff through strategic and leader-led communication, education and training.
- Making the Framework easily accessible to all Department staff through the intranet.

PCS is responsible for ensuring that compliance with the Integrity Framework is supported, monitored, evaluated and enforced.



# Appendix 1 – Roles and responsibilities of specific areas and employees

Position/group	Roles and responsibilities
Director General	<ul style="list-style-type: none"> <li>• Ultimate responsibility for the Department's Integrity Framework.</li> <li>• Sets and embodies integrity expectations for all Department leaders, managers and employees.</li> <li>• Chairs the Corporate Executive Committee.</li> <li>• Final approval of Integrity Framework, including control systems, and sets delegation approval level for key functions.</li> </ul>
Corporate Executive Committee (CEC)	<ul style="list-style-type: none"> <li>• CEC supports the Director General in reviewing, providing input and making recommendations for integrity matters.</li> <li>• Plans and monitors risk and compliance.</li> <li>• Identifies, strategically plans and reviews high level risk and compliance matters.</li> <li>• Considers and endorses key decisions and recommendations</li> </ul>
Risk Management and Audit Committee (RMAC)	<ul style="list-style-type: none"> <li>• RMAC is led by an Independent Chair.</li> <li>• The Committee provides independent assurance by overseeing and monitoring the governance, risk, control, and assurance framework across the Department.</li> <li>• Monitors internal auditing recommendations as well as issues identified by external oversight bodies.</li> <li>• The Committee Chair briefs the Director General on all relevant matters on a regular basis. The Director General is responsible for the Department meeting and maintaining appropriate actions and standards of behaviour.</li> </ul>
People, Culture and Standards (PCS) Division	<ul style="list-style-type: none"> <li>• PCS implements the Department's Integrity Framework and misconduct, fraud and corruption mitigation strategies.</li> <li>• Assesses, investigates and reports to oversight bodies all allegations including disciplinary breaches, fraud or corruption (including criminal referrals to WA Police).</li> <li>• Provides integrity and ethics awareness training and early intervention via Management Engagement and Intervention strategies.</li> <li>• Manages various risk and integrity registers.</li> <li>• Investigates bullying and harassment.</li> <li>• Undertakes internal auditing and compliance functions.</li> <li>• Reviews of deaths in custody.</li> </ul>
Human Resource (HR) Management Delegations	<ul style="list-style-type: none"> <li>• The HR Management Delegations is a schedule of approved delegations (as authorised by section 33 of the <i>Public Sector Management Act 1994</i>) for all human resource management decisions made within the Department.</li> <li>• All employees, and in particular managers and approvers, should familiarise themselves and ensure approval of HR management decisions is authorised per the schedule.</li> </ul>
Corporate Finance	<ul style="list-style-type: none"> <li>• The Finance Directorate is responsible for the financial governance, compliance and adaptation within the Department.</li> <li>• Finance functions include auditing and risk management of the Department's finances, including procurement, purchasing cards and other expenditure.</li> </ul>
Knowledge, Information and Technology (KIT)	<ul style="list-style-type: none"> <li>• KIT is responsible for the Department's information technology, including relevant policies, implementation, system audits, risk and controls.</li> <li>• KIT is responsible for managing the Department's ICT security controls.</li> </ul>
Business areas and their managers and supervisors	<ul style="list-style-type: none"> <li>• All managers and supervisors are obliged to model and promote integrity and ethical behaviour to their employees.</li> <li>• Ensure employees feel safe, supported and encouraged to report concerns, including inappropriate behaviour, misconduct, fraud, corruption and criminality.</li> <li>• Ensure employees complete all mandated training.</li> <li>• Report suspected breaches or concerns to PCS.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• All employees must behave ethically and adopt and apply the Department's culture of integrity.</li> <li>• Comply with this Framework, the Code of Conduct and the PSC Code of Ethics. This includes completing all mandatory training.</li> <li>• Report suspected breaches or concerns to PCS.</li> </ul>



