

**Integrity Framework Template**

Helping WA public authorities develop their integrity framework

This template and the [Integrity Framework Guide](https://www.wa.gov.au/government/multi-step-guides/integrity-framework-guide) help an authority develop or strengthen its integrity framework. The template and guide should be read together; neither is exhaustive.

Many authorities have elements of a framework in place such as policies and procedures, an audit committee and education programs but they may not think of them, or formally coordinate them, as a framework.

PSC2025957

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# **Clear expectations**

Develop a statement from your authority head that:

* introduces the framework
* explains its purpose and objectives
* outlines your authority’s commitment to implementing the framework
* describes the expectations of officers to:
  + know where to find the framework
  + be familiar with it
  + raise ideas for improvement
  + report integrity breaches they see or become aware of
  + demonstrate their commitment to integrity in their daily work.

Reinforce a culture built on integrity by outlining what your authority and its officers stand for. This is likely to be found in your mission, vision and values. See [Values and standards](https://www.wa.gov.au/government/multi-step-guides/31-values-and-standards) and [Organisation culture](https://www.wa.gov.au/government/multi-step-guides/33-organisation-culture) for more information.

**Example:**

*I am committed to ensuring everyone at [insert authority name] understands and operates with the highest level of integrity and accountability. By doing so, we can build and maintain the trust of the community we serve.*

*This is why I have implemented this framework. It describes the instruments, structures and cultural factors that guide how we practice, manage and account for integrity.*

*The framework is based on a thorough assessment of our integrity risks. While it identifies officers with particular roles, we are all responsible.*

*I expect you to familiarise yourself with the framework. You can access it at [insert location in the authority].*

*I commit to monitor and maintain the framework, reviewing its effectiveness and seeking assurance from across [insert authority name] that our approach to integrity is sound. Framework custodians and other assurance providers help me achieve this.*

*I want to be clear that we all have responsibility for safeguarding the integrity of [insert authority name] and preventing misconduct and corruption. We demonstrate this in part by reporting any integrity breaches we see or become aware of, and making suggestions on how we can improve our approach to integrity.*

# **Plan and act to improve integrity**

This is the foundation of your authority’s integrity framework. It is where you identify, develop and implement your authority’s approach to managing integrity based on identified risks.

# **2.1 Roles and responsibilities**

Describe who in your authority has roles or responsibilities under the framework – who does what (custodians). Responsibilities could be carried out by a position (individual), group or committee. Choose an approach that best enables your authority to summarise the roles and responsibilities under the framework. Refer to the [examples of a governance table](https://www.wa.gov.au/government/publications/example-roles-and-responsibilities) as a guide.

# **2.2 Legislation and regulations**

List or group your authority’s enabling legislation and other laws, regulations and external policies that apply to and govern its operations. How much detail to include in the accountability map is a decision for your authority. Refer to the [example accountability map](https://www.wa.gov.au/government/publications/example-accountability-map) as a guide.

# **2.3 Risk analysis and planning for integrity**

Describe your authority’s approach to managing integrity risks. Explain if it is separate from or part of your authority’s broader risk management process.

Refer or link to:

* risk management policy and procedures
* strategic and/or operational risk registers
* internal audit function and committee charter (or similar)
* fraud and corruption detection systems or programs.

Determine how much detail to include about risks, treatments and mitigation. Include enough detail to give assurance that the approach is thorough.

# **2.4 Internal controls, audit and governance**

Document actions and initiatives your authority has in place to manage its governance, control its integrity risks and assure itself that these mechanisms are sound. This includes your authority’s core and complementary integrity policies and procedures. Refer to the [example policy register/library](https://www.wa.gov.au/government/publications/example-policy-register).

Describe the role, responsibilities and work of the internal audit committee or link to documents such as the internal audit charter.

# **2.5 Fraud and corruption detection systems**

Outline the systems and activities used by your authority to detect fraud, corruption, integrity breaches and other errors and irregularities. Decide how much detail to include about detection activities undertaken by your authority. Refer to the [example detection activities table](https://www.wa.gov.au/government/publications/example-detection-activities-table).

# **Model and embody a culture of integrity**

This part of the integrity framework is where your authority shapes and manages its culture to support and enhance integrity. An authority with a culture built on integrity and proactively managed is more resistant to misconduct and corruption.

# **3.1 Values and standards**

Reference your authority’s mission, vision and values statements; and how they relate to integrity and the code of conduct (or similar) that sets standards of behaviour. Detail how the values link to the standards of behaviour in the code of conduct.

Explain where values and standards are included, for example in job advertisements, staff performance processes and on the website. Include reference to the pathways available to report non-compliance with the code of conduct.

# **3.2 Leadership and management attitude**

Outline your authority’s practices to attract, select and recruit new and future leaders. Detail programs and activities that develop the skills and knowledge of leaders with respect to integrity. Describe support provided to leaders to manage integrity in and across their teams.

# **3.3 Organisation culture**

Outline actions and initiatives that develop and maintain a culture built on integrity in your authority including:

* communications with stakeholders and any planned integrity-focused campaigns
* pathways for officers, clients, suppliers and stakeholders to speak up
* protections and support for officers who report suspected integrity breaches.

Describe how integrity practices are evaluated and managed.

# **Learn and develop integrity knowledge and skills**

This part of the integrity framework is where your authority builds the integrity knowledge and skills capacity of its workforce. Learning and development are proactive, planned for and reinforced from an officer’s first interview to their exit from your authority.

# **4.1 Integrity education and capacity**

Detail your authority’s formal and informal actions and initiatives to develop officers’ integrity knowledge and skills.

Outline your authority’s planned approach to integrity. Refer to:

* staff performance processes
* mentoring and/or networking programs and opportunities
* where officers can seek integrity advice and guidance if not from their direct supervisor.

Include or refer to your authority’s annual integrity education and capacity development program. Refer to the [example education and training plan](https://www.wa.gov.au/government/publications/example-integrity-education-and-training-plan).

# **Be accountable for integrity**

This part of the integrity framework is where your authority assures itself and external stakeholders that its approach to integrity is working as intended. All officers are responsible for acting with integrity but ultimate accountability rests with your authority head.

# **5.1 Response to integrity breaches**

Describe how your authority enforces its expectations and standards.

Refer to the discipline policy, procedures and details of any roles that advise decision-makers on investigation principles.

Reinforce mandatory notification requirements to external bodies like the Public Sector Commission and Corruption and Crime Commission.

Describe how responses to integrity breaches and similar data and information are analysed to implement a ‘lessons learned’ approach, and how this may direct future prevention efforts.

# **5.2 Self-analysis and review**

Outline your authority’s process for analysing and reviewing its framework, how often this is undertaken and who is responsible. Include the process to identify and address gaps (including if external expertise is required).

Describe your authority’s approach to continuously improve integrity through the use of findings from internal audits, and the reviews, reports and recommendations of anti-corruption and other integrity bodies.

# **Oversight**

Outline the roles and responsibilities of functional areas/s of your authority, and relevant systems and processes that keep your authority head informed of the approach to practice, manage and account for integrity.

## Glossary

Define the main terms commonly used in your integrity framework and associated documents such as, corruption, misconduct (minor and serious), integrity, responsibility and accountability. Refer to the [glossary](https://www.wa.gov.au/organisation/public-sector-commission/integrity-framework-resources) as necessary.