Integrity Framework Maturity Self Assessment Tool

Helping WA public authorities assess and improve their approach to integrity

# Element 1: Clear expectations

## The authority head clearly describes and communicates their integrity expectations

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

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| * Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant. * Integrity is not defined or well understood by staff. * Integrity actions and initiatives tend to be unplanned, inconsistent and reactive. * Accounting for integrity only relates to meeting compliance obligations. | * Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant. * What integrity means is becoming clearer to staff as the tone from the top is being communicated. * Integrity actions and initiatives are being planned for and coordinated but not yet integrated. * Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives. | * Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant. * Integrity is well communicated by leaders, understood by staff and integrated into business practices. * Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined. * Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment. | * Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning. * Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations. * Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks. * Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach. |
| **Characteristics** | | | |
| Expectations, if documented, are only in the code of conduct.  The authority head rarely communicates their expectations.  Line managers check staff understanding of expectations only after an integrity breach.  There are limited specific expectations communicated to external stakeholders (e.g. those who do business with the authority or use its services). | Expectations are in the code of conduct, being documented in integrity policies and procedures, and included in job descriptions for some positions of trust when they are updated.  The authority head occasionally reinforces their expectations (e.g. face to face, staff communications).  Line managers explain expectations at induction. Some reinforce them during employment (e.g. through staff performance processes).  Specific expectations for external stakeholders are being developed. | The integrity framework, code of conduct, integrity policies and procedures, and most business processes reflect the authority head’s expectations.  The authority head frequently reinforces their expectations and there is clear “tone from the top”.  Line managers consistently model and reinforce the “tone from the top”. This is demonstrated in part by staff understanding expectations and being able to explain what these are when asked.  Expectations are communicated to external stakeholders (e.g. through a statement of business ethics). | New policies and procedures are written consistently to reflect the authority head’s expectations.  The leadership group demonstrates the “tone from the top”. It is visible and well known inside and outside the authority.  Staff model and support the “tone from the top” which is assessed through staff performance processes.  External stakeholders who do not meet communicated expectations are held to account (e.g. through appropriate legislative or contractual mechanisms). |

**Comments**

Add your text here

# Element 2: Roles and responsibilities

## Roles and responsibilities are assigned to ensure a coordinated approach to managing integrity.

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| Some roles and responsibilities are assigned. These are documented to meet compliance obligations (e.g. role of the audit committee).  Some delegations are documented; these mainly relate to finance and human resources.  Information and data requests from external integrity bodies are responded to in an ad hoc way.  Staff think integrity is someone else’s responsibility. Individual and shared responsibility is not well understood. | Roles and responsibilities are being assigned as the integrity framework is developed (e.g. to positions, teams, groups and committees) and in job descriptions when they are updated.  Delegations are being considered across functions and activities and being documented in an accessible schedule.  Responsibility has been assigned to a position or team to coordinate information and data requests and interactions with external integrity bodies.  Staff are becoming aware that integrity is everyone’s responsibility. This is being communicated in the integrity framework, code of conduct, integrity policies and procedures. | Roles and responsibilities – including the authority head’s accountability for integrity – are documented in the integrity framework.  Relevant roles and responsibilities (e.g. between the governing board chair or mayor/shire president, chancellor and authority head and staff) are clear and documented in the integrity framework.  Delegations for all legislative and high risk functions are covered (e.g. regulation, approvals, human resources, finance).  Requests from external integrity bodies are planned for and scheduled so they can be responded to in a timely and fulsome way.  Staff are aware that integrity is everyone’s responsibility and can explain what this means when asked. | Leaders and staff with key assigned roles and responsibilities in the integrity framework regularly discuss challenges and identify opportunities to improve the framework. These improvements feed into self-analysis and review of the framework.  The delegations schedule is monitored and updated in real time.  A dedicated position, team or committee is tasked with engaging with external bodies, promoting integrity, and helping to prevent misconduct and corruption, and providing specialist advice to the leadership group on trends and improvement actions.  Staff are provided with a formal avenue to suggest changes to the integrity framework. |

**Comments**

Add your text here

# Element 3: Legislation and regulations

## Legislation, regulations and external policy obligations are identified and accounted for.

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| Legislative, regulatory and external policy obligations (e.g. those required by enabling legislation and those set by central bodies) are not fully identified.  Compliance gaps, if any, are mostly unknown.  Staff understanding of their powers, functions and obligations – and how they apply these in practice – relies on their knowledge and capability. | Legislative, regulatory and external policy obligations are being identified. An accountability map or similar is being completed.  Any compliance gaps identified are being addressed.  Staff are becoming aware of the power, functions and obligations relevant to their role (e.g. acting in line with operating procedures). Line managers are taking a more active role in this. | All obligations are documented and accounted for (e.g. reflected in internal controls, roles and responsibilities, compliance calendars).  Compliance gaps are addressed as identified.  Staff understand the power, functions and obligations relevant to their role (e.g. delegations) and can explain how these apply in practice.  Line managers support their staff to comply with obligations and oversight compliance. They demonstrate they have taken action on non-compliance (e.g. through staff performance and discipline processes). | All obligations are monitored to track changes to legislation, regulations and external policy. Changes are communicated and updates made (e.g. to internal controls).  Proactive monitoring identifies compliance gaps.  Passive and active monitoring is undertaken to check if staff are carrying out powers, functions and obligations as expected (e.g. discretionary powers are appropriately exercised and staff act in line with delegations). |

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Add your text here

# Element 4: Risk analysis and planning for integrity

## Integrity risks are identified and analysed, and plans are made to manage them.

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| Integrity risks are narrowly defined. Little consideration is given to functions and activities that give rise to integrity risks. The priority is material financial risk.  There is limited agreement about the value of, and approach to, managing integrity risks among the leadership group.  Managing integrity risks associated with functions and activities relies on the judgement of line managers. There are limited methodologies, tools and guidance to assist them, other than processes to manage financial risks.  Some but not all staff are able to explain the integrity risks associated with their work or the importance of managing them. | Integrity risks, including those relating to high risk functions, activities and any outsourced programs and activities, are being identified, adequately defined, analysed and documented in risk registers.  The authority head communicates the value of managing integrity risks to the leadership group. A shared understanding of risk management is being developed.  Risk owners are being identified and assigned for high risk functions and activities. They are provided with methodologies, tools and guidance (e.g. risk management policies and procedures) to help analyse and manage risks.  Staff are becoming familiar with the integrity risks associated with their work and what they need to do to manage them (e.g. comply with policies and procedures). | Integrity risks from internal and external sources have been identified. Risk owners are assigned for all identified risks in risk registers. Integrity risks are reflected in broader planning processes (e.g. strategic, operational, project and business continuity).  Integrity risks are regularly monitored, reviewed, updated and reported on, and take account of changes impacting the risk profile.  The authority head regularly reinforces the value of managing integrity risks (e.g. face to face, in staff communications).  Risks owners are provided with methodologies, tools and guidance that take into account better practice outlined in [Australian Standards 31000-2018: Risk Management Guidelines and 8001-2021: Fraud and Corruption Control](https://store.standards.org.au/reader/as-8001-2021?preview=1).  Staff understand the integrity risks associated with their work and identified shared risks, and can explain how they manage these in practice. | Assessment of integrity risk considers behavioural factors (e.g. what makes individuals more vulnerable to engaging in misconduct and corruption from internal and external sources).  Advanced tools are used to monitor and report on integrity risks (e.g. automated dashboards and data analytics). They help inform decisions to improve risk management.  The leadership group takes a positive and proactive approach to managing all risks including shared risk (e.g. inter-authority or multi-jurisdictional projects).  Risk owners champion risk management.  Staff consistently identify, analyse and manage integrity risks associated with their work. Where new and emerging risks are identified, they are raised via established pathways. |

**Comments**

Add your text here

# Element 5: Internal controls, audit and governance

## Integrity risks are managed through sound internal controls, and audit is used to evaluate the adequacy and effectiveness of controls.

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| Limited or basic internal controls (e.g. policies and procedures) are directed towards managing financial risks.  Accuracy and currency of policies and procedures relies on individuals updating them. There is no assigned responsibility.  Audit scopes and programs focus on the adequacy of financial controls rather than broader integrity issues (e.g. use of confidential information).  The relationships between those with responsibility for audit are undefined.  Applying internal controls associated with functions and activities relies on the line managers explaining to staff why internal controls exist and their importance. There is no standard approach; staff knowledge varies.  Staff are unaware of the need to report unmanaged risks and internal control weaknesses. | Internal controls (e.g. core and complementary integrity policies and procedures) are being developed and implemented to manage identified integrity risks.  A position or team has been assigned to develop a policy register to record what policies and procedures exist, who owns them and their currency.  Integrity risks and the adequacy of internal controls are being included in the audit scopes and programs.  The relationship between the internal audit function, audit committee and accountable authority and any external audit body is being defined and good practices are being developed (e.g. communication of reports and recommendations from external integrity bodies).  Line managers are starting to understand and communicate the importance of applying internal controls consistently to manage integrity risks.  Staff rely on managers informing them of how to report internal control weaknesses. | Internal controls (e.g. preventative, detective and corrective) are proportionate to specific integrity risks.  A position or team manages the policy register to ensure policy owners are undertaking scheduled reviews.  Different types of audits are used to explore integrity risks (e.g. random audits, focus area, forensic, compliance and quality audits).  The importance of audit is well understood across the authority. Line managers readily accept and participate in audits. Recommendations for improvement from internal and external audits are assigned to ensure they are implemented.  Line managers understand their supervision and monitoring role is an internal control. Staff understand the risks associated with their work and apply internal controls to manage these.  Staff know how to report internal control weaknesses via established pathways. | Internal controls are monitored, reviewed (including pressure tested) and improved continuously. Internal controls keep pace with lessons learnt from integrity breaches, changing business processes, risks and other operating conditions and reduce vulnerabilities and unintended consequences.  Risk owners raise, and internal audit records, changes to internal controls and treatment plans in risk registers. Advanced tools automatically update those who need to know of changes.  Evaluation of the adequacy and effectiveness of internal controls to manage integrity risks is conducted in targeted integrity audits and integrity is included as part of most audit scopes.  A combined assurance model (e.g. with activities that are coordinated and planned) is in place to ensure integrity is practiced, managed and accounted for. |

**Comments**

Add your text here

# Element 6: Fraud and corruption detection systems

## Systems and activities are in place to detect events different to those considered standard, normal or expected.

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| Basic detection systems and activities are in place for internal threats (e.g. some financial activities) but relies heavily on the manual effort of individuals (e.g. manual checks, excel spreadsheets).  Detection systems and activities are directed towards managing internal threats. Some basic controls are in place to prevent external fraud and corruption threats (e.g. firewalls to prevent cyber-attacks).  Internal data holdings are unstructured and not easily analysed.  Beyond basic reporting, there is no or limited use of data for detection purposes. | Planning is underway to develop a detection strategy or plan; this is being supported by the leadership group. The plan considers internal and external threats (e.g. cyber security, third parties seeking to exploit individual officers), information and data holdings, people and capability requirements, tools for validation and reporting, and governance arrangements including data sharing and confidentiality.  Changes are being made to how existing data is captured, providing more structure for easier analysis.  Data is mainly used for reporting rather than responding to identified errors and irregularities. | A detection strategy or plan is in place to help control internal and external threats. It takes into account better practice outlined in [Australian Standards 31000-2018: Risk Management Guidelines and 8001-2021: Fraud and Corruption Control](https://store.standards.org.au/reader/as-8001-2021?preview=1) including speaking up and staff and contactor screening.  Data holdings to inform detection have been cleansed, are structured and can be analysed easily.  Fit for purpose data tests are in place and repeatable, usually with consistent results that provide useful insights. These are supported by procedures to respond to and address identified errors and irregularities, and escalate issues for investigation as appropriate. | Detection systems and activities inform the internal audit scopes and program; insights show areas for further examination.  Detection systems and activities support continuous improvement to strategic and operational planning and misconduct and corruption prevention approaches.  Internal and external data holdings, where they can be shared and are relevant, are leveraged to inform detection approaches.  Automated processes are in place to identify and escalate red flags. Processes for prompt escalation, investigation and resolution are in place. |

**Comments**

Add your text here

# Element 7: Values and standards

## Values and standards (code of conduct) are in place and describe what acceptable workplace behaviour looks like in practice.

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| Values have been discussed by the leadership team but have not progressed beyond this.  A code of conduct is in place to meet compliance obligations (e.g. legislative, external policy) but it is not widely promoted by the leadership group.  Any discussions about the code of conduct relies on individual line managers.  Monitoring of compliance with the code of conduct occurs ad hoc.  Staff have limited awareness of the code of conduct. They are unsure where to find it, how it applies to them and their obligations under it. | Values and other direction setting statements (e.g. vision, mission and remit) are being developed and are consistent.  A code of conduct exists but does not fully take account of relevant legislation, regulation and policy (e.g. internal and external) obligations or integrity risks specific to the operating context.  Most leaders and line managers understand their role to promote the code of conduct, support its implementation and their role to monitor and support compliance with it.  Strategies to monitor compliance with the code of conduct are being planned for as integrity policies and procedures are being developed.  Most staff are aware of the code of conduct, can explain its purpose and know where to find it. | Values and codes of conduct focus on the behaviours expected to achieve objectives with integrity. Values and standards are reflected in relevant documents and processes (e.g. policies, strategic and operational plans, job advertisements and descriptions, recruitment processes).  The code of conduct incorporates the views of key internal stakeholders and accounts for relevant obligations and identified risks. It provides guidance to support ethical decision making.  Leaders and line managers consistently promote the code of conduct (e.g. during team meetings, ‘integrity moments’, standing item on the leadership group agenda) to support its implementation.  Compliance with the code of conduct is monitored (e.g. through staff performance processes, analysis of discipline processes and complaints) and reasons for non-compliance addressed.  Staff know about the code of conduct, understand its importance and can describe how it guides their behaviour. | Values and codes of conduct are regularly promoted to all stakeholders (e.g. published on the internet, in recruitment information) and there is a process for annual acknowledgment.  The code of conduct has been developed taking into account the views of the authority’s key external stakeholders.  Values and the code of conduct are discussed at leadership meetings. Data around non-compliance is being used by this group to inform improvements to internal controls. Discussions and information feeds into self analysis and review processes to continuously improve the integrity framework.  Staff are confident holding each other to account for expectations set in the code of conduct (e.g. respectfully calling out behaviour that does not align, reporting unethical behaviour). |

**Comments**

Add your text here

# Element 8: Leadership and management attitude

## Leaders are aware of and understand their role to model behaviours consistent with expectations, values and standards; and to take action addressing behaviour that is inconsistent with these.

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| The leadership group’s role to support integrity (e.g. to model, reinforce, promote, communicate and enforce) is informal; it relies on individual’s views of what their role is.  In the absence of any formal approach, it is left to individual leaders and line managers to interpret and model values and standards.  The role of leaders to support and demonstrate integrity – and if this is reflected in recruitment practices and staff performance processes – relies on those undertaking those processes.  There is little recognition that leadership roles are positions of trust. Employment screening processes (e.g. police clearances, verification of qualifications) are rarely, if ever, undertaken.  Development of leaders and line managers occurs as a result of individual development discussions with those who conduct the process. | A statement is being developed  (e.g. terms of reference, charter) that explains the leadership group’s role to support integrity.  Some leaders and line managers can explain what integrity looks like, its importance, and their role to promote, reinforce it and take action when behaviours are inconsistent with obligations.  The role of leaders to support and demonstrate integrity is being reflected in recruitment and performance documents and processes.  There is a growing recognition that leadership roles are positions of trust. Employment screening is being implemented for these roles.  Development of leaders and line managers includes building their skills to deal with integrity matters effectively (e.g. having difficult conversations about conduct). | The leadership group has a shared understanding of its role to support integrity. The group consistently demonstrates and supports this through its actions.  Leaders and line managers have a shared understanding and can explain how they shape culture, what integrity looks like, its importance, and their role to promote and reinforce it (e.g. taking action when behaviours are inconsistent with obligations).  Integrity forms part of the recruitment and performance processes for leadership roles. Leaders demonstrate how they support integrity through their actions and decisions (e.g. in their performance processes).  Leadership roles are identified positions of trust. Employment screening occurs for all new leadership roles.  Development of leaders and line managers includes building their skills to support integrity and prevent misconduct and corruption (e.g. recognise red flags, address issues early and make proportionate decisions when issues occur). | The leadership group’s cohesive approach to integrity is recognised externally. The authority head and leadership group are often sought to provide advice to their peers on integrity matters as a result.  Leaders and line managers have a good understanding of their role to uphold the reputation of their authority and the broader sector in which they work.  Performance processes assess both what leaders achieve and how they achieve it (e.g. projects delivered effectively manage internal and external risks).  Development of leaders and line managers incorporates mentorships and coaching designed to grow their personal capability, insights and skills to lead with integrity. |

**Comments**

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# Element 9: Organisation culture

## Integrity is part of organisation culture. It is actively managed to ensure integrity is sustained.

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| There are few actions and initiatives (e.g. clear expectations, values, communication about integrity, integrity education) to build and sustain integrity.  There is little understanding about recruiting for integrity (e.g. values based recruitment). Staff employment screening (e.g. police clearances, previous disciplinary matters, verification of qualifications) is rarely, if ever, undertaken.  Reporting pathways exist to meet compliance obligations (e.g. public interest disclosure) but are not widely promoted and confidence in them is low.  Integrity communications only occur in response to a significant integrity breach.  Some staff can describe ‘how we do things around here’, but they are unable to link this to expectations or the code of conduct. | Actions and initiatives to build and sustain integrity are being developed. This includes evaluation activities (e.g. staff surveys to test reporting confidence).  Recruiting for integrity and the requirement for staff employment screening is being documented and promoted to recruiting managers.  Reporting pathways are being developed for staff and external stakeholders. These are clear and concise, include external avenues and strong statements about protection for those who speak up.  An integrity communications plan is being developed. Key integrity messages are communicated periodically (e.g. for International Anti-Corruption Day).  Most staff can describe ‘how we do things around here’ as it relates to their immediate work environment referencing the code of conduct, and policies and procedures relevant to their role. | Actions and initiatives to build and sustain integrity are in place. Evaluation activities are conducted regularly and improvements implemented.  Recruiting for integrity and staff employment screening occurs for all new staff. The type of screening is proportionate to the position and integrity risks.  Reporting pathways are in place and well known by staff. These provide for external stakeholders to also report integrity matters and for anonymous reporting.  An integrity communications plan is in place and messages are sent to staff regularly (e.g. dedicated web/intranet site, campaigns on integrity topics run throughout the year).  Staff can describe ‘how we do things around here’ from an authority wide perspective and can link this to expectations, values, standards and the need to follow policies and procedures. | Data and information that might indicate issues with integrity are identified, monitored and action taken (e.g. business units with high reports of integrity breaches are supported to make better decisions).  There is a process in place to ensure identified positions are rescreened periodically.  Data and information on the use of reporting pathways are analysed to inform continuous improvement (e.g. absence of reporting from certain teams or employment groups).  De-identified data from reporting is used to inform integrity communication messages.  Staff can consistently describe ‘how we do things around here’, referencing authority and sector wide expectations, values, standards, policies and procedures. |

**Comments**

Add your text here

# Element 10: Integrity education and capacity

## Integrity education helps build staff capacity to act with integrity.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| **Emerging** | **Developing** | **Embedded** | **Excelling** |
| --- | --- | --- | --- |
| * Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant. * Integrity is not defined or well understood by staff. * Integrity actions and initiatives tend to be unplanned, inconsistent and reactive. * Accounting for integrity only relates to meeting compliance obligations. | * Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant. * What integrity means is becoming clearer to staff as the tone from the top is being communicated. * Integrity actions and initiatives are being planned for and coordinated but not yet integrated. * Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives. | * Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant. * Integrity is well communicated by leaders, understood by staff and integrated into business practices. * Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined. * Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment. | * Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning. * Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations. * Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks. * Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach. |
| **Characteristics** | | | |

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| Induction, if conducted, relies on the knowledge of individual line managers.  Some integrity education occurs beyond induction to meet compliance obligations.  Leaders and line managers rarely follow up if their staff have attended integrity education provided.  Whether other actions and initiatives (e.g. staff performance processes) to educate and reinforce integrity are undertaken relies on individual line managers.  Staff are unsure about who provides advice about integrity matters as it is not documented. If provided by individual line managers, the quality of advice relies on their knowledge. | An induction program is being developed to incorporate expectations, standards, policies and procedures and guide ethical decision making.  Integrity education is being developed to help manage key integrity risks (e.g. conflicts of interest, information management). The integrity education and training plan includes what is provided, to whom and when, which high risk positions need additional training, and how activities are evaluated (e.g. how participation is tracked).  Most leaders and line managers are active in attending any integrity education provided, encourage their staff to do the same and follow up with staff on mandatory education requirements.  Additional actions and initiatives to educate and reinforce integrity (e.g. staff performance processes and raising integrity consciousness) are being developed or reviewed.  Staff know that line managers and certain functional area leaders (e.g. finance, human resources) provide advice about integrity matters. Quality still relies on an individual’s knowledge. | Induction is regularly updated to ensure it is contemporary, accounts for lessons learned from integrity breaches and reflects any changes to operating conditions (e.g. new policies, changed risks).  An integrity education and training plan is in place and includes specific education on individual and organisational factors (red flags) for those in high risk roles. Participation in and feedback from sessions are collected and analysed to inform improvements.  Leaders and line managers support and champion integrity education. They reinforce the importance of attending integrity education sessions.  Staff performance processes and actions and initiatives to raise integrity consciousness reinforce key integrity messages and support good decision making.  It is well documented in the code of conduct, policies and procedures who provides expert advice on integrity matters. Leaders and line managers understand their role to provide general advice and how to escalate matters as required. | Integrity education is, where relevant, also in place for external stakeholders (e.g. labour hire staff, contractors and suppliers).  Individuals are followed up (e.g. randomly and periodically) to determine if and how knowledge gained during integrity education is being applied in practice in the workplace.  Leaders and line managers support practitioners attending external learning opportunities. A process is in place to ensure this learning is shared with others with roles and responsibilities under the integrity framework.  Those who provide advice about integrity matters meet periodically to discuss advice being sought and provided, helping ensure a consistent approach with policies and procedures and advice from external integrity bodies. |

**Comments**

Add your text here

# Element 11: Response to integrity breaches

## Integrity breaches are responded to in a timely and proportionate way to ensure integrity is sustained.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| **Emerging** | **Developing** | **Embedded** | **Excelling** |
| --- | --- | --- | --- |
| * Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant. * Integrity is not defined or well understood by staff. * Integrity actions and initiatives tend to be unplanned, inconsistent and reactive. * Accounting for integrity only relates to meeting compliance obligations. | * Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant. * What integrity means is becoming clearer to staff as the tone from the top is being communicated. * Integrity actions and initiatives are being planned for and coordinated but not yet integrated. * Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives. | * Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant. * Integrity is well communicated by leaders, understood by staff and integrated into business practices. * Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined. * Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment. | * Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning. * Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations. * Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks. * Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach. |
| **Characteristics** | | | |

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| If procedures exist, they are in place to meet compliance obligations; they provide insufficient guidance.  The quality of processes and decisions varies.  Basic case information (e.g. number of processes started and completed) is used for reporting.  The use of data, lessons learnt from past cases and the findings of external bodies are rarely, if ever, considered.  Whether integrity breaches are responded to relies on the knowledge and skills of individual line managers. | Procedures and guidance on responding to breaches – including awareness raising resources to inform those responding to integrity breaches – are being developed to promote better quality processes and consistent decision making.  Central recording of case information is being developed to streamline reporting.  The use of data, lessons learnt from past cases and findings of external bodies are being considered as procedures are being developed.  Most line managers have an understanding of what a breach looks like and how to respond. | Procedures, guidance and awareness raising materials inform those involved in responding to integrity breaches, and support quality processes and consistent decision making.  A quality assurance process is in place to check for consistent application of procedures.  A central register captures detailed case information. It is used to monitor the progress of processes, analyse trends and outcomes, and for reporting.  The use of data, lessons learnt from past cases and findings of external bodies are used to inform process improvements.  Decision makers, line managers and staff conducting processes have the required knowledge and skills. They are confident to respond to, manage and escalate matters as needed. | Procedures, guidance and awareness raising materials are updated regularly. This reflects results of the quality assurance process, compliance changes, contemporary practice and advice from external integrity bodies.  Detailed case information is captured in a central system with advanced features such as live analytics and dashboards. It provides useful intelligence to inform trend analysis and prevention strategies.  Individual (e.g. motivations) and organisational (e.g. control weaknesses) factors that might have contributed to a breach are analysed to help prevent future breaches.  Decision makers, line managers and staff conducting processes proactively build their own capacity where required (e.g. staying up to date with contemporary practice, industrial decisions).  Those who provide information as part of a process are followed up regarding their experience of the process and any suggestions for improvement. |

**Comments**

Add your text here

# Element 12: Self analysis and review

## Analysis and review activities of actions to support integrity are undertaken as part of continuous improvement.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| **Emerging** | **Developing** | **Embedded** | **Excelling** |
| --- | --- | --- | --- |
| * Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant. * Integrity is not defined or well understood by staff. * Integrity actions and initiatives tend to be unplanned, inconsistent and reactive. * Accounting for integrity only relates to meeting compliance obligations. | * Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant. * What integrity means is becoming clearer to staff as the tone from the top is being communicated. * Integrity actions and initiatives are being planned for and coordinated but not yet integrated. * Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives. | * Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant. * Integrity is well communicated by leaders, understood by staff and integrated into business practices. * Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined. * Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment. | * Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning. * Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations. * Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks. * Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach. |
| **Characteristics** | | | |

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| Analysis and review activities of actions to support integrity rarely occurs unless it relates to compliance.  Little thought has been given to whether there is value in sourcing external help with analysis and review activities.  Where analysis and review activities are conducted, findings and recommendations are not always implemented. | Analysis and review activities of actions to support integrity are sometimes undertaken beyond compliance. Available tools are used (e.g. snapshot tool and maturity self assessment tool).  Further consideration of requirements – including the value of sourcing external help with analysis and review – are being developed as part of the integrity framework.  Processes for coordinating the implementation of findings from self analysis and reviews, and recommendations from the reviews of external integrity bodies are being developed. This considers how monitoring and follow up occur. | Review of the integrity framework is scheduled. Analysis and review activities are aligned to or part of risk analysis and audit processes. Analysis is undertaken to recommend improvements to the framework considering changes in legislative and operating conditions (e.g. structural and legislative).  External assistance to undertake a review is sourced where needed (e.g. where a greater level of expertise and objectivity is required).  A position or team is assigned to coordinate implementation of findings and recommendations from self analysis and reviews, and recommendations from the reviews of external integrity bodies (related to the authority or not) of the integrity framework (and its component parts). Progress is reported to the leadership group. | Analysis and review of the integrity framework and reporting on implementation of improvement actions align with strategic and operational planning and budget cycles.  Results from self analysis and review, and recommendations from the reviews of external integrity bodies (related to the authority or not) inform improvements to the integrity framework (and its component parts). Revisions (where relevant) are shared with the workforce.  Benchmarking of the integrity framework and sharing of ideas occurs (where relevant and possible) with similar types of authorities to identify whether any further improvements can be made. |

**Comments**

Add your text here

# Element 13: Oversight

## Oversight is about providing the authority head assurance that the authority’s approach to integrity is working as intended.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

| **Emerging** | **Developing** | **Embedded** | **Excelling** |
| --- | --- | --- | --- |
| * Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant. * Integrity is not defined or well understood by staff. * Integrity actions and initiatives tend to be unplanned, inconsistent and reactive. * Accounting for integrity only relates to meeting compliance obligations. | * Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant. * What integrity means is becoming clearer to staff as the tone from the top is being communicated. * Integrity actions and initiatives are being planned for and coordinated but not yet integrated. * Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives. | * Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant. * Integrity is well communicated by leaders, understood by staff and integrated into business practices. * Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined. * Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment. | * Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning. * Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations. * Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks. * Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach. |
| **Characteristics** | | | |

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| The authority head relies on informal reports about how integrity is being practiced, managed and accounted for (approach to integrity).  Monitoring of the approach to integrity relies on members of the leadership group ensuring it is undertaken in their respective areas, rather than any formal process.  As required, the audit committee assures finance processes and reports are sent to the authority head.  Any oversight activities are ad hoc and focussed internally. | The authority head is directing the development of processes and structures to obtain the information needed for oversight of the approach to integrity. This is being documented in an integrity framework.  The leadership group understands their role to monitor the approach to integrity in their respective areas and provide data on request to support assurance and oversight.  As the integrity framework is being developed, the collection and provision of information (beyond that required for compliance) to the authority head for assurance, is being identified and documented.  Internally focused oversight activities are routinely performed and documented. | Processes and structures are in place to provide the authority head with information to assist their oversight of the approach to integrity (e.g. reports).  The leadership group are aware of their assurance and oversight obligations for their respective areas and are well prepared to provide updates at leadership group meetings.  A committee has been established (or the role of an existing committee has been expanded) with specific responsibilities to oversight the integrity framework (and its component parts) and report to the authority head.  Oversight activities associated with outsourced programs and services are being identified and documented. | The authority head can provide assurance to external integrity bodies and other stakeholders (e.g. board, council, minister) that the approach to integrity is sound.  The leadership group is well versed in assurance and oversight. Members are able to provide information and insights about the authority’s approach to integrity and can discuss how this compares to other similar authorities (if benchmarking has been conducted).  A committee provides the authority head with regular and fulsome reports about the integrity framework (and its component parts).  Oversight extends to outsourced programs and services to ensure they are adequately controlled and reported on. |

**Comments**

Add your text here