Embedding Integrity

Integrity Strategy for WA Public Authorities 2024-28

September 2024

From the Commissioner

Integrity is an absolute imperative for a strong government sector that is resistant to misconduct and corruption, and maintains the trust of the community it serves.

But it cannot be left to chance. Integrity has to be actively managed and improved especially as new technologies come to the fore, the pace of change accelerates, and different operating environments and risks emerge.

Each person who works in the Western Australian government sector is responsible for integrity – for their own actions and decisions, for being honest and respectful, and for doing the right thing even behind closed doors. More than this, each person has responsibility for taking their commitments and their work seriously, and for understanding their responsibilities and obligations as a public officer.

In essence integrity must be the common frame of reference for how we operate and deliver services for Western Australians.

Embedding Integrity is my second integrity strategy since being appointed Public Sector Commissioner in 2018. The first strategy focused on getting the foundations in place through an integrity framework supported by a toolkit of resources.
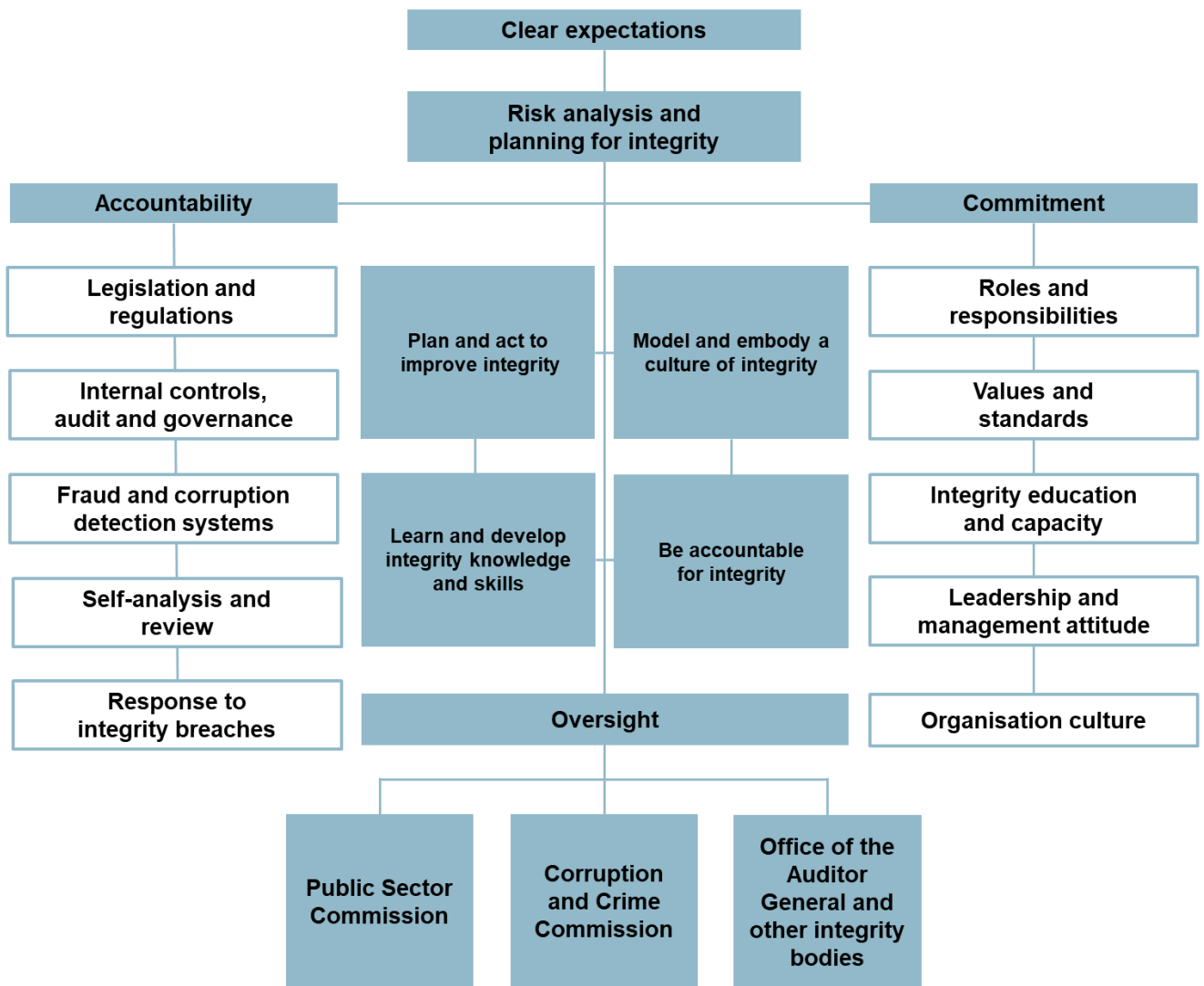
Now we must embed integrity which means having it running through everything we do as a matter of course.

In this strategy we look at further supporting authorities to use the toolkit of resources through formal education opportunities, community of practice sessions and targeted support for identified authorities. We pick up on specific aspects of integrity that can deliver value for the government sector such as pre-employment screening, speaking up and reporting, managing discipline processes, and better use of data to monitor the integrity environment. We also continue our series of thematic reviews examining specific aspects of integrity policy and practice to drive tangible improvements.

While the Commission can – and will – play its part as a key integrity agency, the actions of authorities are paramount to embed integrity. I expect every authority head to implement this strategy to strengthen integrity across the entire government sector.

Sharyn O'Neill PSM
Public Sector Commissioner

Integrity model for WA public authorities

Clear expectations

Risk analysis and planning for integrity

Accountability

- **Legislation and regulations**
- **Internal controls, audit and governance**
- **Fraud and corruption detection systems**
- **Self-analysis and review**
- **Response to integrity breaches**

Plan and act to improve integrity

Learn and develop integrity knowledge and skills

Model and embody a culture of integrity

Be accountable for integrity

Commitment

- **Roles and responsibilities**
- **Values and standards**
- **Integrity education and capacity**
- **Leadership and management attitude**
- **Organisation culture**

Oversight

Public Sector Commission

Corruption and Crime Commission

Office of the Auditor General and other integrity bodies

A focus on improvement through action

This strategy focuses on the 4 improvement areas in the integrity model to promote integrity and prevent misconduct and corruption.

Each improvement area has actions for the Commission, public authorities and individuals.

Actions for the Commission reflect its leadership in helping to prevent misconduct by informing, consulting with and making recommendations to the sector; providing advice and training; and analysing systems in authorities to prevent misconduct.

Actions for public authorities support and build on Commission actions, recognising that each authority needs to prioritise and tailor the actions for its particular operating context, remit and risk profile.

Actions for individuals are for those appointed to, employed by and contracted to public authorities to contribute to integrity in their authorities.

This tiered approach across the 4 improvement areas reflects the responsibilities of all those in the government sector. Actions at any one tier or actions in only one improvement area are not enough – it is the combined effort of the 3 tiers working together across the 4 improvement areas that can have the most impact.

Terms used

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

'Staff' refers to employees, board and committee members, and contractors.

1 Plan and act to improve integrity

Effective governance systems and frameworks are established.

	Actions for Commission	Actions for public authority	Actions for individual
1.1	**Support integrity framework implementation** Identify authorities that do not have an integrity framework, and provide practical advice and information to support them to develop one.	**Implement a framework** Develop and implement an integrity framework[1] to ensure a comprehensive and coordinated approach to integrity.	**Understand and act** Understand and act in accordance with the authority's integrity framework by following the code of conduct, policies and procedures.
1.2	**Drive a continuous improvement approach** Identify authorities that have not completed the Integrity Framework Maturity Self Assessment Tool and provide practical advice to support them to complete it.	**Continue to improve** Use the Integrity Framework Maturity Self Assessment Tool to assess the maturity of the authority's approach to integrity, and use results to develop and implement improvement actions.	**Contribute to improvement** Contribute ideas to improve your authority's integrity framework.
1.3	**Raise awareness about misconduct risks** Publish insights, develop guidance and provide advice to inform authorities about misconduct risks and contemporary practices to manage them.	**Take a risk based approach** Check that specific misconduct risks, vulnerable functions and activities are identified, controls are implemented and their effectiveness is monitored.	**Identify risks and opportunities** Inform the authority of any gaps or weaknesses that provide opportunities for misconduct or corruption to occur.
1.4	**Strengthen integrity pre-employment screening** Examine integrity pre-employment screening options and share information with authorities to strengthen their approaches.	**Recruit with integrity in mind** Screen potential staff having regard to their roles and risks.	**Implement screening requirements** Implement the authority's screening requirements and undertake appropriate checks.

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[1] Under Commissioner's Instruction 40: Ethical Foundations, each public sector agency is required to have an integrity framework.

2 Model and embody a culture of integrity

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

	Actions for Commission	Actions for public authority	Actions for individual
2.1	**Support speaking up** Explore ways and make recommendations to support reporting across the government sector and at an authority level.	**Strengthen reporting** Review reporting processes to ensure a clear tone from the top that promotes staff confidence to report, and helps leaders understand how they support staff to speak up.	**Contribute to cultural health** Speak up when you suspect misconduct, and respectfully challenge conduct not aligned to the authority's values and code of conduct.
2.2	**Target engagement** Develop an engagement plan and provide tailored integrity guidance and support to specific authorities.	**Collaborate to improve approach** Collaborate with the Commission, other integrity agencies and peers to ensure the authority is equipped to prevent misconduct.	**Contribute to prevention** Champion a pro-integrity message.
2.3	**Promote an integrity mindset** Conduct promotions and provide resources to help authorities raise staff awareness of integrity and what it means for them.	**Shape mindsets** Use Commission resources in conjunction with authority initiatives to raise staff awareness of integrity and shape attitudes towards it.	**Adopt an integrity mindset** Demonstrate integrity in all actions and decisions.

3 Learn and develop integrity knowledge and skills

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

		Actions for Commission	Actions for public authority	Actions for individual
3.1		**Increase capability** Deliver formal integrity education for specified authority staff to increase their capability to promote integrity and prevent misconduct.	**Increase the capability of others** Target key staff to attend formal Commission education opportunities and provide ways for these staff to share their learnings in the authority.	**Increase knowledge** Attend authority education opportunities to build integrity knowledge and skills.
3.2		**Share information** Work with integrity practitioners, integrity agencies and experts to deliver community of practice sessions on investigation and review findings, and share lessons learned and examples of good practice.	**Provide opportunities to apply learning** Have key staff attend community of practice sessions run by the Commission and other integrity agencies to build their integrity knowledge and networks, and give these staff opportunities to share ideas in the authority on how to improve processes and practices.	**Apply learning in practice** Apply the knowledge and skills gained from attending community of practice sessions to improve processes and practices.

4 Be accountable for integrity

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

	Actions for Commission	Actions for public authority	Actions for individual
4.1	**Promote good practice** Pilot a workshop initially for public sector staff conducting or managing discipline processes to build capacity to respond to misconduct.	**Skill practitioners** Make knowledge available in the authority to conduct or manage discipline processes and adopt a lesson learned approach to inform improvements.	**Apply practice** Apply good practice when undertaking or managing discipline processes.
4.2	**Enhance reporting** Trial a platform for anonymous reporting of minor misconduct to the Commission.	**Take action** Have clear processes to support staff and community reporting and guide action to be taken.	**Lead at all levels** Contribute to creating an environment where everyone knows the reporting avenues and is confident to report.
4.3	**Review performance** Conduct thematic reviews to identify and share areas of good practice and areas for improvement.	**Learn and improve** Use learnings from Commission reviews to evaluate systems, processes and practices, and make improvements.	**Improve continuously** Implement improvements made by the authority.
4.4	**Encourage an insights approach** Provide guidance about internal and external data sources and information that help authorities monitor their integrity environment and inform their approach to misconduct prevention.	**Use insights to inform prevention approach** Leverage data and information from internal and external sources to identify emerging issues and areas for improvement.	**Use collected data** Use data collected by the authority to support improvements.
4.5	**Collaborate for improvement** Participate with integrity practitioners, integrity agencies and others in research and projects that strengthen approaches to misconduct prevention.	**Apply findings** Use research insights to evaluate prevention methods used and make improvements.	**Adopt new approaches** Adopt changes to prevention methods.

Measuring success

Monitoring the success of the strategy for both the Commission and authorities is important in further embedding integrity across the government sector.

The table below has signs of success for the Commission and examples of signs of success for authorities.

Commission signs of success	Public authority signs of success
• Approaches to integrity are maturing across authorities over time as demonstrated by reviews conducted and data collected by the Commission. • Authority leaders and staff understand and value the work of the Commission and the assistance provided, as demonstrated by their positive feedback and requests for advice and collaboration. • Surveys and collections conducted by the Commission indicate there is growing confidence by individuals to report integrity breaches. • Authorities use the resources and tools provided by the Commission to improve integrity. • Commission sessions are well attended and evaluations indicate knowledge has increased because of attendance. • Commission reporting mechanisms assist the detection of misconduct in the sector.	• The authority's leaders are satisfied that the levels of maturity assessed through the Integrity Framework Maturity Self Assessment Tool are appropriate to their operating context and risk profile. • Findings from reviews and audits indicate the authority's approach to integrity is improving. • Staff survey results show a positive perception of integrity in the authority. • Staff survey results show staff have a good understanding of integrity requirements that apply to them and are confident to report integrity breaches. • Stakeholder survey results indicate confidence that the authority operates with integrity. • Training and information sessions related to integrity are well attended and evaluations indicate knowledge has increased because of attendance. • Time taken to resolve integrity matters is reasonable and results in improvements where necessary. • Notifications and reports to integrity bodies are timely.
Commission progress against these measures is reported periodically over the life of the strategy.	Consider other internal measures that may indicate integrity is improving in the authority.