Integrity Education

An integrity thematic
review

December 2024

From the Public Sector Commissioner

When we know better, we do better. Integrity education helps us do better by creating an understanding of the behaviours expected of us as public officers so we can hold ourselves and each other to account in our work.

Integrity education is an important part of how public authorities promote integrity and prevent misconduct. It builds the integrity knowledge and skills of public officers, shaping their daily attitudes to and behaviours around integrity.

This review considers the approach to integrity education from a cross section of Western Australian government authorities including departments, public sector agencies, local governments, government trading enterprises and public universities. The information gathered from these authorities highlights what is being done well in integrity education and where improvement opportunities lie.

I expect each authority leader to consider this report and use it to inform actions required to strengthen their approach to integrity education.

This is my third thematic review looking at integrity policies, procedures and practices in the government sector. Together, the reviews provide a wealth of information and guidance for the entire sector beyond participating authorities.

I thank the authorities that participated in this review. Their officers generously gave time to share information about the policies, frameworks and practices that make up the review report.

This report contributes to our collective efforts for a trusted government sector.

Sharyn O'Neill PSM
Public Sector Commissioner

December 2024

Integrity education

Public officers are trusted to act with integrity in the delivery of services to the communities they serve. When officers breach this trust it erodes confidence in the public authority they work for and the broader government sector.

To maintain this trust, authority leaders must ensure their officers are aware of their obligation to always act with integrity. This cannot be assumed.

A fundamental way to do this is by educating officers about expectations and requirements that relate to them. Equipped with this knowledge, officers are better able to recognise integrity issues and respond appropriately. They are also better able to assist their authority in detecting breaches of expected standards of behaviour including those involving misconduct.

For their part, officers must inform themselves by attending training, familiarising themselves with policies and guidance provided by their authority, and seeking advice when unsure.

> 'Integrity education' includes all activities and resources to improve integrity knowledge, awareness and understanding such as training, campaigns, messaging, publications and events.
>
> 'Integrity training' is a subset of integrity education and includes formal and planned training – such as training on codes of conduct – which may be delivered face to face, online or through other modes.

How the review was undertaken

The Commission invited a small number of public authorities to be part of the review so good practices and opportunities for improvement can be shared across the government sector.

The review was conducted using the Public Sector Commissioner's prevention and education function under s.45 A of the *Corruption, Crime and Misconduct Act 2003*. It focused on 4 areas:

- Frameworks that govern integrity education
- Approaches used to educate officers
- Reinforcement of integrity education
- Evaluation and improvement of integrity education

The 12 authorities that participated were 3 local governments, 3 departments, 3 public sector agencies, one government trading enterprise and 2 public universities. Full time equivalent employee numbers in each of these authorities ranged from 259 to 8,544.

The review included consultation with authority representatives and examined documents including frameworks, policies and procedures related to integrity education. It also looked at training being provided to officers, with a particular focus on how authorities educate officers about their codes of conduct. It did not cover integrity education provided to those appointed to boards and committees or to elected members of local and state governments.

The report does not provide an account of each authority but rather an overview of the approaches to integrity education undertaken in all 12 authorities. It does not make comparisons between reviewed authorities as approaches to integrity education vary based on authority size, operating context and integrity risk profile.

Opportunities for improvement summary

The review observed that authorities are using resources developed by the Commission to support their integrity education efforts.

As part of the new Integrity Strategy for WA Public Authorities 2024-28, the Commission intends to continue developing and providing awareness raising resources for authorities.

The review identified an opportunity for the Commission to supplement the current integrity education resources with sample evaluation forms for authorities to use; and update the integrity framework guide to include additional good and better practice initiatives in the Learn and Develop section.

Authorities should consider the opportunities for improvement, summarised below, in conjunction with the good practice observations in this report.

Focus area	Improvement
Frameworks that govern integrity education	Authorities document all integrity education being delivered and by whom in an integrity framework, policy or plan.
	Authorities formalise meetings between functional areas with roles and responsibilities for delivering integrity education to identify opportunities for collaboration and confirm whether any content needs to change, such as in response to emerging integrity issues.
	Authorities record attendance at internal non-mandatory sessions to gather a more complete picture of the integrity knowledge of officers and identify areas to further target.
	Authorities formalise in policy the sharing of integrity learnings from external integrity events; and, where attendance approval is required, supporting forms have officers describe how they intend to share learnings with relevant colleagues.
Approaches to educate officers	Authorities give prominence to code of conduct training rather than include it as part of broader inductions where key messages may be lost.
	Authorities provide specific integrity training and resources to managers to build their knowledge about promoting integrity and helping to prevent misconduct.
	Authorities include in integrity training for managers what misconduct is, red flags that may indicate misconduct, the importance of dealing with issues early and how to respond appropriately to reports of misconduct. Including these aspects recognises that most managers have responsibility for supervising officers and leading the daily delivery of services. Managers are most often the first people that officers seek advice from or raise concerns with. Without their support, the leadership team may find it difficult to maintain integrity.

Focus area	Improvement
Reinforcement of integrity education	Authorities develop a specific communications plan for integrity or incorporate it in an existing plan. This should schedule integrity messaging including campaigns that support training being delivered.
	Authorities monitor internet views of integrity policies and procedures as well as readership of emailed integrity messages to inform communications planning. Monitoring helps authorities gauge interest, understand the effectiveness of different messages and channels, and identify areas for further targeting.
Evaluation and improvement of integrity education	Authorities collect, combine and analyse information from a range of sources to help measure the effectiveness of training, validate learning approaches and inform improvements to integrity education.
	Authorities periodically collect post training feedback on how officers intend to use their learning and, at a later stage, follow up with them about whether they have applied their learning. Feedback can be used to inform whether training requires improvements to help embed learnings in workplaces.

Frameworks that govern integrity education

A documented approach governs the delivery, management and monitoring of integrity education in authorities.

Good governance of integrity education starts with well documented policies, procedures, plans and schedules. These guide the authority's overall approach to integrity education by ensuring accountability for and consistency in how and when it is delivered, who it is delivered to and who it is delivered by.

To support governance, a system or process for monitoring integrity education delivery and completion needs to be in place. At a minimum a system or process tracks completion rates for mandatory training so follow up can occur, assurance can be provided to the authority's leadership team and any reporting requirements can be met.

Documentation governing integrity education should form part of an authority's integrity framework. This recognises the importance of integrity education in contributing to an authority's integrity promotion and misconduct prevention efforts.

The Integrity Framework Maturity Self Assessment Tool helps an authority assess the maturity of its approaches to integrity including how it educates its officers.

Key observations
- All reviewed authorities had some documentation such as policies, frameworks and training plans to govern integrity education. The comprehensiveness of these documents varied.
- Ten authorities had integrity frameworks.
- In most authorities the delivery of integrity education sat in more than one functional area.
- Not all integrity frameworks identified or documented education being delivered across the authority outside designated integrity and conduct areas, for example training being undertaken in or by procurement.
- Not all activities to raise awareness about integrity were documented in integrity frameworks, such as messaging being delivered about integrity.
- Over half of the authorities reported using the Commission's Integrity Framework Maturity Self Assessment Tool to check the maturity level of their approach to integrity education.
- All authorities reported they had mandated training on their codes of conduct or similar.
- Most authorities provided training on other integrity topics for their officers or those undertaking higher risk activities and functions such as procurement. Not all training was mandated.
- All authorities had systems or processes to track and record mandatory training and follow up on completion. Approaches varied from collecting attendance sheets and manual entering of data through to automated online systems.

Good practices observed
- Coordination of learning management and professional development systems – provides mandatory training to be followed up and any learning gaps to be discussed by managers with their direct reports such as during performance conversations.
- Mandated refresher training on codes of conduct at intervals between 2 and 3 years – reminds officers of expectations and keeps them up to date with any changes to codes of conduct and related policies.
- Reports and dashboards showing attendance rates for mandatory sessions provided to the leadership team – assures compliance obligations are being met.

Case study: Taking a risk based approach

A risk based approach identifies risks associated with the work of the authority and uses this to inform the type of training required, whether it should be mandatory, who it should be delivered to, when it should be delivered and by whom. Risks can be considered at whole of authority, functional or positional levels.

One authority mandated bi-annual training for all its officers on confidential information based on their risk profile.

Another authority assessed risks for all its positions and linked training to be automatically allocated based on the assigned level of risk. This also applied when officers changed roles.

Opportunities for improvement

- Document all integrity education being delivered and by whom in an integrity framework, policy or plan to support accountability and coordination.
- Formalise meetings between functional areas with roles and responsibilities for delivering education to identify opportunities for collaboration and confirm whether any content needs to change such as in response to emerging integrity issues. Document this approach in the authority's integrity framework or policy.
- Record attendance at internal non-mandatory integrity education sessions to gain a more complete picture of the integrity knowledge of officers and help identify areas to further target.
- Formalise the sharing of integrity learnings from external integrity events in policy to maximise the benefits of external learning beyond participants. Where attendance approval is required, supporting forms have officers describe how they intend sharing learnings with relevant colleagues.

Approaches to educate officers

The approach to integrity education design and delivery accounts for authorities' expectations, operating contexts and integrity risk profiles.

Effective integrity education should be:
- informed by the authority's risks including those presented by stakeholders and groups associated with the authority's work
- reflect an authority's expectations and requirements such as code of conduct, values and legislation
- created by individuals with a good understanding of the subject matter
- delivered in a timely manner
- presented in an appropriate format whether that be face to face or online.

Key observations
- All authorities provided code of conduct training as part of their integrity education. The provision of other education activities varied by type and quantity.
- Most training on codes of conduct covered topics that would be expected in this type of training such as conflicts of interest, use of public resources, record keeping, use of information and reporting breaches of the code.
- Other training delivered by authorities included procurement, fraud and corruption control, and appropriate use of ICT.
- Code of conduct training was incorporated in induction or delivered as standalone sessions. Usual practice was to have new officers complete training as soon as possible after starting employment.
- Online was the most common form of training delivery, with mandatory code of conduct training primarily delivered this way.
- Several authorities with regional presences delivered face to face training on integrity topics across their sites. This approach was seen to be beneficial in fostering relationships between participants and areas responsible for delivering education and supporting misconduct prevention.
- Most authorities delivering regional training reported that, following visits, they noticed an increase in participants seeking advice.
- Authorities reported drawing on internal and external subject matter experts to assist in delivering integrity education on occasions including representatives from integrity agencies.
- Several authorities included information about governance and integrity in existing senior leadership and management programs.
- Most authorities did not provide specific integrity training for contractors or suppliers. Rather, information about their commitment to integrity and expectations were included in a statement of business ethics or engagement arrangements.
- One authority had code of conduct training for volunteers.

Good practices observed
- Leadership endorsement of code of conduct or similar training – helps set the tone from the top and provides leaders with oversight of the information being provided to officers.
- Use of internal and external information to develop and update content, identify where to target training and develop de-identified case studies and scenarios to facilitate learning – helps make training relatable by reflecting risks that officers are likely to encounter. Providing examples related to the authority also helps officers identify behaviour not in keeping with expectations.

Examples of internal information
- o Risk registers
- o Audit recommendations
- o Code of conduct issues
- o Matters reported
- o Conflicts of interest declarations
- o Gift registers
- o Employee perception surveys
- o Post session feedback

Examples of external information
- o Interagency working groups
- o Integrity agency reports
- o Integrity agency resources
- o Media articles

- Inclusion of information about misconduct in mandatory code of conduct training covering how to report it internally and externally to the Public Sector Commission and Corruption and Crime Commission – equips officers with knowledge to identify potential misconduct and ensures they know about pathways to report it.
- Provision of specific integrity training to contractors based on the level of risk they present such as those with system access - can reduce integrity risks where those undertaking functions for an authority have the same level of access to information and resources as those employed by it.
- Regular lunch and learn sessions for managers - provides information on contemporary integrity topics and facilitates discussion with subject matter experts.

Opportunities for improvement
- Give code of conduct training sufficient prominence to avoid key messages being lost. Codes of conduct set the standards of behaviour essential to embedding integrity into daily activities. When code of conduct training is part of broader corporate induction sessions, key messages may be lost. Induction can be used to introduce the code ahead of more fulsome training.
- Provide specific integrity training and resources to managers to build their knowledge about promoting integrity and helping to prevent misconduct.
- Include in integrity training for managers what misconduct is, red flags that may indicate misconduct, the importance of dealing with issues early and how to respond appropriately to reports of misconduct. Including these aspects recognises that most managers have responsibility for supervising officers and leading the daily delivery of services. Managers are most often the first people who officers seek advice from or raise concerns with. Without their support, the leadership team may find it difficult to maintain integrity.

Reinforcement of integrity education

A comprehensive approach is taken to raising awareness about integrity and reinforcing authorities' expectations to support formal and planned training.

To help educate officers and embed integrity, the authority should combine awareness raising activities with formal and planned training. These should start from the moment positions are created and continue until officers leave the authority.

Key observations

- Most authorities incorporated integrity messaging in position descriptions.
- Most authorities required new officers to read and sign their code of conduct to acknowledge they would meet its standards.
- Over half of authorities indicated that codes of conduct and values formed part of their performance discussions. Several authorities also had officers reflect on how their behaviours aligned with the code and values, and recorded this.
- Most authorities had conducted campaigns to raise awareness of integrity risks.
- Several authorities reported using the Commission's resources to educate officers and stakeholders such as ['It's all in a day's work'](#), ['Anything to declare'](#) and ['Check 1,2'](#).
- Other methods authorities reported using to raise awareness included:
  - newsletters
  - emails
  - screens in lifts and common areas
  - social media
  - intranet.

Good practices observed

- Dashboard shared with leaders includes information on conflicts of interest; gifts, benefits and hospitality; secondary employment; and mandatory education completion rates – informs leaders of potential areas of focus.
- Development of an integrity health check – provides leaders with a snapshot of integrity matters in their areas such as the number of conflict of interest declarations, breaches of the code, completion of training and results of perception surveys. It also asks leaders what they are doing to support integrity and recommends ways they can do this such as discussing the code of conduct in team meetings. This approach reinforces training messages about the role of managers to monitor, oversee and maintain integrity.
- Emails or system generated annual reminders about declaring conflicts of interest and secondary employment, and linking these with performance discussions – helps reinforce training messages about declarations and management.
- Videos where authority leaders describe what integrity means to them – reinforces the tone from the top.
- Network of integrity champions responsible for sharing and reinforcing centrally developed messaging with officers in their functional areas and who play an active role in promoting integrity including hosting campaign events – helps create shared responsibility for integrity.
- Recognition for officers who demonstrated authority values at regular whole of authority meetings – acknowledges role models and celebrates positive behaviours while raising awareness about authority values.
- Dedicated integrity sections on intranets – makes it easy for officers to locate relevant frameworks, policies and procedures. Where officers did not have regular computer access other approaches were used such as toolbox meetings.

Case study: Using technology to talk about integrity

Combining communication methods can help reach a broader audience.

One authority made use of technology to complement existing approaches to integrity education. With a geographically spread workforce, it developed podcasts about integrity where subject matter experts discussed topics such as confidentiality, conflicts of interest and gifts. They also talked about their roles in helping to prevent misconduct and conducting investigations, and debunked myths about what they do.

Opportunities for improvement

- Develop a specific communications plan for integrity or incorporate integrity into an existing plan to ensure consistent delivery of integrity messaging throughout the year. Include in the plan a schedule of integrity messaging and campaigns that support training being delivered. The communications plan should form part of authorities' integrity frameworks.
- Monitor internet views of integrity policies and procedures and readership of emailed integrity messages to inform communications planning. Monitoring helps authorities gauge interest, understand the effectiveness of different messaging and channels, and identify areas for further targeting.

Evaluation and improvement of integrity education

Evaluating integrity education and measuring its effectiveness assist authorities to improve their overall education approach.

Evaluating integrity education and measuring the impact of it helps an authority identify gaps in officers' knowledge, know where to target education and inform improvements to its approach.

Key observations
- Authorities were not consistently collecting feedback about mandatory code of conduct or similar training. Some feedback collections were limited to session improvements and did not measure the objectives of the training or ask how participants would apply learnings.
- Authorities did not consistently follow up with officers at a later stage to explore how they were applying their learnings.
- Feedback was not generally sought about non-mandatory training.
- Some authorities reported using a range of methods to measure the effectiveness of integrity education, however most were not fully using all available information to do this.

Good practice observed
- Learnings from attendance at external events and reports of integrity agencies to review training – helps ensure training remains contemporary.
- Monitoring conflicts of interest trends and evaluating the quality of completed declaration forms – helps evaluate the effectiveness of training on conflicts of interest which includes instruction on how forms should be completed.

Opportunities for improvement
- Collect, combine and analyse information from a range of sources to help measure the effectiveness of training, validate learning approaches and inform improvement to integrity education. Some caution should be taken in how information is considered, an example being using low misconduct reporting as assurance that integrity is understood. A small number of reports may indicate little misconduct is occurring or it may indicate an unwillingness to report.
- Use a range of information sources to measure effectiveness including:
  o conflicts of interest and gift registers
  o quality of completed declarations
  o secondary employment applications
  o audit recommendations
  o training session feedback
  o results from training session questions
  o surveys to test officers' knowledge
  o matters reported
  o completed disciplinary matters
  o exit interviews.
- Collect periodic post training session feedback on how officers intend to use their learning, and at a later stage follow up with them about whether they have applied their learning, to inform whether training requires improvements to help embed learnings in the workplace.