City of Stirling

Integrity Strategy

Contents

Commitment to Integrity

The City of Stirling ('City') understands that earning and maintaining community trust is essential for the good governance of our community. The City adopts a zero-tolerance attitude towards fraud, misconduct and corruption. The City's Code of Conduct guides Elected Members and employees to determine the appropriate and acceptable ethical standards of behaviour in various circumstances.

This strategy outlines the City's approach to ensuring it not only acts with integrity, honesty and transparency; but is seen doing so by making reasoned decisions without bias by following fair and objective processes. This strategy applies to all employees and elected members at the City.

The City recognises the work of the WA Government in developing and implementing the Integrity Strategy for WA Public Authorities 2020-2023.

The City has adopted the WA Government Integrity Strategy (Appendix 1) in developing the City of Stirling Integrity Strategy, utilising the Integrity Snapshot Tool to assess its approach to integrity and identify areas of improvement (Appendix 2: The City's Integrity Snapshot and Appendix 3: Integrity Action Plan).

Objectives

The main objectives of the Integrity Strategy are to:

1. Model and embody a culture of integrity.
2. Be accountable for integrity.
3. Learn and develop integrity knowledge and skills.
4. Plan and act to continually improve integrity.

Review

The City's Integrity Strategy will be reviewed as follows:

1. A minor review in 2022 at the midpoint of the Integrity Strategy for WA Public Authorities 2020-2023;
2. A major review following the release of the follow up to the Integrity Strategy for WA Public Authorities 2020 -2023; and
3. The City will present to the Audit Committee a report including an update on the City's Integrity Strategy, the Snapshot Tool and the Action Plan at the last Audit Committee meeting annually.

Roles and Responsibilities

Every employee and elected member are responsible for integrity and has a role to play. The table below details the specific roles and responsibilities.

Roles	Responsibilities
Council	1. Adopt and review the City's Integrity Strategy. 2. Approve the City's Code of Conduct. 3. Designate a senior employee as complaints officer in accordance with section 5.120 of the *Local Government Act 1995* (currently the Manager of Governance). 4. Receive reports from the Audit Committee in relation to integrity risks, audit activities and other integrity controls.
Audit Committee	1. Advise Council on all matters relating to the City's strategic integrity risks. 2. Receive and review regular reports on integrity risk performances. 3. Receive and review internal audits including risks associated with integrity risks. 4. Oversee the implementation of the City's Integrity Strategy.
Elected Members	1. Model leadership and conduct that align with the City's commitment to integrity.
Chief Executive Officer	1. Provide leadership in the prevention, detection and response to misconduct. 2. Notify the Corruption and Crime Commission (for major misconduct) or the Public Sector Commission (for minor misconduct) of any suspected incidences of misconduct as required by section 28 of the *Corruption and Crime Commission Act 2003,* including requirements relating to confidentiality. 3. Ensure the City complies with the *Public Interest Disclosure Act 2003,* including requirements relating to confidentiality 4. Ensure the City complies with Division 9 of the *Local Government Act 1995* including requirements relating to confidentiality. 5. Provide report and advice to the Audit Committee and Council on integrity matters. 6. Drive a culture of integrity through the active demonstration of City values and by communicating the importance of meeting integrity standards.
Corporate Risk Management Group	1. Review relevant policies, management practices and procedures. 2. Receive and consider reports on operational integrity risks.
Directors	1. Demonstrate commitment to integrity through the active demonstration of City values and by building an accountable workplace culture.

Roles	Responsibilities
	2. Reinforce the requirement for integrity by employees and ensure that there are mechanisms in place to: • Identify and assess integrity risks. • Pro-actively identify and communicate business unit specific risks. • Promote employee awareness of integrity. • Ensure that reports of misconduct are dealt with appropriately. • Actively participate in integrity reporting at Leadership meetings. 3. Ensure confidentiality is maintained in all investigations and any findings that are made
Governance Business Unit	1. Oversee the development and review of the Integrity Strategy. 2. Manage strategic and operational risk registers that include integrity risks. 3. Promote a culture of integrity through collaboration, training and other activities. 4. Conduct activities that promote integrity awareness such as International Corruption Day. 5. Act as the City's Complaints Officer and Public Interest Disclosure Officer. 6. Manage the investigation of all reports of misconduct relating to Elected Members. 7. Ensure confidentiality is maintained in all investigations and any findings that are made.
Human Resources Business Unit	1. Ensure appropriate training on Code of Conduct. 2. Manage the investigation of all reports of misconduct relating to employees. 3. Ensure confidentiality is maintained in all investigations and any findings that are made. 4. Ensure that appropriate disciplinary action is taken when there is evidence of misconduct in accordance with the City's policies and procedures. 5. Ensure that appropriate pre-employment screening is carried out for new employees and existing employees who are promoted to positions of trust.
Internal Audit	1. Plan and conduct audits that address integrity risks. 2. Receive reports of alleged misconduct. 3. Report in writing any suspected fraudulent activities or corrupt practices identified during an internal audit function to the Chief Executive Officer and possible investigation or referral to the appropriate external agency. 4. Monitor and report on the status of implementation of management actions to address audit findings. 5. Ensure confidentiality is maintained in all investigations and any findings that are made.

Roles	Responsibilities
Business Unit Managers/ Coordinators/ Supervisors/ Team Leaders	1. Demonstrate commitment to integrity through the active demonstration of City values and by building an accountable workplace culture. 2. Commit to follow a robust and unbiased recruitment and selection process and only to recruit and engage individuals who are closely aligned with our City values. 3. Report any suspected act of misconduct in accordance with the City's misconduct reporting process. 4. Ensure specific behaviours relating to integrity are addressed in the annual performance review 5. Ensure that all employees complete the Code of Conduct training annually. 6. Ensure that all employees are aware of the City's policies and procedures and understand their responsibilities. 7. Implement controls to minimise acts of misconduct and integrate integrity risk management into all aspects of the Business Unit's functions. 8. Ensure confidentiality is maintained in all investigations and any findings that are made.
All Employees	1. Ensure an awareness and understanding of City Integrity Strategy and the employee's role within this framework. 2. Abide by the Integrity Strategy and any misconduct controls. 3. Actively sup ort and contribute towards integrity risk management initiatives. 4. Report any instances of misconduct through the City's reporting processes. 5. Ensure awareness, understanding and support of all City policies, management practices and procedures. 6. Ensure confidentiality is maintained in all investigations and any findings that are made.

Reporting of Misconduct

All employees have a duty to report suspected misconduct. The City has developed processes to facilitate reporting of misconduct.

The City's internal reporting system can be summarised as follows:

1. **Notify your supervisor** – Employees should report any suspected misconduct to their supervisor, coordinator, team leader, manager or director. All reports of misconduct are investigated accordingly and conducted confidentially.
2. **Notify the Chief Executive Officer** – Notifications of the alleged misconduct may be made to the Chief Executive Officer via email or in writing and posted to the City of Stirling Main Administration Centre, 25 Cedric Street, Stirling. The correspondence may be marked 'PRIVATE and CONFIDENTIAL' and addressed directly to the Chief Executive Officer. The confidential correspondence is referred unopened to the Chief Executive Officer.

3. **Make a Public Interest Disclosure to the Public Interest Disclosure (PID) Officer** - The City's PID Officer's are the Manager Governance, Internal Auditor and Service Lead HR Operations . A Public Interest Disclosure must be made in writing. Employees making appropriate disclosures are protected from reprisal when reporting misconduct as the City will endeavour to do regardless of whether reported under the *PID Act* or not.

4. **Notify the Internal Auditor** on 08 9205 8506 or via email at auditor@stirling.wa.gov.au.

5. **Phone the Misconduct Hotline on 08 9205 8990** – an anonymous complaint may be made to the 'Hotline.' The caller may leave their contact details, in which case the caller will be advised of the outcome of the investigation, subject to the requirements of the Public Sector Commission or Corruption and Crime Commission and any other relevant investigatory body. The identity of the caller will remain confidential.

6. **Report to external agencies** – Depending on the nature of the alleged misconduct, the matter may be reported to external agencies such as the Ombudsman, Public Sector Commission, Corruption and Crime Commission and the Department of Local Government, Sport and Cultural Industries.
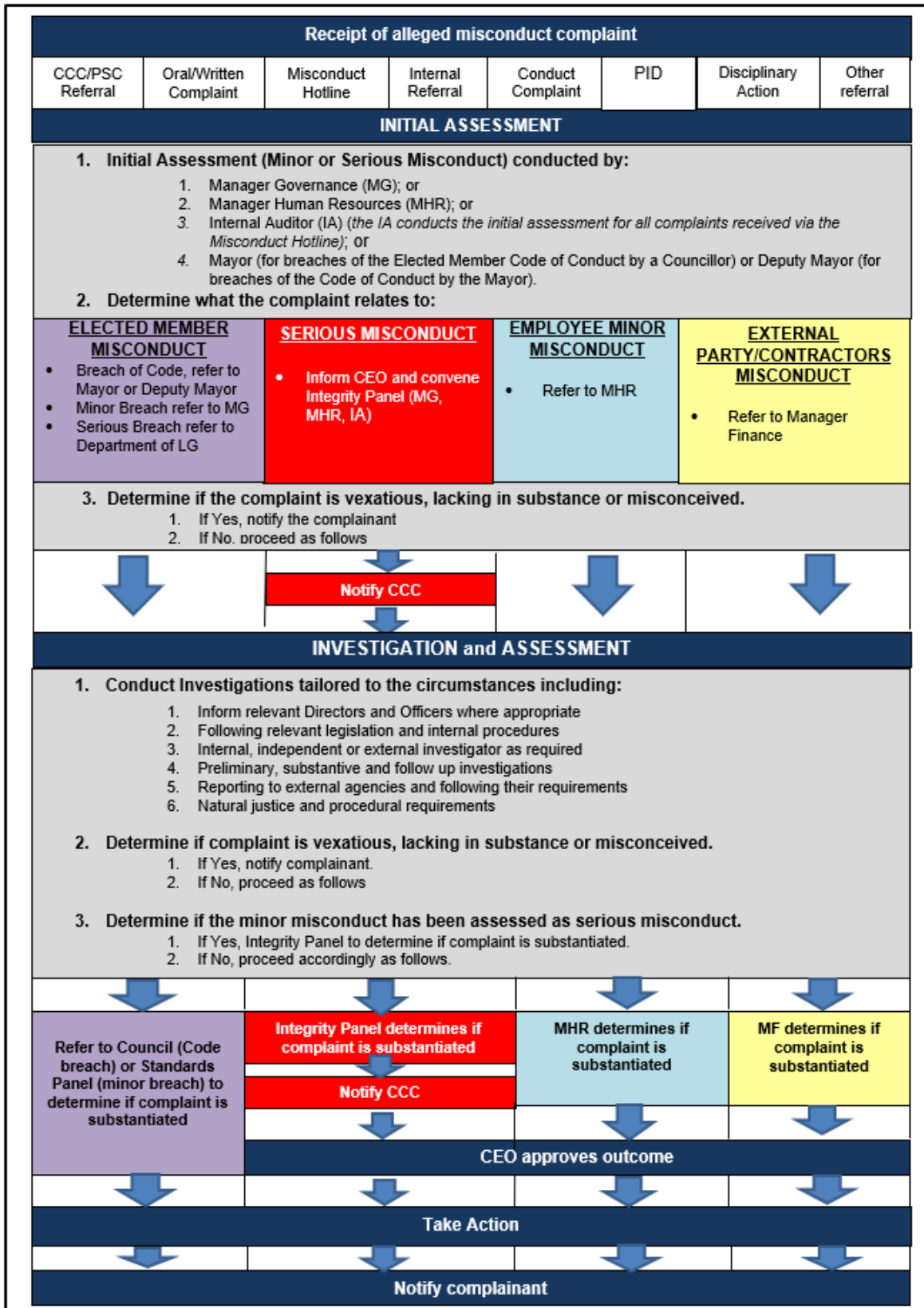
Dealing with Misconduct

The City of Stirling Integrity and Misconduct Management Practice outlines the processes that will be followed when conducting investigations into allegations received that involve alleged misconduct.

The City's investigation process will, unless otherwise required by law:

1. Be fit for purpose based on the nature of the allegations;

2. Follow relevant legislation and internal procedures;

3. Use internal, independent or external investigators as required;

4. Use preliminary, substantive and follow up investigations as required;

5. Be conducted confidentially and protect the complainant from reprisal;

6. Report to external agencies and following their directions as required;

7. Provide natural justice and meet procedural fairness requirements;

8. Keep the complainant informed as appropriate at relevant stages of the investigation process; and

9. Ensure vexatious complaints are identified and dismissed in accordance with the process.

In accordance with the requirements in the Management Practice, Flowchart 1 depicts the City's Misconduct Investigation Process.
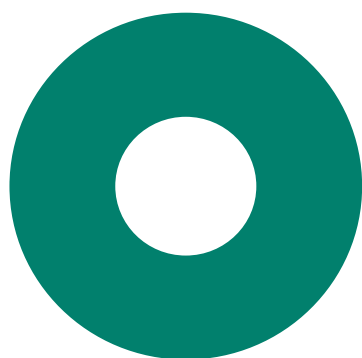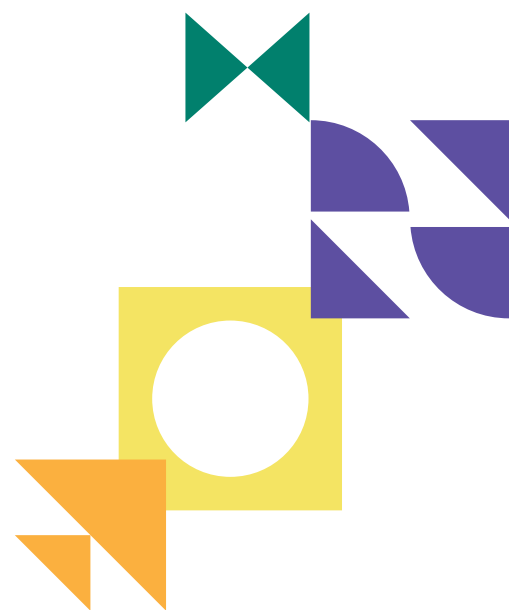
Flowchart 1: Misconduct Investigation Process

Receipt of alleged misconduct complaint							
CCC/PSC Referral	Oral/Written Complaint	Misconduct Hotline	Internal Referral	Conduct Complaint	PID	Disciplinary Action	Other referral

INITIAL ASSESSMENT

1. Initial Assessment (Minor or Serious Misconduct) conducted by:
   1. Manager Governance (MG); or
   2. Manager Human Resources (MHR); or
   3. Internal Auditor (IA) (*the IA conducts the initial assessment for all complaints received via the Misconduct Hotline*); or
   4. Mayor (for breaches of the Elected Member Code of Conduct by a Councillor) or Deputy Mayor (for breaches of the Code of Conduct by the Mayor).

2. Determine what the complaint relates to:

ELECTED MEMBER MISCONDUCT	SERIOUS MISCONDUCT	EMPLOYEE MINOR MISCONDUCT	EXTERNAL PARTY/CONTRACTORS MISCONDUCT
• Breach of Code, refer to Mayor or Deputy Mayor • Minor Breach refer to MG • Serious Breach refer to Department of LG	• Inform CEO and convene Integrity Panel (MG, MHR, IA)	• Refer to MHR	• Refer to Manager Finance

3. Determine if the complaint is vexatious, lacking in substance or misconceived.
   1. If Yes, notify the complainant
   2. If No, proceed as follows

Notify CCC

INVESTIGATION and ASSESSMENT

1. Conduct Investigations tailored to the circumstances including:
   1. Inform relevant Directors and Officers where appropriate
   2. Following relevant legislation and internal procedures
   3. Internal, independent or external investigator as required
   4. Preliminary, substantive and follow up investigations
   5. Reporting to external agencies and following their requirements
   6. Natural justice and procedural requirements

2. Determine if complaint is vexatious, lacking in substance or misconceived.
   1. If Yes, notify complainant.
   2. If No, proceed as follows

3. Determine if the minor misconduct has been assessed as serious misconduct.
   1. If Yes, Integrity Panel to determine if complaint is substantiated.
   2. If No, proceed accordingly as follows.

Refer to Council (Code breach) or Standards Panel (minor breach) to determine if complaint is substantiated	Integrity Panel determines if complaint is substantiated **Notify CCC**	MHR determines if complaint is substantiated	MF determines if complaint is substantiated

CEO approves outcome

Take Action

Notify complainant

Appendix 1

Integrity Strategy for WA Public Authorities 2020-2023

Integrity
Strategy

FOR WA PUBLIC
AUTHORITIES

2020-2023

From the Commissioner

Integrity is a non-negotiable to assure Western Australians that public authorities act in the interest of the community each and every day through the decisions we make and the actions we take.

Operating with integrity means using our powers responsibly for the purpose and in the manner for which they were intended. It means acting with honesty and transparency; and making reasoned decisions without bias by following fair and objective processes.

It also means preventing and addressing improper conduct, disclosing facts without hiding or distorting them, and not allowing decisions or actions to be influenced by personal or private interests.

Earning and maintaining community trust is essential for us to deliver the services that families, individuals, businesses and industry need for them to prosper – and for the State to grow.

We know that any breach of that trust has wide implications. The impact on our work and reputation affects us all. We also know that integrity goes beyond just legislative compliance – it is about doing the right thing because it is the right thing to do.

Two things are critical for us to understand to see improvement – first, integrity does not happen by chance; and second, we are all responsible for protecting the integrity of public authorities.

That is why a clear and focused approach to integrity must be at the core of our work. When integrity is a common frame of reference, it becomes a unifying force across different functions, different services and different employee groups.

Improved integrity helps minimise the incidence and impact of misconduct, including fraud and corruption. It also brings benefits in relation to performance, productivity and employee engagement.

To ensure our work translates into exceptional public value and high community trust, I expect every public authority – and those within – to commit to implementing this strategy.

Sharyn O'Neill

PUBLIC SECTOR COMMISSIONER

Commitment to improve integrity

Improved integrity requires sustained effort which is why all public authorities are expected to commit to implementing this strategy and taking action.

Integrity has to be embedded in all aspects of our work – in governance and administration; systems and controls; culture and attitude; and accountabilities and responses.

Every day. By everyone.

All public authorities and individuals must take an interest in promoting integrity and preventing misconduct and corruption.

While the Commission has a significant role to play, the primary responsibility for preventing misconduct and corruption – and operating with integrity – lies with leaders and individuals in public authorities.

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

Those appointed to, employed in and contracted to public authorities are all covered by this strategy.

Public authorities should see this strategy as an opportunity to demonstrate to the community that they are serious about integrity.

While there are no additional compliance obligations for public authorities arising from this strategy, changes may be made to the compliance framework to ensure it is contemporary and fit-for-purpose.

Over the life of the strategy, the Commission and its integrity partners will continue to ask leaders to report if and how integrity is improving. This may be through surveys, audits or reviews. Leaders of public authorities should consider how they monitor and evaluate integrity as a priority.
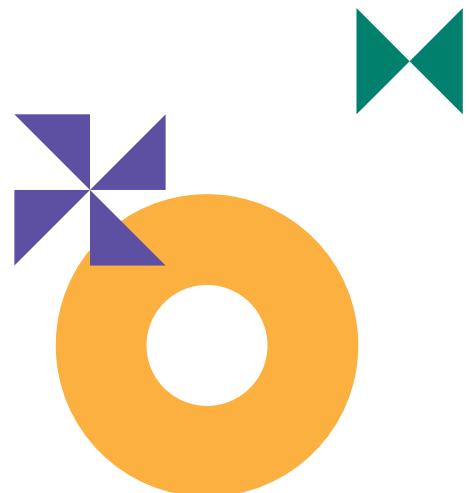
Integrity model for WA public authorities

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

Key actions to achieve our goals

There are many well-documented dimensions needed to ensure strong integrity in public authorities.

This strategy focuses on four key improvement areas with actions and controls to promote integrity and help prevent misconduct and corruption.

Under each of the key improvement areas are actions for the Commission to implement and provide leadership and support to public authorities.

There is also a cohesive suite of practical and achievable actions for public authorities to put in place, and for individuals – those appointed to, employed by and contracted to public authorities – to do.

This three tiered approach across the four improvement areas reflects the responsibilities that every aspect of the government sector has in relation to integrity. Actions at any one tier – or actions in only one area – are not enough. The strength is in the three tiers working together across the four improvement areas.

As public authorities have differing needs and contexts, they should adopt those actions appropriate for their circumstances in a way best suited to their needs.

The strategy also provides a common language for how we talk about integrity across public authorities.

This integrity strategy has four key areas for improvement.

01
PLAN AND ACT TO IMPROVE INTEGRITY
Effective governance systems and frameworks are established.

02
MODEL AND EMBODY A CULTURE OF INTEGRITY
A culture of integrity exists and is reinforced and communicated by leaders.

03
LEARN AND DEVELOP INTEGRITY KNOWLEDGE AND SKILLS
Individual and authority integrity knowledge, skills and competence are grown.

04
BE ACCOUNTABLE FOR INTEGRITY
Prevention, detection and response to integrity matters are everyone's personal and professional responsibilities.

01

Plan and act to improve integrity

Effective governance systems and frameworks are established.

Actions for the Commission

1.1 **PUBLISH FRAMEWORK**

Publish an integrity framework which includes instruments, processes, conditions, systems and control requirements that public authorities should have in place to support integrity; and detect, respond to and prevent misconduct, including fraud and corruption.

1.2 **ENCOURAGE SELF-ASSESSMENT**

Develop a self-assessment tool for public authorities to assess the maturity of their integrity framework to assist in improvement planning.

1.3 **USE DATA TO DRIVE CHANGE**

Use data collected from public authorities to create an online dashboard with analytics for public authorities to use in planning, including to benchmark their integrity environment against like public authorities.

1.4 **PROVIDE PLANNING GUIDANCE**

Make exemplar misconduct prevention plans available for use by public authorities.

1.5 **INVESTIGATE DETECTION SYSTEMS**

Examine detection approaches that identify irregularities and provide early warning including, software to monitor and evaluate data; systems to share intelligence, and a central register of individuals subject to adverse findings to assist with pre-employment screening.

1.6 **LINK TO AUDIT AND RISK**

Assist public authorities to assess governance controls which help identify, monitor and report on integrity matters.

Actions for public authorities

1.1 IMPROVE INTEGRITY FRAMEWORK

Align approach to the integrity framework (as a minimum).

1.2 CONTINUE TO IMPROVE

Use the integrity framework maturity self-assessment tool to assist in improvement planning.

1.3 USE DATA TO DRIVE CHANGE

Use tools such as the online data dashboard to benchmark against like public authorities, and use data to assist planning.

1.4 REASSESS APPROACH

Review regularly approaches to prevention and develop initiatives for improving integrity.

1.5 EVALUATE DETECTION SYSTEMS

Evaluate current systems, including pre-employment checks, and data to inform detection and prevention of irregularities and corrupt practice.

1.6 AUDIT AND RISK CONTROLS

Ensure audit and risk controls are in place and aligned to identify integrity vulnerabilities and risks.

Actions for individuals

1.1 UNDERSTAND AND ACT

Ensure you understand your public authority's code of conduct, policies and procedures; and act accordingly.

1.2 IDENTIFY RISKS AND OPPORTUNITIES

Alert managers/supervisors of any gaps in your public authority's code of conduct, policies and procedures that may provide opportunities for misconduct.

1.3 BE ACCOUNTABLE

Take responsibility for the decisions you make and the actions you take to ensure they are in the public interest.

02

Model and embody a culture of integrity

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

Actions for the Commission

2.1 PRIORITISE INTEGRITY

Promote and prioritise integrity as a key value across public authorities.

2.2 ENSURE A CONTEMPORARY APPROACH

Review integrity instruments and products to support contemporary approaches to integrity and guide conduct in public authorities.

2.3 LISTEN AND RESPOND

Develop resources to assist public authorities to seek and act on staff perceptions about their public authority's integrity culture.

2.4 GIVE FEEDBACK

Build skills of leaders to set behaviour expectations for their staff, give feedback, manage conduct and have difficult conversations.

2.5 SET CLEAR EXPECTATIONS

Support public authorities to set clear behaviour expectations through codes of conduct, recruitment and performance processes.

2.6 PROMOTE A SPEAK UP CULTURE

Share good practice in managing reporting to facilitate positive outcomes for those who speak up.

2.7 PROMOTE AN INTEGRITY MINDSET

Conduct campaigns to promote an integrity mindset such as "All in a day's work" related to gifts and benefits.
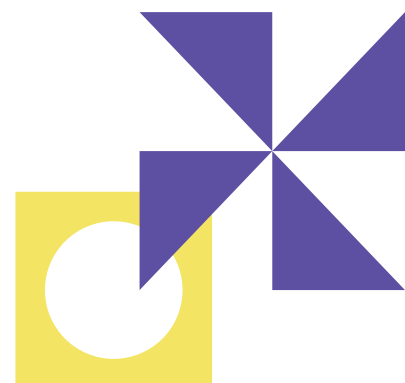
Actions for public authorities

2.1 PRIORITISE INTEGRITY

Review corporate values to ensure integrity is included and promote these values internally and externally.

2.2 DEVELOP TOGETHER

Involve staff in reviewing ethical codes, values, integrity policies and procedures so shared understanding is achieved.

2.3 EVALUATE AND BUILD

Use Commission and other high quality resources to evaluate and build an integrity culture.

2.4 BUILD CAPABILITY

Support leaders to promote a high integrity culture through professional learning, setting expectations for behaviour and building skills in having difficult conversations about conduct.

2.5 SET CLEAR EXPECTATIONS

Recruit for values alignment and ensure behaviour expectations are clear in codes of conduct and staff performance agreements.

2.6 EMBED PRACTICE

Embed good practices and mechanisms to encourage and support staff who speak up.

2.7 ADOPT THE MINDSET

Use campaign materials to ensure staff are conscious of misconduct risk areas and how they should respond.

Actions for individuals

2.1 MODEL VALUES

Ensure your daily behaviours, actions and decisions demonstrate your public authority's values.

2.2 CONTRIBUTE TO CULTURAL HEALTH

Respectfully challenge conduct that is not in accordance with your public authority's values and code of conduct.

2.3 TAKE ACTION EARLY TO ADDRESS MATTERS

Speak up to ensure conduct that does not align with your public authority's values is addressed early and, where possible, take action to avoid escalation or repetition.
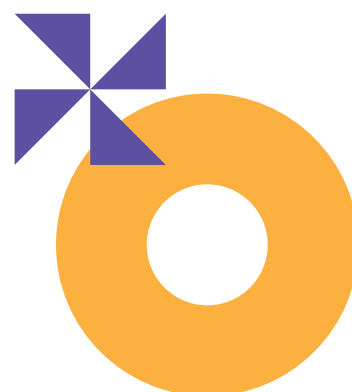
03

Learn and develop integrity knowledge and skills

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

Actions for the Commission

3.1 SHARE AND COLLABORATE

Establish an integrity practitioners' group to collaborate on strategic approaches to detecting and preventing misconduct, and promoting integrity.

3.2 BE A FUNCTIONAL AREA LEADER

Provide practical advice and information to public authorities, including forums and community of practice sessions on integrity matters.

3.3 OFFER ONLINE TRAINING

Introduce online integrity learning modules for use by public authorities.

3.4 INDUCT NEW STAFF

Work with other integrity agencies to develop an online integrity induction program for public authorities to use with their staff.

3.5 SHARE INFORMATION

Publish insights from data and the work of integrity partners to inform public authorities about current and emerging integrity risks and strategies.

3.6 SHARE RESOURCES

Establish an integrity section on wa.gov.au with accessible, practical and up-to-date information and resources.
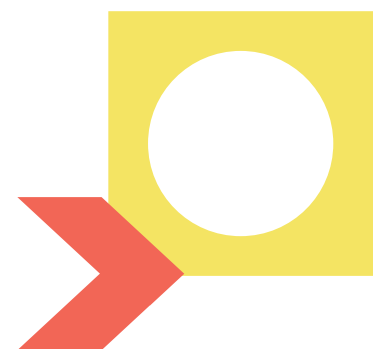
Actions for public authorities

3.1 PARTICIPATE ACTIVELY

Participate in integrity promotion and misconduct prevention initiatives and share learnings with staff.

3.2 INDUCT AND TRAIN STAFF

Deliver integrity training to new staff early in their employment and implement regular integrity training for all staff.

3.3 EDUCATE FOR PREVENTION

Inform staff about misconduct and their role in reporting and preventing it.

3.4 IMPROVE CONTINUOUSLY

Be proactive in looking for integrity improvements and learning by completing the Integrity Snapshot tool.

3.5 CAPABILITY GAPS

Evaluate the capability of key integrity staff, and identify knowledge and skill gaps that require further training or development.

3.6 USE INSIGHTS

Learn from Commission and other integrity agency insights; and use them to review and reassess the approach to integrity risks, areas of vulnerability and prevention.

3.7 ADOPT CONTEMPORARY PRACTICE

Keep up to date by referring to the integrity section on wa.gov.au when developing and reviewing integrity policies and systems.

Actions for individuals

3.1 PARTICIPATE ACTIVELY

Participate actively in integrity learning opportunities provided by your public authority.

3.2 SUPPORT NEW STAFF

Inform new colleagues about your public authority's code of conduct, policies and procedures associated with their work.

3.3 INFORM YOURSELF

Seek information about, and advice on, situations where integrity matters arise.

04

Be accountable for integrity

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

Actions for the Commission

4.1 CLARIFY ACCOUNTABILITY
Ensure public authority leaders understand their responsibilities for preventing, detecting and responding to integrity matters; and take proactive action.

4.2 PROVIDE AUTHORITY
Investigate models of misconduct management that enable more local decision making while maintaining appropriate oversight.

4.3 IMPROVE ONLINE REPORTING
Redevelop existing online misconduct reporting tools to improve the quality and types of notifications and reports made.

4.4 REVIEW FOR PERFORMANCE
Conduct specific and thematic reviews, and use information from capability reviews to identify areas of good practice and those requiring improvement.

4.5 COLLABORATE FOR IMPROVEMENT
Partner with external experts to participate in research and projects that identify contemporary approaches, including behavioural insights and technology to enhance detection and prevent misconduct and corruption.

4.6 LEVERAGE EXPERTISE
Pursue methods that enable greater shared use of expertise and trained investigators across public authorities.

Actions for public authorities

4.1 REPORT MISCONDUCT ONLINE

Use Commission and Corruption and Crime Commission online reporting tools to notify of misconduct in a timely manner.

4.2 OVERSEE INTEGRITY

Have leadership teams lead, own and oversee processes for identifying, detecting, managing and preventing misconduct.

4.3 REVIEW FOR LEARNING

Use learnings from Commission reviews to evaluate current practices and make changes.

4.4 RESPOND TO RISKS

Understand that specific risks change over time and take steps to ensure these are responded to and addressed.

4.5 TAKE ACTION

Put processes in place to support staff and community reporting, and empower leaders to act on reports of misconduct.

4.6 BE ACCOUNTABLE

Ensure integrity is a standing agenda item at leadership meetings to provide a forum to interrogate data, and identify and respond to emerging trends.

Actions for individuals

4.1 REPORT ISSUES

Assist your authority to detect misconduct by reporting suspected misconduct either through internal or external reporting processes.

4.2 LEAD AT ALL LEVELS

Contribute to creating an environment where everyone is comfortable with and confident to report any suspicions of misconduct.

4.3 RESPONSIBLE TEAMS

Take responsibility for operating with integrity in your team and encourage others to do the same.

Measures of success

To know how we are progressing towards building and sustaining a high integrity culture across public authorities, we need ongoing evaluation of our success. The ultimate success is stamping out misconduct, including fraud and corruption.

COMMISSION SIGNS OF SUCCESS

- Approaches to integrity are maturing across public authorities over time, as demonstrated by reviews conducted by the Commission.

- Public authority leaders acknowledge the value of assistance provided by the Commission and seek to collaborate with the Commission on integrity matters.

- In surveys conducted by the Commission, staff report perceptions that public authorities and leaders operate in a high integrity culture.

- There is increased usage of the Commission's products and tools, including online learning modules.

- Commission forums/sessions are well attended and evaluations indicate knowledge has increased as a result of attendance.

- Amendments to online reporting tools assist reporting and notification processes, and the quality of reports to the Commission improves over time.

Monitoring signs of success are commenced from the start of this strategy and reviewed each year. Progress against these measures will be reported periodically over the next four years.

PUBLIC AUTHORITY SIGNS OF SUCCESS

- Public authority has implemented or exceeded the requirements of the integrity framework.

- Commission evaluation and benchmarking tools indicate the public authority is well positioned in regards to governance, culture, education and accountability.

- Survey data shows high staff perception of integrity in the public authority.

- Survey data shows staff have a good understanding of policies, procedures and ethical codes.

- Training and information sessions related to integrity are well attended.

- Time taken to resolve integrity matters is reasonable and results in improvements where necessary.

- Evaluations of reports to integrity bodies indicates reports are timely.

- Responses to integrity matters and results of reviews and audits are considered and implemented.

Consider what other internal measures may indicate integrity is improving. Evaluations should be shared with staff.
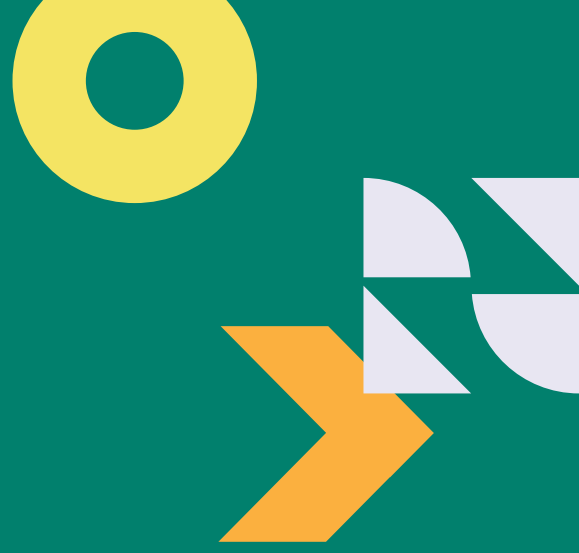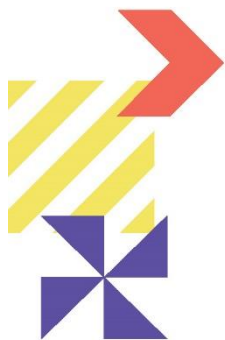
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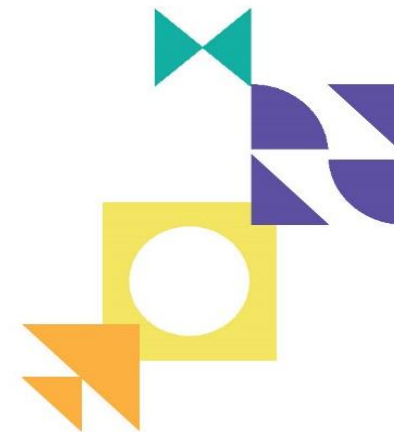
City of Stirling Integrity Snapshot

Integrity Snapshot Tool

FOR WA PUBLIC
AUTHORITIES

Integrity Snapshot Tool

The snapshot tool supports the Integrity Strategy for WA Public Authorities 2020-23. It gives public authorities a clear view of what they have in place to support integrity and can help them identify areas for development or more focus that should feature in their planning. The snapshot tool is not meant to be an exhaustive list of things to consider and should be used by public authorities in a manner that best suits their contexts. It is not intended to replace more detailed or specific risk management activities.

The tool can:

- help public authorities evaluate their approaches to promoting integrity and reducing misconduct risks
- identify any gaps in the current approaches to integrity by public authorities that could be actioned.

How to use the snapshot tool

As this is a self-assessment tool, public authorities can benefit by using it to review the status of their approach to integrity and make decisions about where further or additional work is needed.

Public authorities are encouraged to update their assessments as they progress with actioning items. In this way they capture their assessments on an ongoing basis. It is acknowledged that each public authority has a different risk profile and operating context, and is at varying points of progress in managing integrity risks.

Assessment guide	
Activity	Description
In place	Suggested activity has been addressed or is subject to review.
In progress	Steps are in place to address suggested activity.
Not in place	Steps may be required to address suggested activity.

PSC1956726

01 Model and embody a culture of integrity

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

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has values that include integrity integrated into all aspects of its business (e.g. in policies, processes and systems).	☒	☐	☐	The City is committed to serve its diverse community through delivering efficient, responsive and sustainable service through the adoption and document integration of the following values: • Agile • Approachable • Inclusive • Innovative • Inspiring • Respectful • Transparent The City's values drive its Code of Conduct and organisational culture approach.

	In place	In progress	Not in place	Proposed actions and comments
promotes integrity in and outside the authority (e.g. website, publications, staff newsletters, division meetings, annual reports and everyday practices).	☒	☐	☐	The City's commitment to mitigating misconduct or wrong doing is promoted Monthly Team brief, Anti-Corruption Activation Day, Tool Box sessions, Good Governance Forum and through organisational policies, management practices and Business Unit procedures. Information on the City's Conduct and ethics is published on the City of Stirling website.
has leaders who role model integrity and demonstrate zero tolerance for breaches of ethical codes and misconduct.	☐	☒	☐	The City's leaders continue to build the organisational culture by: - Having robust policies, management practices and procedures. - Ensuring regular training and educational awareness programmes are implemented. - Ensuring employees understand what is and isn't an ethical behaviour. - Regular reminders of misconduct reporting

	In place	In progress	Not in place	Proposed actions and comments
				requirements and procedures. • The City has a clearly defined behaviour. Specific behaviours relating to Integrity are required to be addressed in each Performance Review.
has a consultation mechanism to engage with and involve staff when reviewing integrity policies, procedures and information to gain shared commitment and understanding.	☒	☐	☐	All principal documents including code of conduct, policies, management practices, misconduct control plans and frameworks are reviewed across the organisation in keeping with legislation or Council's decision. The regular review of the Human Resource Management Practices ensures the City has values-driven people practices in place. All key documents are provided in draft to Executives, Business Unit Managers and Elected Member for comment before consideration and final adoption.

	In place	In progress	Not in place	Proposed actions and comments
has human resource policies and practices that reflect a commitment to recruiting staff who demonstrate a strong alignment to its values.	☒	☐	☐	The City of Stirling Recruitment and Selection Management Practice establishes the minimum standards of merit, equity and probity that must be applied when filling a vacancy. All employees involved in the recruitment and selection process are expected to practice the principles of equal opportunity and anti-discrimination, consistent with the City's Equal Employment Opportunity Policy, the City's Values and Code of Conduct.
ensures recruitment materials include information on values and conduct expectations.	☒	☐	☐	Each position description includes the expected corporate responsibilities and values. A copy of the City of Stirling Code of Conduct is provided to all new employees. There is a strong focus on both technical and behavioural competency assessment during the interview process to ensure values alignment.

	In place	In progress	Not in place	Proposed actions and comments
conducts integrity checking, including qualification and employment history checks, as a normal part of selection and recruitment practices, particularly for positions of trust (e.g. integrity officers, finance and procurement staff).	☒	☐	☐	The City's Recruitment processes include pre-employment screening with appointments conditional on an accredited National Criminal History Check being undertaken in accordance with the City of Stirling Criminal Records Screening Procedure. All due diligence is assessed and completed prior to the commencement of employment with the City. All Human Resources Management Practices and procedures outline the importance of all conditions of employment to be upheld by the employee, including but not limited to those individuals already employed.
uses staff performance processes to discuss and reinforce its values and conduct expectations.	☒	☐	☐	The employee Annual Performance Review forms part of the process for management to consider initiatives and reinforce the City's values and conduct expectations. Specific behaviours relating to Integrity are required to be

	In place	In progress	Not in place	Proposed actions and comments
				addressed in each Performance Review. There is an expectation of employees being technically competent to perform at a required level in their substantive role, whilst demonstrating and living City values. The emphasis of the City's annual performance management process is on having ongoing conversations and providing regular feedback. All Managers have access to support, such as Human Resources and leadership coaching, where identified and required.
measures staff confidence and attitudes about its integrity, including confidence in speaking up about misconduct and integrity matters (e.g. through staff perception surveys) and identifies steps to address any findings.	☐	☒	☐	As part of the City's ongoing commitment to improving the workplace culture, employees are encouraged to participate in the Culture audit and Employee Engagement Pulse Survey which includes assessing the City's values. The Culture audit is extensive and provides insights to employee

	In place	In progress	Not in place	Proposed actions and comments
				confidence and also identifies areas for focus to address gaps.
has staff formally acknowledge that they have read its code of conduct at appointment/induction.	☒	☐	☐	The City of Stirling Code of Conduct is a mandatory e-Learning module for all employees to complete.
encourages staff to report misconduct (e.g. in policies, codes of conduct, staff communication).	☒	☐	☐	Employees are at all times to act honestly and with integrity and to safeguard public resources for which they are responsible. The City will not tolerate any act of misconduct and any case will be thoroughly investigated. Reporting alleged misconduct on the "Hotline" or in person will be kept strictly confidential. The City's International Anti-Corruption Day activities, Team Brief and corporate orientation encourage misconduct reporting.
makes information available about public interest disclosure processes and other reporting mechanisms to staff and stakeholders.	☒	☐	☐	The Public Interest Disclosure Management Practice and Procedures and the Guide to Managing Misconduct are available on the City's intranet site.

	In place	In progress	Not in place	Proposed actions and comments
has reporting policies or codes in place that includes a statement that reprisal action is not tolerated against those who speak up about misconduct and integrity matters.	☒	☐	☐	The City's Public Interest Disclosure Management Practice states that protection is provided for any person that makes a disclosure.

02 Be accountable for integrity

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

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has a clear and documented process to assess potential misconduct that guides decision making about when to notify the Public Sector Commission and Corruption and Crime Commission of minor misconduct and serious misconduct (respectively), using their online reporting tools.	☒	☐	☐	Investigations of alleged misconduct are clearly outlined within and undertaken in accordance with the City's Integrity and Misconduct Management Practice.
articulates the roles and responsibilities of the leadership team in overseeing integrity.	☒	☐	☐	The roles and responsibilities are determined in the *Local*

	In place	In progress	Not in place	Proposed actions and comments
				Government Act 1995 and the City of Stirling Integrity Strategy.
has a documented and active process to review and learn from internal and external reports, including focusing on individual conduct as well as system, cultural and capability weaknesses that may have provided the opportunity for misconduct to occur.	☒	☐	☐	Reports and recommendations on any gaps in processes are referred to the Executive Team for action. The City actively learns from the Corruption and Crime Commission, Public Sector Commission, Auditor-General and Department of Local Government reports on activities in other agencies.
monitors, reviews and addresses its approach to changing and emerging risks (e.g. due to restructure, introduction of technology and legislative change) and ensures: • a new integrity risk assessment is completed • its risk register is updated • internal policies, processes and systems are updated to reflect the new operating context	☒	☐	☐	The City of Stirling Information Security Framework provides the guidelines to protect confidentiality and integrity of information systems. Regular review of the City of Stirling Strategic Risk Register assists with mitigating the level of risk or gaps in systems and processes. This review process will continue to evolve as the City reviews its Risk Management Framework.

	In place	In progress	Not in place	Proposed actions and comments
collected data is analysed and reported to the leadership team (e.g. reports of integrity breaches, complaints, grievances, staff survey results, training records, conflicts of interest, gifts and benefits register).	☐	☒	☐	The City collects data some of which is reported to the leadership team, for example employee survey results. **ACTION:** To consider developing a reporting process for integrity issues following completion of the operational risk register review.
has integrity as a standing agenda item for its leadership team to provide a forum to interrogate data, and identify and respond to emerging trends (e.g. data about breaches of Code of Conduct or policy, allegations of misconduct, complaints received, and recommendations from self-assessments and audits).	☒	☐	☐	Recommendations and business improvement opportunities from self-assessments and audits performed are reported to the Executive Team, relevant Business Unit Managers and Corporate Risk Management Group for action. **ACTION:** To consider integrity as a standing agenda item following development of a reporting process.

03 Learn and develop integrity knowledge and skills

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

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
ensures integrity training programs are up to date (e.g. reflects its code, legislative and policy requirements).	☒	☐	☐	The Code of Conduct e-Learning module is conducted annually for all employees. In addition, employees are provided with the opportunity to attend external seminars, conferences, Good Governance Forums and forums to upskill and improve knowledge.
maintains records of staff who attend induction and integrity training.	☒	☐	☐	Mylearning management system (LMS) maintains a record of employees that have orientation, which includes the e-learning code of conduct course.
follows up with staff where necessary to ensure learnings from integrity training are embedded.	☐	☒	☐	An overview of the training session is provided to the supervisor and/or Business Unit Manager by the employee and where possible, embedded into the Business Unit's processes.
has a process for communicating with staff about integrity matters including updating them about changes to policies,	☒	☐	☐	New, amended or revoked policies, management practices or procedures are communicated

	In place	In progress	Not in place	Proposed actions and comments
processes and systems (e.g. through newsletters, emails, meetings).				to employees via the City's intranet site and Business Unit team meetings. Integrity issues are also communicated through Good Governance Forums, Team Brief, the City's intranet site, Leadership Meetings and International Anti-Corruption Day promotions.
has a formal induction process in place for all new staff and contractors that includes a clear focus on integrity.	☒	☐	☐	The City's Code of Conduct is included in each new starter welcome pack. All employees, regardless of position or employment status, participate in an employee orientation programme during their first three months of employment. Managers are responsible for completing the Business Unit Orientation Checklist (including e-Learning components) during the employee's probation period. Completion is monitored by Human Resources. Agency temporary employees, regardless of position or employment status

	In place	In progress	Not in place	Proposed actions and comments
				also participate in an employee orientation/ induction programme. The City of Stirling Statement of Business Ethics is provided to all contractors through the City's Tender and Quotation document.
delivers Accountable and Ethical Decision Making (AEDM) training (or equivalent) and refresher training to staff that:				
• is aligned to its Code of Conduct.	☒	☐	☐	All employees are required to complete the Code of Conduct refresher training.
• is customised to its context and business, and covers its specific integrity risks.	☒	☐	☐	
• is up to date and reflects changes to systems and processes.	☒	☐	☐	**ACTION:** The content and structure of the refresher training will be considered following the review of the Code of Conduct.
• includes information on its integrity framework, policies, processes and systems.	☒	☐	☐	
• includes information on how to recognise, respond to and report misconduct.	☒	☐	☐	
• records attendance and completion rates which can be provided to the Commission and other integrity bodies as required.	☒	☐	☐	
provides specific integrity training to staff working in high risk roles (e.g. finance, procurement, integrity) in relation to fraud	☐	☒	☐	Employees with delegated authority to approve purchase orders must complete the Procurement e-Learning course

	In place	In progress	Not in place	Proposed actions and comments
and corruption, accountability requirements and reporting suspected misconduct.				which includes reference to fraud and misconduct covered in the mandatory annual Code of Conduct training. **ACTION**: Identify position/service areas that are at risk and provide additional training. The provision of training for high risk roles will be considered following the review of the Code of Conduct.
evaluates staff awareness of its integrity requirements (e.g. through staff perception surveys) and acts on any knowledge deficits.	☐	☐	☒	The employee engagement or audit culture survey does not evaluate employee awareness on integrity requirements. **ACTION:** Consider incorporating employee awareness of integrity requirements into employee on boarding survey.
encourages, supports and provides a mechanism for staff to seek advice on integrity matters when they are unsure.	☒	☐	☐	Employees are encouraged to consult with their Business Unit Managers, supervisor, Governance or Human

	In place	In progress	Not in place	Proposed actions and comments
				Resources if they are unsure about integrity matters.
makes staff aware of the process of identifying integrity risks and contributing to the risk register.	☐	☐	☒	**ACTION:** Comprehensive review of the City's Operational Risk Register to include integrity risk will be conducted along with the City of Stirling Integrity Strategy. This action will be undertaken as part of the City of Stirling Operational Risk Register review.
ensures staff who respond to and investigate integrity matters are suitably skilled (e.g. have Certificate IV in Government Investigations or higher qualification and/or relevant experience).	☒	☐	☐	Investigation of alleged or suspected misconduct is conducted by following the relevant Management Practice and Procedure with support and guidance from Human Resources, Governance, independent investigators and Internal Auditor. All these employees have relevant qualifications or experience.
exercises due diligence when engaging contractors to deal with integrity matters to ensure they have the necessary qualifications, skills and/or experience (e.g. through reference and qualification checks).	☒	☐	☐	Probity check is undertaken as part of the appointment criteria.

	In place	In progress	Not in place	Proposed actions and comments
seeks opportunities for further learning about integrity matters by identifying key staff to attend events and forums provided by the Commission and other bodies.	☒	☐	☐	Employees are encouraged to attend or broaden their knowledge at integrity training sessions and relevant conferences. Examples include: • 2020 Integrity and Ethics Conference • 2019 APSACC Conference • 2019 Risk Management in Government Congress • 2019 CCC Law Week Seminar
establishes networks with other integrity practitioners.	☒	☐	☐	The City strongly supports advocacy with the public sector including Public Sector Commission, Department of Local Government and Professional Associations.

04 Plan and act to continually improve integrity

Effective governance systems and frameworks are established.

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has developed and implemented a Code of Conduct that sets out its standards of conduct and integrity, and incorporates code requirements into policies and procedures to reinforce conduct expectations *For public sector agencies, the Code of Conduct should reflect Commissioner's Instruction No. 7: Code of Ethics, and comply with Commissioner's Instruction No.8: Codes of Conduct and Integrity Training.*	☒	☐	☐	The City of Stirling Code of Conduct has been adopted to be observed by elected members, employees and the City's consultants and contractors. **ACTION**: The City will review its Code of Conduct.
has identified its integrity risks considering its work and operating context, and records those risks (e.g. in a risk register, fraud and corruption control plan).	☐	☒	☐	The City has identified misconduct risk as one of its 18 Strategic Risks. This risk has been assessed and a risk appetite set along with Key Risk Indicators. **ACTION:** Comprehensive review of the City's Operational Risk Register to include integrity risk will be conducted along with the City of Stirling Integrity Strategy.

	In place	In progress	Not in place	Proposed actions and comments
enacts controls to address identified risks.	☐	☒	☐	Controls in place have been identified at the strategic level for the City's strategic risk relating to misconduct. **ACTION:** Following completion of the operational risk review identified above, further controls identified will be documented.
identifies and links policies that relate to risks to ensure they have consistent principles and objectives, and are clear and easy to follow (e.g. fraud and corruption, use of public resources, record keeping and use of information, conflicts of interest, gifts and benefits).	☒	☐	☐	The following documents have been used in the development of an effective governance framework: • Code of Conduct • Conflict of Interests • Gifts, Benefits and Hospitality Policy • City of Stirling Integrity Strategy • Integrity and Misconduct Management Practice • Misconduct Brochure • Procurement Policy • Purchasing and Tender Management Practice

	In place	In progress	Not in place	Proposed actions and comments
				• Public Interest Disclosure Management Practice • Information Security Management Practice and Framework • Risk Management Policy and Framework
has an organisation structure that provides clear lines of accountability and responsibility for integrity and misconduct functions (including the role of leaders and managers).	☒	☐	☐	The role and responsibilities of the Elected Members, and employees are clearly set out in the *Local Government Act 1995,* City of Stirling Code of Conduct and the City of Stirling Integrity Strategy. Position Descriptions provide further details on accountabilities and responsibilities for leaders and managers.
has documented delegation schedules in place that align to organisation structure and legislative obligations.	☒	☐	☐	Delegation of authority entrust certain types of decisions, functions and duties to the Chief Executive Officer, employees or committees to be discharged. The City's Delegated Authority Register contains details of all delegations

	In place	In progress	Not in place	Proposed actions and comments
				to committees, the Chief Executive Officer and employees made under the *Local Government Act 1995* and other relevant legislation.
reviews delegation schedules regularly to ensure they remain current and operate with appropriate levels of authority.	☒	☐	☐	A review of the City's delegations of authority is conducted annually.
has a position, team or committee with documented responsibility to consider findings and recommendations from integrity audits, assessments, reviews and investigations.	☒	☐	☐	The Audit Committee oversees and makes recommendations to Council on internal and external audit matters, corporate governance and risk management.
assigns accountability and responsibility for monitoring and oversighting risks and controls (e.g. in authority's structure, job descriptions).	☒	☐	☐	The Risk Management Framework provides the mechanism for each Business Unit to monitor and ensure controls are in place to mitigate the risks. The Corporate Risk Management Group oversees risk management and provides guidance to the Executive Team on risk management matters. Reporting on risk through to the Audit Committee occurs quarterly.

	In place	In progress	Not in place	Proposed actions and comments
has an internal audit committee with an independent chair.	☒	☐	☐	The Audit Committee meets quarterly. The Audit Committee has an independent member. The Audit Committee determined that a Councillor is the presiding member.
uses tools and templates provided by the Commission or other sources to support its approach to managing integrity risks.	☒	☐	☐	The elements set out in the City's Integrity Strategy are closely aligned with the Public Sector Commission's Integrity Strategy for Public Authorities 2020-2023.
has a process to review regularly its integrity risk profile to ensure it is responsive to emerging risks and recommendations made by integrity bodies (e.g. policy and practice review, process improvements).	☒	☐	☐	A comprehensive review is conducted of all integrity risks annually or earlier if circumstances arise.
evaluates and refines any processes, systems and controls that are in place or may be introduced to inform its detection and prevention of irregularities and corrupt practice (e.g. detection software, data analytics).	☒	☐	☐	The internal audit plan is risk based including coverage of fraud and misconduct. In addition, the Internal Auditor conducts a financial management review and a risk, compliance and controls review every three years in accordance with legislative requirements.
conducts regular assessments of business areas and functions that are, or may be, vulnerable to integrity	☒	☐	☐	Compliance audits of statutory and operations are conducted by the

	In place	In progress	Not in place	Proposed actions and comments
risks (e.g. procurement and contracting; use of and access to confidential information; recruitment).				Internal Auditor in accordance with the City's Strategic Audit Plan.
connects and collaborates with other authorities to seek or share expertise and advice on integrity matters (e.g. conducting investigations, policy development and process improvements).	☒	☐	☐	The City maintains strong links and regular communication with the Public Sector Commission, Corruption and Crime Commission, Auditor-General and Department of Local Government. The City is an active participant in the WA Local Government Authority and LG Professionals WA which foster collaboration at both officer and elected member levels.

Appendix 3

City of Stirling Integrity Action Plan

01 Model and embody a culture of integrity

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

#	Action Plan	Due Date	Responsibility
1.	Consider incorporating employee awareness of integrity requirements into on boarding survey.	August 2021	Manager Human Resources

02 Be accountable for integrity

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

#	Action Plan	Due Date	Responsibility
1.	To consider developing a reporting process for integrity issues following completion of the operational risk register review.	June 2021	Manager Governance
2.	To consider integrity as a standing agenda item following development of a reporting process.	August 2021	All Business Unit Managers

03 Learn and develop integrity knowledge and skills

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

# Action Plan	Due Date	Responsibility
1. The content and structure of the refresher training will be considered following the review of the Code of Conduct.	December 2021	Manager Human Resources
2. Identify positions/service areas that are at risk and provide additional training. The provision of training for high risk roles will be considered following the review of the Code of Conduct.	December 2021	All Business Unit Managers Manager Governance/ Manager Human Resources

04 Plan and act to continually improve integrity

Effective governance systems and frameworks are established

# Action Plan	Due Date	Responsibility
1. The City will review its Code of Conduct.	May 2021	Manager Human Resources Manager Governance
2. Comprehensive review of the City's Operational Risk Register to include integrity risk will be conducted along with the City of Stirling Integrity Strategy.	June 2021	Manager Governance
3. Following completion of the operational risk review identified above, further controls identified will be documented.	August 2021	All Business Unit Managers