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Commitment to Integrity

“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”.

Public Sector Commission, Integrity Strategy for WA Public Authorities 2020-2023

This strategy outlines the Town of Claremont’s (**Town**) approach to integrity and ensuring it:

1. Operates with integrity using powers responsibly for the purpose and in the manner for which they were intended.
2. Acts with honesty and transparency; makes reasoned decisions without bias by following fair and objective processes.
3. Prevents and addresses improper conduct, disclosing facts without hiding or distorting them, and not allowing decisions or actions to be influenced by personal or private interests.

The main objectives of this Strategy are for the Town to:

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

This strategy applies to all Town employees and Council Members who are expected to:

- Know where to find the framework and be familiar with its contents;
- Contribute to cultivating integrity in the organisation;
- Report integrity breaches they see or become aware of; and
- Demonstrate their commitment to integrity in their daily work.

The Town has adopted the Public Sector Commission, Integrity Strategy for WA Public Authorities 2020-2023 (**Annexure 1**) in developing this Strategy, utilising the Integrity Snapshot Tool to assess its approach to integrity and identify areas of improvement (**Annexure 2 Integrity Snapshot** and **Annexure 3 Integrity Action Plan**).

01

Plan and Act to Improve Integrity

Effective governance systems and frameworks are established

Roles and Responsibilities

Each employee and Council Member is responsible for integrity in the organisation. The below table details the specific roles and responsibilities relevant to integrity.

Role	Responsibilities
Chief Executive Officer	<ul style="list-style-type: none"> • Implement and administer the Employee Code of Conduct. • Drive a culture of integrity through the active demonstration of Town values and by communicating the importance of meeting integrity standards. • Promote a culture of integrity through collaboration, employee training and other activities. • Exhibit leadership in preventing, detecting and responding to misconduct. • Administer the Town’s Risk Management Framework. • Provide advice to Council regarding integrity and administer the Code of Conduct for Council Members, Committee Members and Candidates. • Provide appropriate inductions and training for Council Members in accordance with the Code of Conduct for Council Members, Committee Members and Candidates. • Act as the Town’s Complaints Officer under the Code of Conduct for Council Members, Committee Members and Candidates and section 5.120 of the <i>Local Government Act 1995</i>. • Notify the Corruption and Crime Commission (major misconduct) or the Public Sector Commission (minor misconduct) of any suspected incidences of misconduct as required by the <i>Corruption, Crime and Misconduct Act 2003</i>. • Provide reports and advice to the Audit and Risk Management Committee on integrity matters.
Executive Management Team	<ul style="list-style-type: none"> • Drive a culture of integrity through the active demonstration of Town values and by communicating the importance of meeting integrity standards. • Promote a culture of integrity through collaboration, employee training and other activities. • Exhibit leadership in preventing, detecting and responding to misconduct. • Administer the Town’s Risk Management Framework and review the Town’s Risk Profile regularly including business unit specific and integrity risks. • A member of the Executive Team to act as the Town’s Public Interest Disclosure Officer.
Governance Business Unit	<ul style="list-style-type: none"> • Assist with the development and review of the Integrity Strategy. • Keep apprised of legislative changes and implement as required. • Act as the Town’s Freedom of Information Officer. • Support inductions and training for Council Members in accordance with the Code of Conduct for Council Members, Committee Members and Candidates. • Facilitate biennial election process including training, support and disclosure requirements.

Human Resources Business Unit	<ul style="list-style-type: none"> • Commit to follow a thorough and unbiased recruitment practice and to recruit individuals who are closely aligned with the Town’s values. • Ensure thorough pre-employment screening is conducted for new employees including: <ul style="list-style-type: none"> ○ Police Clearances ○ 100 points of Identification ○ Behavioural Testing ○ Qualification Checks ○ Reference Checks ○ Working With Children Check where required • Ongoing review of police clearances, identification and qualification for existing employees. • Administer Annual Employee Declaration and Change in Circumstances forms for employees. • Ensure the CEO, Directors, employees in the Finance Team and positions involved in high level procurement obtain a police clearance at least every two years. All staff outside of this are required to obtain a police clearance every four years. • Monitor expiry of licences, qualifications, certificates and Working With Children Check. • Provide appropriate inductions and training for employees in accordance with the Employee Code of Conduct. • Regularly review and update Human Resources Procedures to ensure currency.
Internal Audit and Risk Working Group	<ul style="list-style-type: none"> • Actively participate in integrity reporting at monthly meetings. • Discuss and implement controls to minimise acts of misconduct and integrate risk management into each business unit’s functions.
Business Unit Managers/Coordinators	<ul style="list-style-type: none"> • Demonstrate commitment to integrity through active demonstration of the Town’s values and by building an accountable workplace culture. • Commit to follow a thorough and unbiased recruitment practice and to recruit individuals who are closely aligned with the Town’s values. • Ensure specific behaviours relating to integrity are addressed in the Performance Assessment Cycle process. • Ensure all employees are aware of the Town’s policies and procedures and understand their responsibilities.
All Employees	<ul style="list-style-type: none"> • Demonstrate an awareness and understanding of: <ul style="list-style-type: none"> ○ the Town’s Integrity Strategy; ○ the Employee Code of Conduct; ○ the Town’s policies and procedures; and ○ the employee’s role. • Report any instances of misconduct through the Town’s misconduct reporting process. • Take responsibility for decisions and actions to ensure they are in the public interest. • Seek information from supervisor about, and advice on, situations where integrity matters arise.
Council	<ul style="list-style-type: none"> • Adopt and review the Town’s Integrity Strategy. • Adopt the Code of Conduct for Council Members, Committee Members and Candidates. • Appoint a Complaints Officer and Complaints Committee to receive and manage Behaviour Complaints made under the Code of Conduct. • Receive reports from the Audit and Risk Management Committee in relation

	to integrity risks, audit activities and other integrity controls.
Council Members	<ul style="list-style-type: none"> • Model leadership and conduct that align with: <ul style="list-style-type: none"> ○ the Town's Integrity Strategy; ○ the Code of Conduct for Council Members, Committee Members and Candidates; ○ The <i>Local Government Act 1995</i>; and ○ the Town's policies and procedures.
Complaints Committee	<ul style="list-style-type: none"> • Manage Behaviour Complaints made under Division 3 of the Town of Claremont's Code of Conduct for Council Members, Committee Members and Candidates.
Audit and Risk Management Committee	<ul style="list-style-type: none"> • Receive reports from the Administration in relation to integrity risks, audit activities and other integrity controls. • Receive and review internal and external audits.

Legislation and Regulations

The principle legislation governing the operation of the Town is the *Local Government Act 1995 (Act)* and its subsidiary legislation, which incorporate four fundamental aims:

- better decision-making by local governments;
- greater community participation in the decisions and affairs of local governments;
- greater accountability of local governments to their communities; and
- more efficient and effective local government.

The Town is bound by various other legislation including but not limited to the *Freedom of Information Act 1992*, *Public Sector Management Act 1994* and *Public Interest Disclosure Act 2003*.

Risk Analysis and Planning for Integrity

Council Policy LG534 Risk Management outlines the Town's approach to risk management.

Council has adopted a Risk Management Framework that sets out the Town's approach to the identification, assessment, management, reporting and monitoring of risks. The Administration utilises Risk Profiles to capture operational risks across various areas including misconduct.

For each category, the profile contains:

- Objective
- Risk Event
- Potential Causes
- Key Controls / Control Type
- Control Adequacy
- Control owner
- Risk Rating
- Actions and Responsibility

The risk profile is reviewed and updated regularly by the executive team with input from managers and employees as action items are completed or new risks are identified.

The Town has self-assessed its integrity practices using the Integrity Snapshot Tool (**Annexure 2**) provided by the Public Sector Commission to identify measures in place to support integrity and areas for development. The Integrity Action Plan (**Annexure 3**) has been implemented to ensure accountability of action items identified in the Integrity Snapshot Tool.

Internal Controls, Audit and Governance

Detailed below are the documents that form the Town's governance systems and frameworks aiding integrity across the organisation. The Town will continue to review and amend its suite of corporate documents relating to integrity management.

Codes of Conduct

The *Local Government Act 1995 (Act)* requires:

1. Council to adopt a Model Code of Conduct for Council Members, Committee Members and Candidates; and
2. The CEO to implement an Employee Code of Conduct.

The Code of Conduct for Council Members, Committee Members and Candidates sets out integrity principles, behaviour requirements and rules of conduct.

The Employee Code of Conduct promotes the Town's values and provides expected standards of behaviour. It is regularly reviewed and is available to all staff and on the Town's website. Staff undergo regular refresher training.

Council Policies

A function of Council under the Act is to make policies guiding the Town's operation and decision making. The policies span various business areas and responsibilities of the Town and are reviewed on an annual basis. Council

policies can be viewed on the Town's website in accordance with the Act.

Employees are responsible for acting in accordance with Council policies.

Public Registers

The Town is required to maintain and publish certain registers to its website in accordance with the Act including:

- Register of Gifts;
 - Register of Public Minor Breaches;
 - Register of Council Member Training;
 - Register of Council Member Fees, Allowances and Expenses;
 - Register of Financial Returns.
-

Freedom of Information

The Western Australian *Freedom of Information Act 1992* gives individuals the right to apply for access to documents held by the Town of Claremont.

An Information Statement, updated annually, provides details about the Town's operations, the kinds of documents it holds and the procedures for accessing them.

Public Interest Disclosures

The *Public Interest Disclosures Act 2003* facilitates the disclosure of public interest information and provides protection for those making such disclosures and those who are the subject of disclosures. The Town is committed to the aims and objectives of the Act and does not tolerate corrupt or other improper conduct.

Every public authority is required to have a Public Interest Disclosures (PID) officer to receive disclosures of public interest information. The Director Governance and People is the Town's PID officer.

Information about how to make a public interest disclosure is available on the Town's website.

Delegations

Council, by absolute majority, may delegate the exercise of some of its functions and powers to the Chief Executive Officer in accordance with provisions of the Act. The Act also permits the CEO to delegate or sub-delegate any powers to another employee. Delegators may place conditions on delegations. A written record is required to be kept when a delegation is exercised by the CEO or an employee.

Delegations must be made in writing and the CEO is required to keep a register of delegations which is published on the Town's website. Delegations are to be reviewed by the delegator at least once every financial year.

Authorisations

Legislation applicable to the Town vests certain powers and duties to 'Authorised Officers'.

The Chief Executive Officer authorises certain officers under appropriate legislative provisions by way of a certificate of authorisation and identity card. Authorisations cease upon termination of employment at the Town.

Compliance Audit Return

Under the *Local Government (Audit) Regulations 1996* local governments are required to complete an internal compliance audit each calendar year in addition to external audits. The Compliance Audit Return is a statutory reporting tool that seeks to evaluate the Town's compliance with targeted sections of the Act.

The Compliance Audit Return is completed by the Administration and is required to be accepted by the Audit and Risk Management Committee and Council before being submitted to the Department of Local Government, Sport and Cultural Industries.

Regulation 17 Review

The *Local Government (Audit) Regulations 1996* require the Chief Executive Officer to, every three years, review the appropriateness and effectiveness of the Town's systems and procedures in relation to risk management, internal control and legislative compliance. The CEO is required to report the results of the review to the Audit and Risk Management Committee.

The Regulation 17 Review is outsourced to a consultant to provide an independent assessment of the Town's performance in these areas. The consultant provides a report with recommendations for process improvements. Biannual updates are provided to the Audit and Risk Management Committee in relation to progress on the recommendations.

02 Model and embody a culture of integrity

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

This Strategy is underpinned by the Town’s values, vision and mission.

Our Values

RESPECT	We are responsible for how we behave in our workplace and will show respect and courtesy to all of customers and colleagues.
INTEGRITY	We are open, accountable and honest.
QUALITY COMMUNICATION	We demonstrate our respect for our community and each other through timely, accurate and understandable communication.
CUSTOMER SERVICE	Every contact with a customer is important and an opportunity to demonstrate our commitment.
EXCELLENCE	Our focus is quality outcomes achieved on time and on budget.

Our Vision

The Town is a proud, progressive, sustainable local government supporting a connected, flourishing community.

Our Mission

We exist to deliver quality services for Claremont today and to build the foundation for the future.

Leadership and Management

The Town’s Executive Management Team comprises of the Chief Executive Officer and three Directors who lead the organisation’s business units.

Chief Executive Officer

- Council Members
- Tourism and Events
- Communications and Customer Relations
- Strategic Planning
- Claremont Aquatic Centre
- Economic Development

Governance & People

- Finance & Rates
- Human Resources & WHS
- Information Technology
- Community Safety
- Governance & Records
- Legal
- Property & Leasing

Planning & Development

- Statutory Planning
- Building
- Compliance
- Environmental Health
- Heritage
- Claremont Community Hub & Library

Infrastructure

- Engineering
- Civil Works
- Parks
- Environment
- Building Maintenance
- Asset Management

Each business unit has a Manager or Coordinator responsible for its functions.

Organisational Culture

The Town adopts a model of lead by example. The CEO and Executive Management Team are required to and do demonstrate Town's values, transparency and integrity at all times.

A culture of transparency is demonstrated by:

- Publishing the minutes from the Executive Management Team meetings.
- Weekly communications from the CEO to employees.
- Weekly communications from the CEO to Council members.
- Monthly whole employee meetings which include time for employees to ask questions and provide feedback.
- Regular team meetings.

Attraction and Retention of Staff

Opportunities are provided for staff at all levels to take on higher duties or act in more senior roles.

The Town has a strong pattern of promoting internally to provide opportunities for career growth and progression and to retain employees.

The Town encourages employees to attend external training to assist with their role and career progression.

The Town provides a flexible workplace with high levels of part time employees. Where appropriate for the role, it also allows flexibility with work hours around family and other commitments in addition to working from home arrangements.

The Town provide health and wellness programs, access to the Aquatic Centre and gym for all employees.

03

Learn and develop integrity knowledge and skills

Individual and authority integrity knowledge, skills and competence are grown

Induct and Train Staff

The Town places importance on integrity during recruitment, commencement and throughout an employee's tenure at the Town.

Job advertisements include a description of the Town's vision and values, integrity expectations and application of the Employee Code of Conduct.

Upon commencement at the Town, staff attend an induction with Human Resources where they receive training and advice regarding their responsibilities including their obligation to report improper conduct, misconduct and corruption and the requirement to disclose conflicts of interest, secondary employment and the receipt of gifts. New employees are required to acknowledge they agree to be bound by the Town's Employee Code of Conduct and HR procedures.

Information and training about conduct, integrity and performance are communicated to existing staff via:

- Employee inductions;
- Weekly staff newsletters;
- Monthly staff meetings;
- One on one meetings; and
- The Town's intranet site.

Employees participate in an Annual Performance Achievement Cycle where behaviours relating to integrity can be discussed and addressed.

Induct and Train Council Members

Upon appointment new Council Members are provided with an Induction Manual and training on their role and responsibilities, particularly in relation to integrity matters such as conflict of interest and disclosure of gifts.

Council Members are required to complete compulsory training within 12 months of election to provide the skills and knowledge to perform their role.

Additional opportunities for training are provided to Council Members and a budget is available for training expenditure each year.

Annual training is provided to Council Members regarding the Code of Code of Conduct for Council Members, Committee Members and Candidates and integrity matters. Training is also provided by way of regular Council Member Forums and information about conduct, integrity and performance is communicated to Council Members as required via weekly newsletters.

04

Be accountable for integrity

Prevention, detection and response to integrity matters are everyone’s personal and professional responsibility

Misconduct Reporting

Employees and Council Members have a duty to report suspected misconduct. The following methods are available for the reporting of misconduct:

Notification to Supervisor	<p>The Town encourages notification as a first point to an employee’s immediate supervisor in the first instance, however, employees can also notify a member of the Executive Management Team at any time.</p> <p>All reports of misconduct will be investigated confidentially.</p>
Notification to the Chief Executive Officer	<p>Notifications of suspected misconduct may be made to the Chief Executive Officer by email or in writing for investigation.</p> <p>Where correspondence is addressed to the Chief Executive Officer and marked ‘Private and Confidential’ it will not be opened by anyone other than the Chief Executive Officer.</p> <p>The Chief Executive Officer is designated as the Complaints Officer for complaints made under the Code of Conduct for Council Members, Committee Members and Candidates.</p>
Public Interest Disclosure	<p>A Public Interest Disclosure may be made in writing to the Town’s Public Interest Disclosure Officer.</p> <p>The Town will take all reasonable steps to provide protection to anyone who makes such disclosures from any detrimental action in reprisal for the making of a public interest disclosure.</p>
External agencies	<p>Depending on the nature of the suspected misconduct the matter may be reported to agencies such as the:</p> <ul style="list-style-type: none">• Public Sector Commission• Corruption and Crime Commission• Department of Local Government, Sport and Cultural Industries• WA Police

Integrity Breaches

The Town’s Workplace Investigations Procedure and Grievance Resolution Procedure detail the processes to be followed for investigation of reports of misconduct and resolution of workplace grievances.

The procedures confirm that the CEO is required to notify the Corruption and Crime Commission or Public Sector Commission where they believe an employee may have committed misconduct as defined in the *Corruption, Crime and Misconduct Act 2003*.

Fraud and Corruption Detection

The Town utilises the following controls to detect fraud, corruption, integrity breaches and other errors and irregularities:

- Integrity Snapshot Tool
- Internal and external audits such as Compliance Audit Return, Regulation 17 Review and Annual Financial Audit
- Systems and processes through software detection applications
- Assessments of vulnerable areas such as finance and procurement
- Regular review of conflicts of interest and disclosure of gifts
- Payroll, timesheet and leave audits
- Physical security access
- IT systems access audits
- Analysis of complaints and feedback from stakeholders
- Auditing of police clearances, qualifications and identification for all employees

Integrity Strategy Review

The Town's Integrity Strategy will be reviewed:

1. Annually by a report to the Audit and Risk Management Committee providing an update on the Integrity Strategy, Integrity Snapshot Tool and Integrity Action Plan; and
2. Following the release of the follow up to the Integrity Strategy for WA Public Authorities 2020-2023.

Document Control Box			
Owner:	Chief Executive Officer	Business Unit:	Risk
Legislation and Other References:	Public Sector Commission, Integrity Strategy for WA Public Authorities 2020-2023		
Document Management:			
Review Frequency:	Annually	Next Review Date	2023
Version Control	Approval Date	Reference	
1.	25 October 2022	Council Resolution 146/22	

Annexure 1 – Integrity Strategy for WA Public Authorities 2020-2023

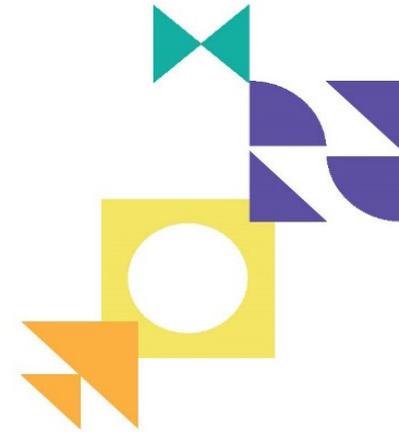
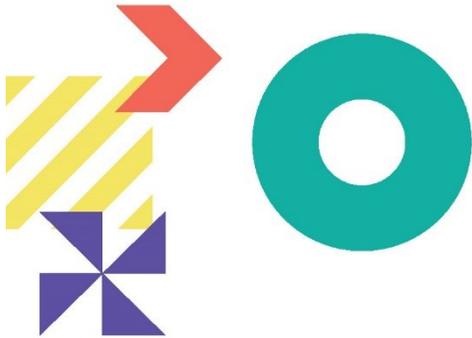
Annexure 2 – Integrity Snapshot Tool



*We're working for
Western Australia.*

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.

01 Plan and act to 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 <i>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.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town of Claremont has a: <ul style="list-style-type: none"> • Code of Conduct for Council Members, Committee Members and Candidates; and • Employee 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Misconduct risk is included in the Town's Risk Profile which sits under the Risk Management Framework.
enacts controls to address identified risks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town's Risk Profile details controls for identified risks.
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The following documents form part of the Town's governance framework and relate to Integrity: <ul style="list-style-type: none"> • Code of Conduct for Council Members, Committee Members and Candidates • Employee Code of Conduct • Council Policy LG509 Purchasing • Record Keeping Plan and Council Policy LG518 Records Management • Council Policy LG534 Risk Management and Risk Management Framework • Council Policy LG535 Legislative Compliance • Council Policy LG536 Public Interest Disclosure

	In place	In progress	Not in place	Proposed actions and comments
				<ul style="list-style-type: none"> • Council Policy LG537 Fraud Prevention • Suite of HR procedures • IT Governance Framework and supporting plans
has an organisation structure that provides clear lines of accountability and responsibility for integrity and misconduct functions (including the role of leaders and managers)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The <i>Local Government Act 1995</i>, Codes of Conduct and the Town's Integrity Strategy set out the roles and responsibilities of Council Members and employees.</p> <p>Position Descriptions set out corporate responsibilities for all employees.</p>
has documented delegation schedules in place that align to organisation structure and legislative obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The <i>Local Government Act 1995</i> allows Council to delegate to the Chief Executive Officer the exercise of its powers or discharge of its duties under the Act, with the exception of some limitations. The Chief Executive Officer is permitted to delegate or sub-delegate any of her powers to another employee. Delegators may place conditions on delegations.</p> <p>Delegations must be made in writing and are contained within the Town's Delegated Authority Register.</p>
reviews delegation schedules regularly to ensure they remain current and operate with appropriate levels of authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Town's Delegated Authority Register is reviewed annually in accordance with the <i>Local Government Act 1995</i>.</p>

01 Plan and act to improve integrity (continued)

	In place	In progress	Not in place	Proposed actions and comments
Assess if your authority:				
has a position, team or committee with documented responsibility to consider findings and recommendations from integrity audits, assessments, reviews and investigations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chief Executive Officer and Executive Management Team.
assigns accountability and responsibility for monitoring and overseeing risks and controls (e.g. in authority's structure, job descriptions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town's Risk Profile lists controls and risk related actions together with the responsible officer and due date.
has an internal audit committee with an independent chair	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pursuant to the Audit and Risk Management Committee's Terms of Reference two independent community representatives sit on the Committee. The Chairperson of the Committee is a Council Member as elected by the Audit and Risk Management Committee.
uses tools and templates provided by the Commission or other sources to support its approach to managing integrity risks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town's Integrity Strategy is complimentary to the Public Sector Commission's Integrity Strategy for Public Authorities 2020-2023. This Integrity Snapshot Tool is used to understand and manage integrity risks.
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town's Integrity Framework and Integrity Snapshot Tool are to be reviewed annually to ensure effectiveness.
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Town's Risk Profile, reviewed regularly by the Executive Management Team, considers such risks.</p> <p>The Town's systems and procedures are audited at three yearly intervals in accordance with legislative requirements.</p> <p>The Town's Internal Audit and Risk Working Group convenes monthly and discusses matters relating to integrity.</p> <p>Business units complete reviews of their respective work procedures.</p> <p>External auditing is undertaken as required under the <i>Local Government Act 1995</i>.</p>

	In place	In progress	Not in place	Proposed actions and comments
conducts regular assessments of business areas and functions that are, or may be, vulnerable to integrity risks (e.g. procurement and contracting; use of and access to confidential information; recruitment)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above.
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town stays informed of communications and information from the Public Sector Commission, Corruption and Crime Commission, Auditor-General and Department of Local Government, Sport and Cultural Industries.

02 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Town's values are:</p> <ul style="list-style-type: none"> • Respect • Integrity • Quality Communication • Customer Service • Excellence <p>The Town's values are enshrined in the Employee Code of Conduct and employee position descriptions.</p>
promotes integrity in and outside the authority (e.g. website, publications, staff newsletters, division meetings, annual reports and everyday practices)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Town's commitment to integrity is promoted through:</p> <ul style="list-style-type: none"> • Council policies • Business unit procedures • Information on ethics and conduct available on the Town's website • Staff newsletters and staff meetings
has leaders who role model integrity and demonstrate zero tolerance for breaches of ethical codes and misconduct	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Leaders at the Town model integrity by:</p> <ul style="list-style-type: none"> • Reviewing and implementing procedures • Providing regular training and educational awareness • Educating employees on ethical behaviour • Assessment of integrity in employee performance reviews
has a consultation mechanism to engage with and involve staff when reviewing integrity policies, procedures and information to gain shared commitment and understanding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Informal consultation currently.</p> <p>Action: To consider whether to engage formally.</p>

	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Employees involved in recruitment are expected to act in accordance with Council Policy LG543 Equal Opportunity, the Employee Code of Conduct and the Town's values. Recruitment is conducted in accordance with the Town's Recruitment and Selection Guidelines.
ensures recruitment materials include information on values and conduct expectations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Information Pack and Position Description include the expected corporate responsibilities and values.
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pre-employment screening is conducted as part of the recruitment process and includes: 100 point Identification Check <ul style="list-style-type: none"> • Right to work in Australia • Working With Children Check if required • Police Clearance • Pre-employment medical • Behavioural testing • Reference checks (minimum two from recent supervisors)
uses staff performance processes to discuss and reinforce its values and conduct expectations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The annual Performance Achievement Cycle process assesses employee's performance against the Corporate Responsibility section of their Position Description. Specific behaviours relating to integrity are addressed by Managers during reviews.
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Town regularly undertakes employee engagement and managerial feedback surveys. Action: Integrity matters to be further incorporated into employee surveys to measure confidence and attitude towards misconduct.

02 Model and embody a culture of integrity (continued)

	In place	In progress	Not in place	Proposed actions and comments
<p><i>Assess if your authority:</i></p> <p>has staff formally acknowledge that they have read its code of conduct at appointment/induction</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Upon acceptance of their position new employees are required to formally acknowledge they have read and agree to abide by the Town's Code of Conduct and HR procedures.
encourages staff to report misconduct (e.g. in policies, codes of conduct, staff communication)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Employee Code of Conduct obligates employees to report any suspected breaches of the Code and describes the reporting process of corrupt conduct.
makes information available about public interest disclosure processes and other reporting mechanisms to staff and stakeholders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Council Policy LG536 Public Interest Disclosures is available on the Town's website for staff and stakeholders. Information about Public Interest Disclosures and how they may be made is also available on the website.
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This information is contained on the Town's website together with information regarding making a Public Interest Disclosure. Action: To be inserted into Employee Code of Conduct and HR Procedures.

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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Induction and refresher training is provided on the Employee Code of Conduct and employee obligations. Employees are entitled to attend external training to upskill and improve their knowledge.</p> <p>Action: Consider whether to provide additional training and how frequently.</p>
maintains records of staff who attend induction and integrity training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Human Resources Business Unit maintains a record of all staff inductions and training.
follows up with staff where necessary to ensure learnings from integrity training are embedded	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Follow ups occur as part of any disciplinary process.
has a process for communicating with staff about integrity matters including updating them about changes to policies, processes and systems (e.g. through newsletters, emails, meetings)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Communications are made to staff either individually or through the Town's internal newsletter. Updated HR procedures are distributed to all staff and available through the Town's intranet site.
has a formal induction process in place for all new staff and contractors that includes a clear focus on integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>All employees participate in an induction with Human Resources within their first week of employment.</p> <p>The induction covers the Employee Code of Conduct and the importance of integrity.</p>

	In place	In progress	Not in place	Proposed actions and comments
delivers Accountable and Ethical Decision Making (AEDM) training (or equivalent) and refresher training to staff that:				
• is aligned to its Code of Conduct	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The training provide to staff is outlined in the balance of this Integrity Strategy.</p> <p>Action: Incorporate integrity training into ongoing staff training. Prepare an internal register to record integrity training and attendees.</p>
• is customised to its context and business, and covers its specific integrity risks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• is up to date and reflects changes to systems and processes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• includes information on its integrity framework, policies, processes and systems	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• includes information on how to recognise, respond to and report misconduct	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• records attendance and completion rates which can be provided to the Commission and other integrity bodies as required	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

03 Learn and develop integrity knowledge and skills (continued)

	In place	In progress	Not in place	Proposed actions and comments
<p><i>Assess if your authority:</i></p> <p>provides specific integrity training to staff working in high risk roles (e.g. finance, procurement, integrity) in relation to fraud and corruption, accountability requirements and reporting suspected misconduct</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Training provided to all employees by Finance and Procurement team is role specific.</p> <p>Manager Finance provides on the job training to Finance team members.</p> <p>External training options are available and encouraged for staff working in high risk roles.</p>
<p>evaluates staff awareness of its integrity requirements (e.g. through staff perception surveys) and acts on any knowledge deficits</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Historical workforce surveys have not evaluated employee awareness of integrity requirements.</p> <p>Action: Consider assessing knowledge of integrity requirements in staff surveys.</p>
<p>encourages, supports and provides a mechanism for staff to seek advice on integrity matters when they are unsure</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Employees are encouraged to speak with Governance or Human Resources if they are unsure about integrity matters.</p>
<p>makes staff aware of the process of identifying integrity risks and contributing to the risk register</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Action: A review of the Town's Risk Profile will be conducted to include integrity risk in conjunction with the Integrity Strategy.</p>
<p>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)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Investigation of integrity matters is undertaken in accordance with the Town's Workplace Investigations Procedure by the CEO, Director Governance and People or an external specialist.</p>
<p>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)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Reference, insurance and qualification checks are undertaken prior to appointment.</p>

	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff members are encouraged to develop their skills and knowledge at integrity training sessions and relevant conferences.
establishes networks with other integrity practitioners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town supports advocacy within the public sector and establishes networks where possible.

04 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town's Workplace Investigations Procedure and Employee Code of Conduct outline when the Public Sector Commission and Corruption and Crime Commission are to be notified of misconduct.
articulates the roles and responsibilities of the leadership team in overseeing integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The roles and responsibilities are set out within the Town's Integrity Strategy, Position Descriptions and Employee Contracts.
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reports and recommendations from internal and external audits are referred to the Executive Management Team for action and where relevant are tracked through regular updates to the Audit and Risk Management Committee.
monitors, reviews and addresses its approach to changing and emerging risks (e.g. due to restructure, introduction of technology and legislative change) and ensures: <ul style="list-style-type: none"> 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 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Town's Risk Profile is reviewed and updated regularly by the Executive Management Team and the Integrity Strategy including this Integrity Snapshot Tool is reviewed annually to ensure currency and accuracy.
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Managers and Coordinators of business units provide quarterly updates to the Executive Management Team on the business unit's performance.

	In place	In progress	Not in place	Proposed actions and comments
				<p>Integrity is a standing item on the Executive Management Team meeting agenda.</p> <p>The Governance team review conflicts of interest and gift disclosures for anomalies.</p>
<p>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)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Integrity is a standing item on the Executive Management Team meeting agenda.</p> <p>Action: Consider whether a more detailed review should occur and at what frequency.</p>

Annexure 3 – Integrity Action Plan

02 Model and embody a culture of integrity

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

Action	Due Date	Responsible Officer
Consider whether to formally engage staff when reviewing integrity policies, procedures and information to gain shared commitment and understanding.	July 2023	Director Governance and People
Integrity matters to be further incorporated into employee surveys to measure confidence and attitude towards misconduct.	July 2023	Chief Executive Officer Director Governance and People Manager Human Resources
Information to be added to Employee Code of Conduct and HR Procedures that reprisal action is not tolerated against those who speak up about misconduct and integrity matters	January 2023	Director Governance and People Manager Human Resources

03 Learn and develop integrity knowledge and skills

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

Action	Due Date	Responsible Officer
Consider whether to provide additional integrity training to employees and how frequently.	February 2023	Director Governance and People Manager Human Resources
Incorporate integrity training into ongoing staff training.	July 2023	Director Governance and People Manager Human Resources
Prepare an internal register to record integrity training and attendees.	December 2023	Coordinator Governance and Records
Consider assessing knowledge of integrity requirements in staff surveys.	July 2023	Chief Executive Officer Director Governance and People
Review the Town's Risk Profile to include integrity risk in conjunction with the Integrity Strategy.	January 2023	Executive Management Team

04 Be accountable for integrity

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

Action	Due Date	Responsible Officer
Consider whether a more detailed review of integrity should occur at Executive Management Team meetings and at what frequency.	February 2023	Executive Management Team