# Integrity Framework 2022

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# Contents

## Acknowledgement

# 1. Introduction

The City of Joondalup delivers a wide variety of services, programs and facilities for its community and there is a rightful expectation that these are delivered and managed in an efficient and effective way. As custodians of public funds and personal information, the City must establish and maintain the trust of its community in the use of those funds and information, to deliver an overall benefit for the entire community.

This trust is established and maintained by ensuring those that work in the City of Joondalup (being elected members, employees, contractors, suppliers and volunteers) operate with integrity and behave in an ethical, transparent and accountable way. Integrity is a cornerstone of good governance and organisations that act with integrity, incidences and impacts of misconduct, fraud and corruption are not only minimised, but organisational benefits can be achieved such as improved productivity and efficiency; positive working relationships; and effective collaboration and engagement.

The City's *Integrity Framework* is aligned to the City's *Strategic Community Plan 2032* (and specifically its key result area of Leadership) and aims to guide the organisation in providing the highest level of integrity for its community, and brings together the instruments, processes and structures within the organisation that foster integrity and help prevent corruption and misconduct from taking place. It also takes into account factors and conditions for implementation that influence within, and outside of, the City's operations.

The City of Joondalup commits to ensuring all elected members, employees, contractors, suppliers and volunteers understand and operate within the *Integrity Framework* and that the elements contained within are continuously enhanced and reviewed so that integrity forms part of the City's day-to-day business, decision-making and operations.

**James Pearson**
Chief Executive Officer

# 2. Integrity Model

## 2.1    Defining Integrity

The Organisation for Economic Co-operation and Development (OECD) in its *2020 Public Integrity Handbook* defines public integrity as the *"consistent alignment of, and adherence to, shared ethical values, principles and norms for upholding and prioritising the public interest over private interests in the public sector"*.

Integrity is important in ensuring the WA Government (including local government) is trusted and accountable for its actions. It is achieved by:

- Serving the public interest.
- Using powers responsibly, for the purpose and in the manner for which they were intended.
- Acting with honesty and transparency, making reasoned decisions without bias by following fair and objective processes.
- Preventing and addressing improper conduct, disclosing facts without hiding or distorting them.
- Not allowing decisions or actions to be influenced by personal or private interests.

The City's primary values help define the minimum standards of conduct and integrity to be observed by the City of Joondalup elected members, employees, contractors and suppliers and are expressed in the following legislated Codes of Conduct general principles:
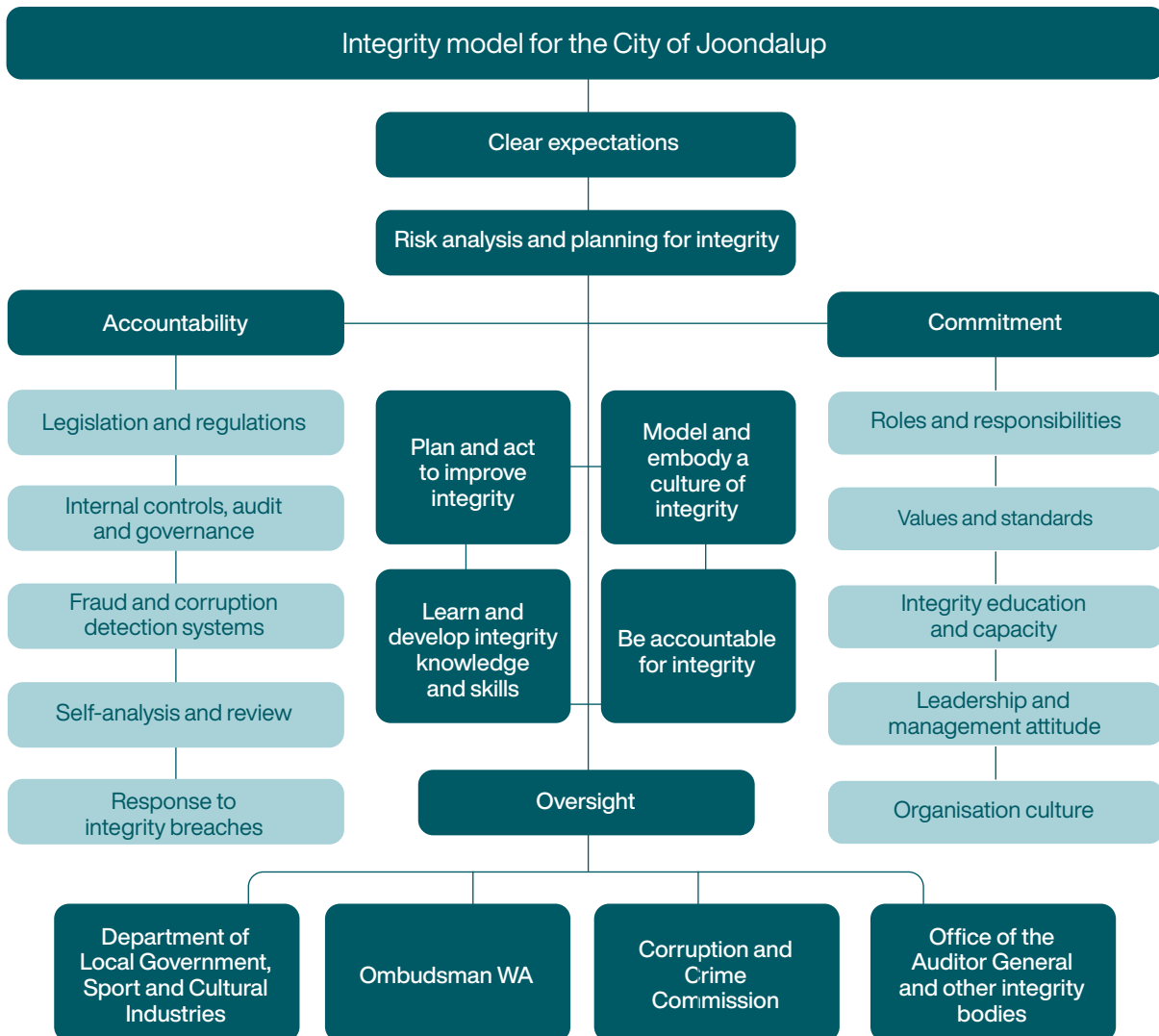
**Personal integrity:** We act with reasonable care and diligence and make decisions that are honest, fair, impartial and timely, and consider all relevant information.

**Relationships with others:** We treat people with respect, courtesy and sensitivity and recognise their interests, rights, safety and welfare.

**Accountability:** We use the resources of the City in a responsible and accountable manner that ensures the efficient, effective and appropriate use of human, natural, financial and physical resources, property and information.

## 2.2    Integrity Model for the City of Joondalup

*The Integrity Model for the City of Joondalup* provides an integrated representation of the City's Integrity Framework. Overall, City integrity is reliant on the two key ideologies of *Commitment and Accountability* that must be exercised continually by all components of the organisation.



Integrity model for the City of Joondalup

- 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
- Model and embody a culture of integrity
- Learn and develop integrity knowledge and skills
- Be accountable for integrity

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

Oversight
- Department of Local Government, Sport and Cultural Industries
- Ombudsman WA
- Corruption and Crime Commission
- Office of the Auditor General and other integrity bodies

With regard oversight agencies and their particular role relevant to local government:

**The Department of Local Government, Sport and Cultural Industries** aims to help to improve the capacity of local governments to respond to community demands and expectations, and improve levels of accountability and legislative compliance.

**Ombudsman WA** is an impartial and independent agency that receives, investigates and resolves complaints about State Government agencies, local governments and universities, and undertakes major investigations with all the powers of a standing Royal Commission.

**Corruption and Crime Commission** assesses, investigates and exposes serious misconduct in the Western Australian public sector; as well as encouraging public sector agencies to implement practices that minimise their risk of serious misconduct.

**Public Sector Commission** works to promote and maintain integrity, conduct and ethics in the Western Australian public sector; as well as assessing minor misconduct.

**Office of the Auditor General** supports accountability and continuous improvement in the public sector through an informed Parliament and community. Its mission is to serve the public interest through independent auditing and reporting on State and local government finances and performance.

# 3.  Plan and Act to Improve Integrity

The ability to plan and act to improve integrity is the foundation of the City of Joondalup's *Integrity Framework*.  It is where the City identifies, develops and implements the organisation's approach to managing integrity based on identified risks.

## 3.1    Roles and Responsibilities

The City's *Integrity Framework* includes areas with responsibilities for defining, supporting, controlling and enforcing integrity across the organisation.  These include core areas, such as the Council and Committees or individuals responsible for implementing integrity policies, as well as complementary areas, whose primary purpose is not to directly support the City's *Integrity Framework*, but without whom the framework could not operate.

Assigning clear responsibilities within the City's operations is necessary to ensure co-operation and to avoid overlaps and prevent fragmentation.  Responsibilities include developing, implementing, monitoring and evaluating integrity standards and tools, and are carried out by not only those areas within the organisation but outside the organisation.

The following table details the various bodies or positions within the City of Joondalup that are key components of the City's integrity system:

| Body or position | Integrity Role |
|---|---|
| **Council** | • Operates in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance.<br><br>• Sets integrity expectations and embodies these through the City's:<br><br>  o  Values.<br><br>  o  Code of Conduct for Council Members, Committee Members and Candidates.<br><br>  o  Risk Management Framework.<br><br>  o  Governance Framework.<br><br>• Approves policy documents as they relate to integrity matters.<br><br>• Sets and endorses delegations for specific functions to the Chief Executive Officer and relevant officers.<br><br>• Endorses the City's Annual Compliance Audit Return.<br><br>• Endorses the Terms of Reference of the Audit and Risk Committee. |
| **Audit and Risk Committee** | • Acts in accordance with its Terms of Reference and Audit and Risk Committee Charter.<br><br>• Monitors the effectiveness of the City's Risk Management Framework including integrity risks.<br><br>• Receives reports on strategic integrity matters.<br><br>• Assesses the adequacy of the internal audit plan and the three-year audit plan.<br><br>• Considers reports by the Office of Auditor General including but not limited to the annual external audit.<br><br>• Reports to Council on integrity risks, audit activities and integrity controls. |
| **Elected Members** | • Adhere to and demonstrate the highest level of commitment and conduct for integrity.<br><br>• Model a culture of integrity through the active demonstration of the City's values and by communicating the importance of meeting integrity standards.<br><br>• Participate in the Council's decision-making processes in an impartial and unbiased manner.<br><br>• Manage, declare and record gifts and conflicts of interest. |

| Body or position | Integrity Role |
|---|---|
| **Chief Executive Officer** | • Operates in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance.<br><br>• Adheres to and demonstrates the highest level of commitment and conduct for integrity.<br><br>• Responsible for the agenda, implementation and enforcement of integrity policies for the City.<br><br>• Drives a culture of integrity through the active demonstration of the City's values and by communicating the importance of meeting integrity standards.<br><br>• Participate in the City's decision-making processes in an impartial and unbiased manner.<br><br>• Provides leadership in the prevention, detection and response to misconduct.<br><br>• Reports misconduct activities or suspected activities to external oversight bodies.<br><br>• Promotes effective risk management and governance across the organisation.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Executive Management Team (Directors and Managers)** | • Operate in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance.<br><br>• Adhere to and demonstrate the highest level of commitment and conduct for integrity.<br><br>• Drive a culture of integrity through the active demonstration of the City's values and by communicating the importance of meeting integrity standards.<br><br>• Participate in the City's decision-making processes in an impartial and unbiased manner.<br><br>• Ensure optimal, and fit for purpose, operational performance to deliver the products, services and programs that benefit the community.<br><br>• Implement and oversee integrity policies and practices and promote ethical behaviour.<br><br>• Manage and control integrity risks including recording actions and controls in developed risk registers.<br><br>• Provide advice and support to staff on integrity matters.<br><br>• Manage, declare and record gifts and conflicts of interest.<br><br>• Manage and control integrity risks related to conflicts of interest related to the business of the Directorate/ Business Unit. |
| **Manager Governance** | • Monitors and evaluates the effectiveness of the City's Integrity Framework, including biennial review.<br><br>• Implements core integrity instruments, processes and systems around governance, codes of conduct; delegations of authority, accountability and ethical decision-making.<br><br>• Ensures compliance with legislative provisions, policies and procedures related to governance practices.<br><br>• Delivers ethical training and awareness.<br><br>• Maintains public registers.<br><br>• Maintains the Delegations of Authority Manual.<br><br>• Manages, declares and records gifts and conflicts of interest. |

| Body or position | Integrity Role |
|---|---|
| **Manager Audit, Risk and Executive Services** | **Risk management**<br><br>• Establishes and maintains the City's Strategic Risk Profile with input from the Council and Executive Management Team.<br><br>• Coordinates detailed strategic and operational risk reports for the Audit and Risk Committee as required.<br><br>• Establishes an internal control system and risk management framework to reduce organisational vulnerability to fraud and corruption.<br><br>• Implements core integrity instruments, processes and systems around gift declarations, risk, fraud and misconduct control.<br><br>• Oversees the City's public interest disclosure framework and other external misconduct reporting mechanisms.<br><br>• Maintains the City's Fraud, Corruption and Misconduct Control Policy.<br><br>• Maintains the City's Business Continuity Plan and Policy.<br><br>• Delivers risk management training and awareness.<br><br>• Manages, declares and records gifts and conflicts of interest.<br><br>**Internal audit**<br><br>• Establishes an independent and objective internal audit function to provide assurance on the City's systems of internal control, compliance and risk management including providing recommendations to improve mitigating actions and controls. |
| **Manager Human Resources** | • Prepares, publishes and implements complementary integrity instruments, processes and systems around human resource practices including recruitment and selection; performance review; workforce management; induction and training; complaints and grievances.<br><br>• Ensures employee induction covers integrity expectations.<br><br>• Ensures compliance with legislative provisions, policies and procedures related to human resources practices including breach of discipline.<br><br>• Oversees organisational employee surveys.<br><br>• Oversees the development of corporate training budgets dependant on organisational requirements.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Manager Financial Services** | • Prepares, publishes and implements complementary integrity instruments, processes and systems around purchasing and procurement; tendering and contracts; and utilisation of the City's finances.<br><br>• Ensures compliance with legislative provisions, policies and procedures related to financial management and reporting, procurement, and financial audits.<br><br>• Ensures due diligence when engaging contractors and suppliers to deal with integrity matters to ensure they have the necessary qualifications, skills and/or experience (eg through reference and qualification checks).<br><br>• Maintains the City's Statement of Business Ethics.<br><br>• Manages, declares and records gifts and conflicts of interest. |

| Body or position | Integrity Role |
|---|---|
| **Manager Strategic and Organisational Development** | • Maintains internal and external policy frameworks.<br><br>• Ensures accountability, compliance with relevant legislation and the contractual obligations applicable to each non-recurrent grant.<br><br>• Ensures policies and procedures are reviewed and updated in accordance with the policy register and relevant legislative changes.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Manager Information Technology** | • Prepares, publishes and implements complementary integrity instruments, processes and systems around ICT use and security.<br><br>• Manages appropriate security testing of ICT systems and develops responses to identified security risks.<br><br>• Ensures employees are appropriately educated in ICT use and security practices.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Manager Asset Management** | • Prepares, publishes and implements complementary integrity instruments, processes and systems around asset management; and disposal of assets.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Manager Communications and Stakeholder Relations** | • Schedules specific integrity messages as directed from the Chief Executive Officer and Executive Management Team.<br><br>• Ensures corporate messages are consistent with the Council and Chief Executive Officer's approach to integrity and stated expectations.<br><br>• Coordinates effective complaint handling systems, and liaison with the Ombudsman WA as required.<br><br>• Assists the Manager Governance and Manager Audit, Risk and Executive Services maintain the internet and intranet regarding integrity information and resources.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Internal Auditor** | • Operates in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance.<br><br>• Plans and conduct audits that address integrity risks.<br><br>• Reports integrity risks to the Chief Executive Officer and the Audit and Risk Committee.<br><br>• Participates in the City's decision-making processes in an impartial and unbiased manner.<br><br>• Manages, declares and records gifts and conflicts of interest. |
| **Integrity Officer** | • Operates in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance.<br><br>• Provides an independent and objective internal investigation function relating to public interest disclosures, fraud and corruption, and other relevant complaints.<br><br>• Participates in the City's decision-making processes in an impartial and unbiased manner.<br><br>• Manages, declares and records gifts and conflicts of interest. |

| Body or position | Integrity Role |
|---|---|
| Employees | • Operate in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance.<br><br>• Adhere to and demonstrate the highest level of commitment and conduct for integrity.<br><br>• Reflect the City's values and integrity standards.<br><br>• Participate in the City's decision-making processes in an impartial and unbiased manner.<br><br>• Comply with core and complementary instruments, policies, processes and systems developed for organisational integrity.<br><br>• Apply appropriate practices for risk management, internal controls, and fraud and corruption prevention.<br><br>• Report misconduct, corruption or fraud through established reporting mechanisms.<br><br>• Participate in training and development opportunities to enhance integrity knowledge and capacity.<br><br>• Manage, declare and record gifts and conflicts of interest. |
| Contractors and Suppliers | • Adhere to the City's Statement of Business Ethics.<br><br>• Adhere to relevant legislative obligations as detailed in contracts of engagement.<br><br>• Comply with core and complementary instruments, policies, processes and systems developed for organisational (and contractor) integrity.<br><br>• Manage, declare and record conflicts of interest. |
| Volunteers | • Adhere to the City's Statement of Business Ethics.<br><br>• Adhere to relevant legislative obligations as detailed in contracts of engagement.<br><br>• Comply with core and complementary instruments, policies, processes and systems developed for organisational (and volunteer) integrity.<br><br>• Manage, declare and record conflicts of interest. |

## 3.2    Legislation and Regulations

The *Local Government Act 1995* is the key legislative instrument which provides the City of Joondalup the power to make policies, plans and strategies, and local laws, which are generally used to establish and maintain the quality of life and amenity in keeping with community expectations.

The City's legislative, policy and planning instruments are available on the City's website.

The City is also responsible for administering a number of State and Commonwealth Acts and regulations. Some of the more significant pieces of legislation are included within the City's *Record Keeping Plan 2020* available on the City's website.

The City also has obligations under State legislation to report matters related to integrity including, but not limited to:

• Corruption, Crime and Misconduct Act 2003.
• Financial Management Act 2006.
• State Records Act 2000.

## 3.3    Risk Analysis and Planning for Integrity

**Risk Management Policy**

The City's *Risk Management Policy* describes the commitment to understanding and managing the City's risk environment, fostering a positive risk culture and taking measures to ensure risks are contained to acceptable levels in accordance to its remit and responsibilities.

The policy and framework are aligned with the Australian Standard/International Organisation for Standardisation (AS/NZS ISO) 31000:2018 Risk Management – Guidelines.

**Risk Management Framework**

The City's *Risk Management Framework* supports and expands on the *Risk Management Policy* and aims to uphold the City's Primary Values of being transparent, accountable, honest, ethical, respectful, sustainable and professional. The Framework provides the guidance to integrate risk management into activities and functions performed by the City.

**Risk Management Guidelines**

The City's internal *Risk Management Guidelines* provide detailed application guidance for the Framework. This includes procedures, practices, responsibilities and activities (including their sequence and timing).

## 3.4    Internal Controls, Audit and Governance

The City undertakes activities and implements internal controls to minimise its integrity risks including the following:

**Governance Framework**

The City's *Governance Framework* has been adopted to help define the City's process by which decisions are taken and implemented, the process by which the City goes about achieving its goals and producing its outputs and the process by which the organisation is directed, controlled and held to account.

**Policies, Protocols, Procedures and Processes**

To ensure policies, protocols, procedures and processes are current, the City's policies, procedures  and processes assign responsible Directorates and review dates.

The City's Policy Register is available on the City's website. Business critical processes and procedures are documented in the internal process documentation system Promapp.

**Supervision**

Directors and Managers are expected to ensure employees adhere to governance policy frameworks, complete mandatory training and demonstrate behaviours required by the *Code of Conduct for Employees*.

**Financial Management Controls**

The following Financial Management Controls are in place:

• Financial Management Information Systems including automated controls to ensure adequate segregation of duties/responsibilities with regard endorsed delegations related to procurement and authorisation of payments.
• Monthly reconciliation and exception reporting.
• Grant acquittals process.
• Financial management guidelines, protocols and processes.
• Appointment of external auditor to undertake reviews of financial management systems and procedures.

### Human Resource Management Controls

The following Human Resource Management Controls are in place;

- Employment screening including for certain positions a requirement to provide a national police clearance certificate and/or working with children checks before employment is offered.
- New employees being required to complete a comprehensive induction process which includes information on integrity and the requirement to notify the City in the event they are charged with a serious criminal offence or an offence involving fraud or dishonesty.
- Employees who hold positions categorised as 'Positions of Trust' being required to produce a national police clearance certificate and/or working with children checks from time to time.
- Undertaking secondary employment being required to be approved.
- Probing for moral judgement capacities at interview by asking questions around ethical predicaments.
- Reference checks of applicants and a level of questioning based on the skills, knowledge and experience required for the position.
- Qualification checks and presentation of original documentation.

The City's annual performance review process is also a mechanism for employees and supervisors to reinforce integrity standards; raise any integrity issues; or identify any training and development needs.

### Information Management Controls

The following Information Management Controls are in place:

- The City's *Record Keeping Plan* details the management of State records to meet obligations under the State Records Act 2000.
- The *Code of Conduct for Council Members*, Committee Members and Candidates and *Code of Conduct for Employees* contain provisions related to the use of information.
- Access to corporate records by employees and contractors being in accordance with designated access and security classifications as determined by the Records Services Coordinator and the City's *Records Management Policy*.
- Access to the City's records by the general public being in accordance with the *Freedom of Information Act 1992*, or other written laws.

- Access to the City's records by elected members and committee members being via the Chief Executive Officer in accordance with Section 5.92 of the *Local Government Act 1995*.
- The *Online Services Usage Protocols* (for elected members and employees) provides guidance on the acceptable business use and personal use when using the City's online services. It provides guidance on logon accounts, password and email etiquette.
- Liaises with the Ombudsman WA in relation to effective complaint handling, investigations and record keeping.

### Risk Management

The City takes integrity risk management seriously and it is embedded into its overall approach to risk described at Part 3.3 *Risk Analysis and Planning for Integrity*.

### Audit

The internal audit functions are maintained in line with the Local Government Act 1995, Local Government (Audit) Regulations 1996 and Local Government (Financial Management) Regulations 1996.  These functions are described in the City's Audit and Risk Committee Charter.

The internal audit function helps maintain and improve organisational effectiveness by providing risk-based and independent assurance advice to the Chief Executive Officer and Audit and Risk Committee.

The internal audit function also assists the Chief Executive Officer achieve business objectives by systematically collecting and reporting information through the Audit and Risk Committee. This includes risk exposure and management, internal controls, compliance, resource and program management, and organisation performance against statutory obligations and best practice principles.

The internal audit function also ensures the appointment of external auditors to undertake reviews of risk management, internal control and legislative compliance.

A risk-based internal audit plan is prepared annually by the internal audit function. The plan sets audit topics and identifies resources required for the year in alignment with the City's objectives and key risks. It is presented to the Audit and Risk Committee. The Chief Executive Officer may vary the plan and change priorities.

The Committee provides advice to the Council on the effectiveness of the risk management and governance frameworks, and external accountability obligations.

The Committee has an independent member appointed by the Council.

## 3.5    Fraud and corruption detection systems

The City's *Fraud, Corruption and Misconduct Control Policy* objective is to communicate the City's zero tolerance approach and response actions to fraudulent and corrupt conduct within the performance of its functions and interactions with contractors and suppliers, the community and all other stakeholders of the City.

The Policy establishes the City's approach to preventing, detecting and responding to reports of suspected fraud, corruption and misconduct. The City acknowledges that the audit function, staff, supplier and contractor reporting of suspected fraud and corruption, set out in the Statement of Business Ethics, contributes to detection activities.

Financial management detection systems include:

- Monthly data and exception issues analysis/reporting.
- Monthly reconciliations and review of exception reports.

- Fortnightly payroll certification reports and monthly payroll data integrity checking.
- Internal audit reviews.
- Annual statutory external audit by the office of the Auditor General and reporting in the City's Annual Report.
- Annual budget process and mid-year review to critically review and examine forward budget projections.
- Annual review of the Strategic Financial Management Plan.

Governance detection systems includes:

- Regular review of conflicts of interest and gifts and hospitality declarations.
- Regular review of registers to ensure compliance with legislative/policy requirements.

Fraud and misconduct detection systems include:

- Live data analysis using accounts payable, contracts and payroll data.

# 4. Model and Embody a Culture of Integrity

## 4.1    Values and Culture

An effective integrity framework holds an organisation to a more robust standard of ethics and morals. Organisational integrity needs to be based on the concept of self-governance in accordance with a set of guiding principles and ethics. To build an ethical organisation, where all parts of it behave with integrity, a strong set of values must be enshrined in day-to-day activities and operations.

The City's *10 Year Strategic Community Plan (Joondalup 2032)* articulates the City's vision as being *'A global City: bold creative and prosperous'.* In alignment with this vision the City believes the following primary values should be inherent within any well-functioning and community-driven organisation:

- **Transparent** – We facilitate appropriate levels of scrutiny by recording our decisions and making them accessible.
- **Accountable** – We accept responsibility for our actions and decisions that are within our control.
- **Honest** – We earn and sustain public trust by being honest and open in all our actions and always acting in the public interest.
- **Ethical** – We demonstrate moral behaviour that is free from corruption.
- **Respectful** – We treat people fairly and objectively and without discrimination.
- **Sustainable** – We manage our natural resources and public assets adaptively, ensuring equitable outcomes for future generations.
- **Professional** – We demonstrate strong skills and good judgment and behaviour in delivering our services.

Integrity is supported when elected members, employees, contractors, suppliers and volunteers model the City's values. These values shape the City's culture and are the fundamental beliefs the City considers to be important; are relatively stable over time; and define expected elected member, employee, contractor and volunteer attitudes and behaviour. Ethical conduct and day to day decision-making is built on the City's primary values.

A positive culture promotes openness and honesty, makes accountability and responsibility clear and encourages debate on important issues. It is also more likely that the organisation will retain high caliber employees who want to work and participate in the activities of the City.

The City fosters and cultivates a culture of integrity through:

- Encouraging an open culture where ethical dilemmas, public integrity concerns, and errors can be discussed freely, and, where appropriate, with employee representatives, and where leadership is responsive and committed to providing timely advice and resolving relevant issues.
- Providing clear rules and procedures for reporting suspected breaches of conduct standards, and ensure, in accordance with fundamental principles of procedural fairness, protection against all types of unjustified treatments as a result of reporting misconduct and integrity violations, in good faith and on reasonable grounds.
- Providing alternative channels for reporting suspected breaches of conduct standards, including when appropriate the possibility of confidentially reporting to a body with the mandate and capacity to conduct an independent investigation.
- Communicating the City's Codes of Conduct (at pre-employment and during employment) and Public Interest Disclosures processes.
- Undertaking Employee Opinion Surveys and Climate Surveys to determine perceptions of observance to values and standards of integrity; and establishment of Employee Opinion Survey Working Groups to examine opportunities to enhance understanding of values in decision-making.
- Publishing registers on the City's website for public inspection in accordance with the *Local Government Act 1995*. These include, but are not limited to the Gifts Register, Minor Breaches Register, Complaints Register, Declarations of Interest Register and Electoral Gifts Register.

## 4.2    Leadership and Management Attitude

From the perspective of integrity, there is a continuing need to give life to the City's primary values and standards of behaviour; to create an environment that supports ethically sound behaviour and decision-making; and to instil a sense of shared integrity responsibility and accountability among elected members and employees. Ineffective oversight by formal and informal leaders, especially when coupled with weaknesses in other internal integrity systems and controls, presents real integrity risks for any public authority.

A "do it right" climate must be created and continually reinforced and communicated from the highest level of the organisation, being elected members and the City's Executive Management Team (the Chief Executive Officer, Directors and Business Unit Managers). In turn, all other leaders in the City (formal and informal) must also demonstrate and reflect the highest standards of integrity for other employees to follow.

Effective leadership and supervision can have a significant impact on the performance and integrity of teams and help to detect and prevent misconduct at the City.

Leaders must proactively promote integrity and supervise by:

• Visible demonstration and active promotion of the primary values of the organisation.

• Knowing and understanding the management and monitoring tools available to them including performance management and substandard performance processes, and disciplinary and reporting processes.

• Being consistent and clear about expectations, how they align with values and policies, and not shying away from difficult conversations about performance and integrity.

• Trusting their team but still fulfilling their obligations by monitoring work performance and integrity requirements and following up on any concerns.

• Taking consistent, appropriate and proportionate action to deal with issues.

• Creating safe places where staff can challenge the status quo by speaking up (also refer to the City's Public Interest Disclosure Officers; Workmates Program; and Employee Assistance Program).

Matters related to integrity should be continually promoted and discussed at regular meetings between leaders and employees so that ethical standards of behaviour can not only be reinforced, but also for integrity issues or concerns to be highlighted so that clarification or any further educational instruments or processes can be investigated and implemented.

The City's intent is that through reinforcement of positive leadership attitudes and expectations toward high levels of conduct and integrity, a normalised professional business culture will be maintained and enhanced. Employee Opinion Surveys and Climate Surveys will assist leaders in understanding employee perceptions of observance to values and standards of integrity as a measure of success.

# 5. Learn and Develop Integrity Knowledge and Skills

## 5.1    Integrity Education and Capacity

An organisation may have the best processes and practices in place to foster a culture of integrity, but it must continue to educate and communicate those standards and practices through understanding and capacity building.

The provision of sufficient information, training, guidance and timely advice for elected members and employees to apply public integrity standards is done through:

- Providing elected members, employees, contractors, suppliers and volunteers with clear and up-to-date information about the organisation's policies, protocols and administrative procedures relevant to maintaining high standards of public integrity.

- Requiring all new employees to be provided with an induction package that includes the *Code of Conduct for Employees* and requires them to confirm they have read and understood the Code.

- Offering induction and on-the-job integrity training to elected members and employees in order to raise awareness and develop essential skills for the analysis of ethical dilemmas, and to make public integrity standards applicable and meaningful in their own personal contexts.

- Providing easily accessible formal and informal guidance and consultation mechanisms to help elected members, employees, contractors, suppliers and volunteers apply public integrity standards in their daily work as well as to manage conflict-of-interest situations.

- Development and training completed by elected members and employees are recorded in the learning management system.

- Development of short guides related to ethical and integrity matters.

- The employee performance management process reinforces the need to comply with the *Code of Conduct for Employees* and declare any conflicts of interest.

- Elected members, employees, contractors, suppliers and volunteers are provided with avenues to seek advice about integrity obligations including policies and procedures from those with relevant expertise.

- Employee access to the City's 'Workmates Program' and Public Interest Disclosures Officers.

- Referencing and engaging with the Public Sector Commission through its integrity insights materials.

# 6.  Be Accountable for Integrity

## 6.1     Response to Integrity Breaches

As an overarching principle, the City does not tolerate corrupt or other improper conduct, including mismanagement of public resources, in the exercise of the public functions of the City, by its elected members, employees, contractors, suppliers or volunteers. In view of this it actively promotes and supports disclosures being made by elected members, employees and members of the public, as to corrupt or other improper conduct that is happening or may happen.

The City will take all reasonable steps to provide protection to elected members, employees, contractors, suppliers and volunteers who make disclosures from any detrimental action in reprisal for the making of a disclosure or misconduct report and also does not tolerate any of its elected members or employees engaging in acts of victimisation or reprisal against those who make a disclosure.

The *City's Code of Conduct for Council Members, Committee Members and Candidates* and *Code of Conduct for Employees* contain principles and minimum requirements to ensure compliance with relevant legislation and standards. In addressing matters, the City may take investigative and disciplinary action in line with relevant City policies and protocols.

Where complaints against elected members, committee members or candidates are upheld they will be included in the City's Complaints Registers, available on the City's website.  Complaints (upheld) and reporting to external oversight bodies will also be reported on in the City's Annual Report.

For certain types of conduct, the Chief Executive Officer has a statutory obligation to notify the Public Sector Commission and Department of Local Government, Sport and Cultural Industries (minor misconduct), Corruption and Crime Commission (serious misconduct) and Western Australia Police (criminal conduct).

Where relevant, any reports and discipline processes are used as opportunities to improve practices and strengthen controls.

## 6.2     Self-assessment and Review

The City will self-assess and review the framework on a biennial basis examining ways to continuously improve it by:

- Making judgements informed by data and evidence about what is currently working and what is not.
- Identifying gaps between the current and desired future state.
- Deciding the best way to address any gaps and get to the desired future state based on operating context, risks and resourcing.
- Development of an *Integrity Action Plan*.

The Chief Executive Officer will be responsible for coordinating the review.

The City also uses available tools (eg Integrity Snapshot Tool, Integrity and Conduct Annual Collection, Integrity in Financial Management Self-Assessment Checklist, Compliance Program, Local Government and Public Sector Inquiry Reports and the like) to assess what is currently in place and the maturity of its approach to integrity.

# 7. Oversight

The Chief Executive Officer, with the support of the Executive Management Team, is responsible for oversight of the Integrity Framework.

The following processes are in place to provide the Council and Chief Executive Officer with assurance that the approach to practicing, managing and accounting for integrity is sound, and the framework is working as intended:

### Chief Executive Officer

- Integrity matters to be a standing Executive agenda item.
- Role and responsibilities as the City's Complaints Officer undertaken.
- Regular reporting from business areas to the Chief Executive and/or Executive Leadership Team includes:
  - o Financial performance and any requests for changes to the approved budget parameters.
  - o Regular review of the conflicts of interest, secondary employment, and gifts and benefits register.
  - o Regular reporting on the staff development and training plan as it relates to integrity matters.
  - o Progress reporting from internal audit provided to ensure audit corrective actions are implemented.
  - o Progress reporting on risk management matters as they relate to integrity.
  - o Regular Employee Opinion Surveys and Climate Surveys incorporating integrity feedback mechanisms.

### Council/Audit and Risk Committee

- Quarterly reporting on the use of Chief Executive Officer's credit card.
- Annual Compliance Audit Return.
- Regular reporting on internal audit coverage and annual work plan
- Regular reporting on the Office of the Auditor General's work program.
- Regular reporting on identifying and management of misconduct and integrity matters affecting the City or local government sector.
- Policy documents as they relate to integrity matters.
- Monitors the effectiveness of the City's *Risk Management Framework* including integrity risks.
- Sets and endorses delegations for specific functions to the Chief Executive Officer and relevant officers.
- Three yearly reviews of the appropriateness and effectiveness of the City's systems and procedures in relation to risk management, internal controls and legislative compliance and report to the Council the results of those reviews.
- Three yearly reviews of the appropriateness and effectiveness of the City's financial management systems and procedures of the City and report to the Council the results of those reviews.

# 8. Relevant City of Joondalup Documents

The following key City of Joondalup documents are relevant to the Integrity Framework:

- *Strategic Community Plan 2032*
- Governance Framework
- Code of Conduct for Council Members, Committee Members and Candidates
- Code of Conduct for Employees
- Risk Management Framework
- Audit and Risk Committee Terms of Reference and Charter
- Public Registers
- *Risk Management Policy*
- *Fraud Corruption and Misconduct Control Policy*
- *Elections Caretaker Policy*
- *Attendance at Events Policy*
- Customer Service Charter
- Public Interests Disclosure Framework
- Statement of Business Ethics

*City of*
Joondalup