Integrity
Framework
2024

City of Kwinana

This document is available in alternative formats upon request.

City of Kwinana kaditj kalyakool moondang-ak kaaradj midi boodjar-ak ngala nyininy, yakka wer waabiny, Noongar moort. Ngala kaditj baalap kalyakoorl nidja boodjar wer kep kaaradjiny, baalap moorditj nidja yaakiny-ak wer moorditj moort wer kaditj Birdiya wer yeyi.

City of Kwinana acknowledges the traditional custodians of the land on which we live, work and play, the Nyoongar people. We recognise their connection to the land and local waterways, their resilience and commitment to community and pay our respect to Elders past and present.

Contents

1. CEO Mission Statement

Here at the City of Kwinana (the City), we are committed to ensuring everyone understands and operates with the highest level of integrity and accountability. By doing so, we can build and maintain the trust of the community we serve.

This is why the City has implemented this framework. It describes the instruments, structures and cultural factors that guide how we practice, manage and account for integrity.

The framework is based on a thorough assessment of our integrity risks. While it identifies some people with particular roles, we are all responsible in maintaining the integrity of the City.

Staff are asked to familiarise themselves with the framework document which can be accessed on the intranet at any time.

It is the responsibility of all staff to monitor and maintain the framework, review its effectiveness, and seek assurance from across the organisation that the City's approach to integrity is sound. Framework custodians and other assurance providers help us achieve this.

We all have responsibility for safeguarding the integrity of the City and preventing misconduct and corruption. We demonstrate this in part by reporting any integrity breaches we see or become aware of, and making suggestions on how we can improve the City's approach to integrity.

2. Improving Integrity

2.1. The City's Integrity Ethos

The Macquarie dictionary defines integrity as being the "soundness of moral principle and character; uprightness; honesty.¹"

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

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

An ethical and professional workplace is the best safeguard against risks to integrity, including improper conduct, misconduct, and corruption.

To ensure that the City can continue to enhance ethical conduct, prevent misconduct, and promote transparency, the City has outlined a framework that will assist in managing integrity based on identified risks.
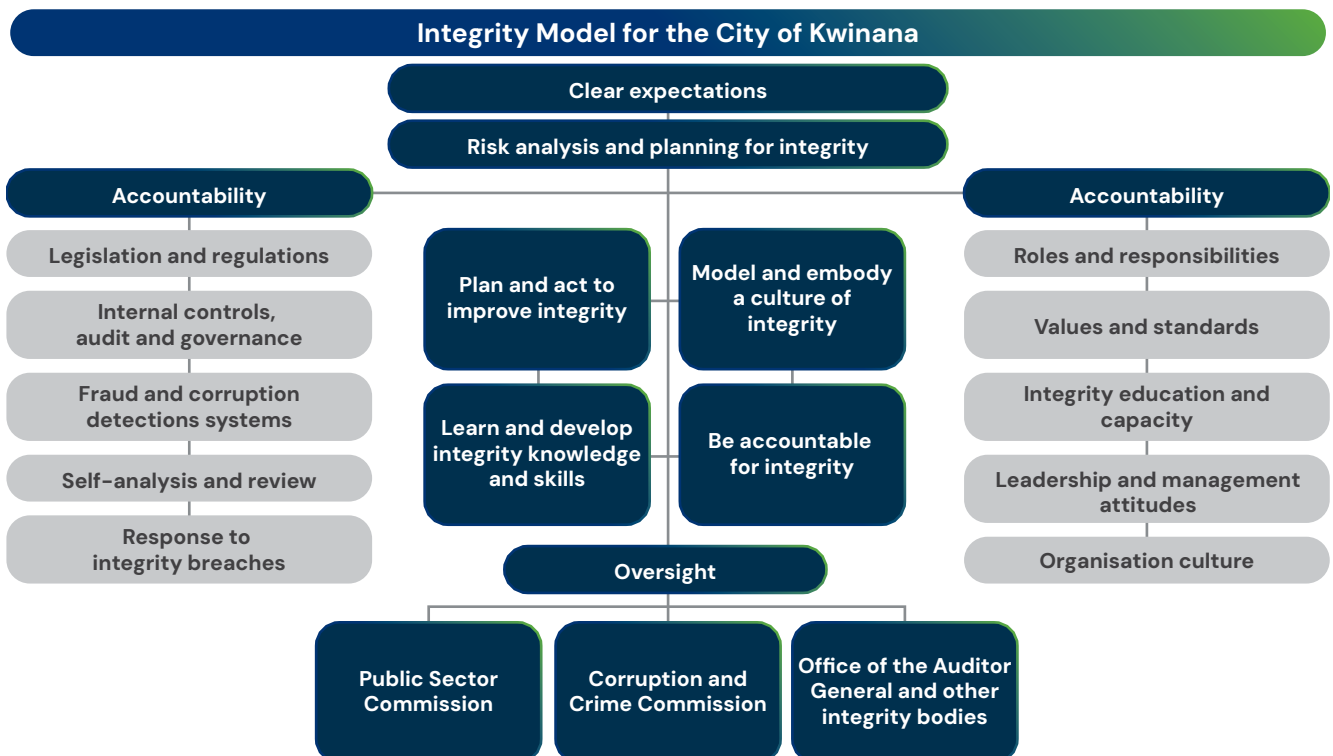
Note: The above information aligns with the City's Employee Code of Conduct.

The City supports the Public Sector Commission's Integrity Strategy for WA Public Authorities by developing this framework. It applies to all City 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.

2.2. Integrity Model

The *Integrity Model for the City of Kwinana* (below) 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 Kwinana

Clear expectations

Risk analysis and planning for integrity

Accountability
- Legislation and regulations
- Internal controls, audit and governance
- Fraud and corruption detections 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

Accountability
- Roles and responsibilities
- Values and standards
- Integrity education and capacity
- Leadership and management attitudes
- Organisation culture

Oversight
- Public Sector Commission
- Corruption and Crime Commission
- Office of the Auditor General and other integrity bodies

1   https://www.macquariedictionary.com.au/features/word/search/integrity/.

2.3. Roles and responsibilities

Role	Responsibilities
Council	• Adopt and review the City's Integrity Framework. • Adopt and review the Code of Conduct for Council Members, Committee Members and Candidates. • Appoint an Independent Complaints Officer to receive and manage complaints made under the Code of Conduct. • Receive reports from the Audit and Risk Committee in relation to integrity risks, audit activities and other integrity controls.
Elected Members	• Model leadership and conduct that aligns with: ▪ the City's Integrity Framework; ▪ the Code of Conduct for Council Members, Committee Members and Candidates; ▪ the *Local Government Act 1995* (WA); and the City's policies and procedures.
Chief Executive Officer	• Implement and administer the Code of Conduct for Council Members, Committee Members and Candidates. • Implement and administer the City's Employee Code of Conduct. • Lead a culture of integrity through the active demonstration of City values and by communicating the importance of meeting integrity standards. • Provide leadership in preventing, detecting, and responding to misconduct. • Oversee the implementation of the City's Risk Management Framework. • Provide appropriate training for Elected Members in accordance with the Code of Conduct for Elected Members, Committee Members and Candidates. • 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 Corruption, Crime and Misconduct Act 2003 (WA). • Promote a culture of integrity through collaboration, employee training and other activities. • Provide reports and advice to the Audit and Risk Committee on integrity matters.
Executive Team	• Lead a culture of integrity through the active demonstration of City values and by communicating the importance of meeting integrity standards. • Promote a culture of integrity through collaboration, employee training and other activities. • Provide leadership in preventing, detecting and responding to misconduct. • Administer the City's Risk Management Framework including business unit specific and integrity risks.
Marketing and Communications Team	• Responsible for ensuring expectations (Code of Conduct etc.) are accessible (on intranet)
HR Team	• Commit to follow a thorough and unbiased recruitment process and to recruit individuals who are closely aligned with the City's values. • Ensure comprehensive screening is conducted for new employees including, but not limited to: ▪ Police Clearances ▪ 100 points of Identification ▪ Behavioural Testing where required ▪ Qualification Checks ▪ Reference Checks ▪ Working With Children Check where required • Perform ongoing reviews of police clearances, licences and qualifications for existing employees. • Administer annual checks to ensure all employee information is up to date and relevant. • 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. • Ensure confidentiality is maintained and the appropriate disciplinary action is taken when investigating reports of misconduct, in accordance with the City's policies and procedures.

Role	Responsibilities

All staff	• Demonstrate an awareness and understanding of:
	  ▪ the City's Integrity Framework;
	  ▪ the Employee Code of Conduct;
	  ▪ the City's policies and procedures; and
	  ▪ the employee's role.
	• Report any instances of misconduct through the City's misconduct reporting process.
	• Take responsibility for decisions and actions to ensure they are in the public interest.
	• Seek information from their supervisor about, and advice on, situations where integrity matters arise.
	• Outlining all potential conflicts of interests and declaring any secondary employment.

Audit and Risk Committee	• Receive reports from the Administration in relation to integrity risks, audit activities and other integrity controls. • Receive and review internal and external audits.
PID Officer/s	• Ensure requirements of the *Public Interest Disclosure Act 2003* (WA) have been met.

2.4. Legislation and Regulations

The City needs to adhere to numerous pieces of legislation. The primary pieces of legislation, and the teams responsible for adherence to these legislative requirements, are outlined below:

Relevant legislation / body	Description of obligations	Governance methods	Accountable team
Local Government Act 1995 (WA) and Regulations	Outlines the framework for local governments within Western Australia. This includes the regulation of the conduct of employees and council members.	City policies and procedures	All staff
Corruption, Crime and Misconduct Act 2003 (WA)	Obligation to notify suspected serious misconduct to Corruption and Crime Commission. Obligation to notify suspected minor misconduct to Public Sector Commission.	Internal notification procedures and disciplinary policies (e.g. Disciplinary Action) Fraud and Corruption Policy	HR Governance and Legal
Public Sector Management Act 1994 (WA)	Provides for the administration of the Public Sector of Western Australia	Employee Code of Conduct	HR
Public Interest Disclosure Act 2003 (WA)	Allows people to make disclosures about wrongdoing in public authorities.	Employee Code of Conduct	All staff
Freedom of Information Act 1992 (WA)	Confers a legally enforceable public right of access (subject to specified exemptions) to documents in the possession of the City.	Freedom of Information Statement	Information Management
State Records Act 2000 (WA)	Provides for the creation, management and protection of State records, and for public access to those records.	Record Keeping Plan Retention and Disposal Authorities	Information Management

2.5. Risk analysis and planning for integrity

The City's Risk Management Policy and Strategy documents details the City's approach to risk management.

The administration uses risk registers to capture and record operational risks, including misconduct.

Register requirements include:

- Description
- Possible Cause
- Classification
- Actions
- Risk Scores – Residual and Inherent
- Mandatory Controls
- Owner

The register is managed, reviewed and updated regularly by Executives, Managers and employees as actions are completed and new risks are identified.

The Audit and Risk Committee have oversight of the City's risks as well as risk management processes.

The City also uses available tools (eg. 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.

2.6. Internal controls, audit and governance

2.6.1. Key Integrity Policies etc.

The below outlines the measures the City has in place to manage its governance, control its integrity risks and assure itself that these mechanisms are sound. The below includes the City's core and complementary integrity policies and procedures which are all recorded in the City's Document Management System; links have been provided below where appropriate:

Document	Link	Custodian	Last review date
City of Kwinana Employee Code of Conduct	Intranet link	ELT	August 2023
City of Kwinana Elected Members Code of Conduct	Internet link	Governance and Legal	August 2023
Policy – Employee Recruitment, Selection and Appointment	Recorded in the City's Document Management System	HR	Currently in review
Policy – Workplace Behaviour (Harassment, Discrimination and Bullying)	Intranet link	HR	May 2023
Policy - Fraud and Corruption	Internet link	Governance and Legal	December 2023
Policy – Procurement	Intranet link	Procurement and Contracts	September 2022
Policy – Workplace Privacy	Intranet link	HR	June 2023
Policy – Grievance Management	Intranet link	HR	June 2023
Policy – HR – Disciplinary Action	Intranet link	HR	June 2023
Policy – Employee Performance Management	Intranet link	HR	June 2023
Policy – Cybersecurity	Intranet link	ICT	April 2024
Policy – Risk Management	Intranet link	Governance and Legal	August 2022
Strategy – Risk Management	Intranet link	Governance and Legal	2020
Register – CAMs Risk Software	Software	Governance and Legal	Individual risks to be reviewed in accordance with the Risk Management Strategy
Policy – Secondary Employment	Intranet link	HR	February 2023

Document	Link	Custodian	Last review date
Policy – Work Health and Safety	Recorded in the City's Document Management System	HR	April 2024
Policy – Pre-Employment Medical	**Intranet link**	HR	May 2023
Policy – Complaints (Council Policy)	**Internet link**	Governance and Legal	Currently in review
Policy – ICT Acceptable Use	Recorded in the City's Document Management System	HR, ICT	Currently in review
Register – Delegation of Authority	**Internet link**	Governance and Legal, HR	2023
Record keeping Plan	Recorded in the City's Document Management System	Information Management	2021 Due for review December 2024
Integrity risk management	Risk registers: Camms.Risk	Governance and Legal	Ongoing
	Risk Management Policy: **Intranet link**	Governance and Legal	2022
	Risk Management Strategy: **Intranet link**	Governance and Legal	2022
Policy – Social Media – Personal Use	**Intranet link**	Human Resources	2023
Policy – Digital Communications and Social Media	**Intranet link**	Marketing and Communications	2024

2.6.2. Internal Audit and Risk Committee

The Audit and Risk Committee supports the overall risk management process by:

a) Ensuring the City has appropriate risk management and internal controls in place;

b) Approving and reviewing risk management programmes and risk treatment options for extreme risks;

c) Setting and reviewing risk management tolerances/ appetite and making recommendations to Council;

d) Providing guidance and governance to support significant and/or high-profile elements of the risk management spectrum;

e) Monitoring strategic risk management and the adequacy of internal controls established to manage the identified risks;

f) Monitoring the City's internal control environment and reviewing the adequacy of policies, practices and procedures;

g) Assessing the adequacy of risk reporting;

h) Monitoring the internal risk audit function, including development of audit programs as well as monitoring of audit outcomes and the implementation of recommendations;

i) Setting the annual internal audit plan in conjunction with the internal auditor taking into account the City Strategic and Operational Risk Registers;

j) Conduct a bi-annual review of the organisation's Risk Management Policy and Strategy; and

k) k) Reporting through the Chief Executive Officer to the Council on its findings.

2.7. Internal fraud and corruption controls

Code of Conduct for Council Members and Employees

The Code of Conduct promotes the City's organisational values and provides expected standards of behaviour as required by regulations made under the *Local Government Act 1995* (WA) ("LG Act").

The Codes have been formulated on the basis that they express standards of conduct which are appropriate to the roles and functions that Council Members and

Employees have and perform. The Code of Conduct is available on the City's website and the internal intranet, with staff also being required to read and acknowledge it during their onboarding. This is also re-visited at varying periods throughout each employee's employment.

Governance Framework

The City's Governance Framework provides the principles and mechanisms within which the City is able to practice good governance in the provision of its services and facilities. This is enabled through a large suite of processes, systems, roles and corporate relationships by which the City is directed and controlled and by which decisions are made.

Freedom of Information

The *Freedom of Information Act 1992* (WA) gives the public the right to apply for access to documents held by the City.

A public Information Statement provides details about the demographics, government structure, administration and statutory responsibilities of the City, and is updated annually.

Registers

The City is required by the LG Act to maintain certain registers that are designed to encourage transparency in its operations. These registers include the:

- Electoral Gift Register
- Gift Register
- Travel Contributions Register
- Elected Member Complaints Register
- Interest Declaration Register
- Primary and Annual Returns
- Elected Member Fees, Allowances and Expenses

Public Interest Disclosures

The *Public Interest Disclosures Act 2003* (WA) ("PID Act") facilitates the disclosure of public interest information and provides protection for those making such disclosures and those who are the subject of disclosures. The City supports and complies with the aims and objectives of the PID Act and has zero tolerance towards improper or corrupt conduct.

All public authorities are required to have a Public Interest Disclosures (PID) officer to receive disclosures of public interest information. The City's PID officers are the Manager Governance and Legal, Manager Human Resources, Manager Essential Services and Director, City Life.

Authorisations

Legislation applicable to various City duties may assign certain powers to "Authorised Officers" or "Authorised Persons". The CEO authorises certain officers to complete specific duties by way of an authorisation certificate and identity card, with authorisations ceasing upon termination of employment.

Delegations

Council, by absolute majority, may delegate the action of some of its functions and powers to the CEO in accordance with provisions of the LG Act. The LG Act also permits the CEO to delegate or sub-delegate some of those powers to another employee. Delegations may be made subject to conditions and limitations, as specified by the person delegating.

A written record is required to be kept when a delegation is exercised by the CEO or an employee, with a register of delegations published on the City's website. Under the LG Act, delegations are to be reviewed by the delegator at least once every financial year.

Regulation 17 Review

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

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

Compliance Audit Return

The City is required to complete an internal compliance audit each calendar year in addition to external audits, in accordance with the *Local Government (Audit) Regulations 1996*. The Compliance Audit Return is a statutory report used to evaluate the City's compliance with targeted sections of the LG Act.

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

3. City's integrity model and culture

This part of the integrity framework outlines how the City shapes and manages its culture to support and enhance integrity as a culture built on integrity, as well as being proactively managed, is more resistant to misconduct and corruption.

3.1. Values and standards

Maintaining integrity is paramount for the City. Key components of this integrity framework, which outline expected professional behaviour within the workplace, are the City's staff values and Code of Conduct/s. These values are outlined in the City's intranet and website, advertisements of new roles, each role's Position Description (PD) and are displayed prominently throughout the City on noticeboards and other documentation.

3.1.1. Staff Values

For each staff value there are behaviours that are expected of employees to be able to achieve these standards. These staff values are outlined below:

• Courage to Act

• Make it fun

• Community First

• Trust and be trusted

3.1.2. Standards of Behaviour / Code of Conduct

The City's Code of Conduct forms a critical basis for the integrity of City operations and administration, outlining the standards of behaviour for all employees. Having these standards for all employees (and Elected Members with their own specific Code), involves detailing specifically what is expected when representing the interests of the Kwinana Community. Employees have a responsibility not to engage in misconduct or to act corruptly or fraudulently, to actively prevent or detect these activities and to immediately report them. Any

allegation of misconduct will be investigated in line with the City's Disciplinary Action policy which outlines steps that are followed when investigating misconduct, serious or otherwise.

To observe the Code of Conduct for City employees on the City's website, please follow this link.

3.2. Attitudes and organisational culture

At the City, our leadership team is unwavering in its dedication to integrity. They lead by example, emphasizing ethical behaviour, professional accountability and proactively promote integrity through:

• Promoting the values of the City.

• Promote reporting potential conduct that jeopardises the City's integrity (i.e. misconduct, poor behaviour, fraud etc.) and identifying the appropriate channels to raise concerns.

• Outlining clear expectations of behaviour and performance and address issues as they arise through known management tools (performance management etc.), whilst not shying away from difficult discussions regarding performance and integrity.

• Whilst trusting their teams to make the right decisions, also monitoring performance and addressing concerns consistently.

• Identifying areas where conflicts of interest, actual or perceived, may occur and discussing and actioning in leadership meetings as required.

The intention is that through positive reinforcement of leadership attitudes and clearly outlining performance and behaviour expectations, normalisation of highly ethical performance will become the City's cultural norm.

There are regular activities in the City throughout the year that develop and maintain a culture built on integrity including:

- **Leaders attending Leadership Programmes** – this is where behaviours based on the City's values are reinforced and where skills based on influencing, effective communication, performance management, negotiation, emotional intelligence and conflict resolution are taught to further their leadership abilities. This in turn contributes to a culture of integrity, trust, and ethical behaviour, benefiting both individuals and the organisation as a whole;

- **Code of Conduct training** – Code of Conduct training is a fundamental element of an organisation's efforts to ensure ethical behaviour, compliance with laws, and a respectful workplace culture. By setting clear expectations, preventing misconduct, and promoting an ethical culture, it supports the organisation's long-term success and reputation.

- **Performance of regular audits** – the conducts regular audits throughout each year as part of legislative compliance and to ensure the City's various processes are above board and compliant.

- **Resources for training** – training can occur across various teams both to increase efficiency and capacity as well as ensuring compliance with standards. When situations dictate new training is required, resources can be provided to ensure staff are up to speed on the latest best practice and legislative developments.

- **Reviewing processes, policies and procedures** – the City regularly reviews internal processes to ensure compliance and integrity at various times due to, legislative changes, periodic review, and as and when required.

- **Regular staff and community surveys** – these surveys provide insights into the organisational culture, employee engagement and satisfaction. By giving employees, a voice and acting on their feedback, the City fosters a positive work environment. Additionally, surveys help predict behaviour and drive positive changes, ensuring alignment with the City's values and mission statement.

In addition to activities that increase integrity in the City, the City has dedicated pathways for the community, employees and all stakeholders that wish to raise a complaint through the **general enquiry or feedback form** on the City's website. For employees, grievances or genuine reports of misconduct are also consistently encouraged through escalation of issues to the appropriate line manager or can also be discussed through the Employee Assistance Program (EAP). The City also has protections in place for employees that wish to speak up (if inappropriate actions are observed) in accordance with the *Public Interest Disclosure Act 2003* – the City's Public Interest Disclosure (PID) Officers can also be approached at any time to discuss concerns.

4. Learning and developing integrity

4.1. Integrity education and increasing awareness

The City has robust processes in place to assist employees in the personal development of their own integrity right from the outset of their employment that continues through the rest of their time with the City. This serves to increase the culture of integrity within the City as education and communication of standards and expectations are regularly communicated which reinforces understanding in employees.

Integrity expectations, training, guidance and advice is supplied through:

- All new employees being provided with the City's Code of Conduct and being required to confirm they have read and understand the behavioural and performance expectations contained therein.

- Introduce new policies as required and provide all employees, elected members, and stakeholders with clear up-to-date information about the City's policies, protocols and administrative procedures relevant to maintaining high standards of public integrity.

- Implement risk and fraud controls, including conflict of interest and gift and benefit procedures and registers.

- Advertisement of the City's PID Officers and making them accessible for all employees and stakeholders to contact.

- Regular discussions in team meetings regarding honesty and integrity, including mitigating conflicts of interest and identifying fraudulent behaviour.

- Investigate occurrences where dishonesty, fraud and corruption may occur, including where employee behaviour may not align with the City's values.

5. Being Accountable for Integrity

As a public organisation whose core business is to provide services to the Kwinana community, it is essential that the City remains honest and upholds its values. As such, it is of the utmost importance that the City does not tolerate corruption, dishonest behaviour or other improper conduct from its employees, elected members, volunteers, contractors and other stakeholder and carefully considers all allegations of this behaviour and investigates allegations as required. Similarly, the City actively supports disclosures of improper conduct made by its employees, elected members and community members on behaviours that have been witnessed or where instances may not yet have occurred.

5.1. Responses to integrity breaches

In accordance with the *Public Interest Disclosure Act 2003* (WA), the City will take all reasonable steps to ensure that protection and confidentiality is provided to all employees, elected members, volunteers and other stakeholders after making a disclosure of improper conduct. The City will reasonably ensure that each person making the disclosure will not suffer any detrimental impact or is victimised for making any disclosure.

In addition, each allegation of misconduct or improper behaviour will be considered alongside the City's *Employee Code of Conduct* and *Elected Members, Committee Members and Candidates Code of Conduct*, which outline the principles of expected behaviour and are further discussed previously in this framework. Each allegation will be recorded appropriately and dealt with in accordance with the City's relevant policies and procedures which may include the policies 'Disciplinary Action', 'Employee Performance Management', 'Grievance Management' and 'Workplace Behaviour – Harassment, Discrimination and Bullying'.

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 appropriate, internal systems and processes are also improved after disclosures made or disciplinary action has occurred to demonstrate lessons have been learned and improvements have been made to further mitigate further instances of similar conduct occurring.

5.2 Self- assessment and review

The City commits to reviewing this framework on a bi-annual basis and ensure it is updated as required. The CEO will be responsible for the review and both the Executive team and Senior Management team will have input.

A number of factors will be taken into consideration when the review occurs which includes:

- Past disclosures and substantiated allegations.
- Results of audits of the City's internal processes and systems.
- Collation of data and evidence, taking into account the frequencies of disclosures, complaints and allegations.
- As required, the formulation of Action Plans to address key issues that may arise.

Processes and systems are regularly reviewed and monitored to ensure they are meeting the needs and requirements of all stakeholders needs.