



Australian Government

Department of the Prime Minister and Cabinet

Louder Than Words: An APS Integrity Action Plan

APS Integrity Taskforce



The opportunity and why it matters

The integrity of the public service is one of the key drivers of public trust in government institutions. Recent lessons in public administration offer us a crucial opportunity for reflection, learning and action on integrity across the Australian Public Service (APS). We should grab it with both hands.

The APS delivers vital community services and shapes policies that affect the lives of millions of people. We need Australians to trust that we will use the power of our role and the resources of the state in the public interest. The vast majority of Australian public servants honour this expectation with professionalism and commitment. If failures in public administration do occur, we need to be willing to learn from these mistakes. Otherwise we risk eroding trust, which can undermine the APS as an effective democratic institution.

Integrity is a broad concept. At its heart it is concerned with individual and institutional trustworthiness, and demands high standards of ethical behaviour and respect for the law. The Australian Public Service Commission (APSC) defines integrity as “doing the right thing at the right time” to “deliver the best outcomes for Australia sought by the government of the day”. In practice it means our behaviour matches the APS Values and we are accountable when it does not. At the systems level, integrity also refers to being ‘whole and undivided’, which means the APS needs to adopt a more strategic and coordinated approach to integrity across the service.

The Taskforce’s purpose and approach

The APS Integrity Taskforce (the Taskforce) was established by Secretaries Board to take a ‘bird’s-eye’ view of the APS integrity landscape, identify gaps and look for opportunities to learn from and build upon the important work already underway across the service. Secretaries Board agreed the Taskforce would examine three action areas:

CULTURE

with a focus on ethical leadership and rewarding the behaviours needed to serve the Australian community.

SYSTEMS

with a focus on making it easier for our people to do the right thing.

ACCOUNTABILITY

with a focus on improving knowledge-sharing, strategic cooperation and coordinated approaches to implementing integrity standards.

The three action areas are interdependent, and all are necessary to be a public service with integrity at its heart. While the Taskforce has made recommendations on all three areas, there is a particular emphasis on the unique role of APS leadership as cultural architects for integrity. Our capability uplift recommendations therefore largely focus on SES. Integrity requires action at all levels, but without the right tone and demonstration from the top there will be no lasting impact. We have largely limited our focus to the APS, with some additional recommendations to ensure that the third parties we deal with uphold our integrity standards, and to support ministers' offices where relevant.

The APS has strong conduct and financial probity frameworks which need to be understood and enforced. Compliance processes are important, and leaders need to adopt a positive attitude to internal assurance and external oversight. But this alone is not enough. Being overly focused on formal processes and rules risks overlooking the informal leadership-based efforts and communication that have an important impact on the ethical culture of organisations.

Integrity requires action at all levels, but without the right tone and demonstration from the top there will be no lasting impact.

Where cultures are based on fear and silence, integrity cannot thrive. If the APS is serious about preventing problems, leaders need to provide the psychological safety necessary for staff to raise issues, ask questions, and point out when lines are crossed without risk of negative consequences. This means giving leaders the skills, behaviours and communication tools to build respect and trust. Fostering psychological safety also has a range of other important benefits including promoting mental well-being, curiosity and innovation. The follow-up and the quality of management's response to staff concerns is crucial. We need to support leaders to respond effectively, with curiosity, with empathy and without defensiveness. Two key reasons that staff do not speak up are the fear of retaliation and the perception that speaking up is futile. Integrity conversations need to become a part of the everyday conversations and work of our teams.

Leaders need to create an environment that empowers staff to perform their roles as impartial advisers in the public interest. The relationship of trust with ministers and their advisers is crucial. Ministers want, and generally appreciate, candid advice that is evidence-based and solutions-focused. We have recommended bolstering work to assist ministers' offices to better understand the different and complementary role played by the public service. Equally, our staff need to feel supported by the senior executive in providing frank and fearless advice to the government of the day.

A significant theme for the Taskforce has been the importance of public servants understanding, applying and balancing their unique role serving the Government, the Parliament and the Australian people. Role clarity, combined with ethical decision making, tempers the mindset of delivery 'at all costs' and the integrity risks it entails. Uniform induction addressing the fundamentals of being a public servant is available but needs to be more consistently implemented with a stronger focus on integrity and dealing with ambiguity. We also need leaders to give more than lip service to the importance of this obligation.

A pro-integrity culture can only exist where we have clear systems and accountability that support the behaviour we want to see. We need to ensure our people have the support to do the right thing at the right time. Government lawyers already play an important role in ensuring the public service can implement the Government's policies lawfully. But the law was never intended to be the maximum standard of behaviour required. Legality is the minimum standard expected of public servants. More work is needed to make sure APS staff not only uphold their obligations but are empowered to model the highest ethical standards of behaviour.

The pro-integrity culture we are building in the APS needs to be mirrored in the external partnerships we have with consultants, contractors and service providers. The government is committed to reducing APS reliance on consultants through building public service capability, but the need for external expertise and surge workforces will remain. External labour undertaking work on behalf and in support of government should be held to the same values as public servants. Strengthening the integrity of our relationships with external providers will also require development of specialist skills for APS staff in procurement and contracting roles. Our people need skills to effectively manage contracts so the APS gets the product it wants and value for money from its partners. Greater visibility across the APS of who we contract with and their past performance will increase transparency and help manage potential conflicts of interest.

We need to support leaders to respond effectively, with curiosity, with empathy and without defensiveness.

There are a number of different Commonwealth integrity and oversight bodies which would benefit from thinking and acting more like a system. To enable strategic discussions on risk and learning, actions need to be coordinated and integrity roles and responsibilities clarified across the Service. All the players need to be connected and work together to better support a pro integrity culture. There is cross-sectoral knowledge, insight and experience within integrity policy and oversight agencies. This knowledge could forge a greater strategic approach to integrity and system-wide learning across the APS.

The Taskforce is not recommending the APS reinvent the wheel. There is a wealth of good integrity practice to draw from within agencies. We have identified good practices in embedding institutional integrity within individual agencies and looked for opportunities to scale those examples (and share them) across the service. There are varying levels of integrity maturity across Commonwealth agencies. More guidance and support is needed to implement the array of integrity obligations that apply across the Commonwealth public sector. The Taskforce has developed an Integrity Good Practice Guide to inform more unified approaches and promote information-sharing between agencies.

The policy landscape

The Taskforce has worked in partnership with agencies engaged in a high tempo of reform activity. This includes integrity as the first pillar of the Government's ambitious APS reform agenda and the establishment of the National Anti-Corruption Commission on 1 July 2023. We have sought to avoid duplication and used our recommendations to identify gaps or strengthen and uplift existing work or good practices.

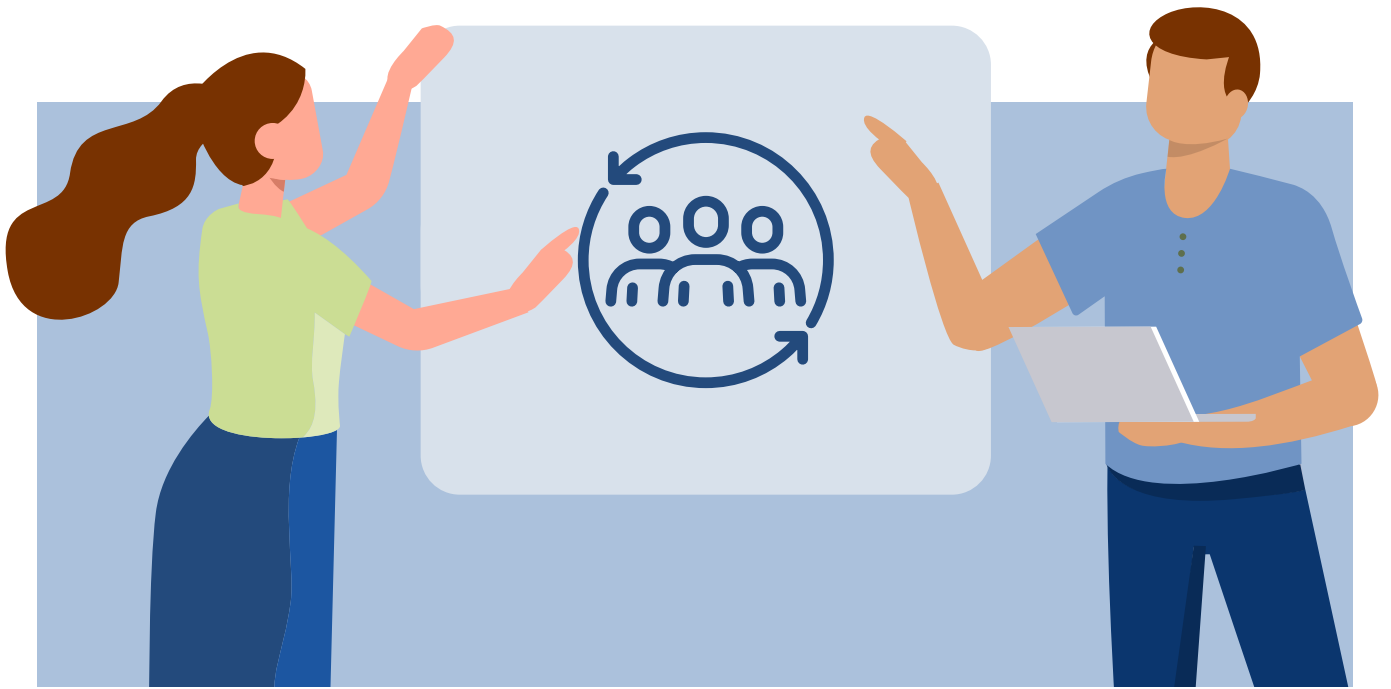
Current reforms to provide greater protections to whistle-blowers are complemented by the Taskforce's emphasis on building a culture of psychological safety in the workplace.

There is reform underway to improve regulation and procurement in the wake of confidentiality breaches by PwC and a taskforce is currently formulating advice for the government's response to the Robodebt Royal Commission. In addition, inquiries are currently being undertaken by the Parliamentary Joint Committee on Corporations and Financial Services and the Senate Finance and Public Administration References Committee.

We have collaborated with stakeholders throughout the process but the landscape continues to evolve. This is a good thing. It means some of our recommendations may have already been adopted by the time this Action Plan is presented to Secretaries Board. It could also mean that recommendations have been overtaken by ongoing events, including Cabinet decisions or parliamentary inquiries. In these cases we ask Secretaries to consider the intent of our recommendations.

Implementation

The Taskforce's assessment is that there are a number of larger recommended actions that cannot be absorbed by the responsible agencies and would only be taken forward if adequately resourced.



CULTURE

Recommendation 1

Appoint the right leaders. Recruit people whose behaviour is consistent with the APS Values.

Recommendation 2

Incentivise good leadership. Appraise performance of Secretaries and SES based on delivery of results and leadership behaviours.

Recommendation 3

Recognise and reward people who lead with integrity.

Recommendation 4

Bolster the capability of the APS to lead with integrity. Focus on ethical decision making and fostering psychological safety.

Recommendation 5

Promote role clarity for the APS. Induct new SES into the cultural stewardship and legal responsibilities of their role.

SYSTEMS

Recommendation 6

Make confidential ethics and integrity advice available to APS staff, SES and agency heads.

Recommendation 7

Provide clarity, confidence and capability uplift for public servants working with ministerial offices.

Recommendation 8

Reinforce a culture of legality across the APS. Strengthen the independence of government lawyers.

Recommendation 9

Reinforce the importance of good record keeping for integrity and support its practice across the APS.

Recommendation 10

Bolster the specialist skills of procurement and contract management officers, and lift the contracting skills of all APS staff.

ACCOUNTABILITY

Recommendation 11

Build a strategic approach to integrity. Integrate the knowledge of oversight agencies to identify risks, create solutions and provide a unified message on integrity across the APS.

Recommendation 12

Upscale institutional integrity (culture and compliance) within agencies.

Recommendation 13

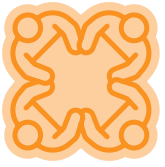
Strengthen the integrity of supplier conduct. Increase visibility across the Commonwealth of supplier engagement and performance.

Recommendation 14

Address risks associated with the 'revolving door' and other conflicts of interest.

Recommendation 15

Measure and report on integrity data across the APS to track progress and identify opportunities for improvement. Build APS skills in collecting and interpreting integrity data.



Culture

Recommendation 1

Appoint the right leaders. Recruit people whose behaviour is consistent with the APS Values.

Leaders set the cultural tone for their organisation through their behaviour. The APS needs to select leaders who 'walk the talk' on ethical values and respectful relationships. Appointing leaders who achieve results through enabling others is crucial to building a high-performing service. Greater visibility of upwards feedback will bring attention to people who lead with integrity, as well as indicating where behavioural 'red flags' may exist.

Actions

1. Agencies to thoroughly investigate SES candidates through recruitment checks and questions that demonstrate self-reflection, commitment to inclusive culture-building, and sustainable delivery.
2. Applicants have the opportunity to provide, through the recruitment panel chair or APS Commissioner's representative, access to past performance appraisals and '360 degree' reports (where they exist) to provide more information for selection decisions. The recruitment panel also to extend the opportunity for external applicants to provide equivalent appraisals.
3. The APSC (in collaboration with agencies) to develop guidance to support the actions above.

Recommendation 2

Incentivise good leadership. Appraise performance of Secretaries and SES based on delivery of results and leadership behaviours.

Integrity problems and poor ethical behaviour can arise if a culture is overly focused on results at any cost. For public servants, how we perform our role is as important as what we deliver in the job. By measuring the performance of both a leader's results and their enabling behaviours, we demonstrate the value and necessity of both.

Actions

1. Agencies to implement, as a priority, the new SES Performance Leadership Framework which gives equal weighting to values-based leadership behaviours and the delivery of results.
2. The Department of the Prime Minister and Cabinet (PM&C), in consultation with the APSC, to implement a similarly-principled appraisal framework for Secretaries (through amendment of the *Public Service Act 1999*) and agency heads.
3. PM&C and the APSC to make both performance frameworks publicly available.
4. SES and Secretaries to be held accountable for creating the right environment for integrity through their performance discussions (for example, by discussing steps taken to build psychological safety in their departments and agencies in line with the Secretaries' Charter of Leadership Behaviours).

Recommendation 3

Recognise and reward people who lead with integrity.

What we recognise and reward sends a strong signal about what we value and creates incentives for the behaviour we want to see.

Actions

1. The Public Service Medal Committee to encourage nominations that recognise delivery of results through exemplary values-based leadership and culture-building.
2. Secretaries to review agency-level reward and recognition processes to ensure they include leading and acting with integrity.
3. Agencies to encourage managers at all levels to acknowledge and reward people who deliver results while upholding the APS Values to the highest standard.
4. APSC to include a question in the annual agency survey on whether and how integrity is recognised.

Recommendation 4

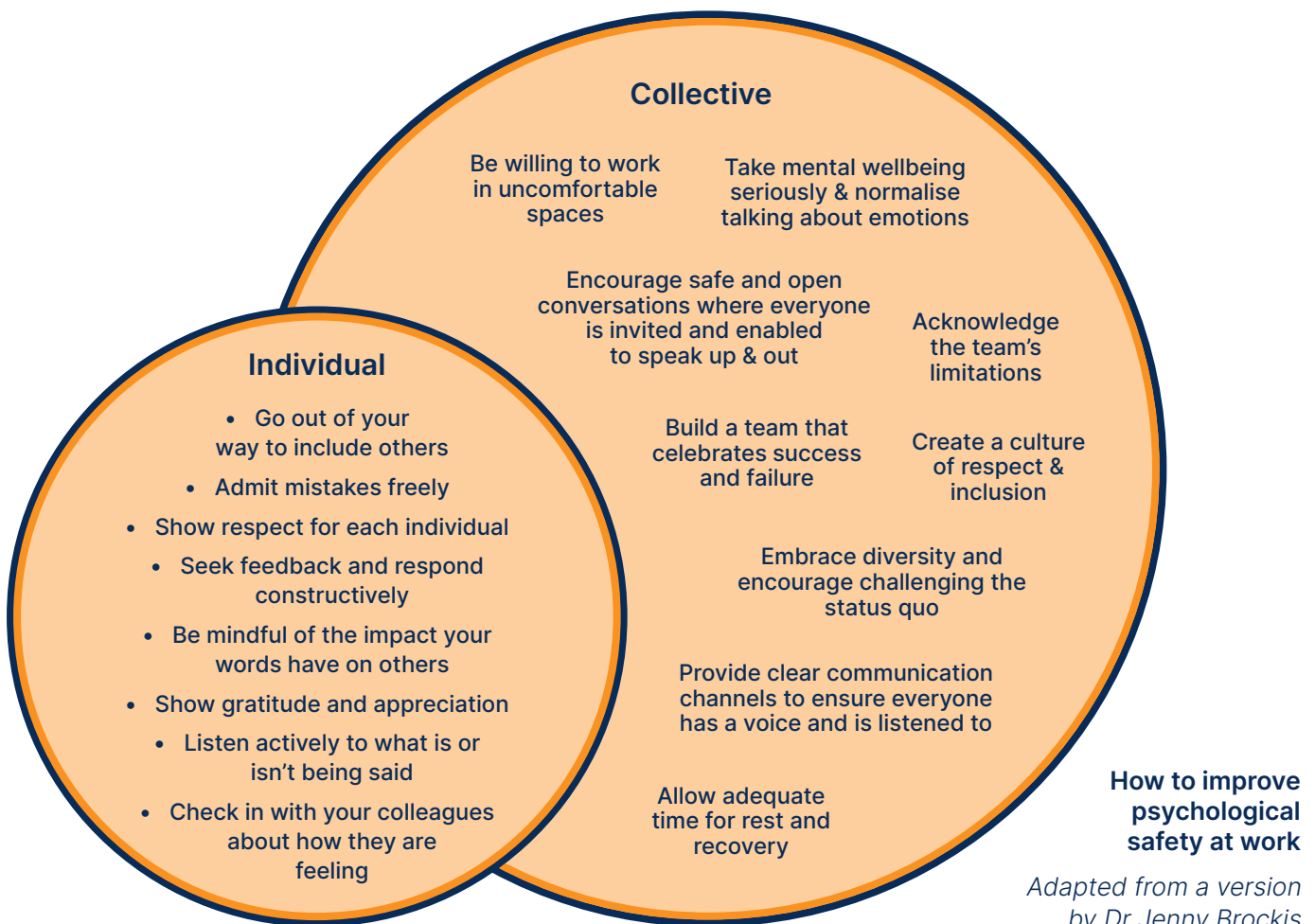
Bolster the capability of the APS to lead with integrity. Focus on ethical decision making and fostering psychological safety.

Leading with integrity means more than complying with rules. Behaving ethically is a key APS-Value. We must ensure our leaders have the skills to exercise and model ethical judgement. In addition, fostering psychological safety so that staff can speak up and raise concerns early can prevent integrity problems, increase wellbeing at work and make the APS an employer of choice. Understanding our roles as public servants enables us to engage in difficult and uncomfortable — but fundamentally important — conversations.

The APS Academy's Craft offerings include an excellent integrity product — the SES Integrity Masterclass. All staff, starting with SES, should be trained in practitioner-led sessions to recognise the ethical dimensions of workplace situations and use immersive hypothetical scenarios to practice ethical decision making.

Actions

1. Secretaries to support all SES (particularly those newly promoted) to undertake the APS Academy's SES Integrity Masterclass to increase their understanding of:
 - the expectations and accountabilities of leading in the APS
 - how to exercise integrity and ethical decision making in all aspects of their work.
2. The APS Academy to explore uplifting its current offerings (starting with SES) on ethical decision making and practical approaches to building psychological safety in the workplace.
 - The Academy to continue partnering with expert providers, using the latest research, neuroscience-based learning approaches and behavioural ethics.
3. The APSC to scope establishing a continuing professional development model for the APS. This would mandate core capabilities in integrity and legal frameworks for all public servants.



4. The Secretaries Future of Work Committee to:
 - develop a whole-of-service approach to building psychological safety in practice
 - identify and develop indicators for measuring what success looks like.
5. Departments and agencies to promote simple tools for ethical decision making for staff at all levels, such as the APSC 'ReFLECT' model and the 'reflective practice' model in the three-minute 'Ethical Decision Making' video from The Ethics Centre.
6. Secretaries and agency heads to invest in their own leadership development and publicise this to their teams.

Recommendation 5

Promote role clarity for the APS. Induct new SES into the cultural stewardship and legal responsibilities of their role.

Significant work is underway to provide clarity for public servants on the unique nature of their role. In legislation currently before parliament, the *Public Service Act 1999* will be amended to add a new APS Value of stewardship and a requirement for an APS purpose statement. One gap that could be addressed is for new SES to better understand their cultural responsibilities and broader obligations. A more intentional and consistent approach to SES induction could build a greater sense of belonging and recognition of the privilege of the role.

Actions

1. Agencies to send new SES a letter of welcome which outlines their responsibilities as stewards of the APS, the significance of modelling the APS Values, and their obligations as members of the SES.
2. The APSC to host a mandatory welcome session for new SES, complementing the existing SES Orientation program and marking the significance of the promotion to SES. Established senior leaders could reflect on the role and responsibilities of the SES and the importance of leadership 'shadow' in building a pro-integrity culture.



Systems

Recommendation 6

Make confidential ethics and integrity advice available to APS staff, SES and agency heads.

APS staff at all levels can benefit from confidential support to talk through an integrity issue causing them concern. SES must navigate additional levels of complexity and ambiguity which at times can be isolating. Whilst some agencies have internal ethics and integrity advice available to their staff, others do not. Formal and informal support can be strengthened. Ideally, advice should come from people with a deep knowledge of the APS and governmental system, and training in integrity standards and advice. Integrity and ethics advice is also relevant to parliamentarians and their staff and may be provided by the Parliamentary Workplace Support Service.

Actions

1. The APSC to bolster and promote its ethics advisory services:
 - Ensure the APSC Ethics Advisory Service is adequately resourced and trained to provide confidential ethics and integrity advice to APS staff and entities under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).
 - Create a bespoke service within APSC that is trained and resourced at a senior level to provide confidential ethics and integrity advice to SES staff and agency heads.
 - Promote these services and monitor and evaluate their uptake.
2. Deputy Secretaries or equivalent level to access informal peer support through the Ethics and Integrity Champions network (recommendation 12).

Recommendation 7

Provide clarity, confidence and capability uplift for public servants working with ministerial offices.

A trusted partnership between the APS, ministers and ministerial offices is vital for effective policy and service delivery. Public servants, ministers and their staff need a clear understanding of their different and complementary roles. APS officers need to have effective communication skills to deliver solutions and evidence-based advice to ministers, and feel that the SES ‘has their back’ in the delivery of impartial (and from time to time unwelcome) news to government. Ministers and their offices need to be supported to get the most from the public service.

Actions

1. The APSC to promote key education products such as the APS Academy’s Strengthening Partnerships program to all SES and APS staff, especially Departmental Liaison Officers.
2. The APSC to develop a statement of practice which contains key expectations of the relationship between ministers’ offices and the APS. This will be circulated to APS staff working in ministers’ offices and raised with Chiefs of Staff on a regular basis.
3. The APS Academy to include the Strengthening Partnerships program in the SES induction.
4. The APS Academy to uplift the Strengthening Partnerships program for ministers and their offices on their respective roles, responsibilities and relevant legal and integrity frameworks (following the pilot in 2023).
5. Agencies to give APS staff in ministers’ offices a clear understanding of, and access to, support services available to them in the Parliamentary Workplace Support Service. Regular check-in conversations with SES can assist to surface any role clarity or integrity concerns before they become bigger issues.

Recommendation 8

Reinforce a culture of legality across the APS. Strengthen the independence of government lawyers.

A culture of legality underpins the maintenance of trust in public administration and sound governance. This is not negotiable. It includes the proper handling of public resources by the APS, and the APS role in assisting the government of the day to implement its policies lawfully. Government lawyers need appropriate support when faced with ethical issues, including escalation structures when advice is not being heeded. Clear roles and responsibilities are essential to ensuring government lawyers are able to provide independent advice.

Actions

1. Ensure timely escalation of legal risk within all APS agencies.
 - All heads of legal to have direct access to their accountable authority for escalation of legal risk.
 - Accountable authorities to make clear their expectation that significant legal risks will be brought to their attention, particularly as to the lawfulness of the activities of the agency.
2. Provide role clarity for government lawyers, to promote the independent discharge of their professional duties.
 - Each agency to ensure it has identified a head of legal who has ultimate professional responsibility (internal and external) for the legal services provided by the agency's in-house lawyers and who serves as the internal escalation point for any legal issues.
 - AGD to reinforce the fundamental professional duties of government lawyers, particularly the duty to avoid any compromise to their integrity and professional independence, through the whole of service guidance on the role and responsibilities of lawyers.
3. AGD to develop guidance for government lawyers on how to provide clear and consistent advice on the lawfulness of policy proposals, administration of public resources and executive action.
4. Leaders to reinforce to their staff the centrality of lawfulness to all the public service does.
5. AGD and APSC to consider expanding education resources for non-lawyers about the role of legal advice in policy development.

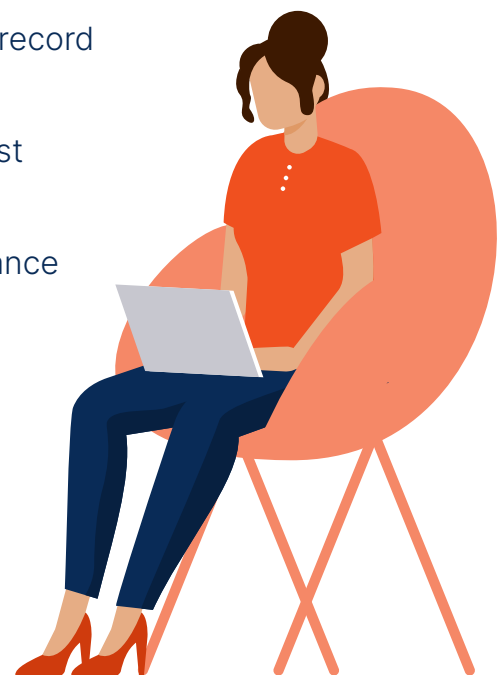
Recommendation 9

Reinforce the importance of good record keeping for integrity and support its practice across the APS.

Recordkeeping is essential for demonstrating accountability in APS decision making. It is also a basic legal requirement of being a public servant. Recordkeeping enhances transparency and ensures we are accountable for how we deal with public resources. We should increase APS understanding of why recordkeeping is essential to integrity, as well as addressing potential disincentives to recordkeeping in the Commonwealth's freedom of information laws. We should also showcase useful existing resources such as the APS Academy's Records Management course, which includes a list of questions to help officers decide if a record needs to be made.

Actions

1. After the conclusion of the Senate inquiry into the Commonwealth's freedom of information laws, AGD to consider if the *Freedom of Information Act 1982* is contemporary, fit-for-purpose and meets its original intention.
2. The APSC to implement a coordinated, APS-wide communications strategy (in consultation with the Office of the Australian Information Commissioner (OAIC) and National Archives of Australia (NAA)) that:
 - highlights the connection between integrity and record keeping, in line with the latest NAA guidance
 - articulates support from senior leadership for best practice in record keeping
 - promotes existing training and resources to enhance capability and culture around record keeping, including for ministers' offices.
3. Agencies to assess if their records management teams are sufficiently skilled and resourced.



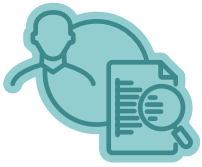
Recommendation 10

Bolster the specialist skills of procurement and contract management officers, and lift the contracting skills of all APS staff.

Procurement processes, poor contract management and contract variations present a significant financial and reputational risk to the Commonwealth. Efforts have been made to improve procurement processes in recent years. These efforts need to be continued and expanded to contract management skills and processes – which are a vital, but often overlooked, element of the procurement lifecycle. Without this capability uplift, there is a risk contracts will not represent value for money or deliver outcomes for the Australian community.

Actions

1. The Department of Finance, in consultation with the APSC, to continue the development of practitioner-level procurement and contract management training and explore opportunities to mandate procurement and contract management training for all APS officers. This will support existing efforts to develop a Procurement Profession.
2. The Department of Finance to update the existing Australian Government Contract Management Guide to ensure it includes guidance on:
 - establishing meaningful and enforceable milestones and deliverables for supplier performance
 - monitoring and enforcing supplier performance against contract commitments, including guidance on escalation points
 - seeking appropriate legal advice when developing contract requirements beyond the Commonwealth Contracting Suite and ClauseBank to ensure that the new requirements give effect to contract enforcement
 - ensuring contract variations and extensions achieve value for money and are approved at a level commensurate with the risk, scope and nature of the contract being extended.



Accountability

Recommendation 11

Build a strategic approach to integrity. Integrate the knowledge of oversight agencies to identify risks, create solutions and provide a unified message on integrity across the APS.

The Commonwealth uses a multi-agency approach to promote integrity, transparency and accountability and to prevent corruption, fraud and misconduct. In order to build an integrity system greater than the sum of its parts, a strategic approach to governance is required. There is a rich vein of untapped cross-sectoral knowledge, insight and experience within integrity policy and oversight agencies. Bringing together agency heads who know the integrity picture across the whole APS will enable discussions on risk and learning, ensure actions are coordinated and clarify integrity roles and responsibilities across the Service. This smaller senior strategic group could be supported by two groups with membership covering policy and operational integrity. The three governance levels should collaborate, coordinate effort and share information and knowledge. Civil society groups, such as the Open Government Forum, should also be involved in efforts to build a strategic approach to integrity.

Actions

1. Secretaries Board to establish a Strategic Integrity Advisory Group consisting of heads of those agencies with cross-sectoral oversight and integrity roles (the Commonwealth Auditor-General, Commonwealth Ombudsman and National Anti-Corruption Commissioner) co-chaired by the Secretary of AGD and the APS Commissioner. The Strategic Integrity Advisory Group will provide insights which could assist members to fulfil their respective integrity mandates including through reporting on strategic trends, championing an integrated approach to integrity and sharing insights domestically and internationally.
 - Invite the Strategic Integrity Advisory Group to make recommendations to the Secretaries Board on themes and issues for focus in the Commonwealth public sector.
 - Invite the Commonwealth Auditor-General, Commonwealth Ombudsman and National Anti-Corruption Commissioner to present at least once a year to Secretaries Board on cross-sectoral integrity themes.

2. APSC to refocus the Integrity Agencies Group chaired by the APS Commissioner to address operational and tactical issues and other priorities identified in the current review of its terms of reference.
3. AGD to continue the SES Integrity Forum it initially established for NACC preparation. The Forum brings together SES integrity policy makers and implementers across the public service and could share best practice, learn from integrity challenges and clarify integrity leadership roles and responsibilities. The Forum could provide a place to prioritise and coordinate effort on integrity initiatives across government and consider policy responses to issues identified by the Strategic Integrity Advisory Group and Integrity Agencies Group.
4. AGD, in partnership with the APSC, to develop an APS Integrity Strategy which articulates a clear narrative for the integrity activities and reforms underway across agencies, and identifies what agencies need to do to improve integrity across the service. This could include enhancements to coordination, information-sharing, evidence-gathering and reporting to strengthen integrity efforts and promote continuous improvement.

Towards a strategic Commonwealth Integrity System

APS Integrity Strategy

- Clear narrative for integrity activities and reforms underway across agencies
- Identifies enhancements to coordination, information-sharing, evidence-gathering and reporting to strengthen integrity efforts and promote continuous improvement
- AGD in partnership with APSC

Strategic Integrity Advisory Group

- APS Commissioner, AGD Secretary, Auditor-General, Ombudsman, NACC Commissioner
- Strategic trends, championing an integrated approach to integrity, sharing insights domestically and internationally
- Recommend to Secretaries Board themes and issues for focus

Integrity Agencies Group

- APS Commissioner Chair, Heads of 15 agencies with an integrity remit
- Address operational and tactical issues

SES Integrity Forum

- AGD Chair, SES integrity policy makers and implementers
- Coordinate effort on integrity, share best practice, learn from integrity challenges, clarify integrity leadership roles and responsibilities, consider policy responses to integrity issues identified by the Strategic Integrity Advisory Group and Integrity Agencies Group

Recommendation 12

Upscale institutional integrity (culture and compliance) within agencies.

Agencies need reassurance that their integrity frameworks are effective and that their fraud and corruption risks are mitigated. Integrity maturity self-assessments not only embed a culture of continuous improvement but also start an important cultural conversation about what integrity means to each agency and its staff. This work has already begun with almost two-thirds of departments and agencies having completed or planning to complete an integrity maturity self-assessment under the Commonwealth Integrity Maturity Framework.

Actions

1. Secretaries to upscale integrity maturity across the Commonwealth by:
 - undertaking an agency self-assessment against the Commonwealth Integrity Maturity Framework and reporting back to Secretaries Board by September 2024 on plans to upscale their agency's integrity maturity
 - supporting agency heads within their portfolios to do the same
 - circulating the Integrity Good Practice Guide
 - establishing Deputy Secretary-level Integrity Champions to act as stewards of a pro-integrity culture and foster informal integrity conversations.
2. AGD to scope mechanisms to provide tailored, expert integrity guidance to agencies seeking to improve their integrity frameworks and identify capability needs or to address integrity risks.



Recommendation 13

Strengthen the integrity of supplier conduct. Increase visibility across the Commonwealth of supplier engagement and performance.

Suppliers (including consultants, contractors and outsourced service providers) can be held accountable to the terms of their contract and are now subject to the jurisdiction of the NACC. However, suppliers are not APS employees and are therefore not held to the same standards and values as public servants. A Supplier Code of Conduct, under development, will assure the Australian public that entities undertaking work on behalf of the Commonwealth will be expected to uphold the same values and behaviours expected of public officials.

Across the APS, the decentralised nature of the Commonwealth procurement network provides a level of anonymity for poorly-performing contract service providers. Centralised knowledge sharing would enable delegates to make more informed decisions and reduce the risks of departments operating in a siloed manner.

Actions

1. The Department of Finance to continue the development of a Supplier Code of Conduct, covering consultants, contractors and outsourced service providers, which would be enforceable as a material breach of contract.
2. The Department of Finance, in collaboration with AGD, to scope establishing a centrally-held register of all supplier contracts to improve knowledge sharing on prior performance, including information on suppliers who have been removed from government contracts or for breaches to the Supplier Code of Conduct.



Recommendation 14

Address risks associated with the 'revolving door' and other conflicts of interest.

Career mobility between the public and private sector presents opportunities and risks. To maintain public confidence in the integrity of public officials, the 'revolving door' and the management of conflicts of interest across the APS needs to be strengthened. We need to enforce clear expectations of staff pursuing private sector opportunities in areas of related competency where a conflict could arise. Currently, only around half of Commonwealth agencies have a formal post-employment conflict of interest policy in place. We have also identified a gap in mechanisms to monitor compliance with conflict of interest policies. The APS would benefit from dedicated, ongoing education for staff at all levels about the rules, practice and significance of managing conflicts of interest.

Actions

1. Secretaries Board to task Chief Operating Officer (COO) Committee to review conflict of interest management frameworks of all agencies from a risk mitigation perspective with a view to recommending agencies share good practice and establish the following:
 - Clear conflict of interest management policies and processes, including conflicts of interest arising in the context of previous employment, secondary employment and post-separation employment (the 'revolving door').
 - Specific processes for declaring and managing the actual, potential or perceived conflicts of interest of agency heads and SES officials, particularly after they leave the APS.
 - Regular, scenario-based training and guidance for staff at all levels on how to identify, declare and, most importantly, manage and monitor conflicts of interest to uphold integrity.
 - Centrally-recorded conflict declarations and conflict management plans within agencies, with monitoring and assurance processes in place.

Recommendation 15

Measure and report on integrity data across the APS to track progress and identify opportunities for improvement. Build APS skills in collecting and interpreting integrity data.

We need to be able to measure the APS's integrity issues in order to address them, and to evaluate the efficacy of our responses. Integrity data collection and analysis should take place both at the agency level and APS-wide, showing 'hotspots' and areas of good practice. There is a variety of data available which can tell different stories about integrity across the APS, such as the annual Australian Institute of Criminology Fraud Census. The APSC's Integrity Metrics Resource is a useful reference and some agencies are already reviewing their data through an integrity lens. A common baseline for measuring and reporting on integrity is needed and should cover measuring data on compliance and culture (quantitative and qualitative sources). We also need to build up our databank to allow for evaluation over time.

Actions

1. Secretaries Board to seek advice on how to measure integrity in the APS from the Strategic Integrity Advisory Group, supported by the APSC. The project could:
 - identify best practice for measuring integrity both within agencies and across the APS
 - provide practical guidance to help agencies engage with and interpret the data
 - cover qualitative factors that contribute to integrity, such as psychological safety, as well as more clear-cut metrics such as adjudicated instances of fraud and corruption
 - align with the work on psychological safety indicators to be undertaken by the Future of Work Committee (recommendation 4)
 - deliver a plan for a coordinated APS approach to collection, analysis, ongoing monitoring and reporting to Secretaries Board of this data.