Integrity Good Practice Guide

APS Integrity Taskforce

Introduction

There is currently a high volume of activity across the Commonwealth to strengthen integrity systems and culture. This Integrity Good Practice Guide brings together a sample of good practices, to shine a light on innovative work underway and to encourage the sharing and uptake of scalable ideas across the APS. It presents initiatives that can be readily implemented across the integrity 'lifecycle' of an agency, from strategy through to implementation, monitoring and evaluation. The emphasis is on integrity culture rather than pure compliance with integrity obligations.

Integrity Strategy

Integrity Data

Integrated approach to integrity

Integrity Champions & Leadership

Integrity evaluation & oversight

Integrity Knowledge

Integrity rewards & recognition

Integrity reporting channels

Integrity conversations

Integrity & ethics advice

Implementing an Integrity Strategy

Developing an integrity strategy can start an important conversation about how to embed a pro-integrity culture within an organisation. It also helps meet compliance obligations. Ideally, integrity strategies bring together the different internal areas responsible for workforce, governance and accountability, and provide a pathway for agencies to uplift their internal integrity maturity by implementing clear, actionable steps.

It is important to delegate responsibility for implementation and oversight of the Strategy and determine a fixed time period for implementation (these vary from 2-5 years). For example, the Department of Finance's Integrity Framework was established by its Executive Board and overseen by the Deputy Secretary Business Enabling Services.

DITRDCA Integrity Strategy 2022-24

The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) Integrity Strategy seeks to **engage and empower** DITRDCA's people to:

- manage integrity risks
- role model behaviours of the highest integrity
- instill a culture of doing the right thing
- have difficult conversations about unethical behaviour when required

The Strategy contains an Integrity Framework which brings together DITRDCA's key areas of activity, including people, procurement, grants, federation funding agreements, governance and policy, and regulation. It is a living document, supported by an Action Plan with specific actions to uplift overall integrity maturity.

DITRDCA undertakes reviews to evaluate the effectiveness of its Integrity Framework, particularly in the event of significant change to the department's structure, priorities or risk profile. DITRDCA's approach to integrity, and integrity-related risks, is included in its Corporate Plan.

Integrity Champions & Leadership

Leaders in the APS are stewards of culture and should have the skills to foster an environment where integrity conversations are common. Peer learning and support can occur when leaders share ethical dilemmas and reflections on learning in a small group setting.

- Finance is developing leadership capability and accountability through a training module on 'ethics and Integrity' for SES leaders. In order to underscore that behaving with integrity is a responsibility of staff at all levels, Finance added 'Acting with Integrity' to its leadership expectations (which apply to all staff).

- The Department of Foreign Affairs and Trade (DFAT) customised the APS Academy's SES Integrity Masterclass for the overseas context and has embedded it in pre-posting training for outgoing Ambassadors, Heads of Mission and SES staff.

- DITRDCA has developed conversation starters to help senior executives and governance committees consider integrity issues, including an Integrity checklist and instructional videos. DITRDCA has appointed a Deputy Secretary-level Integrity and Risk Champion to promote an ongoing positive integrity and risk culture, raise awareness of integrity and drive implementation of DITRDCA's Integrity Strategy.

APS Academy SES Integrity Masterclass

The APS Academy SES Integrity Masterclass Series is a 3-part series designed to support SES staff to strengthen integrity culture within their organisation.

SES Integrity Masterclass Series
Key Takeaways

Australian Government

AUSTRALIAN PUBLIC SERVICE ACADEMY

This placemat outlines key concepts from the SES Integrity Masterclass Series on championing and strengthening a workplace culture of integrity, and building integrity capability. Participants are encouraged to discuss course learnings with team members and colleagues and to guide how learnings might be applied in the workplace. Remember, integrity is something we do, not just something we have. To practise integrity well, simply knowing the 'rules' is not sufficient – all employees, at all levels, play an important role in fostering a culture where integrity conversations are mainstream.

For more information visit the Australian Public Service Commission's Integrity webpage or the APS Academy's website.

Championing an integrity culture

- A pro-integrity culture in the Australian Public Service is essential to enhancing trust, producing better decision making and exemplifying high professional standards.
- Senior leaders are stewards of culture and must foster an environment where integrity conversations are mainstream.
- The building blocks of a strong integrity culture are awareness, capability and accountability.

Applying your learnings in the workplace

Promote enduring engagement with integrity within your team and organisation.

Engage in frank and fearless conversations with colleagues to make integrity conversations mainstream.

Champion a culture of integrity by sharing and socialising the Guide to Integrity Conversations and this Key takeaways placemat.

Enhancing integrity capability

- Mutual awareness and recognition for the importance of integrity is vital to fostering environments where integrity conversations are mainstream.
- The difference between 'pro-integrity culture' and simply 'anti-corruption' is the maturity of agency culture and capability to have integrity conversations.
- Bring your own experiences and reflections to the table when engaging in integrity conversations.
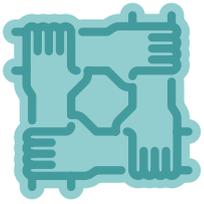
Strengthening workplace integrity culture

- Integrity is developed through critical reflection – individually and at the organisational level.
- Leading with integrity entails developing trustworthiness and authenticity.
- Regular integrity conversations fosters a reflective space and builds psychological safety.
- Effective integrity management ensures proper leadership succession planning, and builds the bedrock for future organisational reflection.

Reflections:

- How will you champion a culture of integrity in your workplace?
- How can you embed integrity into your organisation's everyday practice?
- Do you empower your teams and organisation to be critically reflective?

- Is your leadership trusted enough for people to initiate integrity conversations with you?
- What does integrity mean within your agency?
- Is integrity viewed as an individual, professional or organisational responsibility?

An integrated approach to integrity

Agencies should consider the benefits of taking an integrated approach to integrity systems and culture. This can including bringing together the diversity of expertise across the organisation to share knowledge and address emerging issues.

- DFAT has created an Enhanced Personnel Security Capability working group. The working group brings together officers from across the department to identify and mitigate issues relating to insider threat, allowing for a holistic response.
- The Department of Industry, Science and Resources (DISR) has established a new Integrity Branch that brings together a range of integrity-related functions. The Integrity Branch includes a 'one-stop shop' for staff to seek advice or raise concerns in relation to integrity-related matters. The branch is focused on shaping the department's integrity culture, including by supporting good judgement and intentional thinking in all staff, to navigate and achieve the intent of integrity rules.

A baseline of integrity knowledge

The APS Commissioner's Directions 2022 introduced mandatory integrity training for APS employees within 6 months of being employed. Good practice suggests that integrity training should be ongoing and tailored to specific roles.
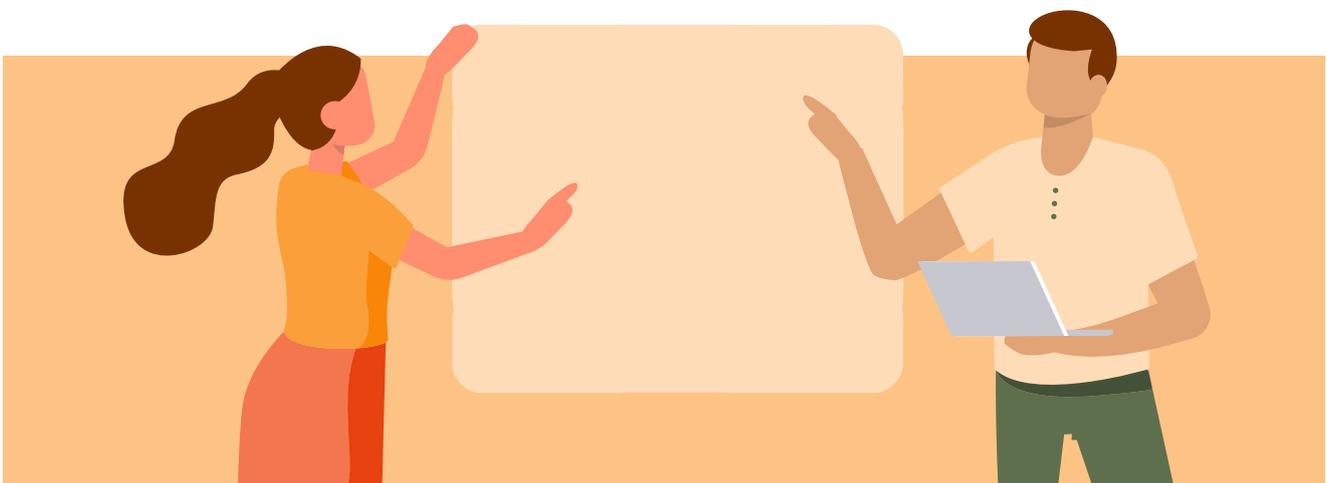
- The APS Academy offers an Integrity in the APS e-Learning module designed to strengthen APS employees' understanding of the importance of acting with integrity as they undertake their duties. Some agencies have embedded this module in their internal eLearning platforms as part of mandatory induction and ongoing training programs.
- DFAT is progressively delivering integrity training sessions at overseas posts, for both A-based and Locally Engaged Staff.

Integrity Rewards & Recognition

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

- The Australian Taxation Office (ATO) provides awards to those who go '**Above and Beyond**' including in a specific category for integrity. The integrity category **recognises** employees who either "exemplify integrity at the heart of the ATO" or "demonstrate ethical conduct by embedding and strengthening individual or system integrity by showcasing fraud prevention thinking and maintaining high integrity standards".

- The Department of Finance recognises ethical leadership **informally through feedback and public acknowledgement**, and formally through the Finance Awards program. Under the Awards, a specific leadership category recognises those staff that have exemplified Finance's leadership expectations, which explicitly includes "Acting with Integrity".

- DITRDCA acknowledges staff who are 'Living the Values' of the department informally using **thank you cards** that can recognise 'integrity moments'. Integrity is recognised more formally through the annual Secretary's awards.

- The Treasury has **individual and team awards for Integrity.**

- **Ethical leadership** is recognised within some agencies when their award programs consider nominations using the APS Leadership Capabilities and Secretaries Charter of Leadership Behaviours, which include integrity.

- A number of agencies have **Secretary's awards** with categories that recognise contributions to ethical culture, excellence in leadership through integrity and honesty, promoting positive morale and respect, empowering others to succeed and modelling exceptional service and integrity.

Integrity Conversations & regular communications

Clear, consistent and regular communication is fundamental to embedding culture in an organisation. It is important that there is broader engagement across the agency in ongoing integrity conversations.

- The Independent Parliamentary Expenses Authority (IPEA) engages its staff in regular 'Curious Conversations' about ethical scenarios and questions.

- DITRDCA encourages staff to notice 'the uncomfortable feeling in the stomach', take a moment to pause, reflect and discuss with an appropriate person if needed. An integrity panel discussion was held as part of a broader range of integrity-themed engagement activities during its 2023 integrity week to encourage conversations around integrity.

- The Australian Federal Police (AFP) uses a range of tools to shape integrity culture, including an Integrity Matters Newsletter, case study briefings, podcasts, videos, posters, a continuous learning package (Recruit-to-Retirement), lock screen messages and all-staff emails.

- DITRDCA, the Department of Home Affairs and the ATO hold an annual 'Integrity Week' accompanied by a communications strategy to raise awareness among staff of integrity standards and expectations.

- DITRDCA has launched a centralised intranet integrity portal with resources and contact information for staff.

Integrity
EVERYBODY AT EVERY LEVEL

BE HONEST AND TRANSPARENT

Communicate openly and honestly
Lead by example
Value the contributions of others
Store all records in Records Workspace
Complete mandatory integrity training

**DO THE RIGHT THING
AT THE RIGHT TIME**

Make decisions that are apolitical, based on evidence and are accountable
Consider implications and engage with risk
Use the Integrity Framework
Always report concerns

HAVE A VALUES-DRIVEN MINDSET

Follow the APS Values and Code of Conduct
Live the department's Values and Secretaries' Charter of Leadership Behaviours (DRIVE)
Harness a pro-integrity culture

Search 'Integrity Strategy' on CONNECT for more info
integrity@infrastructure.gov.au

Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Integrity Screen Card

ATO One Habit at a Time program

The 'One Habit at a Time' program is an interactive program designed to help embed habits into everyday work. There is a six week 'sprint' where learning and development and communications activities across the agency focus on one habit to introduce and develop for all staff. The first campaign theme was 'Constructively Challenge'.

The One Habit at a Time program is the signature initiative of the refreshed ATO Culture strategy and is an interactive program designed to help us make positive changes to the way we work together. Together, we will focus on changing everyday habits, one at a time, giving us an opportunity to practice new ways of thinking and working together until it becomes part of our routine, and our culture.

The three behaviours of Constructively Challenge:

1. Constructively challenging others - I step up and constructively challenge others
2. Responding to constructive challenges - I keep an open mind to curiously explore the suggestions from others
3. Creating opportunities to challenge - I create an environment where my colleagues and team feel safe to challenge me

'Own It' is about:

- Owning all aspects of your work, relationships and wellbeing
- Being accountable and taking ownership of outcomes - whether they are successes or learning opportunities
- Proactively investing in your own development by taking charge of your career, being actively involved and being open to feedback
- Looking after your wellbeing by making it a daily priority

Integrity & Ethics Advice

APS staff at all levels can benefit from confidential support to talk through an integrity issue causing them concern. Early advice can also prevent issues from getting worse. Agencies have adopted various models that are adapted to their specific operating environments.

- Finance has created Integrity Advisor roles in which volunteer staff are trained as confidential peer contacts. Integrity Advisors guide other staff to available channels for managing integrity matters.

- The Australian Border Force (within Home Affairs) has a confidential support and advice service called 'ABF Speak Safe' (Speak Safe). Speak Safe provides confidential support for all ABF officers to discuss inappropriate behaviour within, or connected to, the workplace, including behaviour that conflicts with Home Affairs' Integrity Principles. Speak Safe officers provide information on responding to inappropriate workplace behaviour, and can also assist in connecting ABF officers to Home Affairs' anonymous reporting system.
- The APSC offers an [Ethics Advisory Service](#) to all APS staff who wish to discuss and seek advice on workplace ethical issues.

AFP Confidant Network

The AFP's Confidant Network is a national confidential integrity peer support network providing information, options and support to AFP members faced with harmful, unethical or corrupt behaviour connected to the workplace. Confidants are trained and undertake this voluntary role in addition to their usual duties.

Integrity Reporting Channels

Agencies have differing approaches to internal integrity reporting. It is essential agencies are responsive to reports and protect confidentiality.

- Finance is progressing towards a **single front door** for all complaints and feedback and a centralised point for procurement complaints handling.
- The ATO maintains **multiple channels** for staff to report integrity concerns, including a Speak-up Hotline, an anonymous Fraud Alert Form, as well as an externally-facing Report Internal Fraud or Corruption Form.
- The AFP's integrated complaints management model (ICMM) introduces a **single entry point** for reporting workplace issues, grievances and complaints, with teams and strategies in place to help individuals navigate the right pathway. This model aims to be people-focused, reduce complexity and confusion, enhance communication, increase timeliness and promote transparency and consistency in decision making relating to complaints and grievances.

Integrity Evaluation & Oversight

Monitoring and evaluation are critical to embedding a culture of continuous improvement. Agencies can adopt a positive mindset towards accountability, whether this is through initiating internal assessment, responding to external oversight, or bringing in a fresh pair of eyes.

- The Commonwealth Integrity Maturity Framework is a valuable resource for agencies seeking to benchmark and improve their internal integrity maturity.
- The ATO and the Department of Education engaged independent Integrity Advisors to bring a pair of fresh eyes to assess the department's integrity culture and frameworks.

DISR embraces audit findings

DISR made a concerted effort to improve after the Australian National Audit Office (ANAO) identified failings in the department's administration of an entrepreneurs' grants program. Following the audit, strong leadership from the top set the tone for embracing oversight and owning the problems. The department established a taskforce to deal with issues it saw as systemic, and invited the ANAO to discuss the audit findings with SES and EL staff. The department also offered to meet with affected businesses to explain what went wrong. The department has now actioned all of the ANAO recommendations to get things right for the future.
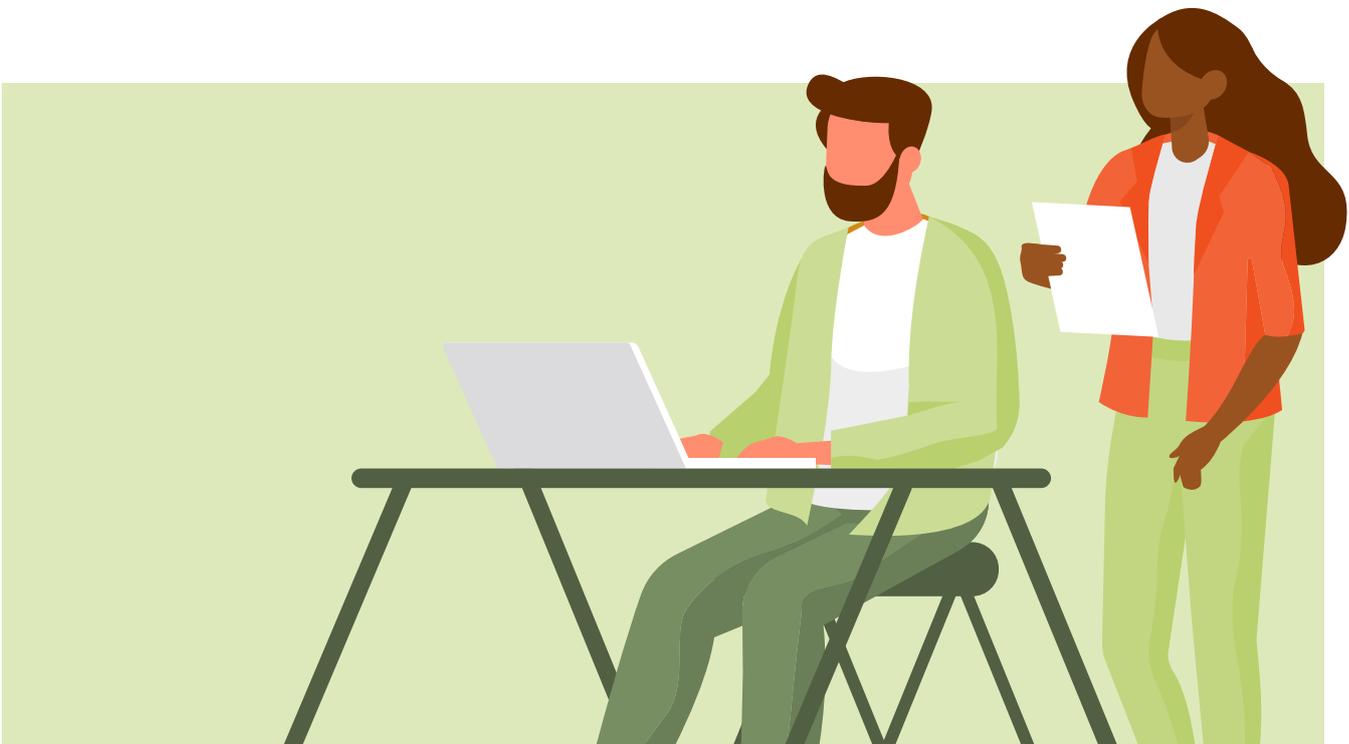
Integrity Data

There is a variety of data available which can tell different 'stories' about integrity within an agency. Whilst measuring integrity performance is not mandatory, it is good practice for agencies to use integrity indicators to identify risks, measure the effectiveness of integrity controls and monitor workplace culture and practice.

- The APSC has published an Integrity Metrics Resource to support agencies to understand their current integrity measurement capability and make informed decisions on where to focus future effort.

- DITRDCA issues a quarterly integrity dashboard to senior executives to measure, monitor and report on integrity performance. The dashboard assesses if integrity arrangements are working as intended and supports senior management decision making. It is intended that the dashboard will be shared across the department.

- Finance has established a quarterly Integrity Dashboard which it shares with all staff to provide visibility of key integrity data (for example, conduct, financial and procurement data), including to identify emerging risks. It regularly reviews and reassesses data points to ensure that they are being correctly interpreted and accurately represent the integrity picture.

Finance Integrity Metrics Register

Finance has developed an Integrity Metrics Register to support its quarterly Integrity Dashboard. The Register describes the integrity indicator, its data source and the basis for its inclusion.

Metric	Description	Examples	Integrity indicators and considerations
Performance management data	Data that indicates whether appropriate performance management practices are in place and whether performance is being appropriately managed across the organisation	• Percentage of staff that have a performance agreement in place • Percentage of staff that have undertaken a mid- or end-of- cycle assessment • Active number of under-performance cases	High rates of performance agreements in place, and regular performance conversations occurring, may indicate employees and managers are clear on expected deliverables, behaviours, career goals and development needs.
Unscheduled leave absence	Monitoring of unscheduled absences	• Number of days of unscheduled absence • Number of employees whose unscheduled absence has reached or exceeded organisational thresholds	Higher than usual unscheduled absences or changes to attendance patterns may indicate: health concerns for employees, including stress and burnout and cultural concerns within teams.
Overtime and leave balances	Records of overtime, flex- time/time off in lieu (TOIL) and excess leave balances.	• Days of overtime worked (APS1-6). • Flex-time accumulated; maximums and minimums reached (APS1-6) • TOIL accumulated; maximums and minimums reached (EL and SES). • Instances of accumulated leave over 40 days	High levels of overtime, flex-time, or TOIL may indicate excessive workload or performance concerns, which may impact upon staff integrity. Regular overtime or after hours work can raise integrity concerns in terms of unsupervised work. High leave balances may indicate: • employees are not accessing their leave entitlements • Increased chance of stress and burnout feeling that they cannot take leave due to workload.

Metric	Description	Examples	Integrity indicators and considerations
Code of conduct reports	Monitoring number, type, action time and outcomes of reports and investigations.	• Number of code of conduct investigations active and closed	Monitoring code of conduct reports is important in identifying and responding to inappropriate behaviour, preventing it from reoccurring, and demonstrating to the agency that employees will be held accountable if they are found to have breached the Code.
Compensable claims	Monitoring number, type, action time and outcomes of compensable claims.	• Number of compensable claims	Changes to the number of compensable claims may indicate broader integrity concerns within a business area, i.e. those claiming compensation for workplace injury due to stress or other workplace concerns.
Work, health and safety (WHS) reports and incidents	Monitoring number, type, action time and outcomes of WHS reports.	• Number of work, health and safety incidents by group/division	Changes to the number of WHS reports may indicate broader integrity concerns within a business area, such as not making employee safety a business priority.
Training completion rates	Monitoring and reporting on training that has an integrity focus. This includes the mandatory integrity training for all employees new to the APS.	• Percentage that have completed mandatory integrity training within the required timeframe from induction	Providing and monitoring completion of integrity training will assist with uplifting integrity awareness and capability. Also ensures that agencies are meeting their obligations as outlined the Commissioner's Directions.
Cessation processes	Exit interviews and surveys provide an invaluable source of integrity information.	• Rate of completion of exit interviews/surveys • Correlation of perceived integrity issues in exit surveys with broader agency responses to Census/pulse survey questions	Staff members who are leaving an agency are most likely to raise integrity concerns during exit processes – they have nothing to lose or to fear given they are ceasing employment. This is a key opportunity to collect important information on integrity issues.

Metric	Description	Examples	Integrity indicators and considerations
Conflict of interest declarations	Monitoring and reporting on conflict of interest declarations and conflict of interest management plans.	• Number of conflict of interest declarations benchmarked against previous records for an equivalent period	Encouraging, monitoring and reporting on Conflict of interest declarations supports employees to work with integrity, be accountable and be transparent.
Gifts and benefits reporting	Monitoring and reporting on gifts and benefits.	• Gifts, benefits or hospitality accepted, measured against gifts or hospitality offered • Percentage of gift declarations approved within the required timeframe	Encouraging, monitoring and reporting on gift and benefits supports employees to work with integrity, be accountable and be transparent.
Outside Employment and volunteering	Monitoring and reporting on requests for approval of outside employment and volunteering.	• Nature and frequency of outside employment and volunteering requests • Number of requests for approval of outside employment/ volunteering and percentage of requests approved	Encouraging, monitoring and reporting on outside employment and volunteering requests supports employees to work with integrity, be accountable and be transparent.
Security clearances **Cessation Secrecy**	Tracking and reporting on security clearance status and processing.	• Number of APS clearances granted and confirmed • Number of staff or contractors PSPF non-compliant on separation • Temporary access – short term and provisional • Number of departure forms submitted • Cessation Secrecy Undertakings	Monitoring security clearance processes ensures that the agency is aware of potential onboarding delays, high risk role requirements and so on. A high number of pending security clearances for staff already engaged presents a higher risk to integrity.

Metric	Description	Examples	Integrity indicators and considerations
Breaches (personal, physical and ICT)	Monitoring and reporting on breaches.	• Number and severity of personal security incidents • Number and severity of physical security breaches • Number and severity of ICT security breaches	Changes to the number of breaches may indicate broader integrity concerns within a business area. This may indicate that business processes need updating or better awareness.
Fraud and corruption reports and investigations	Monitoring number, type, action time and outcomes of fraud and corruption reports and investigations.	• Number of fraud allegations • Reporting channels for allegations of fraud and corruption (handled internally or reported to law enforcement agencies) • Fraud Risk Assessment completed • Fraud awareness training completed	Monitoring fraud and corruption reports is important in identifying and responding to illegal behaviour, preventing it from reoccurring, and demonstrating to the agency that employees and contractors will be held accountable if they are found to have participated in fraudulent or corrupt behaviours.
Privacy breaches	Monitoring number, type, action time and outcomes of privacy breaches.	• Number of reported privacy breaches by group • Types of privacy breach by group	An increase in privacy breaches may indicate broader integrity concerns within a business area such as poor induction and business processes.
Public Interest Disclosures	Monitoring number of Public Interest Disclosures (PID).	• Number of PID made	Changes to the number of PID may indicate broader integrity concerns within an agency. Emphasis on a particular area may highlight the need for reformed integrity practices in relation to that area.

Metric	Description	Examples	Integrity indicators and considerations
Late Contracts published to Austender	Monitoring late number of contracts published to Austender website	• Number of late published contracts over 42 days • Total number of contracts	All entities must report contracts over $10k on Austender within 42 days of entering an arrangement. Monitoring this metric ensures good record keeping practices and compliance with mandatory requirements.
Late Invoices paid	Monitoring number of late invoices paid	• Number of late invoices paid • Total number of invoices	High number of late invoices accrue interest if payments are not made within the maximum payment terms.

More Information

Websites

Australian Public Service Commission: Integrity in the APS

APS Academy: Integrity Craft

Commonwealth Fraud Prevention Centre: Commonwealth Fraud Prevention Centre

National Anti-Corruption Commission, Corruption Prevention and Education: Corruption prevention and education

National Anti-Corruption Commission, Commonwealth Integrity Maturity Framework: Commonwealth Integrity Maturity Framework

Contacts

DITRDCA, Assurance, Integrity, Risk and Governance: integrity@infrastructure.gov.au

National Anti-Corruption Commission, Corruption Prevention & Education: prevention@nacc.gov.au