Integrity Framework

25 November 2025

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Our Integrity Commitment

The City of Stirling ('City') recognises earning and maintaining community trust is essential for the good governance of our community. The City adopts a zero-tolerance attitude towards fraud, misconduct and corruption and must embed integrity in everything that it does as a good corporate citizen should.
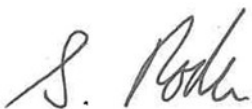
Operating with integrity means using powers responsibly for the purpose and in the manner for which they were intended. It means acting with honesty and transparency; and making reasoned decisions without bias by following fair and objective processes.

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.

Each person at the City, whether they are an Elected Member, employee, contractor or volunteer is responsible for acting with integrity and must always be accountable for:

- their own actions and decisions;
- acting honestly and transparently;
- being honest and respectful, and
- doing the right thing even behind closed doors.

The City's Integrity Framework (Framework) outlines the City's approach to ensuring it not only acts with integrity, honesty and transparency; but is seen doing so by making reasoned decisions without bias by following fair and objective processes. It describes the instruments, structures and cultural factors that guide how the City practices, manages and accounts for integrity within its operations.
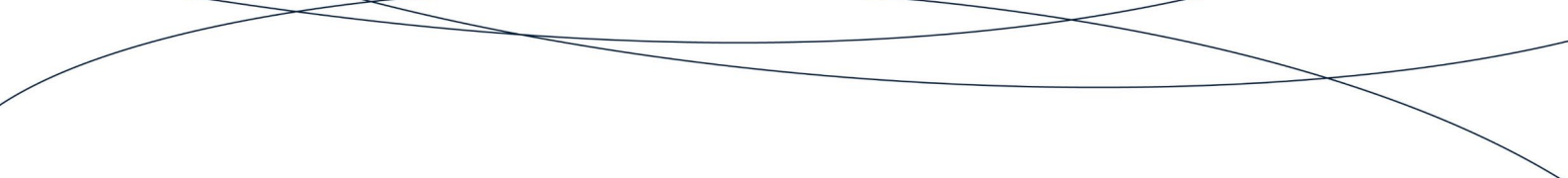
Stevan Rodic
Chief Executive Officer

City's Integrity Model

The City's Integrity Framework is based on the model developed by the Public Sector Commission's *Integrity Strategy for WA Public Authorities 2024-28*:

Clear expectations

Risk analysis and planning for integrity

Accountability		Commitment

Legislation and regulations	Plan and act to improve integrity	Model and embody a culture of integrity	Roles and responsibilities
Internal controls, audit and governance			Values and standards
Legislation and regulations	Learn and develop integrity knowledge and skills	Be accountable for integrity	Integrity education and capacity
Self-analysis and review			Leadership and management attitude
Response to integrity breaches	Oversight		Organisation culture

Public Sector Commission	Corruption and Crime Commission	Office of the Auditor General and Other integrity bodies

Diagram 1: Integrity Model (source: Public Sector Commission**)**

The City's Framework, based on the above model, has four key areas detailing the actions, activities, processes, practices and documents within the City that address integrity:

1. **PLAN AND ACT TO IMPROVE INTEGRITY** - Effective governance systems and frameworks are established.

2. **MODEL AND EMBODY A CULTURE OF INTEGRITY** - A culture of integrity exists and is reinforced and communicated by the Executive Team and Business Leaders.

3. **LEARN AND DEVELOP INTEGRITY KNOWLEDGE AND SKILLS** - Individual and authority integrity knowledge, skills and competence are grown.

4. **BE ACCOUNTABLE FOR INTEGRITY** - Prevention, detection and response to integrity matters are everyone's personal and professional responsibilities.

Plan and act to improve integrity

Integrity Framework Foundations

Roles and Responsibilities

Every Elected Member, employee, volunteer and contractor are responsible for integrity and has a role to play. The table below details the specific roles and responsibilities for integrity throughout the City's operations.

Roles	Responsibilities
Council	- Adopt and review the City's Integrity Framework. - Adopt and review the City's Governance Framework. - Approve the City's Code of Conduct for Council Members, Committee Members and Candidates. - Receive reports from the Audit, Risk and Improvement Committee in relation to integrity risks, audit activities and other integrity controls.
Audit, Risk and Improvement Committee	- Oversee the implementation of the City's Integrity Framework. - Advise Council on all matters relating to the City's strategic integrity risks. - Receive and review regular reports on integrity risk minimisation performance. - Receive and review internal audits including risks associated with integrity.
Elected Members	- Model leadership and conduct that align with the City's commitment to integrity. - Perform role and responsibilities in accordance with *the Local Government Act 1995.* - Reflect the behaviours and conduct standards required in the City's Code of Conduct for Council Members, Committee Members and Candidates. - Make decisions at Council and Committee meetings based on evidence, merit and in accordance with the law.
CEO	- Provide leadership in the prevention, detection and response to misconduct, fraud and corruption. - Approve the City's Code of Conduct for Employees. - Designate a complaints officer in accordance with section 5.120 of the *Local Government Act 1995*. - Notify relevant integrity agencies of any suspected incidences of misconduct as required by the *Corruption, Crime and Misconduct Act 2003*.

Roles	Responsibilities
	• Notify the WA Ombudsman on Reportable Conduct under the *Parliamentary Commissioner Act 1971* and conduct Reportable Conduct investigations around child abuse*.* • Ensure the City complies with the *Public Interest Disclosure Act 2003.* • Ensure the City complies with Division 9 of the *Local Government Act 1995*. • Provide reports and advice to the Audit, Risk and Improvement Committee and Council on integrity matters. • Drive a culture of integrity through the active demonstration of City values and by communicating the importance of meeting integrity standards.

Executive Team	• Adopt and review the City's Fraud and Corruption Control Plan.
	
	• Adopt Management Practices that reinforce integrity practices within the City's Administration.
	
	• Demonstrate commitment to integrity through an active demonstration of City values and by building an accountable workplace culture.
	
	• Reinforce the requirement for integrity by employees and ensure there are mechanisms in place to:
	
	   o identify and assess integrity risks;
	
	   o proactively identify and communicate business unit specific risks;
	
	   o promote employee awareness of integrity;
	
	   o ensure that reports of misconduct are dealt with appropriately; and
	
	   o actively participate in integrity reporting at leadership meetings.
	
	• Ensure confidentiality is maintained in all investigations and any findings that are made.

Manager Governance	• Oversee the development and review of the Integrity Framework, Governance Framework, Fraud and Corruption Control Plan and Statement of Business Ethics. • Develop and implement appropriate Management Practices and internal procedures around integrity matters. • Ensure appropriate training is provided on the City's Code of Conduct for Council Members, Committee Members and Candidates. • Promote a culture of integrity through collaboration, training and other activities. • Conduct activities that promote integrity awareness such as International Corruption Day.

Roles	Responsibilities
	• Act as the City's Complaints Officer and Principal Public Interest Disclosure Officer. • Manage the investigation of reports of misconduct relating to Elected Members. • Ensure confidentiality is maintained in all investigations and any findings that are made.
Chief People Officer	• Review the City's Code of Conduct for Employees. • Ensure appropriate training on the City's Code of Conduct for Employees. • Develop and implement appropriate Management Practices and internal procedures around employee misconduct matters. • Act as a Public Interest Disclosure Officer for the City. • Manage the investigation of all reports of misconduct relating to employees and Reportable Conduct Investigations. • Ensure that appropriate disciplinary action is taken when there is evidence of misconduct in accordance with the City's Management Practices and internal procedures. • Ensure appropriate pre-employment screening is carried out for new employees and existing employees who are promoted to positions of trust. • Ensure confidentiality is maintained in all investigations and any findings that are made.
Internal Auditor	• Plan and conduct audits that address integrity risks. • Receive reports of alleged misconduct through the Misconduct and Fraud Hotline. • Report any suspected fraudulent activities or corrupt practices identified during an internal audit function to the CEO and possible investigation or referral to the appropriate external agency. • Monitor and report on the status of implementation of management actions to address audit findings. • Ensure confidentiality is maintained in all investigations and any findings that are made.
Manager Strategy and Performance	• Oversee the review of the Risk Management Framework, Risk Management Policy and relevant risk management documents. • Manage strategic and operational risk registers that include integrity risks. • Implement a risk management culture through the facilitation of risk awareness training and provision of risk management advice to the organisation. • Provide risk management training and support to Business Units.

Roles	Responsibilities
Management Risk Forum	• Facilitates management-level oversight of integrity risks and review emerging risks. • Aligns operational insights with enterprise risk management. • Consolidates advice for the Executive Team. • Reinforces a consistent and constructive approach to risk culture across services.
Integrity Panel	• Discuss and analyse Misconduct Reports and other integrity issues that have been reported or identified. • Develop strategies and management actions to minimise systemic Misconduct issues or to improve integrity practices at the City. • Compile information for quarterly reporting to the Executive Team and Audit, Risk and Improvement Committee.
Business Leaders	• Demonstrate commitment to integrity through an active demonstration of City values and by building an accountable workplace culture. • Ensure an awareness and understanding of the City Integrity Framework and the employee's role within this framework. • Commit to following a robust and unbiased recruitment and selection process and only to recruit and engage individuals who are closely aligned with City values. • Report any suspected act of misconduct in accordance with the City's misconduct reporting process. • Ensure specific behaviours relating to integrity are addressed in employee performance reviews. • Ensure that all employees are aware of the Code of Conduct for Employees. • Ensure that all employees observe the City's policies, management practices and procedures and understand their roles and responsibilities. • Implement controls to minimise acts of misconduct and integrate integrity risk management into all aspects of the Business Unit's functions. • Ensure confidentiality is maintained in all investigations and any findings that are made.

Roles	Responsibilities
All employees	• Abide by the Integrity Framework and any fraud, corruption and misconduct controls. • Actively support and contribute towards integrity risk management initiatives. • Report any instances of misconduct through the City's reporting processes. • Ensure awareness, understanding and support of all City policies, management practices and procedures. • Ensure confidentiality is maintained in all investigations and any findings that are made.
Volunteers and Contractors	• Actively support and contribute towards integrity risk management initiatives. • Report any instances of misconduct through the City's reporting processes.

Relevant legislation and regulations

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

• Better decision-making by local governments.
• Greater community participation in the decisions and affairs of local governments.
• Greater accountability of local governments to their communities.
• More efficient and effective local government.

The City is also governed by other legislative instruments that embed integrity mechanisms within the City's operational functions. Such instruments include the following:

• *Corruption, Crime and Misconduct Act 2003.*
• *Criminal Code Act Compilation Act 1913.*
• *Freedom of Information Act 1992.*
• *Parliamentary Commissioner Act 1971.*
• *Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022.*
• *Public Interest Disclosure Act 2003.*
• *Public Sector Management Act 1994.*
• *Privacy and Responsible Information Sharing Act 2024.*
• *State Records Act 2000.*
• *Working with Children (Screening) Act 2004.*
• *Work Health and Safety Act 2020.*

These legislative instruments, as well as others, place obligations on the City, the CEO and employees. Any appointed employees to specific roles are required to comply with any requirements and responsibilities relating to their integrity responsibilities.

Risk analysis and integrity planning

Risk management is a fundamental element of sound corporate governance and is part of the City's organisational purpose, governance, leadership and commitment.

The City's Risk Management Framework sets out the City's approach to the identification, assessment, management, reporting and monitoring of risks, including integrity risks.

An integral part of the City's Risk Management Framework is the City's Risk Management Policy that establishes the City's commitment to embedding risk management practices across the organisation to support the delivery of the City's Strategic Community Plan and Corporate Business Plan.

Internal controls, audit and governance arrangements

The City has a number of internal controls to manage its overall corporate governance obligations and to address possible integrity issues and risks:

Codes of Conduct

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

- Council to adopt a Code of Conduct for Council Members, Committee Members and Candidates; and
- the CEO to implement a Code of Conduct for Employees.

The Code of Conduct for Council Members, Committee Members and Candidates sets out integrity principles, behaviour requirements and rules of conduct. The Code of Conduct for Employees promotes the City's values and provides expected standards of behaviour.

Both Codes are regularly reviewed and made available to Elected Members and employees on their commencement at the City, and the Codes are also made available to the public on the City's website. Through the City's induction program, both Elected Members and employees are made aware of their responsibilities under the respective Codes and employee undergo regular refresher training on the Code's requirements and obligations.

Council Policies

A function of Council under the Act is to make policies which guide the City's operation and decision making. The policies affect various business areas and responsibilities of the City and are reviewed on a regular basis. Council policies can be viewed on the City's website and employees and Elected Members are to observe the requirement with Council adopted policies relevant to them and their activities.

A number of Council adopted policies relate to fostering integrity standards and activities at the City, including but not limited to the following:

- Appointment of Acting or Temporary Chief Executive Officer Policy.
- Complaints Policy.
- Elected Member and Chief Executive Officer Attendance at Events Policy.
- Elected Member Entitlement Policy.
- Elected Member Training Policy.
- Election Caretaker Policy.
- Equal Opportunity and Diversity Policy.
- Generative Artificial Intelligence (AI) Policy.
- Information Handling and Breach Policy.
- Information Management Policy.
- Information and Technology Acceptable Use Policy.
- Issue and the Use of Corporate Credit Cards Policy.
- Legal Representation and Elected Members and Employees Policy.
- Media and Communications Policy.
- Model Standards for CEO Recruitment, Performance and Termination Policy.
- Procurement Policy.
- Risk Management Policy.

Statement of Business Ethics

The City has adopted a Statement of Business Ethics which provides guidance for all sectors of the community when conducting business with the City. It outlines the City's ethical standards and our expectation that goods and service providers will comply with these standards in all their dealings with the City. This Statement also outlines what goods and service providers can expect of the City.

The Statement of Business Ethics is available on the City's website and is supplied to goods and service providers of the City.

Governance Framework

Good governance in local government is about ensuring the local government is able to manage its many complex responsibilities effectively and in the best interests of the community. When a local government practices good governance, the community is more connected and engaged, appropriate services are provided and there is more effective use of the local government's resources.

The City's Governance Framework demonstrates how good governance is put into practice at the City and sets out the roles and responsibilities of Elected Members and employees; their relationships; and the City's financial, legal and ethical obligations and accountability requirements.

Fraud and Corruption Control Plan

The City is committed to best practice fraud and corruption prevention. Employees and Elected Members must not engage in practices that may constitute fraud or corruption. Fraud and corruption can be damaging to the City through financial loss, loss of public confidence (either perceived or real), reputational damage and adverse publicity.

The Fraud and Corruption Control Plan documents the City's approach to identifying, assessing, controlling and reporting fraud risk, and how this approach integrates with current risk management practices.

Public Registers

The City is required to maintain and publish certain registers to the City's website for public inspection in accordance with the *Local Government Act 1995*. These include the following:

- Gifts, Benefits and Hospitality Register.
- Employee Conference Attendance Register.
- Contribution to Travel Register.
- Minor Breach Complaints Register.
- Primary Return and Annual Return Register.
- Tender Register.
- Declarations of Interest Register and an Electoral Gifts Register.

Management Practices

The City's Administration has developed a number of internal Management Practices that relate to promoting and strengthening integrity at the City. These include, but not limited to the following:

- Conflicts of Interest Management Practice.
- Drug and Alcohol Management Practice.
- Elected Member Conflicts of Interest Management Practice.
- Employee Conflicts of Interest Management Practice.
- Employee Discipline Management Practice.
- Employee Grievance Management Practice.
- Fitness for Work Management Practice.
- Integrity and Misconduct Management Practice.
- Public Interest Disclosure Management Practice.
- Outside Employment Management Practice.
- Recruitment and Selection Management Practice.
- Reportable Conduct Scheme Management Practice.
- Social Media Management Practice.

Management Practices are endorsed by the City's Executive Team and reviewed on a regular basis to ensure that are relevant and contemporary to the City's operations. The City's management practices are available for employees to access on the City's intranet stie (CoSi).

Freedom of Information

The *Freedom of Information Act 1992* gives individuals the right to apply for access to certain documents held by the City. The City has designated employees to deal with freedom of information applications lodged with the City.

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

Public Interest Disclosures

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

Every public authority is required to have a Public Interest Disclosures (PID) officer to receive disclosures of public interest information. The City has a number of employees designated by the CEO for this purpose and their details, as well as information about how to make a public interest disclosure, is available on the City's website.

Delegations and Authorisations

Council may delegate the exercise of some of its functions and powers to the CEO in accordance with provisions of the *Local Government Act 1995*. Other legislation allows delegation of powers and duties to the CEO or other employees directly. The *Local Government Act 1995* also allows the CEO to delegate or sub-delegate any powers to another employee. Delegators may place conditions on delegations. A written record is required to be kept when a delegation is exercised by the CEO or an employee.

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

Legislation applicable to the City also vests certain powers and duties to 'Authorised Persons' or other such termed officers. The CEO authorises certain officers under appropriate legislative provisions or enforcement functions by way of a certificate of authorisation and identity card. Authorisations cease upon termination of employment at the City.

Audit oversight

Implementing a comprehensive suite of audit functions is essential to safeguarding public trust, ensuring accountability, and promoting ethical governance. Together, these audit functions act as a watchdog and a compass by minimising integrity risks while fostering continual improvement and sound public administration.

The *Local Government Act 1995* requires Council to establish an Audit, Risk and Improvement Committee to oversee and advise the Council on matters of internal or external audit, risk management, financial reporting and legislative compliance functions of the City.

Such matters include developing and monitoring the City's internal audit activities as well as reviewing the appropriateness and effectiveness of the City's systems and procedures in relation to risk management, internal controls, legislative compliance, including matters around integrity at the City.

Details of the Audit, Risk and Improvement Committee, including its terms of reference are available on the City's website.

Fraud and Corruption Detection Systems

The City relies on a variety of strategies, programs and systems to detect fraud, corruption, integrity breaches and other errors or irregularities.

Fraud and Misconduct Reporting

The City has established a Fraud and Misconduct Hotline where an anonymous complaint may be made. The caller may leave their contact details, in which case the caller will be advised of the outcome of the investigation, subject to the requirements of the Public Sector Commission or Corruption and Crime Commission and any other relevant investigatory body. The identity of the caller will remain confidential.

Further information around the City's fraud and misconduct reporting mechanisms are detailed further in this Framework.

Internal Audit

Robust internal audits allow the City to regularly assess operations, identify procedural weaknesses, and reinforce compliance with regulatory frameworks. Performance audits help evaluate the efficiency and effectiveness of programs and services, ensuring they deliver value to the community.

The City's internal audit plan and audit program are crucial in reviewing integrity controls and testing vulnerabilities, particularly around:

• fraud and corruption;
• cyber resilience, data protection, and system integrity; and
• decision-making structures and risk management.

As part of the City's internal audit plan high integrity risks will be assessed to ensure the City's controls and activities are sufficient to minimise fraud and misconduct. Internal audits may include sample testing of data to identify any irregularities that may need further investigation.

Findings and recommendations for improvement resulting from internal audits are considered by the Executive Team and the Audit, Risk and Improvement Committee with progress on actions to address these recommendations being monitored through the City's audit log and status reporting.

External Audit

Each year the Office of the Auditor General, or contractors appointed on its behalf, provide the independent oversight of the local government sector and audit the City's financial statements with an audit report being provided to Council. Any significant issues the Office of the Auditor General identifies, are reported to the City, the Mayor, the City's CEO and the Minister for Local Government.

The audit report is examined by the City and is to implement appropriate action in respect to the significant matters that may be raised and detail such action in a report to be submitted to the Minister for Local Government within three months of the City receiving the audit report. This report is also published on the City's website.

In addition to financial and compliance audits, the Office of the Auditor General may carry out performance audits that examine the economy, efficiency, and effectiveness of programs and organisations, including compliance with legislative provisions and internal policies.

Gifts, benefits and hospitality reporting

The City's gifts, benefits and hospitality reporting and other disclosures are monitored to identify any potential patterns of influence; recipients receiving multiple gifts; or other irregular behaviour.

Conflicts of interest reporting

Like gifts, benefits and hospitality reporting, conflicts of interest reporting are monitored to identify any patterns or irregularities that may lend themselves to fraud and misconduct occurring.

Public Interest Disclosures

The *Public Interest Disclosure Act 2003* facilitates the disclosure of public interest information enabling anyone to make disclosures about improper or unlawful conduct, including fraud and corruption.

Any disclosures made through the City's established Public Interest Disclosure process, will be investigated by the City's designated Public Interest Disclosure (PID) Officers in accordance with the City's established procedures. These procedures are available on the City's website.

Compliance Audit

Under the *Local Government (Audit) Regulations 1996*, local governments are required to complete an internal compliance audit each calendar year in addition to external audits. The Compliance Audit Return is a statutory reporting tool that seeks to evaluate the City's compliance with targeted sections of the *Local Government Act 1995*.

The Compliance Audit Return is completed by the City's Administration and is required to be accepted by the Audit, Risk and Improvement Committee and Council before being submitted to the Department of Local Government, Industry Regulation and Safety.

Regulation 17 Review

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

The Regulation 17 Review is in most instances 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. Any internal controls relating to integrity matters may also be identified.

Updates are provided to the Audit, Risk and Improvement Committee and Council in relation to progress on the recommendations.

Model and embody a culture of integrity

Increasing the ethical capacity of the City and managing risks appropriately assists in establishing an ethical organisational culture. Although the City has Codes of Conduct, policies and management practices, these alone will not guarantee ethical behaviour. An ethical and professional workplace culture is the best safeguard against risks to integrity, including improper conduct, misconduct and corruption.

Values and standards

The City must shape and manage its culture to support and enhance integrity throughout the City's operations. An organisation with a culture built on integrity and proactively managed is more resistant to misconduct and corruption from occurring.

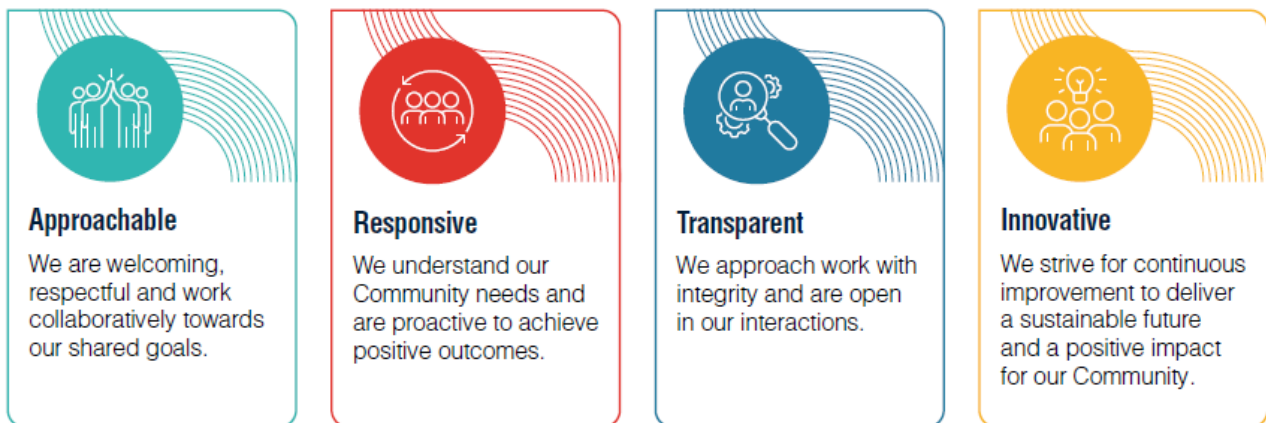The City has adopted the following vision and mission statement and established four key values:

Vision

A sustainable City with a local focus.

Mission Statement

To serve our community by delivering efficient, responsive and sustainable service.

Values

The City of Stirling's core values are:

Approachable
We are welcoming, respectful and work collaboratively towards our shared goals.

Responsive
We understand our Community needs and are proactive to achieve positive outcomes.

Transparent
We approach work with integrity and are open in our interactions.

Innovative
We strive for continuous improvement to deliver a sustainable future and a positive impact for our Community.

The City's vision, mission statement and values are reflected in the City's key organisational strategic documents, codes of conduct as well as within position descriptions for employees.

Such information is also reflected in the City's recruitment activities, including job notices and advertisements.

Leadership and Management attitude

The Executive Team has taken responsibility for leading the ethical tone of the City to build a professional and respectful workplace. The Executive Team communicates to the Business Leaders, and other employees, on ethical conduct and integrity issues whilst modelling the expected standards of behaviour.

This demonstrates the City's commitment to the established values and is consistent with the level of professional leadership that is expected from all that work at the City.

Expectations are discussed with all new employees during their onboarding with the City. This includes their roles and responsibilities, expectations and professional standards. This is reinforced with new employees through the City's online induction program and at any probation review meeting and with existing staff during the performance review process.

Organisational Culture

The City's organisational culture reflects the values, beliefs and behaviours of the entire workforce. The City's values are critical to shaping culture by guiding workplace conduct and decision making. They represent employee standards and underpin the City's day-to-day interactions with each other and the decisions made individually and collectively as an organisation.

The City adopts a model of lead by example. The CEO and Executive Team are required to demonstrate City's values, as well as its transparency and integrity regimes at all times. A culture of transparency is demonstrated by:

- regular communication from the CEO to employees;
- regular communications from the CEO to Elected Members;
- whole employee meetings which include time for employees to ask questions and provide feedback;
- regular team meetings; and
- regular Elected Member briefings and workshops.

Developing Integrity Knowledge and Skills

Integrity education and capacity

The City takes responsibility for educating and developing employee knowledge and capacity around integrity. This is achieved through a number of formal and informal actions and initiatives.

Job applicants

The City's job descriptions include information around the City's organisational vision, mission statement and values. These documents also including the desired corporate responsibilities of all employees including the need to undertake duties and responsibilities in accordance with the City's corporate Policies, Management Practices and Procedures and demonstrate expected behaviours aligned with the City's Values and Code of Conduct.

Employee screening and reference checks are conducted of all potential new employees, including the requirement to submit a recent National Police Clearance or Working with Children Checks (where applicable).

New employees

The City's induction program for new employees includes on-line induction modules around the City's Code of Conduct, vision and values, and references to the City's policies and procedures relating to integrity, fraud and misconduct. New employees are required to declare that they have read and understood the City's Code of Conduct and relevant integrity management practices and procedures before they can complete their on-line induction.

Elected Members, Committee Members and local government election candidates

Local government election candidates are provided information at candidate information sessions around the ethical and integrity standards that are expected of them should they become elected as a Council Member of the City. Copies of the Code of Conduct for Council Members, Committee Members and Candidates is also provided to candidates and all Elected Members, on being sworn in as an Elected Member of the City, must formally declare they will observe the requirements of the City's Code.

Following a successful election, Elected Members undertake an induction program where their duties and responsibilities around integrity matters are also discussed.

Elected Members, through the Audit, Risk and Improvement Committee are informed of integrity risks, controls and integrity activities through regular reporting.

Executive Team and Business Leaders

The Executive Team and Business Leaders must role model the expected integrity standards at the City. They must also identify integrity risks through their operational risk management and service planning processes.

The Executive Team and Business Leaders undertake in-house training on how to manage employee grievances, integrity and misconduct matters. The City's Management Practices that relate to integrity are available on the City's intranet site (CoSi).

The City's People Services Business Unit also has dedicated People Services Business Partners to support Business Leaders in the management of employee conduct matters and associated advice.

All employees

Fraud and corruption awareness training is conducted on a regular basis, including international Anit-Corruption Day, education campaigns and e-learning. A dedicated page is maintained on the City's intranet site (COSi) regarding integrity and misconduct awareness. This includes links to all relevant documents and external agency websites.

Any substantive changes in the Code of Conduct for Employees or relevant management practices are communicated to all employees.

Key employees responsible for implementing crucial components of the City's framework will be invited to attend formal Public Sector Commission education opportunities and provide ways for these employees to share their learnings within the City's operations.

Contractors

Contractors are made aware of the City's ethical standards through the City's adopted Statement of Business Ethics, which is also available on the City's website. Employees responsible for the management and oversight of City contracts and procurement activities are to monitor contractor performance, including reporting breaches of ethical and integrity standards that may be evident.

Overall community

Information is made available to members of the public on the City's website. This includes information such as the City's Codes of Conduct, ethical standards, public interest disclosure and freedom of information processes. Reporting mechanisms, such and code of conduct breach forms, minor conduct breach forms and the City's Fraud and Corruption Hotline are also communicated.

Be Accountable for Integrity

All Elected Members, employees and contractors have a responsibility to ensure the ethical health and professional standards of the workplace are upheld. This includes having the courage to raise integrity concerns with others, to report improper conduct and to support each other. The City supports and maintains a safe reporting environment in which any party feels confident and comfortable to report any integrity concerns.

Reporting Guidelines

Employees should report suspected wrongdoing to their immediate supervisor or line manager in the first instance. Should an employee be reluctant to report any concerns immediately, or feel that appropriate action has not been taken, alternate reporting options include reporting to:

- the Chief People Officer;
- the Manager Governance;
- the Internal Auditor;
- the CEO;
- a Director;
- the Fraud and Misconduct Hotline;
- a designated Public Interest Disclosure (PID) Officer appointed by the City utilising the City Public Interest Disclosure process;
- the Public Sector Commission (where a matter involves minor misconduct – see below); or
- the Corruption and Crime Commission (where a matter involves serious misconduct – see below).

Reporting Minor and Serious Misconduct

The CEO has a duty to notify the Public Sector Commission (PSC) or the Corruption and Crime Commission (CCC) where minor or serious misconduct occurs, or where they suspect, on reasonable grounds, that a matter concerns or may concern either serious or minor misconduct. Notifications must be made in writing, and where possible, electronically to the following agencies:

	Serious Misconduct (CCC)	Minor Misconduct (PSC)
Online	Using the online form at www.ccc.wa.gov.au	Using the online form at www.wa.gov.au
Email	info@ccc.wa.gov.au	minormisconduct@psc.wa.gov.au
Post	PO Box 330, NORTHBRIDGE WA 6865	Locked Bag 3002, WEST PERTH WA 6872

Reportable Conduct Scheme

The CEO has a duty to notify the WA Ombudsman of allegations of, or convictions for, child abuse by City employees and Elected Members and then investigate these allegations. The reportable conduct covered by the Reportable Conduct Scheme includes the following misconduct and inappropriate behaviour against children:

- Sexual offences.
- Sexual misconduct.
- Physical assault.
- Other prescribed offences.
- Significant neglect of a child.
- Any behaviour that causes significant emotional or psychological harm to a child.

Further information around the reportable conduct scheme can be sources from the WA Ombudsman's website.

The WA Ombudsman will monitor, oversee and review investigations undertaken by the City into allegations of, and convictions for, abuse of children involving any of the City's employees. The WA Ombudsman may also at any time investigate matters or their own volition. Reports of child abuse can also be made to the following agencies:

	Ombudsman	WA Police	Corruption and Crime Commission	Department of Communities
Phone	(08) 9220 7471 1800 117 000	131 444 1800 333 000	1800 803 186	1800 273 889
Online	Using the online form at www.ombudsman.wa.gov.au	Using the WA Police Safe2Say Portal at Safe2Say.com.au	Using the online form at www.ccc.wa.gov.au	Using the online form at www.gov.au

Behavioural and Conduct Breaches by Elected Members

Where a behavioural or conduct breach involves an Elected Member, Committee Member or local government election candidate under the City's Code of Conduct for Council Members, Committee Members and Candidates, the complaint process will be followed in accordance with the Code. Investigations and process will be in line with the Code and those processes stated within the *Local Government Act 1995* for particular conduct breaches*.*

Disciplinary action

Where an integrity matter is found to have occurred by an employee, any disciplinary action will be undertaken in accordance with the City's Employee Discipline Management Practice.

Where a Code of Conduct breach is found to have occurred by an Elected Member, Committee Member or local government election candidate, action will be taken as per the City's Code, or as per the requirements under the *Local Government Act 1995.*

Some conduct breaches may be required to be listed in the City's Complaints Register which is available on the City's website.

Response to integrity breaches

The City takes its responsibilities seriously when dealing with actual or potential integrity issues within its operations. This includes ensuring any reported integrity issues, including misconduct, fraud, corruption or abuse are thoroughly investigated.
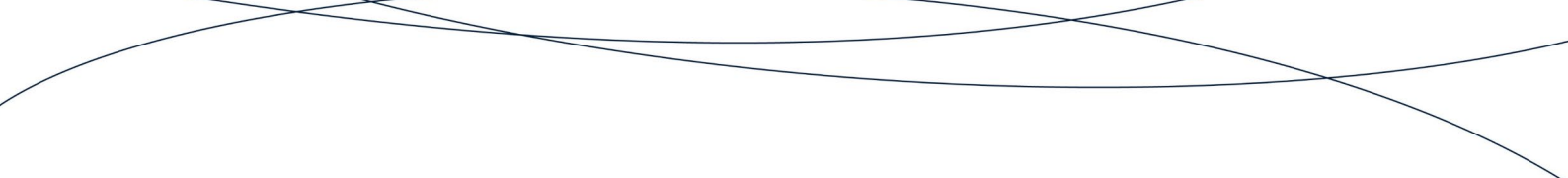
The City's Integrity and Misconduct Management Practice and Reportable Conduct Management Practice outline the processes that will be followed when conducting investigations into allegations received involving actual or alleged integrity or misconduct issues, or matters involving the harm of children.

The City's investigation process will, unless otherwise required by law:

- be fit for purpose based on the nature of the allegations;
- follow relevant legislation and internal procedures;
- use internal, independent or external investigators as required;
- use suitably qualified and experienced investigators with specific expertise in child abuse and interviewing children where required;
- use preliminary, substantive and follow up investigations as required;
- be conducted confidentially and protect the complainant from reprisal;
- report to external agencies and following their directions as required;
- provide natural justice and meet procedural fairness requirements;
- keep the complainant informed as appropriate at relevant stages of the investigation process; and
- ensure vexatious complaints are identified and dismissed in accordance with the process.

Self-analysis and review

The City will continuously improve integrity across the organisation (and subsequently contents within this Framework) through environmental scanning of both public and private sectors; use of findings from internal audits; and the reviews, reports and recommendations of anti-corruption and other integrity bodies.

The City will also utilise the [Integrity Framework Maturity Self-Assessment Tool](#) developed by the Public Sector Commission to assess the maturity of the City's approach to integrity and use results to develop and implement improvement actions.

Recommended updates to this Framework will be undertaken by the Manager Governance as and when required, in consultation with the City's Integrity Panel and Executive Team. Changes to the Framework will be reported through to the Audit, Risk and Improvement Committee and Council for its consideration and adoption.

Oversight

The City has established an Integrity Panel consisting of the Manager Governance, Chief People Officer and Internal Auditor. The purpose of the Integrity Panel is to:

- discuss and analyse misconduct reports and other integrity issues that have been reported or identified at the City from time to time;
- develop strategies and management responses to minimise systemic misconduct issues or to improve integrity practices at the City; and
- compile information for quarterly reporting to the Executive Team and Audit, Risk and Improvement Committee.

Measure of success

For the City's Integrity Framework to be successful, the following corporate objectives are embedded within our normal business processes:

- Integrity matters are incorporated into all aspects of the business as a standing item.
- Integrity risks are incorporated into the City's Risk Register and are constantly monitored and reviewed.
- Integrity risks are presented to the Audit, Risk and Improvement Committee.
- Integrity checks are conducted as a normal recruitment process.
- Regular networking opportunities with other local governments and public organisations on integrity matters.
- The City continues the use of formal notification processes such as newsletters, emails and meetings.
- Integrity reporting processes are advertised and encouraged.
- The roles and responsibilities of leadership team is to include a focus on integrity management.
- The City is committed to learn from internal and external reports on integrity management.

Signs of success that the City's Integrity Framework, and associated actions, processes and activities are imbedded within the City's daily operations include the following:

- The City's Executive Team are satisfied that the levels of maturity assessed through the Integrity Framework Maturity Self-Assessment Tool are appropriate to the City's operating context and risk profile.
- Findings from reviews and audits indicate the City's approach to integrity is improving.
- Employee survey results show a positive perception of integrity within the City's operations.
- Employee survey results show employees have a good understanding of integrity requirements that apply to them and are confident to report integrity breaches.
- Stakeholder feedback indicate confidence that the City operates with integrity.
- Training and information sessions related to integrity are well attended and evaluations indicate knowledge has increased because of attendance.
- Time taken to resolve integrity matters is reasonable and results in improvements where necessary.
- Notifications and reports to integrity bodies are timely.

Glossary

The following terms are used throughout this Framework:

Term	Definition
Administration	The operational part of the City.
Business Leader	An employee holding a leadership / supervisory role at the City and includes Business Unit Managers, Service Leads, Coordinators, Supervisors, and Team Leaders.
CEO	The Chief Executive Officer of the City.
City	The City of Stirling local government.
Council	The City of Stirling Council established under the *Local Government Act 1995.*
Council Member	Has the same meaning as Elected Member.
Committee	A committee established under the *Local Government Act 1995.*
Committee Member	Means a person appointed to a Committee.
Contractor	A person or body that supplies products or services to the City through either a contract or procurement process.
Corruption	Dishonest activity in which a person associated with an organisation (Elected Member or employee) acts contrary to the interests of the organisation and abuses their position of trust to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly.
Director	A senior employee of the City responsible for a Directorate of the City's Administration.
Employee	An employee of the City.
Executive Team	The Executive Leadership body within the City's Administration consisting of the CEO and all Directors.
Elected Member	Means the Mayor and Councillors.
Fraud	Dishonest activity causing actual or potential gain or loss to any person or organisation including theft of moneys or other property by persons internal and/or external to the organisation and where deception is used at the time, immediately before or immediately following the activity.

Term	Definition
Integrity Panel	As per the City's Integrity and Misconduct Management Practice, a panel of employees consisting of the Chief People Officer, Manager Governance and Internal Auditor.
Minor misconduct	Conduct by a public officer that: • adversely affects the honest or impartial performance of the functions of a public authority or public officer, whether or not the public officer was acting in their official capacity at the time of engaging in the conduct; • involves the performance of functions in a manner that is not honest or impartial; • involves a breach of the trust placed in the public officer; or • involves the misuse of information or material that is in connection with their functions as a public officer, whether the misuse is for the benefit of the public officer or the benefit or detriment of another person; **and** • constitutes, or could constitute, a disciplinary offence providing reasonable grounds for termination of a person's office or employment.
Public Officer	Includes all public sector employees; members of government boards and committees; local government elected officials and employees; employees of public universities; employees of public utilities and some volunteers.
Serious misconduct	Conduct by a public officer who: • acts corruptly or corruptly fails to act in the course of their duties; or • corruptly takes advantage of their office or employment to obtain a benefit or to cause a detriment to any person; or • acting in the course of their duties or while deliberately creating the appearance of acting in the course of their duties, commits an offence punishable by two or more years imprisonment.
WA Ombudsman	The Parliamentary Commissioner for Administrative Investigations appointed under the *Parliamentary Commissioner Act 1971.*

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This information is available in alternative formats on request. Please contact the Customer Contact Centre on (08) 9205 8555