

Integrity Framework

Shire of EAST  
**Pilbara**  
THE HEART OF THE PILBARA

**Integrity Framework**

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# 1. Introduction – Promoting Integrity

The Shire of East Pilbara Integrity Framework has been developed to enhance and promote a culture of integrity, sound conduct and ethical behaviour among all Shire Officers, and to foster confidence in the probity of each and every one of the Shire’s actions and decisions at all levels of organisation, and in all parts of the vast and diverse District of East Pilbara.

The Integrity Framework aligns with the WA Public Sector Commission’s mandate to promote and maintain integrity, conduct and ethics in the WA government sector.

The Integrity Framework provides the foundation by which all Shire council members, employees, contractors and volunteers are expected to operate. It will enhance accountability and work towards fostering the trust of the communities the Shire serves.

It describes the instruments, structures and cultural factors that guide how the Shire practices, manages and accounts for integrity and has been prepared following an assessment of the organisation’s integrity risks.

The Framework is closely aligned with the Shire’s Values:

# SHIRE VALUES

## Leadership with HEART

<div style="background-color: #8B4513; color: white; padding: 5px; text-align: center;"> <b>Leadership</b> </div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Shire of EAST Pilbara</div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Leadership with HEART</div> <div style="padding: 5px;"> <p>Being ethical and acting with integrity.</p> <p>Leading by example, being decisive, setting direction and providing good governance.</p> <p>Maintaining open and transparent communication across the whole organisation.</p> </div>	<div style="background-color: #8B4513; color: white; padding: 5px; text-align: center;"> <b>Honesty</b> </div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Shire of EAST Pilbara</div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Leadership with HEART</div> <div style="padding: 5px;"> <p>Being truthful and acting with personal integrity.</p> <p>Admitting mistakes, taking responsibility for them and being able to move on within a no-blame culture.</p> <p>Build trust through reliability and consistency.</p> </div>	<div style="background-color: #8B4513; color: white; padding: 5px; text-align: center;"> <b>Excellence</b> </div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Shire of EAST Pilbara</div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Leadership with HEART</div> <div style="padding: 5px;"> <p>Striving to achieve our best outcome. Encouraging and committing to innovation, creativity, learning and development. Planning to deliver quality programs, projects and services.</p> <p>Recognising excellence, encouraging people to aspire to be their best and taking pride in our work.</p> </div>
<div style="background-color: #8B4513; color: white; padding: 5px; text-align: center;"> <b>Accountability</b> </div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Shire of EAST Pilbara</div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Leadership with HEART</div> <div style="padding: 5px;"> <p>Being accountable to each other, to the community, and to get things right the first time.</p> <p>Being accountable to the environment and Aboriginal culture.</p> <p>Being accountable to achieve the best outcome and best value of money for our community.</p> </div>	<div style="background-color: #8B4513; color: white; padding: 5px; text-align: center;"> <b>Respect</b> </div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Shire of EAST Pilbara</div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Leadership with HEART</div> <div style="padding: 5px;"> <p>Being respectful of people, their cultures, ideas, circumstances and environment.</p> <p>Being respectful of ourselves and our well-being, safety, appearance and reputation.</p> </div>	<div style="background-color: #8B4513; color: white; padding: 5px; text-align: center;"> <b>Teamwork</b> </div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Shire of EAST Pilbara</div> <div style="background-color: #8B4513; color: white; padding: 2px; font-size: 0.8em;">Leadership with HEART</div> <div style="padding: 5px;"> <p>Working as a team within and beyond our organisation to achieve a common goal and vision.</p> <p>Welcoming and providing feedback respectfully.</p> <p>Supporting and talking to each other and sharing information.</p> <p>Encouraging creativity, flexibility and resilience.</p> </div>

It is everyone's responsibility to be aware of the integrity risks, including maladministration and corruption, and I expect you to familiarise yourself with the Framework. The document is available on the Shire's website and internal portals, the Councillor Portal and The Loop.

I commit to regularly monitor and review the framework to ensure it remains effective and fit for purpose.

Every one of us – every councillor, employee, contractor and volunteer has a personal responsibility to ensure that the highest standards of integrity are practiced at all times at the Shire of East Pilbara. We all have responsibility for safeguarding the integrity of the organisation and preventing misconduct and corruption. We demonstrate this in part by reporting any integrity breaches we see or become aware of, and making suggestions on how we can improve our approach to integrity.

Steven Harding  
Chief Executive Officer

## **2. Plan and act to improve integrity**

### **2.1 What is integrity?**

The WA Public Sector Commission defines integrity as:

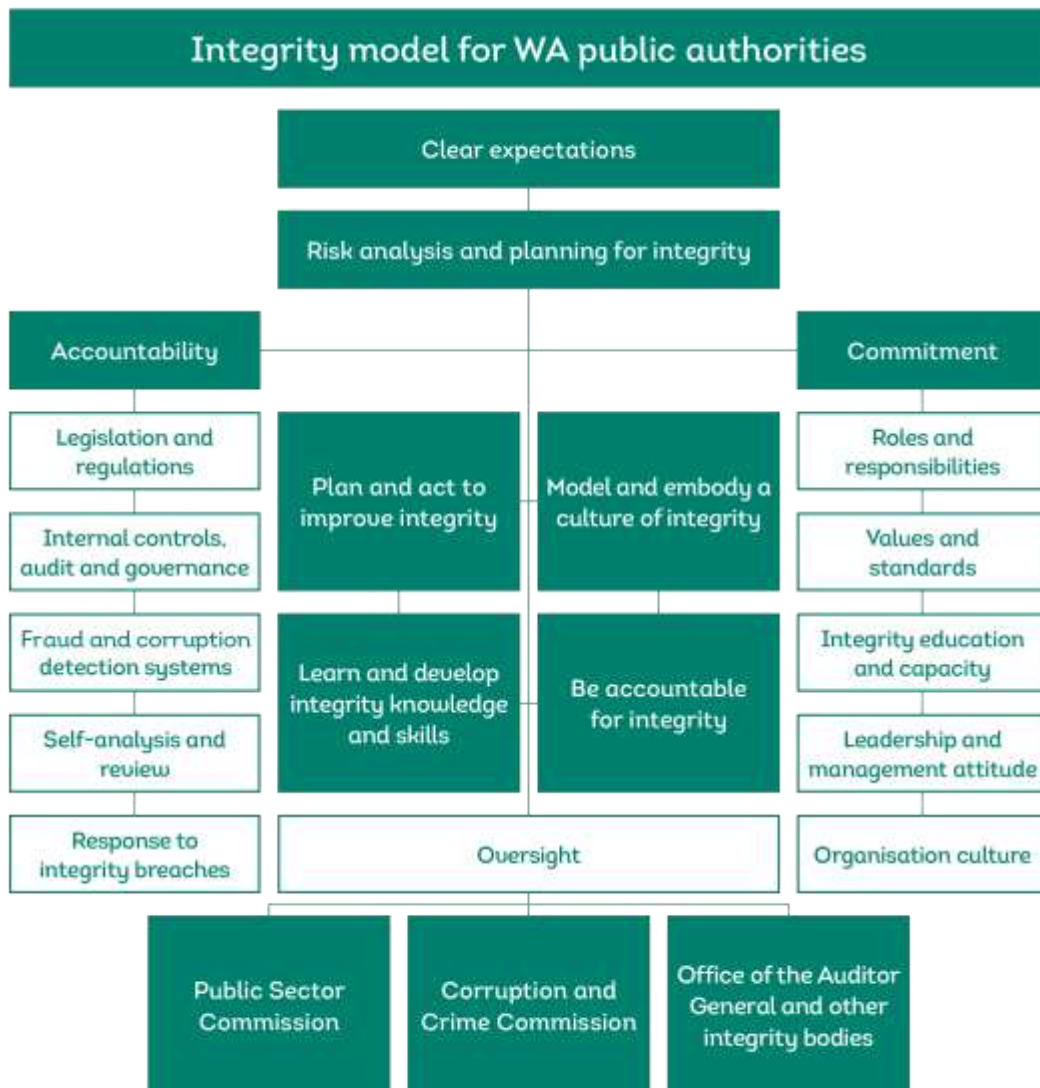
*“a non-negotiable to assure Western Australians that public authorities act in the interest of the community each and every day through the decisions we make and the actions we take”.*

Integrity is the building block of establishing and maintaining trust in public authorities, including the Shire of East Pilbara and is made up of:

- Serving the best interests of the community;
- Responsible use of power and only for the purpose and in the manner for which they were intended;
- Transparent and honest dealings with all stakeholders;
- Proper, accountable and consistent decision making, based on reasoning, without bias and in line with establish and transparent processes;
- Preventing, calling out and addressing improper conduct;
- Honest and proactive disclosure of facts and information; and
- Always acting in the public interest.

### **2.2 Shire of East Pilbara Integrity Model**

The Shire of East Pilbara Integrity Model reflects the integrity model in place for WA public authorities, and provides a visual structure to the Shire’s integrated approach to the promotion of integrity:



The Shire’s Integrity Model is underpinned by three of the Shire’s organisational values:

**Leadership**

- Being ethical and acting with integrity.
- Leading by example, being decisive, setting direction and providing good governance.
- Maintaining open and transparent communication across the whole organisation.

**Honesty**

- Being truthful and acting with personal integrity.
- Admitting mistakes, taking responsibility for them and being able to move on within a no-blame culture.
- Build trust through reliability and consistency.

## Accountability

- Being accountable to each other, to the community, and to get things right the first time.
- Being accountable to the environment and Aboriginal culture.
- Being accountable to achieve the best outcome and best value of money for our community.

## 2.3 Roles and responsibilities

The Shire of East Pilbara Integrity Framework provides the basis by which the organisation will plan and act to improve integrity outcomes. It assigns responsibility to all Shire officers to identify, report and fix areas of improvement. The following table identifies those positions and bodies responsible for functions under this Framework:

Body/Position	Integrity Responsibilities
Council	<ul style="list-style-type: none"> <li>• Complies with and operates lawfully and in accordance with the <i>Local Government Act 1995</i> and other relevant legislation.</li> <li>• Responsible for oversight of integrity matters and strategic governance.</li> <li>• Sets integrity expectations and embodies these through the Shire's:               <ul style="list-style-type: none"> <li>→ Code of Conduct for Council Members, Committee Members and Candidates.</li> <li>→ Risk Management Framework.</li> <li>→ Integrity Framework.</li> </ul> </li> <li>• Authorises policy relating to integrity matters.</li> <li>• Delegates powers and functions to the Chief Executive Officer and relevant officers.</li> <li>• Endorses the City's Annual Compliance Audit Return.</li> <li>• Appoints members and adopts the Terms of Reference of the Audit, Risk and Governance Committee.</li> </ul>
Audit, Risk and Governance Committee	<ul style="list-style-type: none"> <li>• Acts in accordance with its Terms of Reference.</li> <li>• Monitors the effectiveness of the Shire's Risk Management Framework including integrity risks.</li> <li>• Receives reports on strategic integrity matters.</li> <li>• Reviews and endorses the internal audit plan and the three-year strategic audit plan.</li> <li>• Considers reports by the Office of Auditor General including but not limited to the annual external audit.</li> <li>• Reports to Council on integrity risks, audit activities and integrity controls.</li> </ul>
Council Member	<ul style="list-style-type: none"> <li>• Adheres to, and demonstrates at all times the highest standard of conduct and integrity in the discharge of their duties.</li> </ul>

	<ul style="list-style-type: none"> <li>• Models a culture of integrity through the active demonstration of the Shire’s values and by communicating the importance of meeting integrity standards.</li> <li>• Participates in the Council’s decision-making processes in an impartial, unbiased and informed manner.</li> <li>• Gives due consideration to all matters and information contained in Council Agendas and Business Papers.</li> <li>• Manages, declares and records gifts and conflicts of interest.</li> </ul>
Chief Executive Officer	<ul style="list-style-type: none"> <li>• Complies with and operates lawfully and in accordance with the <i>Local Government Act 1995</i> and other relevant legislation.</li> <li>• Responsible for the oversight, implementation, monitoring and reporting on all integrity measures and initiatives in place in the Shire.</li> <li>• Adheres to, and demonstrates at all times the highest standard of conduct and integrity in the discharge of their duties.</li> <li>• Models a culture of integrity through the active demonstration of the Shire’s values and by communicating the importance of meeting integrity standards.</li> <li>• Drives a culture of integrity through the active demonstration of the Shire’s values and by communicating the importance of meeting integrity standards.</li> <li>• Participates in the Shire’s decision-making processes in an impartial and unbiased manner.</li> <li>• Provides leadership in the prevention, detection and response to misconduct.</li> <li>• Reports misconduct activities or suspected activities to external oversight bodies.</li> <li>• Promotes effective risk management and sound governance across the organisation.</li> <li>• Manages, declares and records gifts and conflicts of interest.</li> </ul>
Directors and Managers (MELT)	<ul style="list-style-type: none"> <li>• Comply with and operate lawfully and in accordance with the <i>Local Government Act 1995</i> and other relevant legislation.</li> <li>• Adhere to, and demonstrate at all times the highest standard of conduct and integrity in the discharge of their duties.</li> <li>• Drive a culture of integrity through the active demonstration of the Shire’s values and by communicating the importance of meeting integrity standards.</li> <li>• Participate in the Shire’s decision-making processes in an impartial and unbiased manner.</li> <li>• Deliver optimal, and fit for purpose operational performance to meet the expectations and needs of the Shire’s communities.</li> <li>• Share and communicate information on integrity practices and policies and promote ethical behaviour within your team.</li> <li>• Identify, report, manage and control integrity risks.</li> <li>• Provide advice and support to staff on integrity matters.</li> <li>• Manage, declare and record gifts and conflicts of interest.</li> </ul>



	<ul style="list-style-type: none"> <li>• Manage and control integrity risks related to conflicts of interest related to the business of the Directorate/ Business Unit.</li> </ul>
Manager Governance, Risk and Procurement	<ul style="list-style-type: none"> <li>• Monitors and evaluates the effectiveness of the Shire's Integrity Framework.</li> <li>• Develops and implements core integrity processes and systems for governance, codes of conduct, delegations of authority, accountability and ethical decision-making, purchasing and procurement, and the disposal of assets, land and other property.</li> <li>• Responsible for monitoring legislative and policy compliance.</li> <li>• Delivers ethical training and awareness.</li> <li>• Maintains public registers.</li> <li>• Maintains the Register of Delegations of Authorisations.</li> <li>• Maintains the Shire's Statement of Business Ethics.</li> <li>• Manages, declares and records gifts and conflicts of interest.</li> </ul>
Manager People and Culture	<ul style="list-style-type: none"> <li>• Develops and implements core integrity processes and systems for human resource practices including recruitment and selection; performance review; workforce management; induction and training; complaints and grievances.</li> <li>• Ensures new employee inductions includes integrity training.</li> <li>• Manages, declares and records gifts and conflicts of interest.</li> </ul>
Director Corporate Services and Manager Corporate Services	<ul style="list-style-type: none"> <li>• Develops and implements core integrity processes and systems for the Shire's finances.</li> <li>• Ensures compliance with all legislative requirements, policies and procedures related to financial management and reporting, and financial audits.</li> <li>• Manages, declares and records gifts and conflicts of interest.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Comply with and operate lawfully and in accordance with the <i>Local Government Act 1995</i> and other relevant legislation at all times.</li> <li>• Adhere to, and demonstrate at all times the highest standard of conduct and integrity in the discharge of their duties.</li> <li>• Reflect the Shire's values and integrity standards.</li> <li>• Participate in the Shire's decision-making processes in an impartial and unbiased manner.</li> <li>• Comply with all Shire policies and work directions.</li> <li>• Apply appropriate practices for risk management, internal controls, and fraud and corruption prevention.</li> <li>• Report misconduct, corruption or fraud.</li> <li>• Participate in training and development opportunities to enhance integrity awareness, knowledge and capacity.</li> <li>• Manage, declare and record gifts and conflicts of interest.</li> </ul>
Contractors and Suppliers	<ul style="list-style-type: none"> <li>• Adhere to the Shire's Statement of Business Ethics.</li> </ul>

	<ul style="list-style-type: none"> <li>• Comply with and operate lawfully and in accordance with relevant contractual and legislative obligations as detailed in contracts with the Shire.</li> <li>• Comply with Shire policies, processes and systems developed for organisational (and contractor) integrity.</li> <li>• Manage, declare and record conflicts of interest.</li> </ul>
Volunteers	<ul style="list-style-type: none"> <li>• Adhere to the Shire’s Statement of Business Ethics.</li> <li>• Comply with and operate lawfully and in accordance with relevant contractual and legislative obligations as detailed in contracts with the Shire.</li> <li>• Comply with Shire policies, processes and systems developed for organisational (and volunteer) integrity.</li> <li>• Manage, declare and record conflicts of interest.</li> </ul>

## 2.4 Legislation and regulations

The *Local Government Act 1995* (“the Act”) provides the legislative basis for the powers and operations of the Shire of East Pilbara. The Council of the Shire of East Pilbara is empowered by the Act to make policies, plans and strategies, and local laws for the good governance of the communities the Shire serves. The Shire is subject to a range of other legislation. The Shire is also subject to a range of regulations, made by a responsible Minister or their delegate.

Principal legislation governing integrity and conduct obligations is set out in the following table:

Relevant legislation	Description of obligations	Shire response
<i>Local Government Act 1995</i>	s9.69A notification under Corruption, Crime and Misconduct Act	Compliance with the relevant section
	Employment arrangements	Compliance with section 5.40 principles affecting employment by local governments
<i>Corruption, Crime and Misconduct Act 2003</i>	s28 principal officers to notify suspected serious misconduct to Corruption and Crime Commission  s45H principal officers to notify suspected minor misconduct to Public Sector Commission	Local Government Act s9.69A notification under Corruption, Crime and Misconduct Act
<i>Public Sector Management Act 1994</i>	s9 all officers to act with integrity in performance of official duties	Code of Conduct for Council Members, Committee Members and Candidates

	s102 employees not to be employed outside government without permission	Code of Conduct for Employees, Contractors and Volunteers  Secondary employment policy, procedures and forms
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## 2.5 Risk analysis and planning for integrity

The Shire’s Risk Management Policy has been developed to ensure that sound Risk Management practices and procedures are fully integrated into the Council’s strategic and operational planning processes and provide direction on how Council is to manage risk. This Policy is supported by the Shire of East Pilbara Risk Management Procedures which were developed using International Organisation for Standardisation (ISO) Standard 31000:2018 Risk Management – Principles and Guidelines. The Policy and the supporting documentation and practice will be reviewed in the 2023/24 financial year as part of the Council’s commitment to best practice in risk management.

## 2.6 Internal controls, audit and governance

The Shire of East Pilbara has the following measures and controls in place to manage integrity risks as listed below. All internal controls will be subject to a major review in 2024.

### Codes of Conduct

The Shire of East Pilbara Code of Conduct for Council Members, Committee Members and Candidates and Code of Conduct for Employees, Contractors and Volunteers provide the standards of conduct and behaviour required by the Shire. The Codes are compliant with the *Local Government Act 1995* and *Local Government (Administration) Regulation 1996*, which provides the Codes’ framework. Both are published on the Shire’s website and internal portals, the Loop and Councillor Portal.

The Codes detail the requirements to be adhered to with respect to:

- Declaring and managing conflicts of interest
- Offer, acceptance and provision of gifts, benefits and hospitality
- Managing official and/or confidential information
- Use of Shire resources

The Code of Conduct for Council Members, Committee Members and Candidates is subject to review following each ordinary election, and Code of Conduct for Employees, Contractors and Volunteers is subject to review every two (2) years. The Chief Executive Officer is the custodian of both documents.

All Council members, employees, contractors and volunteers are required to complete training in the application of the relevant Code, and will be required to acknowledge receipt and understanding of the relevant Code. A copy of the acknowledgement will be retained on file.

#### Fraud and Corruption Control Policy

The Shire's Fraud and Corruption Control Policy articulates the Shire's commitment to the prevention, detection, response and monitoring of fraud and corrupt activities. It applies to all employees, Elected Members and contractors.

All employees are accountable for, and have a role to play in, fraud and corruption prevention and control. The Shire encourages staff to disclose actual or suspected fraudulent or corrupt activity. When identified, any suspected fraudulent or corrupt activity will be promptly investigated, and where appropriate legal remedies available under the law will be pursued. All alleged incidences will be investigated thoroughly. Where appropriate, the Shire will protect the anonymity of those responsible for reporting the activity.

The Shire will ensure that systems and procedures are in place to prevent, detect, report and investigate incidents of fraudulent or corrupt behaviour or activities. It will also ensure that staff are trained in and aware of their responsibilities in respect to the prevention, detection, reporting and investigation of fraudulent or corrupt behaviour.

A Fraud and Corruption Control Plan ("the Plan") has been developed to assist to meet the objectives of the Shire's policy. The Plan will ensure that the Shire has thorough and up-to-date procedures in place to mitigate the risk of fraud or corruption occurring in the organisation.

#### Audit Function

The internal audit function is undertaken in accordance with the *Local Government Act 1995*, *Local Government (Audit) Regulations 1996* and *Local Government (Financial Management) Regulations 1996*.

The internal audit function assists with the maintenance and improvement of organisational effectiveness by providing risk-based and independent assurance advice to the Chief Executive Officer and the Audit, Risk and Governance Committee of Council.

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

The internal audit function currently relies on the use of suitably qualified consultants to undertake performance audits, reviews of risk management, internal control and legislative compliance.

An annual risk-based internal audit plan is prepared by the Manager Governance, Risk and Procurement, based upon the three yearly adopted Strategic Internal Audit Plan. The annual plan identifies audit topics and is reported to the Audit, Risk and Governance Committee for endorsement. The Chief Executive Officer may vary the plan and change priorities in line with emerging risks and threats.

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

#### Risk Management Policy

The Shire's Risk Management Policy has been developed to ensure that sound Risk Management practices and procedures are fully integrated into the Council's strategic and operational planning processes and provide direction on how Council is to manage risk. This Policy is supported by the Shire of East Pilbara Risk Management Procedures which were developed using International Organisation for Standardisation (ISO) Standard 31000:2018 Risk Management – Principles and Guidelines. The Policy and the supporting documentation and practice will be reviewed in the 2023/24 financial year as part of the Council's commitment to best practice in risk management.

#### Financial and Procurement Management Controls

The Shire has the following Financial Management Controls in place:

- Financial Management Information System governing recording of all financial transactions. The Financial Management Information System also imposes automated controls to ensure segregation of duties/responsibilities for the procurement of goods and services, confirmation of receipt of goods and services, and the authorisation of payments.
- Mandatory training by all employees with authority to raise requisitions or approve payments. Access to the Financial Management Information System is not granted until the training is completed successfully. The online training is currently provided by WALGA. The Coordinator Procurement has responsibility for the provision of this training.
- Monthly reconciliation and reporting of payments to Council.
- Grant acquittals process.
- Financial management guidelines, protocols and processes.
- Appointment of external auditor to undertake reviews of financial management systems and procedures, and annual financial statements.

Financial Management Controls are reviewed at least once every three (3) years in accordance with the *Local Government (Financial Management) Regulations 1996*, and responsibility for their performance rests with the Director of Corporate Services.



### Public Interest Disclosures

The Shire has internal guidelines in place to assist and support the report of suspected wrongdoing in accordance with s23(1)(e) of the *Public Interest Disclosure Act 2003* (“the PID Act”). These guidelines outline how we will meet our obligations under the PID Act. The guidelines cover the roles and responsibilities of the Shire, the person(s) designated as the proper authority in accordance with s23(1)(a) and s5(3)(h) referred to in this document as the PID Officer, the discloser and the subject of the disclosure. These guidelines should be read in conjunction with the PID Act and the *Public Interest Disclosure Regulations 2003*. The guidelines are scheduled for review, which will take place in 2023/24.

### Statement of Business Ethics

The Shire has adopted a Statement of Business Ethics, which provides guidance for businesses, organisations and other sectors of the community, undertaking business with the Shire. It outlines the Shire’s ethical standards and expectations that goods and service providers and contractors will comply with these standards in all their dealings with the Shire. This Statement also outlines what goods and service providers and contractors can expect from the Shire.

### Recordkeeping Policy

Council adopted a new Recordkeeping Policy in 2023. The Policy and related recordkeeping procedures and guidelines provide the framework for all Shire employees and council members to comply with the requirements of the *State Records Act 2000* and the *Local Government Act 1995*. The Policy provides direction on the creation and management of records and to clarify responsibilities for recordkeeping within the Shire.

### Attain Governance Software

The Shire has invested in the use of the Attain Governance software to provide an online environment to record the receipt of gifts, declarations of interest, primary and annual returns, related party transactions and the exercise of power under delegation. The software is overseen and managed by the Manager Governance, Risk and Procurement.

### Information Technology Policy

The Shire’s Information Technology (IT) Policy provides the frame work for the maintenance of the security and integrity of the organisation’s IT system.

### Register of Delegations and Authorisations

Council has adopted a Register of Delegations and Authorisations which is published on the Shire’s website and internal portals (the Loop and Councillor Portal). The Register is reviewed each year and subject to annual adoption by Council. The custodian of the document is the Manager Governance, Risk and Procurement.

### Induction of New Employees, Contractors and Volunteers

Council members and new Employees of the Shire are required to undertake an induction upon commencement, which includes familiarisation with the respective Shire Codes of Conduct. Regular refreshers are held generally once or more each year.

### Mandatory Accountable and Ethical Decision Making Training

All Council members and employees are required to undertake mandatory training in accountable and ethical decision making. The Shire will arrange such training at least once every twelve months to be provided by an external trainer. Council members and employees are encouraged to take the training at least every two years as a refresher following the completion of their mandatory accountable and ethical decision making training. Responsibility for the provision of this training lies with the Manager People and Culture and the Manager Governance, Risk and Procurement.

### Freedom of Information

The Shire considers is compliant with the requirements of the *Freedom of Information Act 1992*.

### Supervision

It is the responsibility of all Council members, employees, contractors and volunteers to be aware of the integrity measures in place at the Shire, and to monitor and report any suspected wrongdoing. Directors and Managers must ensure their teams (including contractors and volunteers) adhere to each integrity measure, undertake all mandatory training and demonstrate personal and professional conduct in line with the Code of Conduct for Employees, Contractors and Volunteers.

### 3. Promoting a culture of integrity

The Shire of East Pilbara continues to work on the development of an organisation that models and embodies a positive culture of integrity among all our people, and embeds confidence and trust in the Shire among our stakeholders and ratepayers.

#### 3.1 Values and standards

An effective integrity framework holds an organisation and its people to high standards of ethical behaviour and conduct. Council members, employees, contractors and volunteers must be empowered to conduct themselves and the way in which they work with a culture where instinctive integrity is the minimum standard to which they are held accountable.

The Shire’s Leadership with HEART values support the development of such a culture within the organisation and promote the minimum standards required to ensure the Shire and all its people promote honesty and openness in their dealings with others.

- Leadership
- Honesty
- Excellence
- Accountability
- Respect
- Teamwork

**SHIRE VALUES** Shire of EAST Pilbara

*Leadership with HEART*

<p><b>Leadership</b></p> <p>Being ethical and acting with integrity.</p> <p>Leading by example, being decisive, setting direction and providing good governance.</p> <p>Maintaining open and transparent communication across the whole organisation.</p>	<p>Shire of EAST Pilbara</p> <p><i>Leadership with HEART</i></p>	<p><b>Honesty</b></p> <p>Being truthful and acting with personal integrity.</p> <p>Admitting mistakes, taking responsibility for them and being able to move on within a no-blame culture.</p> <p>Build trust through reliability and consistency.</p>	<p>Shire of EAST Pilbara</p> <p><i>Leadership with HEART</i></p>	<p><b>Excellence</b></p> <p>Striving to achieve our best outcome.</p> <p>Encouraging and committing to innovation, creativity, learning and development.</p> <p>Planning to deliver quality programs, projects and services.</p> <p>Recognising excellence, encouraging people to aspire to be their best and taking pride in our work.</p>	<p>Shire of EAST Pilbara</p> <p><i>Leadership with HEART</i></p>
<p><b>Accountability</b></p> <p>Being accountable to each other, to the community, and to get things right the first time.</p> <p>Being accountable to the environment and Aboriginal culture.</p> <p>Being accountable to achieve the best outcome and best value of money for our community.</p>	<p>Shire of EAST Pilbara</p> <p><i>Leadership with HEART</i></p>	<p><b>Respect</b></p> <p>Being respectful of people, their cultures, ideas, circumstances and environment.</p> <p>Being respectful of ourselves and our well-being, safety, appearance and reputation.</p>	<p>Shire of EAST Pilbara</p> <p><i>Leadership with HEART</i></p>	<p><b>Teamwork</b></p> <p>Working as a team within and beyond our organisation to achieve a common goal and vision.</p> <p>Welcoming and providing feedback respectfully.</p> <p>Supporting and talking to each other and sharing information.</p> <p>Encouraging creativity, flexibility and resilience.</p>	<p>Shire of EAST Pilbara</p> <p><i>Leadership with HEART</i></p>

Find the Shire Values in all six Shire colours: <https://theloop.eastpilbara.wa.gov.au/documents/Shire-Values>

The Shire's values form the cornerstone of the organisation's commitment to integrity and are backed by measures and controls in place to support in their work.

#### Clear rules and work directions

The Shire's Staff Policy Manual provides clear rules and direction to employees.

#### Encouraging the reporting of suspected wrongdoing

The Shire promotes a culture of reporting all incidences of suspected wrongdoing. Council has adopted Public Interest Disclosure Guidelines.

#### Seeking regular and honest feedback from employees

The Shire encourages all employees to provide their supervisors with open and honest feedback, and promotes a supportive and encouraging culture free of any threat of reprisal. The Chief Executive Officer regularly meets with staff members on a one-on-one basis to receive feedback on the organisation and to provide a mechanism whereby concerns can be raised and which will be responded to and action taken where necessary.

#### Publication of registers

The Shire publishes registers in accordance with the *Local Government Act 1995*.

### **3.2 Leadership and Organisational Culture**

The Shire's leadership strives for continuous improvement in its practices to build and promote a positive culture. This assists in the identification, attraction, selection and recruitment of new and future leaders.

The Shire is led by the Council and an Executive Leadership Team (comprising the Chief Executive Officer and all Directors) who in partnership with Managers must live and communicate the organisation's values in their effort to continually promote and improve upon the desired culture of integrity. Not settling for 'second best' and anything less than the expected high standards is a mantra of the Shire's leadership and management, whilst accepting mistakes occur by providing support and guidance, and not attributing blame in those instances where the Shire's strived for standards are not met.

Ongoing training in accountable and ethical decision making is sponsored by the leadership of the Shire to broaden awareness of our people's responsibilities and obligations, and will be backed up by regular communication of the importance of reporting concerns of alleged misconduct. A review of the Public Interest Disclosures scheme in place at the Shire will be undertaken in 2023/24, and is anticipated to result in improvements in awareness among employees of the methods of reporting and the protections in place for them to feel comfortable making reports of suspected wrongdoing.

The Shire's leadership has a zero tolerance to corrupt conduct or maladministration, and it will be dealt with swiftly through established procedures, and where required reported to the

relevant external authority. Any alleged misconduct is properly investigated and managed in line with the principles of natural justice and procedural fairness.

The Integrity Framework will also establish a program of regular review of the performance and management of integrity measures and controls in place at the Shire.

It is recognised that effective and supportive leadership and supervision can have a significant positive impact on overall organisational performance and integrity, and is a key element of the ongoing development of the Shire's culture.

## **4. Continuous development of integrity knowledge and skills**

The Shire supports the delivery of training to build integrity capacity through increased knowledge and better skills.

### **4.1 Integrity education and capacity**

As part of its ongoing commitment to improvement and to build integrity capacity, knowledge and skills among its Council members, employees, contractors and volunteers, the Shire will implement enhancements to its existing training program, through the provision of refresher courses and the delivery of knowledge in accessible ways (both formally and informally) to ensure that our people have a genuine understanding and knowledge of their obligations and opportunities to improve the integrity of their work.

The Shire currently provides regular proactive mandatory training in accountable and ethical decision making, an introduction to the principles of governance in local government and a program of inductions for new starters.

Further opportunities exist to better deliver knowledge in the following areas:

- Statement of Business Ethics for contractors and suppliers
- Council Policy initiatives and changes
- Public Interest Disclosures and reporting suspected wrongdoing
- Disclosures of gifts and interests
- Management of conflicts of interest
- Use of Council resources

An enhanced program of training will be developed as an outcome of the Integrity Framework.

In addition to the existing formal and informal integrity advisory service provided by the Shire's Governance team, the Integrity Framework will mandate the development of accessible and plain language resources to assist and guide the Shire's people. This resource will be particularly aimed at those wishing to self direct their own integrity learning, or who may prefer to seek advice anonymously, particularly concerning disclosures and reporting suspected wrongdoing.



The Governance team engages from time to time and as necessary with the Public Sector Commission, WA Ombudsman, the Crime and Corruption Commission, WA Local Government Association and Department of Local Government, Sport and Cultural Industries to ensure it is up-to-date with developments in the integrity space.

A record of all formal training undertaken by employees is retained on file by the Shire's People and Culture team. A register of Councillor training is published on the Shire's website and reported to Council annually. Records of contractor inductions are also maintained. The Shire's program of training and development is regularly monitored and reviewed.

## **5. Be accountable for integrity**

Every Councillor, employee, contractor and volunteer of the Shire of East Pilbara is accountable for the integrity of their actions, which includes the obligation to report suspected misconduct or wrongdoing. The ultimate accountability rests with the Chief Executive Officer and the Council, which work in partnership to ensure that the Shire's approach to eliminating the risks of corruption and misconduct are robust and fit for purpose. A key element of the Integrity Framework is to set a regime of assurance that the measures and controls in place to support integrity within the organisation.

### **5.1 Response to integrity breaches**

The Shire of East Pilbara takes a zero tolerance approach to corrupt conduct or maladministration, and it will be dealt with swiftly through established procedures, and where required reported to the relevant external authority. Such misconduct includes mismanagement of public resources, in the exercise of powers and functions of the local government by its Council members, employees, contractors, or volunteers.

The Shire encourages the reporting of suspected corrupt or other improper conduct that has occurred, is occurring or may occur.

The Shire will take all reasonable steps to provide protection and support to any person who seeks to report any suspected wrongdoing from any detrimental action in reprisal for the making of such a report, and will not tolerate any of its Council members or employees engaging or attempting to engage in acts of victimisation or reprisal against any person who makes a report.

Any alleged misconduct will be properly investigated and managed in line with the principles of natural justice and procedural fairness. The Chief Executive Officer, or the President in the case of complaint against the Chief Executive Officer, has the discretion to refer a report to an external, independent investigator.

Any allegation of misconduct that is upheld will be addressed in line with the relevant legislation, Code of Conduct or internal disciplinary process as appropriate, and reported as and where appropriate. For certain types of misconduct, the Chief Executive Officer has a statutory obligation to report such misconduct to the Public Sector Commission, the

Department of Local Government, Sport and Cultural Industries (minor misconduct), the Corruption and Crime Commission (serious misconduct), and/or the WA Police (criminal conduct).

In instances where findings of misconduct are made, the Shire will use these to identify opportunities for improvements to integrity practices and controls.

## **5.2 Analysis and review of the Integrity Framework**

The Shire of East Pilbara will initially undertake a review of the performance and suitability of the Integrity Framework as part of its enterprise risk management review in 2024. Following this review, the Integrity Framework will be subject to review every two years. Reviews may also take place based on a current risk assessment or changes in industry best practice.

Each review will consider opportunities for improvement and maturity through:

- Analysis of data and evidence of its performance and suitability; and a
- Gap analysis
- Comparative analysis of best industry integrity practice

Coordination of the review is the responsibility of the Shire's Chief Executive Officer.

The Shire will also continue to access existing publicly available resources to assist in the development of the Framework's effectiveness and maturity, including the following:

- Integrity Snapshot Tool
- Integrity and Conduct Annual Collection
- Integrity in Financial Management Self-Assessment Checklist
- Compliance Audit Returns
- Local Government and Public Sector Inquiry Reports

## **6. Oversight**

The Chief Executive Officer and Council have ultimate oversight and responsibility for the integrity measures and controls within the Shire of East Pilbara, including the Integrity Framework. Regular monitoring and report is essential to ensure the Integrity Framework is effective and fit for purpose.

The following specific oversight and assurance measures are in place:

### Chief Executive Officer and Executive Leadership Team

- Executive Leadership Team meeting agendas regularly includes consideration of a range of integrity matters;
- Regular reporting from each Directorate to the Executive Leadership Team meetings to include:
  - Financial performance monitoring and proposed budget amendments

- Review of disclosures of interest, gifts and approved secondary employment of employees
- Training and development
- Status updates of progressive implementation of internal audit log actions and improvements
- Risk management
- Surveys of Shire employees and stakeholders

#### Director Corporate Services

- Appointment as Complaints Officer

#### Council

- Monthly reporting on the use of all Shire issued credit cards and financial transactions
- Adoption of annual Compliance Audit Report
- Policy development and review
- Adoption of Register of Delegations and Authorisations

#### Audit, Risk and Governance Committee

- Review and endorsement of annual Compliance Audit Return
- Regular review of internal audit function, including status updates on progressive implementation of internal audit log actions and improvements, and annual review of program of internal audit reviews, and endorsement of three yearly strategic internal audit plan
- Review and monitor performance and effectiveness of the Shire’s enterprise risk management systems
- Three yearly review of the appropriateness and effectiveness of the Shire’s systems and risk management systems, internal controls and legislative compliance and report the findings to Council
- Three yearly review of the appropriateness and effectiveness of the Shire’s financial management systems and procedures and report to the findings to Council

## **7. Authorisation**

<b>References:</b>	<i>Provide any Statutory, Regulatory or Policy related documents</i>		
<b>Authorised by:</b>	Council		
<b>Date:</b>	25 August 2023	<b>Item No.</b>	11.1.1
<b>Review/Amendment Date</b>		<b>Item No.</b>	
<b>Next Review</b>	Every two (2) years after an initial one (1) year review		
<b>Responsible Directorate</b>	Chief Executive Officer		

<b>Responsible Officer</b>	Manager Governance, Risk and Procurement
<b>File No.</b>	