Integrity Framework

Acknowledgement of Country

"Kaya, Nala Maat Kaya Noonduk (Hello, Our Family Welcomes You) to Wadandi Boodja (Saltwater People's Country) – we all come together on Boodja (Country). Whilst on Wadandi Boodja we ask that you respect the land by walking softly and take the time to listen to Boodja as she Wongi (Talks).

We respect the presence of the Demmala Goomala (Ancestors) whose Djanga (Spirits) reside on Boodja and whose Djenna (feet) walk the land and whose Djanga Korda (heart spirit) flows through all creation. Wooditjup (Margaret River) is the heart of Wadandi Boodja (country), a meeting place between land and sea, connecting us all with Wadandi Boodja.

The Wadandi Boodja (Motherland) reaches from Bunbury, along the coast of Geographe Bay, extending to Yallingup (Place of Holes) to Talinup, Augusta (Place of Reeds) inland to Nannup (The Stopping Place), taking in the region of Undalup (Busselton) The Wadan Boodja (Sea Country) is of great spiritual significance to the coastal Wadandi people. Boodja – Land, Country, Mother Earth – is our most important resource. No matter what culture or religion – all of us rely on Nala Boodja, Our Country.

It is up to all of us to listen to the land, understand the connection to Country that we all have and realise how urgent it is to work together to make better decisions on how we can create that balance, ensuring sustainability for the generations to come, in order to protect and preserve the beauty of Boodja.

Whilst living, travelling, visiting and holidaying on Wadandi Boodja (Saltwater People's Country) we ask that you respect the area and walk softly on the country, taking the time to listen to Boodja (Country) as she Wongi (Talks) of the Season, and leave nothing but footprints".
Wadandi Traditional Cultural Custodian Wayne "Wonitji" Webb.

The Shire of Augusta Margaret River acknowledges we are on Wadandi and Pibelmen Boodja, whose ancestors and their descendants are the traditional owners of this country.

We acknowledge the Wadandi and Pibelmen have been custodians since the land was soft (creation times) and continue to perform age old ceremonies of celebration, initiation and renewal. We acknowledge their living culture and their unique role in the life of this region.

The Shire is committed to Aboriginal Australians sharing fairly and equitably in the region's cultural, social, environmental and economic future.

Contents

Alignment to the
Strategic Community Plan
2040

COMMUNITY VISION
Augusta Margaret River
Sustainable, inclusive, connected to place and respecting Boodja

Environment

We will protect and enhance the unique natural environment and biodiversity of the region through climate action and informed decision making.

We will focus on:
Outcome EN.1: Ecology and biodiversity protection
Outcome EN.2: Healthy waterways, foreshores and natural landscapes
Outcome EN.3: Collective climate action
Outcome EN.4: Sustainable resource and waste management

People

We will support and strengthen our diverse, resilient, welcoming, safe and connected community through our services and advocacy.

We will focus on:
Outcome PE.1: Diverse cultural values are respected and adopted
Outcome PE.2: Equal opportunities for all
Outcome PE.3: Active, healthy and fulfilling lifestyles
Outcome PE.4: Safe and resilient communities

Place

We will responsibly develop vibrant, sustainable places which maintain their distinctive characters, and which supports a local economy that is resilient, equitable and sustainable.

We will focus on:
Outcome PL.1: Diverse, sustainable and well-designed places
Outcome PL.2: Infrastructure which caters to need
Outcome PL.3: Sustainable agriculture and thriving rural community
Outcome PL.4: Resilient circular local economy

Performance

We will deliver quality governance, service and value with integrity and transparency.

We will focus on:
Outcome PF.1: Responsible planning and ownership of outcomes
Outcome PF.2: Community and customer focus
Outcome PF.3: High performing and engaged people
Outcome PF.4: A culture of innovation, quality and continuous improvement

1. Clear Expectations

1.1 Introduction

The Shire of Augusta Margaret River's (Shire's) Integrity Framework is aligned to the Shire's Strategic Community Plan 2040, aiming to guide the organisation in providing the highest level of integrity for its community, and bringing together the instruments, processes and structures within the organisation that foster integrity and help prevent corruption and misconduct from taking place.

Integrity is one of the Shire's four core values, underscoring the importance of courage in doing the right thing and promoting transparency in decision-making. This value guides the Shire's behaviours, decisions, organisational actions, and its approach to leading and serving the community.

The Shire commits to ensuring all elected members, employees, contractors, suppliers and volunteers understand and operate within the Integrity Framework and that the elements contained within are continuously enhanced and reviewed so that integrity forms part of the Shire's day-to-day business, decision-making and operations.

1.2 Purpose and Objectives

The purpose of this framework is to establish a robust system that promotes and delivers ethical conduct, transparency, and accountability within the operations and activities. It provides guidelines that assist in aligning decisions with the Shire's vision, fostering ethical leadership and decision-making.
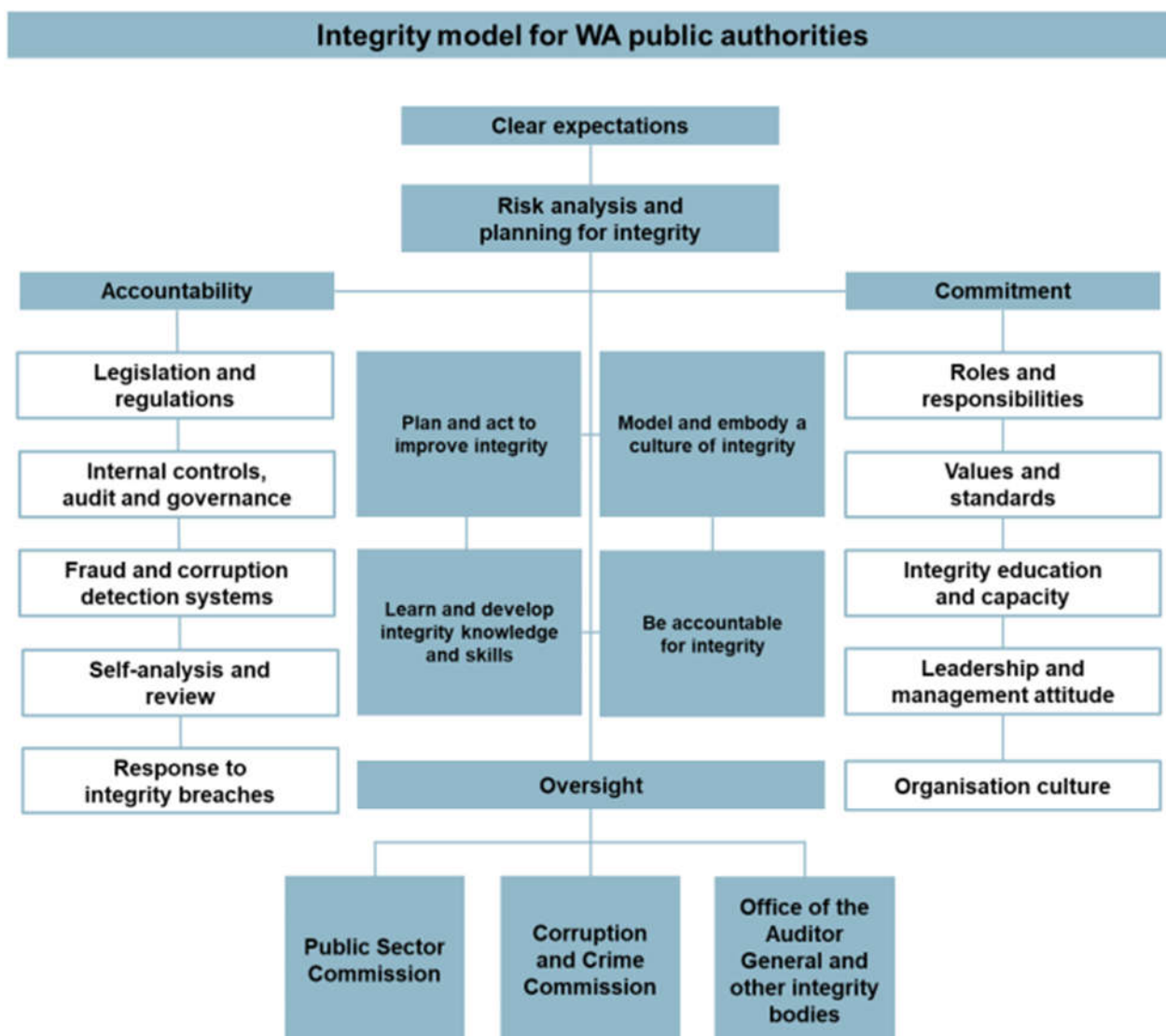
Key objectives:
- Ethical, accountable and effective decision making;
- Enhancing community trust and reputation;
- Reducing the risk of misconduct and conflicts of interest;
- A culture of continuous improvement;
- Building organisational resilience and continuity.

By:
- Establishing and communicating clear standards;
- Implementing policies and procedures;
- Providing education and training;
- Creating oversight mechanisms;
- Encouraging the reporting of unethical behaviour;
- Conducting regular audits;
- Enforcing consequences for violation.

1.3 The Shire of Augusta Margaret River Integrity Model

Integrity model for WA public authorities

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
Fraud and corruption detection systems	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

2. Plan and Act to Improve Integrity

2.1: Roles and Responsibilities

The Shire's Integrity Framework includes specific areas with responsibilities for defining, supporting, controlling and enforcing integrity across the organisation. These include core areas, such as the Audit and Risk Management Committee (ARMC), individuals responsible for implementing integrity-related policies, as well as complementary areas whose primary purpose is not to directly support the Shire's Integrity Framework, but without whom the framework could not operate.

Whilst the framework applies to all areas and all employees, assigning clear responsibilities within the Shire's operations is necessary to ensure co-operation and to avoid overlaps and prevent fragmentation.

Responsibilities include developing, implementing, monitoring and evaluating integrity standards and tools.

The following table details the various bodies or positions within the Shire that are key components of the Shire's integrity system:

Roles	Responsibilities

Council	• Operates in accordance with the *Local Government Act 1995* (LG Act) and relevant legislation, including in relation to integrity and governance.
	• Sets integrity expectations and embodies these through the Shire's:
	  o Values
	  o Code of Conduct for Council Members, Committee Members and Candidates
	  o Risk Management Framework
	• Approves policy documents as they relate to integrity matters.
	• Sets and endorses delegations for specific functions to the Chief Executive Officer and relevant officers.
	• Endorses the Shire's Annual Compliance Audit Return.
	• Endorses the Instrument of Appointment and Delegation of the Audit and Risk Management Committee.

Audit and Risk Management Committee	• Acts in accordance with its Instrument of Appointment and Delegation, including:
	  o Review in accordance with *Regulation 17 LG (Audit) Regulations 1996; and*
	  o Review in accordance with R*egulation 5(2)(c) of LG (Financial Management) Regulations*.
	• Reports to Council on integrity risks, audit activities and integrity controls.
	• Recommends improvements to Council.

Elected Members	• Adheres to and demonstrates the highest level of commitment and conduct for integrity. • Models a culture of integrity through the active demonstration of the Shire's values and by communicating the importance of meeting integrity standards. • Participates in the Council's decision-making processes in an impartial and unbiased manner. • Manages, declares and records gifts and conflicts of interest.
Chief Executive Officer	• Provides leadership in preventing, detecting, and responding to misconduct. • Oversees the implementation of the Shire's Risk Management Framework. • Notifies the Corruption and Crime Commission (major misconduct) or the Public Sector Commission (minor misconduct) of any suspected incidences of misconduct as required by the *Corruption, Crime and Misconduct Act 2003.*

	• Drives a culture of integrity through active demonstration of Shire values and communicating the importance of meeting integrity standards.

Executive and Senior Leadership Team	• Demonstrates commitment to integrity through the active demonstration of Shire values and by building an accountable workplace culture.
	• Reinforces the requirement for integrity by employees and ensures that there are mechanisms in place to:
	    o Identify and assess integrity risks.
	    o Proactively identify and communicate business unit specific risks.
	    o Actively participate in integrity reporting at Leadership meetings.

Manager Legal and Governance Services	• Oversees the development and review of the Integrity Framework. • Manages strategic and operational risk registers that include integrity risks. • Implements core integrity instruments, processes and systems around gift declarations, risk, fraud and misconduct control. • Is the Shire's Secondary Public Interest Disclosure (PID) Officer • Oversees the Shire's external misconduct reporting mechanisms. • Maintains the Shire's Fraud and Corruption Control Policy. • Manages, declares and records gifts and conflicts of interest. • Ensures all employees receive appropriate training on integrity expectations. • Maintains the Shire's Statement of Purchasing Ethics. • Prepares, publishes complementary integrity instruments, processes and systems around purchasing and procurement; tendering and contracts.
Manager People, Culture and Safety	• Ensures all employees receive appropriate training on the Code of Conduct. • Ensures compliance with legislative provisions, policies and procedures related to human resources practices inclusive of the Shire's Code of Conduct. • Ensures appropriate pre-employment screening is carried out for new employees. • Oversees organisational employee surveys.
Manager Corporate Services	• Implements complementary integrity instruments, processes and systems around purchasing and procurement; tendering and contracts; and utilisation of the Shire's finances. • Ensures compliance with legislative provisions, policies and procedures related to financial management and reporting, procurement, and financial audits • Is the Shire's Primary PID Officer.

Employees	• Operates in accordance with the LG Act and relevant legislation, including in relation to integrity and governance.
	• Ensures an awareness and understanding of the employee's role within this framework.
	• Actively supports and contributes toward integrity risk management initiatives.
	• Reports any instances of misconduct through the Shire's reporting process.
	• Ensures awareness, understanding and support of all Shire policies and procedures.

2.2: Legislation and Regulations

The LG Act is the key legislative instrument which provides the Shire the power to make policies, plans and strategies, and local laws, which are generally used to establish and maintain the quality of life and amenity in keeping with community expectations.

The Shire's legislative, policy and planning documents are available on the Shire's website.

The Shire is also responsible for administering a number of State and Commonwealth Acts and Regulations.

The Shire also has obligations under State legislation to report matters related to integrity including, but not limited to:

- *Corruption, Crime and Misconduct Act 2003*
- *Financial Management Act 2006*
- *State Records Act 2000*
- *Freedom of Information Act 1992*
- *Public Secor Management Act 1994*
- *Public Interest Disclosure Act 2003*
- *Equal Opportunity Act 1984*

2.3: Risk Analysis and Planning for Integrity

Risk Management Policy
The Shire's *Risk Management Policy* describes the commitment to understanding and managing the Shire's risk environment, taking measures to ensure risks are contained to acceptable levels in accordance to its remit and responsibilities.

Risk Management Framework
The Shire's *Risk Management Framework* supports and expands on the *Risk Management Policy* and aims to uphold the Shire's approach to managing risk, including identifying, evaluating, treating, monitoring, reviewing and reporting risk. The framework provides guidance to integrate risk management into activities and function performed by the Shire.

The policy and framework are aligned with the Australian Standard/International Organisation for Standardisation (AS/NZS ISO) 31000:2018 Risk Management – Guidelines.

2.4: Internal Controls, Audit and Governance

The Shire undertakes activities and implements internal controls to minimise its integrity risks including the following:

Policies and Procedures
A function of Council under the LG Act is to make policies guiding the Shire's operational and decision making. The policies span various business areas and responsibilities of the Shire and are reviewed every four years or on an as needs basis. Council policies can be viewed on the Shire website:https://www.amrshire.wa.gov.au/shire-and-council/laws,-policies-governance-and-fees/policies

The integrity action plan ensures policies and procedures relating to integrity are reviewed to ensure they have consistent principles and objectives, and are clear and easy to follow.

Table of policies / procedures / documents that relate to integrity:

Policy	How it relates to integrity
Fraud and Corruption Control Policy	Provides specific guidance on preventing, detecting, and responding to fraudulent and corrupt behaviour.
Risk Management Policy	Sets out the Shire's approach to risk management, including integrity related risks (further defined in the Risk Management Framework).
Purchasing Policy	Contains a section specifically addressing integrity and ethics.
Investment Policy	Contains section on ethical investment. *'wherever possible the Shire will invest with financial institutions whose values align with the Shire's strategic priorities.'*
Equal Employment Opportunity Policy	Promotes fairness, respect, transparency, legal compliance, diversity. Includes monitoring, reporting and consequences of non-compliance.
Work Health and Safety Policy	When employees feel safe and valued, their job satisfaction and commitment increases, reflecting positively on the Shire's ethical standards.
Complaints Handling Policy	Sections of complaints regarding elected members including allegations of misconduct and reporting mechanisms.
Execution of Documents Policy	Arm of governance management control – delegations.
Councillor Professional Development Policy	Sets out compulsory inductions for new elected members, including Code of Conduct and governance, which covers integrity.
Code of Conduct Behaviour Complaints Policy	Sets out the mechanism for dealing with complaints, established under clause 15(2) *Local Government (Model Code of Conduct) Regulations 2021.*
Public Interest Disclosure Procedure (whistleblowing procedure)	Statutory under *Public Interest Disclosure Act 2003* Objective – mechanism for reporting corrupt or improper conduct Staff awareness of how to report misconduct
Issues Handling Procedure	Outlines how to address performance issues, distinguishes the process for informal and formal investigations.
Investigation Procedure	Promotes transparency, fairness, accountability, trust, protection of rights, prevention of retaliation,

	consistency, legal and ethical compliance, resolution and improvement and ethical leadership.
Disciplinary Procedure	Contributes to a supportive and safe work environment where employees feel comfortable raising concerns. This environment is essential for maintaining high ethical standards and fostering a culture of integrity.
Performance Management Procedure	Ensures compliance with employment laws and ethical guidelines. This adherence to legal and ethical standards underscores the Shire's commitment to lawful and principled conduct.
Induction Procedure	Sets out compulsory induction for new employees, including Code of Conduct and governance, which covers integrity.
Criminal Investigations and Prosecutions Procedure	Upholds Shire's reputation for integrity by demonstrating that criminal activities are taken seriously and addressed consistently, promptly and fairly.
Recruitment and Selection Procedure	Recruitment materials include information of values and ethical standards of behaviour, conflict of interest requirements, promotion of equal employment opportunities and a merit based selection process.
Related Party Transactions Procedure	Ensures disclosure requirements of Australian Accounting Standards Board (AASB) 124 are met, minimising the risk of influenced decision making, maintaining integrity of the Shire and trust of the community.
Petty Cash Procedure	Controls for financial integrity, preventing fraud and misuse of petty cash.
Conflict of Interest Procedure	Aims to minimise the risk of influenced decision making, maintaining integrity of the Shire and trust of the community.
Disclosure of Gifts and Tickets to Events Procedure	Aims to minimise the risk of influenced decision making, maintaining integrity of the Shire and trust of the community.
Secondary Employment Procedure	Manages potential conflicts of interest and ensures accountability
Statement of Purchasing Ethics	Provides a framework for ensuring ethical, transparent, and fair procurement practices.

Code of Conduct
The Code of Conduct for Employees and Code of Conduct for Councillors, Committee Members and Candidates outlines the ethical standards and acceptable behaviours expected of all employees, elected members, committee members and candidates. By clarifying what constitutes appropriate conduct, the Code reinforces integrity, deters unethical behaviour and provides a baseline for accountability and disciplinary actions.

Supervision
Directors and Managers are expected to ensure employees adhere to governance policy frameworks and demonstrate behaviours required by the *Code of Conduct for Employees.*

Governance Management Controls
The following governance management controls are in place:
- Clear Delegations and Authorisations that define roles, responsibilities and decision-making limits, ensuring that authority is exercised appropriately and transparently.

- Managing conflicts of interest to ensure they do not influence decisions, promoting fairness and impartiality in decision making and mitigating risks associated with compromised decision making that could harm the Shire's integrity.
- Undertaking secondary employment being required to be approved.
- Effective reporting pathways, including the Public Interest Disclosure system provide safe, confidential channels for reporting unethical or unlawful behaviour.

Human Resource Management Controls
The following human resource management controls are in place;
- Employment screening including a requirement to provide a national police clearance certificate and/or working with children checks before employment is offered as relevant to each role.
- New employees being required to complete a comprehensive induction process which includes information on integrity and the requirement to notify the Shire in the event they are charged with a serious criminal offence or an offence involving fraud or dishonesty.
- Probing for moral judgement capacities at interview by asking questions around ethical predicaments as relevant to each role.
- Reference checks of applicants and a level of questioning based on the skills, knowledge and experience required for the position.
- Qualification checks and presentation of original documentation.

The Shire's annual performance review process is also a mechanism for employees and supervisors to reinforce integrity standards; raise any integrity issues; or identify any training and development needs.

Financial Management Controls
The following Financial Management Controls are in place:
- Internal controls to ensure adequate segregation of duties/responsibilities with regard endorsed delegations related to procurement and authorisation of payments.
- Bank payments to ensure authorisations.
- Monthly reconciliation and exception reporting.
- Financial management guidelines, protocols and processes.
  Appointment of external auditor to undertake reviews of financial management systems and procedures.

Information Management Controls
The following Information Management Controls are in place:
- The Shire's Record Keeping Plan details the management of State records to meet obligations under the *State Records Act 2000.*
- The Code of Conduct for Council Members, Committee Members and Candidates and Code of Conduct for Employees contain provisions related to the use of information.
- Access to corporate records by employees and contractors being in accordance with designated access and security classifications as determined by the Shire's Records Management Policy.
- Access to the Shire's records by the general public being in accordance with the *Freedom of Information Act 1992,* or other written laws.
- Access to the Shire's records by elected members and committee members being via the CEO in accordance with Section 5.92 of the LG Act.
- Liaises with the Ombudsman WA in relation to effective complaint handling, investigations and record keeping.

Audit and Risk Management Controls
The following table shows a list of matters that are required to be reported to the Audit and Risk Management Committee:

Report	Frequency	Source

Risk management report	At least once a year	*Risk Management Framework*
Compliance audit return	Annually	*Regulation 14 Local Government (Audit) Regulations 1996)*
Interim and End of Financial year Audit	Annually	*Part 4 of the Local Government (Financial Management) Regulations 1996*
Review in accordance with regulation 5(2)(c) of LG (Financial Management) Regulations (also referred to as internal audit review).	Once every three years	*Local Government (Financial Management) Regulations 1996 regulation 5(2)(c)*
Annual Financial Report	Annually	*Part 4 of the Local Government (Financial Management) Regulations 1996*
Review in accordance of *Regulation 17 LG (Audit) Regulations 1996* Report on appropriateness and effectiveness of systems and procedures in relations to risk management, internal controls and legislative compliance.	Once every three years	*Regulation 17 LG (Audit) Regulations 1996*
OAG – Local Government Focus Reports	Within three months of an OAG focus report	*ARMC resolution 11/11/2020 (ARMC2020/10)*

The ARMC has two independent members appointed by Council.

2.5: Fraud and Corruption Detection Systems

The Shire's Fraud and Corruption Control Policy demonstrates the Shire's commitment to the prevention, detection, response and monitoring of fraud and corrupt activities. The Shire has a zero tolerance for fraud or corruption and will take all reasonable steps that are necessary to prevent fraud and corruption occurring.

Financial management detection systems include:
- Monthly data and exception issues analysis/reporting.
- Monthly reconciliations and review of exception reports.
- Fortnightly payroll certification reports and monthly payroll data integrity checking.
- Internal audit reviews.
- Annual statutory external audit by the Office of the Auditor General and reporting in the Shire's Annual Report.
- Annual budget process and mid-year review to critically review and examine forward budget projections.
- Annual review of the Strategic Financial Management Plan.

Governance detection systems includes:

- Regular review of conflicts of interest and gifts and declarations.
- Regular review of registers to ensure compliance with legislative/policy requirements.
- Quarterly review of legislative compliance.

3. Model and Embody a Culture of Integrity

3.1: Values and Standards

The Shire's Strategic Community Plan sets out the vision, focus areas and strategies for the future 20 years.

The Shire's Values guide behaviours and decision making, how the Shire acts as an organisation and how it leads and serves the community. The Shire's values are:

- **Respect**
  Acknowledging culture, environment and community, whilst ensuring behaviour has a positive impact

- **Integrity**
  Having the courage to do the right thing and be transparent in decision making

- **Community**
  Focussing on supporting positive collaborative relationships that connect communities to deliver great outcomes for the wider community.

- **Excellence**
  Committing to providing a high level service to customers and being open to opportunities and change.

Integrity is reinforced when elected members, employees, contractors, suppliers and volunteers model the Shire's values. These values shape the Shire's culture, forming the foundation for expected attitudes and behaviours. Ethical conduct and daily decision-making are rooted in the Shire's core values.

A positive culture promotes openness and honesty, makes accountability and responsibility clear and encourages discussion on important issues. This environment also increases the likelihood of retaining high-calibre employees who are motivated to work and engage in the Shire's activities.

3.2: Leadership and Management Attitude

Effective leadership and supervision can have a significant impact on the performance and integrity of teams and help to detect and prevent misconduct at the Shire.

The Executive and Senior Leadership Teams proactively promote integrity and supervise by:

- Visibly demonstrating and actively promoting the Shire's values.
- Understanding and utilising management and monitoring tools, including performance management, substandard performance processes, and disciplinary and reporting procedures.
- Being consistent and clear about expectations, aligning them with values and policies, and addressing difficult conversations about performance and integrity.
- Trusting their team but still fulfilling their obligations by monitoring work performance and integrity requirements and following up on any concerns.

- Taking consistent, appropriate and proportionate action to address issues.
- Creating safe places where employees can challenge the status quo by speaking up (also refer to the Shire's Public Interest Disclosure Officers and Employee Assistance Program).

Employee Opinion Surveys and Climate Surveys will help leaders in understanding employee perceptions regarding adherence to values and standards of integrity as a measure of success.

Employees and leaders who adhere to established ethical standards are more likely to act responsibly under pressure, supporting resilience and continuity, especially during a crisis

3.3: Organisation Culture

A culture of integrity promotes fairness, respect, and accountability, which can lead to higher employee morale and satisfaction. Employees are more likely to stay with an organisation where they feel safe, respected, and valued.

The Shire fosters and cultivates a culture of integrity through:

- Encouraging an open culture where ethical dilemmas, public integrity concerns, and mistakes can be openly discussed and where leadership is responsive and committed to providing timely advice and resolving relevant issues.
- Establishing clear guidelines and procedures for reporting suspected breaches of conduct.
- Ensuring protection from any form of unjustified treatment for those who report misconduct or integrity violations in good faith and with reasonable grounds, in alignment with the core principles of procedural fairness.
- Communicating the Shire's Code of Conduct.
- Undertaking Employee perception survey to determine perceptions of observance to values and standards of integrity.
- Publishing registers on the Shire's website for public inspection in accordance with the LG Act. These include, but are not limited to the Gifts Register, Minor Breaches Register, Complaints Register, Declarations of Interest Register and Electoral Gifts Register.

4. Learn and Develop Integrity Knowledge and Skills

4.1: Integrity Education and Capacity

The Shire may have processes and practices in place to promote a culture of integrity, but it must continue to educate and communicate these standards and practices through understanding and capacity building.

Providing adequate information, training, guidance, and timely advice to elected members and employees to uphold public integrity standards is accomplished through:

- Implementation and monitoring of the Integrity Action Plan;
- Referencing and engaging with the Public Sector Commission through its integrity insights materials; and
- Adhering to the below Integrity education and training plan.

Integrity education and training plan

Audience	Message	Mechanism	Frequency	Supported by
Job applicants	• Vision and values • Code of conduct • Integrity expectations	• In job descriptions • Applicant packs • Website/jobs board materials • Job advertisements	• On application	• Website • Annual report • Corporate documents
New starters (including temporary staff, volunteers and contractors)	• Vision and values • Code of conduct • Policies and procedures • Reporting pathways	• Induction • Training on the Code of Conduct • Acknowledgement of Code of Conduct	• First week to first 3 months of employment	• Policies and procedures • Induction manual • Intranet • Online modules
Elected members	• Vision and values • Risk areas identified in integrity risk management • Importance of role modelling • Reporting pathways	• Induction • Professional development • Further education	• On appointment • When legislation, risks or policies change • When an integrity incident occurs	• Risk management process • Policies and procedures
Leaders and managers	• How to manage complaints • How to have difficult conversations • How to recognise red flags • PID awareness • Risk awareness	• In-house training (facilitated by relevant team) • Training run by anti-corruption and other integrity bodies • Training run by external provider • Mentoring	• On appointment • When legislation, risks or policies change • When an integrity incident occurs	• Policies and processes • Materials developed by anti-corruption and other integrity bodies

5. Be accountable for integrity

5.1: Response to Integrity Breaches

As an overarching principle, the Shire does not tolerate corrupt or improper conduct by its elected members, employees, contractors, suppliers or volunteers in the performance of public duties. To uphold this standard, the Shire enforces its expectations and encourages disclosures from elected members, employees and the public regarding any actual or potential corrupt or improper conduct.

The Shire will take all reasonable steps to protect any person who makes a disclosure from any detrimental actions taken in reprisal for their report of misconduct. The Shire strictly prohibits and does not tolerate any acts of victimisation or retaliation by its elected members or employees against individuals who come forward with disclosures.

The Shire's *Code of Conduct for Council Members, Committee Members and Candidates* and *Code of Conduct for Employees* outline key principles and minimum requirements to ensure compliance with relevant legislation and ethical standards. In addressing matters, the Shire may take investigative and disciplinary action in line with relevant Shire policies and procedures.

When complaints against elected members, committee members, or candidates are upheld, they will be recorded in the Shire's Register of Minor Breaches, which is available on the Shire's website, and reported in the Shire's Annual Report.

For certain types of conduct, the CEO has a statutory obligation to notify the PSC and DLGSC (minor misconduct), CCC (serious misconduct) and Western Australia Police (criminal conduct).

Where relevant, any reports and discipline processes are used as opportunities to improve practices and strengthen controls.

5.2: Self-analysis and Review

The Shire will self assess and review the framework on a biennial basis examining ways to continuously improve by:

- Development and implementation of the Integrity Action Plan.
- Making judgements informed by data and evidence about what is working and what is not.
- Identifying gaps and areas for improvements and deciding the best way to address gaps.

The CEO will be responsible for coordinating the review.

The Shire also uses available tools (e.g. PSC Integrity Snapshot Tool, Integrity and Conduct Annual Collection, Integrity in Financial Management Self-Assessment Checklist) to assess what is currently in place and the maturity of its approach to integrity.

6. Oversight

The CEO, with the support of the ELT, is responsible for oversight of the Integrity Framework.

In practice, oversight seeks to reduce the opportunity for misconduct and corruption to occur by making sure:

- Legislation, regulations, policies and standards are met and followed;
- Integrity risks are identified, controlled and monitored;
- Due diligence occurs before key decisions are made; and

- Systems and processes are working well and being continuously improved.

The following processes are in place to provide the Council and Chief Executive Officer with assurance that the approach to practicing, managing and accounting for integrity is sound, and the framework is working as intended:

Chief Executive Officer
- Integrity matters to be a standing executive agenda item.
- Role and responsibilities as the Shire's Complaints Officer undertaken.
- Regular reporting from business areas to the CEO and/or ELT.

Council / Audit and Risk Management Committee
- Annual Compliance Audit Return.
- Regular reporting on internal audit coverage and annual work plan
- Regular reporting on the Office of the Auditor General's work program.
- Regular reporting on identifying and management of misconduct and integrity matters affecting the Shire or local government sector.
- Monitors the effectiveness of the Shire's Risk Management Framework including integrity risks.
- Sets and endorses delegations for specific functions to the CEO and relevant officers.
- Three yearly reviews of the appropriateness and effectiveness of the Shire's systems and procedures in relation to risk management, internal controls and legislative compliance and report to the Council the results of those reviews.
- Three yearly reviews of the appropriateness and effectiveness of the Shire's financial management systems and procedures of the Shire and report to the Council the results of those reviews.

Internal Audit Function
An internal audit function will provide the ELT with assurance that operational controls are functioning efficiently, effectively, and ethically. It will also strengthen the Shire's risk management framework, promote good governance, and enhance the Shire's oversight of integrity.

The internal audit function will be developed to align with operational risk reporting.
The internal audit function will:

a) Develop an audit plan at the beginning of each calendar year for consideration and approval of the ELT.
b) Ensure the audit plan meets the requirements of the Shire;
c) Identify and secure all necessary resources required to execute the audit plan;
d) Ensure any proposed changes to the plan are communicated to the ELT.

7. Relevant Shire of Augusta Margaret River Documents

The following key Shire documents are relevant to the Integrity Framework:
- Strategic Community Plan 2040
- Code of Conduct for Council Members, Committee Members and Candidates
- Code of Conduct for Employees
- Risk Management Framework
- Audit and Risk Committee Instrument of Appointment and Delegation
- Public Registers
- Risk Management Policy
- Fraud and Corruption Control Policy
- Public Interest Disclosure Procedure
- Statement of Purchasing Ethics

Document and version control table	
Responsible Directorate	Legal and Governance
Contact officer	Claire Schiller, Senior Governance and Risk Officer
Adopted / approved by:	ELT 30.01.2025
Date of next review	2027
Document No. N293408	**File No.** GOV/51

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amrshire@amrshire.wa.gov.au
www.amrshire.wa.gov.au

Margaret River

41 Wallcliffe Rd (PO Box 61)
Margaret River 6285

T (08) 9780 5255 | F (08) 9757 2512

Office Hours
Mon to Fri, 9am – 4pm

Phone enquiries
8.30am – 4.30pm

Augusta

66 Allnut Tce
Augusta 6290

T (08) 9780 5255 | F (08) 9757 2512

Office Hours
Tue to Thu 9am – 12pm, 1pm – 4pm

Phone enquiries
8.30am – 4.30pm

If you are deaf, or have a hearing
impairment or speech impairment,
contact us through the National
Relay Service:

- TTY users phone 133 677
  then ask for 08 9780 5255

- Speak and Listen users
  phone 1300 555 727
  then ask for 08 9780 5255

- Internet relay users
  connect to the NRS
  www.relayservice.com.au
  then ask for 08 9780 5255