Behaviours for organisational integrity

This information sheet provides good practice guidance for public sector agencies and public officers regarding the key behaviours and actions that should be expected to support organisational integrity. While the list is not exhaustive, consideration of these behaviours will help to build capacity within public sector agencies to detect, expose and prevent misconduct and corruption.

Background

Through our research and investigations, IBAC has observed a range of behaviours that can allow corruption to take hold and flourish in public sector agencies. If they go unchecked, these behaviours can form a powerful incubator that enables misconduct and corruption to be covered up or hidden. These patterns of behaviour can occur at different levels, including for example:

- An individual officer conceals or fails to disclose wrongdoing, including their involvement.

- Colleagues who suspect or witness the officer's conduct are reluctant or unwilling to report, including for fear of being punished.

- A supervisor fails to apply rigour and sufficient standards within their team. They are apathetic or unwilling to fully explore wrongdoing, or to consider the role (including the involvement or inaction) of other team members.

- Internal integrity and governance teams have ineffective systems for identifying and reporting corrupt conduct, including not adequately assessing evidence of corruption. They focus on individual behaviour in the implicit assumption that removing "rotten apples" is enough.

- Senior management is overly focused on getting the job done at all costs, with insufficient focus on the need for systemic vigilance against poor standards. Senior management does not see how a culture of cutting corners enables corruption to take hold.

As set out in this guide, public officers can take action to disrupt such behaviours and conditions, and help build their agencies' capacity to expose and prevent misconduct and corruption.

Employees

- Forthcoming and honest in all their interactions (eg acknowledges and reports any mistakes and deals with them in a timely manner).

- Uses any discretionary powers appropriately and proactively identifies, declares and manages any actual, potential or perceived conflicts of interest.

- Completes all organisational training relevant to their role and responsibilities to build awareness of policies and procedures (eg recruitment, procurement, integrity reporting).

- Always follows organisational policies and procedures (eg in relation to gifts, benefits and hospitality, secondary employment, financial management, social media and privacy) and communicates any gaps, risks or issues to supervisors or appropriate members of staff.

Colleagues

- Forthcoming and honest in all their interactions (eg acknowledges and reports any mistakes and deals with them in a timely manner).

- Recognises misconduct and corruption in the workplace (eg what to look for and how it can happen).

- Knows how to report suspected misconduct or corruption (ie who to report to, how to report, understands the impact of not speaking up).

- Colleagues are encouraged to speak up about suspected misconduct or corruption and feel supported and safe to do so.

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Supervisors

- Understand their responsibilities to support, educate and supervise staff, and their delegation responsibilities within the workplace (eg pre-employment vetting, financial approvals, good governance.)

- Ensure staff complete training relevant to their role.

- Are proactive in oversighting work and holding staff accountable for their actions, including compliance with policies and procedures (eg active oversight during recruitment and procurement processes).

- Openly and regularly talk about integrity and ethics and contextualise this for staff based on the type of work undertaken (eg discussing examples of 'integrity moments' in practice and lessons learnt).

- Build a culture where staff are encouraged to be forthcoming and honest and feel safe to own up to mistakes made (rather than covering up mistakes).

- Educate and encourage staff about how and why to report wrongdoing and model ethical behaviour themselves, including reporting suspicious behaviour.

- Ensure any staff who do speak up about suspected misconduct or corruption are protected and aware of supports available to them under the *Public Interest Disclosure Act 2012* (PID Act).

- Encourage staff to identify opportunities to improve policies, systems and practices and take action to implement these improvements to prevent misconduct or corruption.

Internal integrity and governance teams

- Conduct rigorous and independent investigations, considering any actions to address the individual behaviour as well as the broader organisational factors that enabled the wrongdoing to occur.

- Establish and manage systems to ensure allegations of suspected corruption are reported to IBAC in a timely manner and handled in accordance with mandatory notification reporting provisions under section 57 of the IBAC Act.

- Establish and manage systems to ensure the agency complies with the obligations under the PID Act.

- Develop and implement robust integrity programs, including regular audits, data monitoring and investigations.

- Undertake proactive reviews of organisational policies, systems and practices to identify opportunities to improve and prevent misconduct or corruption.

Senior leaders

- Maintain and promote a fraud and corruption control system to proactively manage fraud and corruption risk. This includes ensuring policies, systems and practices are regularly reviewed by the agency to identify and implement strengthened controls and to build capacity to prevent misconduct and corruption.

- Work collectively to build corruption-resistance across the organisation by supporting the delivery of ongoing corruption prevention training for staff, and by openly and regularly talking about integrity and ethics and contextualising this for staff based on the type of work undertaken.

- Act in the public interest and lead by example, modelling behaviours expected of all staff.

- Ensure all staff are aware of the PID Act and use opportunities to encourage and publicly support staff/community to speak up about wrongdoing. Ensure compliance with the organisation's obligations under the PID Act.

- Notify IBAC of all instances of suspected corrupt conduct, as required of relevant principal officers under section 57 of the IBAC Act (see the Mandatory Notification form available on the IBAC website).

- Acknowledge identified instances of wrongdoing and use these instances as an opportunity for staff and the organisation to learn from complaints and investigations and improve (rather than sweeping incidents under the carpet).

- Consistently apply an ethical lens to decision-making to ensure governance activities include genuine consideration of the impact and outcomes of decisions, beyond KPIs (eg via risk assessments, active monitoring of internal intelligence/data and regular audits).

- Ensure internal integrity and governance teams and systems are well resourced and supported (eg funding for audits, data monitoring, investigations).

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