

The logo for ACOHIG, where 'A' is dark blue, 'CO' is light teal, 'HI' is medium teal, and 'G' is grey.

Quality in governance

**AUSTRALIAN
CENTRE FOR
HEALTHCARE
GOVERNANCE**

Integrity Governance framework and Capability Assessment Tool

Project Commissioned by the DHHS in response to the IBAC Operation Liverpool report (Bendigo Health)

Integrity framework

Based on the Three Lines of Defence risk management model

Focuses on integrity practices in:

- Employment principles and personnel

- Procurement, contract/project management

- Finance

- Governance

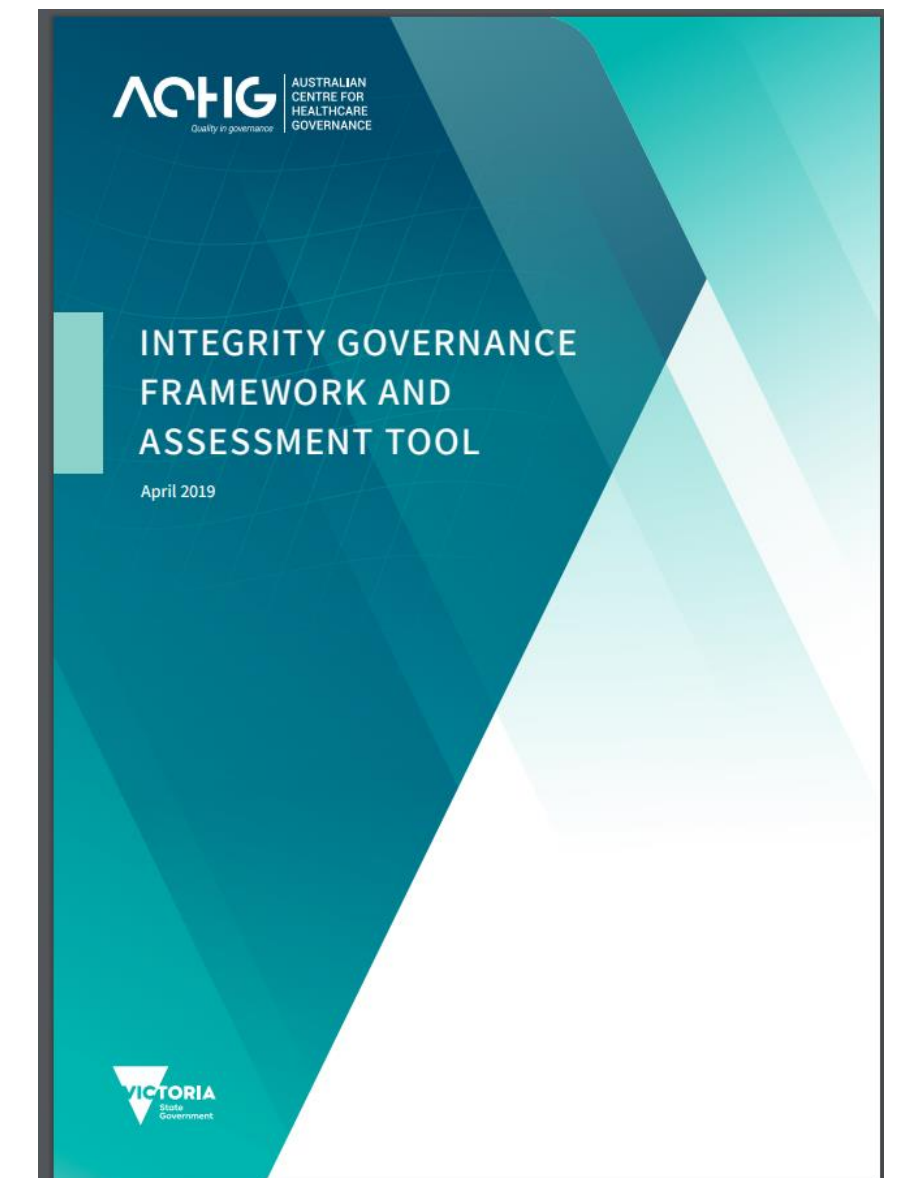
Integrity Better Practice Assessment and Reporting Tool

Self assessment using the three lines of defence risk management model against key organisational areas

Provides suggested processes to achieve better practice

Results feed into an integrity map

Action Plan Template



Three Lines of Defence

FIRST LINE | PEOPLE AND PRACTICES

Priorities

- Effective policies and procedures in place and correctly utilised
- Awareness and understanding of policies and procedures at all levels
- Organisational values support a culture of integrity and underpin all activity
- Behaviours and values form a key part of the recruitment process
- Effective induction and ongoing training
- Right people in the right places

Who owns this?
Everyone

SECOND LINE | OVERSIGHT

Setting the rules and monitoring compliance

Priorities

- Setting and reviewing organisational frameworks, policies and procedures in line with local, state and federal requirements
- Ensuring compliance through internal controls
- Identifying and managing risk
- Monitoring and oversight of the people and practices

Who owns this?
Management and Executive

THIRD LINE | ASSURANCE

Assuring the process

Priorities

- Understanding the first and second lines of defence
- Reviewing control measures for effectiveness
- Providing a final check
- Interrogation of issues and concerns
- Oversight of third party review and input

Who owns this?
Board and Executive

Self Assessment

SECOND LINE OF DEFENCE			
Better practice integrity	Rating (Please check the box next to the appropriate response)	Suggested processes	Comments
Procurement and contract policies and procedures meet government and legislative requirements	<input type="checkbox"/> never <input type="checkbox"/> inconsistently <input type="checkbox"/> consistently	Organisational policies and procedures are annually reviewed to ensure alignment with HPV and the Standing Directions for the Minister for Finance	
Management regularly reviews compliance with expected integrity policy and practice	<input type="checkbox"/> never <input type="checkbox"/> inconsistently <input type="checkbox"/> consistently	Relevant data is collated and reported at management level such as: <ul style="list-style-type: none"> • Compliance audits and action plans • Self-assessments • Regular rotation and review of compliance with the annual leave policy for staff in sensitive positions • Complaints and reports of integrity breaches • Complaints from contractors and other commercial bodies • Decision and approval process for key contracts and procurement activities 	

Integrity map

Employment principles & personnel

Better Practice Application	Consistent	2	0	0
		3	0	0
	Inconsistent	1	0	0
	Never			
			1st Line of Defence	2nd Line of Defence
Risk Management				

BETTER PRACTICE ASSESSMENT AND REPORTING TOOL

Employment principles and personnel

A culture of integrity is at the core of the organisation's ability to reduce the likelihood of fraud and corruption. The organisation's values and Code of Conduct should set the integrity standard for all interactions, decisions and behaviours within the health service. Leaders must model these values and behaviours and ensure that all personnel are aware of and understand their role in applying these values in the workplace. There must be a clear pathway to raise issues of concern, and address behaviour and actions that sit outside of the code of conduct. Employment practices should reflect the public sector employment principles.

FIRST LINE OF DEFENCE			
Better practice integrity	Rating <small>(Please check the box next to the appropriate response)</small>	Suggested processes	Comments
All staff are provided with a copy of the organisation Code of Conduct and orientated to the expected behaviours and values	<input type="checkbox"/> never <input type="checkbox"/> inconsistently <input checked="" type="checkbox"/> consistently	Code of Conduct and values form an integral part of the organisational and local induction process	
All personnel are evaluated against the Code of Conduct and organisational values annually	<input type="checkbox"/> never <input checked="" type="checkbox"/> inconsistently <input type="checkbox"/> consistently	Occurs as part of the performance appraisal/review process	
Conversations regarding the integrity of processes and decisions are a regular occurrence	<input type="checkbox"/> never <input checked="" type="checkbox"/> inconsistently <input type="checkbox"/> consistently	Integrity discussions are a standard process in team meetings	
Integrity breaches are reported and addressed	<input type="checkbox"/> never <input type="checkbox"/> inconsistently <input checked="" type="checkbox"/> consistently	There is a documented process for reporting and investigating breaches of the code of conduct and unacceptable employee behaviour	
The recruitment processes ensures the appropriate application of the public sector employment principles	<input type="checkbox"/> never <input checked="" type="checkbox"/> inconsistently <input type="checkbox"/> consistently	All vacancies are advertised internally and externally Staff are trained and have tools to support capability, values and behavioural based recruitment techniques Pre-employment checks are completed	
Staff in high risk or integrity sensitive positions are regularly rotated and leave is appropriately managed	<input checked="" type="checkbox"/> never <input type="checkbox"/> inconsistently <input type="checkbox"/> consistently	A policy of rotating staff in high risk/sensitive positions is implemented and a leave management process occurs to ensure that staff in these roles take leave at appropriate intervals	
Other: Please add any local practices that support effective processes in this line of defence	<input type="checkbox"/> never <input type="checkbox"/> inconsistently <input type="checkbox"/> consistently		

INTEGRITY GOVERNANCE MAP

Objectives

- Map current practice against the three lines of defence in the four key operational pillars
- Highlight better practice integrity gaps and identify potential integrity vulnerabilities
- Identify areas for improvement and assist in prioritising remedial actions

Limitations

- The self-assessment is based on a subjective review of current integrity practice **and therefore results are not intended for comparison or benchmarking with other health services.**
- The assessment is not a measure of the quality or effectiveness of a practice
- The results are a self-assessed snapshot at a point in time and not an indicator of compliance

INTEGRITY GOVERNANCE FRAMEWORK ACTION PLAN

Organisational Pillar – Culture/Code of Conduct – Employment principles and personnel – Finance – Governance	Line of Defence First Second Third	Better Practice Process	Action Required	By Whom	Due Date
For Example: Culture / Code of Conduct	First	Staff are evaluated against code of conduct and organisational values as part of the appraisal / performance review process	Revise performance appraisal procedure and form to include a section to record a discussion on the organisational values and professional behaviours required in the role being appraised and for the manager to comment on the workplace conduct of the staff member	Human Resources Manager	30/06/19