

**Audit, Risk & Improvement Committee Meeting Agenda - 12 May 2026  
Attachments**

**12.1 Annual Work Plan Review .....2**  
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Item	12 May 2026	11 Aug 2026	24 Nov 2026	TOR Clause	Comment
<b>Meeting Dates</b>	<b>12 May 2026</b>	<b>11 Aug 2026</b>	<b>24 Nov 2026</b>	<b>TOR Clause</b>	
<b>ARIC Administration</b>					
Annual Work Plan Review			x	12.5	Forward work plan provided for endorsement at November meeting and ad-hoc as any revisions are recommended.
<b>Risk Management</b>					
Risk Registers				4.2(b)	
Business Continuity Plan Review		x		4.2(b)	
Risk Appetite Statement Review	x			4.2(b)	
Risk Management Policy Review				4.2(b)	Policy went to March OCM as part of the Policy Review Program.
<b>Internal Audit and Assurance Activities</b>				4.2(a)	
Internal Audit Plan - FY2026/27 to FY2028/29		x		4.2(a)	
Internal Audit Reports (as available)				4.2(a)	As available.
Audit Log Review	x	x	x	4.2(a)	
<b>Financial Reporting</b>					
Town Debtors	x	x	x	4.1(b)(i)	
<b>Compliance</b>					
Procurement Report on Panels Usage	x	x	x	4.1(b)(ii)	
Compliance Audit Return		x		4.1(a)(ii) 4.1(b)(ii)	Deadline deferred to 30 September 2026.
<b>External Audit</b>					
Annual Audited Financial Statements			x	4.1(a)(i)	
<b>Other Responsibilities</b>					
Forward Improvement Plan Reporting				4.2(c)	As available.
Asset Management Framework Progress Report	x	x	x	4.2(d)	
ERP Implementation Progress Report		x	x	4.2(d)	
Integrity and Fraud Control Framework	x	x		4.2(e)	Aim for August, dependent on prioritisation of other initiatives.
Relevant reports - adhoc					As required.

**12 Reports of Officers****12.1 2026 Annual Work Plan Review****Author:** Audit, Risk & Insurance Officer**Authorising Officer:** Director Corporate Services**Disclosure of Interest:** The Author and Authorising Officer declare that they do not have any conflicts of interest in relation to this item.**ARC202526/028 ARIC DECISION****MOVED:** Deputy Presiding Member  
Stephen Brown**SECONDED:** CMM Jessica Shaw**That the Audit, Risk & Improvement Committee endorse the reviewed  
2026 Work Plan.*****CARRIED BY SIMPLE MAJORITY (3/0)****For: CMM Jessica Shaw, Presiding Member Baptiste Isambert and Deputy  
Presiding Member Stephen Brown  
Against: Nil***PURPOSE**

The purpose of this report is for the Audit, Risk and Improvement Committee (ARIC) to endorse the reviewed 2026 Annual Work Plan.

**DETAIL**

Pursuant to Part 7 of the *Local Government Act 1995* ("the Act"), an ARIC must be established to provide guidance and assistance to the local government, operating with reporting to the Council.

In accordance with section 6.8 of the Committee's current Terms of Reference (TOR) (Version 13), the ARIC is required to develop an annual work plan. This plan serves as a strategic roadmap, enabling the ARIC to effectively fulfil its functions, roles, and responsibilities for the upcoming calendar year.

The 2026 annual work plan was endorsed at the 26 November 2025 ARIC meeting. It integrates key components that link the Committee's responsibilities to legislative compliance dates and the approved meeting schedule. Additional reports may be presented to the Committee throughout the year as deemed appropriate.

Key Updates as below

Business Continuity Plan

The ARIC is responsible for ensuring that the Town maintains a sound and effective approach to Business Continuity Planning (BCP) (TOR 7.2). The Director of Regulatory Services and the Manager of Environmental Services have implemented the BCP for the Town, and the plan is now scheduled for an annual performance update in May 2026.

Compliance Audit Return

Preparation of the annual Compliance Audit Return (CAR) has been rescheduled to August in the 2026 Work Plan (subject to completion given the Town is not yet aware of the Department of Local Government, Industry Regulation and Safety (DLGIRS) new release date). The deadline for submitting the CAR for the period of 1 January 2025 to 31 December 2025 has been deferred until 30 September 2026.

The proposed work plan is as follows:

ARI Committee Work Plan 2026					
<i>Meeting Dates</i>	10 Mar 2026	12 May 2026	11 Aug 2026	24 Nov 2026	TOR Clause Version 13
<i>Recommendations to Council Meeting Dates</i>	25 Mar 2026	27 May 2026	26 Aug 2026	10 Dec 2026	
<b>ARI Committee Performance and Administration</b>					
Annual Work Plan Review					6.8
<b>Risk Management (including Fraud)</b>					
Risk Register Review					7.2
Business Continuity Plan					7.2
Risk Appetite Statement Review					7.2
Risk Management Policy Review					7.2
<b>Internal Control and Internal Audit</b>					
Internal Audit Plan - FY2026/27 to FY2028/29					7.3
Internal Audit Reports (as available)					7.3
Audit Log Review					7.3
<b>Financial Reporting</b>					
Outstanding Debtors (Including Rates)					7.5
<b>Compliance</b>					
Procurement Report on Panels Usage					7.6
Compliance Audit Return					7.6
<b>External Audit</b>					
Annual Audited Financial Statements					7.4

<b>Other Responsibilities</b>					
Terms of Reference Review					7.8
Asset Management Framework Progress Report					7.8
Enterprise Resource Planning Implementation Progress Report					7.8
Town of Port Hedland Integrity Framework					7.8

**LEVEL OF SIGNIFICANCE**

In accordance with Policy 4/009 ‘Significant Decision Making’, this matter is of low significance because endorsement of the plan does not yield any social, economic, or environmental impacts for the community.

**CONSULTATION**

*Internal*

- Senior Audit, Risk & Insurance Advisor
- Executive Leadership Team

*External Agencies*

- Department of Local Government, Industry Regulation and Safety (DLGIRS)

*Community*

Nil.

**LEGISLATION AND POLICY CONSIDERATIONS**

- Part 7 of the *Local Government Act 1995*
- Audit, Risk & Improvement Committee Terms of Reference section 6.8

**FINANCE AND RESOURCE IMPLICATIONS**

As per 2025-2026 Annual Budget

**STRATEGIC SUSTAINABILITY IMPLICATIONS**

**Council Plan**

The following section of the Town’s *Council Plan 2025-2035* applies in consideration of this item:

Our Leadership: We are united in our actions to connect, listen, support and advocate, thereby leveraging the potential of our people, places and resources.

4.2 Transparent and accountable governance and financial sustainability

**Access and Inclusion**

The following outcome of the Town’s Access and Inclusion Plan *2023-2026* apply in relation to this item:

Nil.

**RISK MANAGEMENT CONSIDERATIONS**

<b>Risk Type</b>	Operational
<b>Risk Category</b>	Compliance
<b>Cause</b>	Failure to endorse the annual work plan
<b>Effect</b>	Missed opportunities for continuous improvement Delayed identification of emerging risks Potential non-compliance with statutory requirements
<b>Risk Treatment</b>	Treat
<p>There is an operational compliance risk associated with this item caused by failure to endorse the work plan and implement proactive and best-practice review processes, which could lead to missed opportunities for improvement and delayed risk identification.</p> <p>The risk rating is considered Medium (6), determined by a likelihood of Unlikely (2) and a consequence of Moderate (3).</p> <p>This risk will be treated by adoption of the work plan and periodic review.</p>	

**OPTIONS**

- Option 1 – Adopt officer’s recommendation
- Option 2 – Amend officer’s recommendation
- Option 3 – Do not adopt officer’s recommendation

**CONCLUSION**

Endorsing the Reviewed 2026 Annual Work Plan ensures compliance with the ARIC Terms of Reference and supports effective governance and risk management practices.



# Integrity Framework Maturity Self-Assessment Tool

Helping WA public authorities assess and improve their approach to integrity

## Element 1: Clear expectations

The authority head clearly describes and communicates their integrity expectations

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>
Characteristics			

<ul style="list-style-type: none"> <li><input type="checkbox"/> Expectations, if documented, are only in the code of conduct.</li> <li><input type="checkbox"/> The authority head rarely communicates their expectations.</li> <li><input type="checkbox"/> Line managers check staff understanding of expectations only after an integrity breach.</li> <li><input type="checkbox"/> There are limited specific expectations communicated to external stakeholders (e.g. those who do business with the authority or use its services).</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Expectations are in the code of conduct, being documented in integrity policies and procedures, and included in job descriptions for some positions of trust when they are updated.</li> <li><input checked="" type="checkbox"/> <b>The authority head occasionally reinforces their expectations (e.g. face to face, staff communications).</b></li> <li><input checked="" type="checkbox"/> <b>Line managers explain expectations at induction. Some reinforce them during employment (e.g. through staff performance processes).</b></li> <li><input type="checkbox"/> Specific expectations for external stakeholders are being developed.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>The integrity framework, code of conduct, integrity policies and procedures, and most business processes reflect the authority head's expectations.</b></li> <li><input type="checkbox"/> The authority head frequently reinforces their expectations and there is clear "tone from the top".</li> <li><input type="checkbox"/> Line managers consistently model and reinforce the "tone from the top". This is demonstrated in part by staff understanding expectations and being able to explain what these are when asked.</li> <li><input checked="" type="checkbox"/> <b>Expectations are communicated to external stakeholders (e.g. through a statement of business ethics).</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> New policies and procedures are written consistently to reflect the authority head's expectations.</li> <li><input type="checkbox"/> The leadership group demonstrates the "tone from the top". It is visible and well known inside and outside the authority.</li> <li><input type="checkbox"/> Staff model and support the "tone from the top" which is assessed through staff performance processes.</li> <li><input type="checkbox"/> External stakeholders who do not meet communicated expectations are held to account (e.g. through appropriate legislative or contractual mechanisms).</li> </ul>
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**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town’s maturity level is **Developing/Embedded**.

**Basis for assessment**

Documentation:

The authority head’s expectations are clearly documented through key documentation including:

Document	Last review date	Next review due	Comments
Town of Port Hedland Code of Conduct for Employees, Consultants, Contractors and Volunteers	July 2025	Not stated	Sets mandatory behavioural standards, ethical expectations, conflict-of-interest rules, and accountability obligations for all workers. It is a primary integrity control preventing misconduct and guiding ethical decision-making.
Town of Port Hedland Code of Conduct for Council Members, Committee Members and Candidates	28 April 2021	Not stated	Defines legislated integrity requirements for elected members, including personal integrity, use of resources, conflicts of interest, disclosure, and behavioural obligations. It is one of the Town’s core integrity governance instruments.
Fraud Control Plan	30 July 2024	30 July 2026	Provides the Town’s fraud and corruption prevention, detection, and response framework. Directly relates to integrity by mitigating corruption, misconduct, and unethical behaviour.
IOP GOV 012 Managing Conflicts of Interest	14 July 2021	14 July 2024	Operationalises how conflicts of interest are identified, recorded, managed, escalated, and monitored, central to integrity risk prevention. Ensures impartiality, transparency, and ethical decision-making.
IOP GOV 004 Gift Disclosure Requirements for Elected Members and the CEO	22 October 2019	22 October 2022	Requires elected members and the CEO to declare gifts, reducing bribery, undue influence, and perception-of-bias risks.
IOP GOV 017 Related Party Disclosures	1 July 2021	1 July 2024	Ensures compliance with accounting standards but also prevents undisclosed personal benefit, preferential treatment, and conflicts of interest.
IOP GOV 018 Gift Disclosure Requirements for Town of Port Hedland Employees	7 December 2021	7 December 2024	Ensures employees declare gifts, benefits, and hospitality; directly prevents corruption and protects integrity in procurement and service delivery.
IOP GOV 026 Public Interest Disclosure Procedures	19 May 2025	19 May 2027	Implements the PID Act requirements by providing pathways for reporting wrongdoing.
Policy 1/024 Fraud and Corruption	25 September 2024	25 September 2026	Establishes the Town’s anti-fraud and anti-corruption framework. Sets expectations for prevention, detection, reporting, and investigation.
Policy 1/023 Public Interest Disclosure	28 May 2025	28 May 2028	Supports ethical reporting of wrongdoing and aligns behaviour to the PID Act.
Town of Port Hedland Statement of Business Ethics	5 February 2020	As required	Sets ethical expectations for suppliers, contractors, and external stakeholders. Ensures procurement and external engagement is conducted with fairness, transparency, and accountability.

Communication

The authority head communicates integrity expectations periodically through corporate communications, including:

- Reminders to complete Code of Conduct training
- Updates shared via the CEO’s Heds Up emails; and
- Organisation-wide messages reinforcing expected standards of behaviour.

These communications demonstrate leadership commitment; however, they are occasional rather than systematic and well established.

Role of line managers and performance processes

Current evidence indicates that line managers introduce integrity expectations during induction and reinforce them to varying degrees during employment. However, this practice is inconsistent across directorates. A review of the Leadership Resources intranet page found limited emphasis on integrity and organisational values, and the messaging does not yet clearly articulate expectations for leaders in modelling and reinforcing integrity-based behaviours.

Additionally, the Performance and Development Review module within the ERP system is currently only in use within the Corporate Services Directorate. Although the system allows for assessment of employee performance against Town values, this practice has not been adopted organisation-wide. The absence of a consistent process for integrating values and integrity considerations into staff performance reviews represents a gap between Developing and Embedded maturity.

Expectations communicated to external stakeholders

The Town's Statement of Business Ethics, along with procurement-related policies and procedures, communicates expectations of integrity and ethical conduct to contractors, suppliers, and other external stakeholders.

**Key gaps**

- Integrity expectations are not communicated in a structured or scheduled way.
- Values and expectations are not yet consistently linked to performance processes across the organisation.

**Improvement opportunities to consider in developing the Framework**

- Establish a simple communication schedule for reinforcing integrity expectations (e.g., quarterly CEO messages).
- Embed values expectations in the annual performance review template for all staff.

## Element 2: Roles and responsibilities

Roles and responsibilities are assigned to ensure a coordinated approach to managing integrity.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>
Characteristics			

- |  |   |   |  |
|--|---|---|--|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Some roles and responsibilities are assigned. These are documented to meet compliance obligations (e.g. role of the audit committee).</li> <li><input type="checkbox"/> Some delegations are documented; these mainly relate to finance and human resources.</li> <li><input type="checkbox"/> Information and data requests from external integrity bodies are responded to in an ad hoc way.</li> <li><input type="checkbox"/> Staff think integrity is someone else’s responsibility. Individual and shared responsibility is not well understood.</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Roles and responsibilities are being assigned as the integrity framework is developed (e.g. to positions, teams, groups and committees) and in job descriptions when they are updated.</b></li> <li><input type="checkbox"/> Delegations are being considered across functions and activities and being documented in an accessible schedule.</li> <li><input checked="" type="checkbox"/> <b>Responsibility has been assigned to a position or team to coordinate information and data requests and interactions with external integrity bodies.</b></li> <li><input checked="" type="checkbox"/> <b>Staff are becoming aware that integrity is everyone’s responsibility. This is being communicated in the integrity framework, code of conduct, integrity policies and procedures.</b></li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Roles and responsibilities – including the authority head’s accountability for integrity – are documented in the integrity framework.</li> <li><input type="checkbox"/> Relevant roles and responsibilities (e.g. between the governing board chair or mayor/shire president, chancellor and authority head and staff) are clear and documented in the integrity framework.</li> <li><input checked="" type="checkbox"/> <b>Delegations for all legislative and high risk functions are covered (e.g. regulation, approvals, human resources, finance).</b></li> <li><input type="checkbox"/> Requests from external integrity bodies are planned for and scheduled so they can be responded to in a timely and fulsome way.</li> <li><input type="checkbox"/> Staff are aware that integrity is everyone’s responsibility and can explain what this means when asked.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Leaders and staff with key assigned roles and responsibilities in the integrity framework regularly discuss challenges and identify opportunities to improve the framework. These improvements feed into self-analysis and review of the framework.</li> <li><input checked="" type="checkbox"/> <b>The delegation’s schedule is monitored and updated in real time.</b></li> <li><input type="checkbox"/> A dedicated position, team or committee is tasked with engaging with external bodies, promoting integrity, and helping to prevent misconduct and corruption, and providing specialist advice to the leadership group on trends and improvement actions.</li> <li><input type="checkbox"/> Staff are provided with a formal avenue to suggest changes to the integrity framework.</li> </ul> |
|--|---|---|--|

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town’s maturity level is **Developing/Embedded**.

**Basis for assessment**

- Integrity responsibilities embedded across Fraud Control Plan and policies pending formal framework.
- Delegations register current and monitored in real time across high-risk functions.
- Coordination of external integrity body requests allocated but largely reactive.

**Key gaps**

- Integrity roles are mapped however could be better integrated across the organisation and embedded in key documentation.
- Coordination for external integrity body requests is reactive rather than planned.

**Improvement opportunities to consider in developing the Framework**

- Develop a simple “integrity roles and responsibilities map” showing key owners, committees and escalation.
- Create a yearly calendar of known external reporting requirements to support planning rather than reactive work.

## Element 3: Legislation and regulations

Legislation, regulations and external policy obligations are identified and accounted for.

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Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>
Characteristics			
<ul style="list-style-type: none"> <li><input type="checkbox"/> Legislative, regulatory and external policy obligations (e.g. those required by enabling legislation and those set by central bodies) are not fully identified.</li> <li><input type="checkbox"/> Compliance gaps, if any, are mostly unknown.</li> <li><input type="checkbox"/> Staff understanding of their powers, functions and obligations – and how they apply these in practice – relies on their knowledge and capability.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Legislative, regulatory and external policy obligations are being identified. An accountability map or similar is being completed.</li> <li><input type="checkbox"/> Any compliance gaps identified are being addressed.</li> <li><input type="checkbox"/> Staff are becoming aware of the power, functions and obligations relevant to their role (e.g. acting in line with operating procedures). Line managers are taking a more active role in this.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>All obligations are documented and accounted for (e.g. reflected in internal controls, roles and responsibilities, compliance calendars).</b></li> <li><input checked="" type="checkbox"/> <b>Compliance gaps are addressed as identified.</b></li> <li><input checked="" type="checkbox"/> <b>Staff understand the power, functions and obligations relevant to their role (e.g. delegations) and can explain how these apply in practice.</b></li> <li><input checked="" type="checkbox"/> <b>Line managers support their staff to comply with obligations and oversight compliance. They demonstrate they have taken action on non-compliance (e.g. through staff performance and discipline processes).</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> All obligations are monitored to track changes to legislation, regulations and external policy. Changes are communicated and updates made (e.g. to internal controls).</li> <li><input type="checkbox"/> Proactive monitoring identifies compliance gaps.</li> <li><input type="checkbox"/> Passive and active monitoring is undertaken to check if staff are carrying out powers, functions and obligations as expected (e.g. discretionary powers are appropriately exercised and staff act in line with delegations).</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town’s maturity level is **Embedded**.

**Basis for assessment**

Documentation of legislative, regulatory and external policy obligations

The Town has documented its statutory and regulatory obligations across a variety of mechanisms, including internal controls, policies, procedures, and role-specific responsibilities. Obligations are also reflected in delegations and contract management requirements.

A compliance calendar is maintained by Governance and supplemented by additional assurance activities, such as the Compliance Audit Return (CAR) and the mid-year check-in process conducted by the Audit, Risk & Insurance function. These mechanisms evidence that obligations are identified, owned, and accounted for across the organisation.

Compliance gaps

Compliance gaps are identified through a combination of internal and external assurance activities, including the annual CAR, Office of the Auditor General (OAG) audits, internal audit reviews and regulatory reviews. When non-compliance or control weaknesses are identified, corrective actions are implemented and monitored through the Town’s Audit Log.

For example, historical CAR non-compliance relating to Primary and Annual Returns led the Town to improve oversight by introducing regular reporting to ELT.

All non-compliances arising from internal and external audits are logged, assigned to responsible officers, tracked to completion, and formally reported through to ELT and the ARIC.

Delegations/powers

Delegations are clearly assigned, maintained, and communicated. Officers receive a delegation certificate outlining the specific powers and authorities relevant to their role. The delegation schedule is monitored and updated in real time to ensure accuracy and alignment with statutory requirements and organisational needs.

Actions on non-compliance

Line managers and supervisors oversee compliance within their areas, supporting staff in understanding their obligations, and addressing any breaches through performance, conduct, or disciplinary processes where required.

A centralised exercise of delegation register is not yet maintained to proactively monitor compliance of use of powers.

**Key gaps**

- Limited proactive monitoring for legislative changes.
- No centralised process to test the correct use of delegations.
- No central delegations exercised register in place.

**Improvement opportunities to consider in developing the Framework**

- Add a quarterly/6-monthly legislative scan to the Governance calendar.
- Sample checks of exercised delegations in high-risk areas (consider in assurance mapping context).

## Element 4: Risk analysis and planning for integrity

Integrity risks are identified and analysed, and plans are made to manage them.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

### Characteristics

<ul style="list-style-type: none"> <li><input type="checkbox"/> Integrity risks are narrowly defined. Little consideration is given to functions and activities that give rise to integrity risks. The priority is material financial risk.</li> <li><input checked="" type="checkbox"/> <b>There is limited agreement about the value of, and approach to, managing integrity risks among the leadership group.</b></li> <li><input type="checkbox"/> Managing integrity risks associated with functions and activities relies on the judgement of line managers. There are limited methodologies, tools and guidance to assist them, other than processes to manage financial risks.</li> <li><input type="checkbox"/> Some but not all staff are able to explain the integrity risks associated with their work or the importance of managing them.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Integrity risks, including those relating to high risk functions, activities and any outsourced programs and activities, are being identified, adequately defined, analysed and documented in risk registers.</li> <li><input type="checkbox"/> The authority head communicates the value of managing integrity risks to the leadership group. A shared understanding of risk management is being developed.</li> <li><input type="checkbox"/> Risk owners are being identified and assigned for high risk functions and activities. They are provided with methodologies, tools and guidance (e.g. risk management policies and procedures) to help analyse and manage risks.</li> <li><input type="checkbox"/> Staff are becoming familiar with the integrity risks associated with their work and what they need to do to manage them (e.g. comply with policies and procedures).</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Integrity risks from internal and external sources have been identified. Risk owners are assigned for all identified risks in risk registers. Integrity risks are reflected in broader planning processes (e.g. strategic, operational, project and business continuity).</b></li> <li><input type="checkbox"/> Integrity risks are regularly monitored, reviewed, updated and reported on, and take account of changes impacting the risk profile.</li> <li><input checked="" type="checkbox"/> <b>The authority head regularly reinforces the value of managing integrity risks (e.g. face to face, in staff communications).</b></li> <li><input checked="" type="checkbox"/> <b>Risks owners are provided with methodologies, tools and guidance that take into account better practice outlined in Australian Standards 31000-2018: Risk Management Guidelines and 8001-2021: Fraud and Corruption Control.</b></li> <li><input checked="" type="checkbox"/> <b>Staff understand the integrity risks associated with their work and identified shared risks and can explain how they manage these in practice.</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Assessment of integrity risk considers behavioural factors (e.g. what makes individuals more vulnerable to engaging in misconduct and corruption from internal and external sources).</li> <li><input type="checkbox"/> Advanced tools are used to monitor and report on integrity risks (e.g. automated dashboards and data analytics). They help inform decisions to improve risk management.</li> <li><input type="checkbox"/> The leadership group takes a positive and proactive approach to managing all risks including shared risk (e.g. inter-authority or multi-jurisdictional projects).</li> <li><input type="checkbox"/> Risk owners champion risk management.</li> <li><input type="checkbox"/> Staff consistently identify, analyse and manage integrity risks associated with their work. Where new and emerging risks are identified, they are raised via established pathways.</li> </ul>
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**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town’s maturity level is **Embedded**.

**Basis for assessment**

- Integrity risks have been identified from both internal and external sources and are documented in the Town’s risk registers, with risk owners assigned and accountable for controls and treatment actions.
- Integrity risks are reflected in broader planning processes (strategic, operational and project planning), supporting a consistent approach to prevention, detection and response across the organisation.
- Risk methodologies and guidance are aligned to ISO 31000:2018 and AS 8001:2021.

**Key gaps**

- Integrity risks are not reviewed on a consistent/separate cycle to operational and strategic risk.
- Limited analysis of behavioural drivers and opportunity in high-risk functions.

**Improvement opportunities to consider in developing the Framework**

- Implement a periodic integrity risk review and report the results to ELT and the ARIC.
- Include basic behavioural risk prompts in key risk assessments (procurement, payroll, approvals).
- Introduce an emerging integrity risk scan as part of strategic planning (e.g. legislative change, third-party risk, cyber-enabled fraud) and document actions taken.

## Element 5: Internal controls, audit and governance

Integrity risks are managed through sound internal controls, and audit is used to evaluate the adequacy and effectiveness of controls.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

Characteristics			
<ul style="list-style-type: none"> <li><input type="checkbox"/> Limited or basic internal controls (e.g. policies and procedures) are directed towards managing financial risks.</li> <li><input type="checkbox"/> Accuracy and currency of policies and procedures relies on individuals updating them. There is no assigned responsibility.</li> <li><input type="checkbox"/> Audit scopes and programs focus on the adequacy of financial controls rather than broader integrity issues (e.g. use of confidential information).</li> <li><input type="checkbox"/> The relationships between those with responsibility for audit are undefined.</li> <li><input type="checkbox"/> Applying internal controls associated with functions and activities relies on the line managers explaining to staff why internal controls exist and their importance. There is no standard approach; staff knowledge varies.</li> <li><input type="checkbox"/> Staff are unaware of the need to report unmanaged risks and internal control weaknesses.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Internal controls (e.g. core and complementary integrity policies and procedures) are being developed and implemented to manage identified integrity risks.</li> <li><input type="checkbox"/> A position or team has been assigned to develop a policy register to record what policies and procedures exist, who owns them and their currency.</li> <li><input checked="" type="checkbox"/> <b>Integrity risks and the adequacy of internal controls are being included in the audit scopes and programs.</b></li> <li><input type="checkbox"/> The relationship between the internal audit function, audit committee and accountable authority and any external audit body is being defined and good practices are being developed (e.g. communication of reports and recommendations from external integrity bodies).</li> <li><input type="checkbox"/> Line managers are starting to understand and communicate the importance of applying internal controls consistently to manage integrity risks.</li> <li><input checked="" type="checkbox"/> <b>Staff rely on managers informing them of how to report internal control weaknesses.</b></li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Internal controls (e.g. preventative, detective and corrective) are proportionate to specific integrity risks.</b></li> <li><input checked="" type="checkbox"/> <b>A position or team manages the policy register to ensure policy owners are undertaking scheduled reviews.</b></li> <li><input type="checkbox"/> Different types of audits are used to explore integrity risks (e.g. random audits, focus area, forensic, compliance and quality audits).</li> <li><input checked="" type="checkbox"/> <b>The importance of audit is well understood across the authority. Line managers readily accept and participate in audits. Recommendations for improvement from internal and external audits are assigned to ensure they are implemented.</b></li> <li><input checked="" type="checkbox"/> <b>Line managers understand their supervision and monitoring role is an internal control. Staff understand the risks associated with their work and apply internal controls to manage these.</b></li> <li><input type="checkbox"/> Staff know how to report internal control weaknesses via established pathways.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Internal controls are monitored, reviewed (including pressure tested) and improved continuously. Internal controls keep pace with lessons learnt from integrity breaches, changing business processes, risks and other operating conditions and reduce vulnerabilities and unintended consequences.</li> <li><input type="checkbox"/> Risk owners raise, and internal audit records, changes to internal controls and treatment plans in risk registers. Advanced tools automatically update those who need to know of changes.</li> <li><input type="checkbox"/> Evaluation of the adequacy and effectiveness of internal controls to manage integrity risks is conducted in targeted integrity audits and integrity is included as part of most audit scopes.</li> <li><input type="checkbox"/> A combined assurance model (e.g. with activities that are coordinated and planned) is in place to ensure integrity is practiced, managed and accounted for.</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town of Port Hedland’s (the Town) maturity level is **Developing/Embedded**.

**Basis for assessment**

- Preventative, detective and corrective internal controls are in place and are generally proportionate to identified integrity risks (supported by core policies, procedures and the Fraud Control Plan).
- Integrity risks and the adequacy of controls are being considered within internal audit scopes and programs, and improvement actions are tracked through the Town’s Audit Log with reporting to ELT and ARIC.
- A policy register is managed to support scheduled reviews and currency of key integrity documents; however, practices for communicating and embedding updates are not yet fully consistent across all business areas.

**Key gaps**

- No single pathway for reporting control weaknesses.
- Limited targeted integrity audits (spot checks, compliance reviews).

**Improvement opportunities to consider in developing the Framework**

- Implement an assurance map and annual assurance plan that aligns integrity risks, key controls, assurance providers and reporting lines (first, second and third line activities).
- Introduce an accessible control weakness reporting pathway with clear ownership, triage criteria, tracking and escalation to ELT/ARIC where required.
- Schedule at least two targeted integrity audits per year in high-risk areas (e.g. procurement and contract management; gifts/hospitality and conflicts of interest; corporate card and purchase card controls) and ensure actions are documented and tracked to implementation of any corrective action.

## Element 6: Fraud and corruption detection systems

Systems and activities are in place to detect events different to those considered standard, normal or expected.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

Characteristics			
<ul style="list-style-type: none"> <li><input type="checkbox"/> Basic detection systems and activities are in place for internal threats (e.g. some financial activities) but relies heavily on the manual effort of individuals (e.g. manual checks, excel spreadsheets).</li> <li><input type="checkbox"/> Detection systems and activities are directed towards managing internal threats. Some basic controls are in place to prevent external fraud and corruption threats (e.g. firewalls to prevent cyber-attacks).</li> <li><input type="checkbox"/> Internal data holdings are unstructured and not easily analysed.</li> <li><input type="checkbox"/> Beyond basic reporting, there is no or limited use of data for detection purposes.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Planning is underway to develop a detection strategy or plan; this is being supported by the leadership group. The plan considers internal and external threats (e.g. cyber security, third parties seeking to exploit individual officers), information and data holdings, people and capability requirements, tools for validation and reporting, and governance arrangements including data sharing and confidentiality.</li> <li><input type="checkbox"/> Changes are being made to how existing data is captured, providing more structure for easier analysis.</li> <li><input checked="" type="checkbox"/> <b>Data is mainly used for reporting rather than responding to identified errors and irregularities.</b></li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>A detection strategy or plan is in place to help control internal and external threats. It takes into account better practice outlined in <a href="#">Australian Standards 31000-2018: Risk Management Guidelines</a> and <a href="#">8001-2021: Fraud and Corruption Control including speaking up and staff and contactor screening</a>.</b></li> <li><input checked="" type="checkbox"/> <b>Data holdings to inform detection have been cleansed, are structured and can be analysed easily.</b></li> <li><input type="checkbox"/> Fit for purpose data tests are in place and repeatable, usually with consistent results that provide useful insights. These are supported by procedures to respond to and address identified errors and irregularities and escalate issues for investigation as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Detection systems and activities inform the internal audit scopes and program; insights show areas for further examination.</li> <li><input type="checkbox"/> Detection systems and activities support continuous improvement to strategic and operational planning and misconduct and corruption prevention approaches.</li> <li><input type="checkbox"/> Internal and external data holdings, where they can be shared and are relevant, are leveraged to inform detection approaches.</li> <li><input type="checkbox"/> Automated processes are in place to identify and escalate red flags. Processes for prompt escalation, investigation and resolution are in place.</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town of Port Hedland’s (the Town) maturity level is **Developing/Embedded**.

**Basis for assessment**

- Current use of data is primarily focused on reporting outputs rather than routine detection testing and proactive identification of irregularities.
- A small number of areas run data checks such as bank account change reports in payroll, but these are not documented with standard procedures or linked to investigation pathways. As a result, the reliability of these checks depends on individual staff rather than a system.

**Key gaps**

- No consistent or documented exception testing program.
- Lack of repeatable tests and investigation pathways.

**Improvement opportunities to consider in developing the Framework**

- Develop/document a small set of scheduled exception tests for high-risk areas (e.g., duplicate suppliers, payroll changes).
- Improve internal audit planning regarding fraud/corruption detection for high-risk areas.

## Element 7: Values and standards

Values and standards (code of conduct) are in place and describe what acceptable workplace behaviour looks like in practice.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>
Characteristics			

- |  |  |   |   |
|--|--|---|---|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Values have been discussed by the leadership team but have not progressed beyond this.</li> <li><input type="checkbox"/> A code of conduct is in place to meet compliance obligations (e.g. legislative, external policy) but it is not widely promoted by the leadership group.</li> <li><input type="checkbox"/> Any discussions about the code of conduct relies on individual line managers.</li> <li><input type="checkbox"/> Monitoring of compliance with the code of conduct occurs ad hoc.</li> <li><input type="checkbox"/> Staff have limited awareness of the code of conduct. They are unsure where to find it, how it applies to them and their obligations under it.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Values and other direction setting statements (e.g. vision, mission and remit) are being developed and are consistent.</li> <li><input type="checkbox"/> A code of conduct exists but does not fully take account of relevant legislation, regulation and policy (e.g. internal and external) obligations or integrity risks specific to the operating context.</li> <li><input checked="" type="checkbox"/> <b>Most leaders and line managers understand their role to promote the code of conduct, support its implementation and their role to monitor and support compliance with it.</b></li> <li><input checked="" type="checkbox"/> <b>Strategies to monitor compliance with the code of conduct are being planned for as integrity policies and procedures are being developed.</b></li> <li><input type="checkbox"/> Most staff are aware of the code of conduct, can explain its purpose and know where to find it.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Values and codes of conduct focus on the behaviours expected to achieve objectives with integrity. Values and standards are reflected in relevant documents and processes (e.g. policies, strategic and operational plans, job advertisements and descriptions, recruitment processes).</li> <li><input type="checkbox"/> The code of conduct incorporates the views of key internal stakeholders and accounts for relevant obligations and identified risks. It provides guidance to support ethical decision making.</li> <li><input type="checkbox"/> Leaders and line managers consistently promote the code of conduct (e.g. during team meetings, 'integrity moments', standing item on the leadership group agenda) to support its implementation.</li> <li><input type="checkbox"/> Compliance with the code of conduct is monitored (e.g. through staff performance processes, analysis of discipline processes and complaints) and reasons for non-compliance addressed.</li> <li><input checked="" type="checkbox"/> <b>Staff know about the code of conduct, understand its importance and can describe how it guides their behaviour.</b></li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Values and codes of conduct are regularly promoted to all stakeholders (e.g. published on the internet, in recruitment information) and there is a process for annual acknowledgment.</b></li> <li><input checked="" type="checkbox"/> <b>The code of conduct has been developed taking into account the views of the authority's key external stakeholders.</b></li> <li><input type="checkbox"/> Values and the code of conduct are discussed at leadership meetings. Data around non-compliance is being used by this group to inform improvements to internal controls. Discussions and information feeds into self-analysis and review processes to continuously improve the integrity framework.</li> <li><input type="checkbox"/> Staff are confident holding each other to account for expectations set in the code of conduct (e.g. respectfully calling out behaviour that does not align, reporting unethical behaviour).</li> </ul> |
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**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town of Port Hedland’s (the Town) maturity level is **Embedded**.

**Basis for assessment**

- Values and the Code of Conduct are actively promoted by the Human Resources function and are generally well understood by staff. These expectations are reflected in selected business processes, including recruitment, onboarding and mandatory training.
- All employees are required to complete annual Code of Conduct refresher training, with completion rates monitored and reported to the leadership team to support oversight of compliance.

**Key gaps**

- Integrity and values-based messaging occurs intermittently and is not guided by a formal or structured communications plan, limiting consistency and reach across the organisation.
- Staff understanding of values varies across teams.
- Values and behavioural expectations are not yet integrated into a consistent organisation-wide performance review process, reducing the ability to reinforce and assess expected conduct.

**Improvement opportunities to consider in developing the Framework**

- Integrate values and behavioural expectations into the formal performance review process to strengthen accountability.
- Develop a simple, scheduled Code of Conduct and values communications plan to guide systematic reinforcement of integrity expectations.

## Element 8: Leadership and management attitude

Leaders are aware of and understand their role to model behaviours consistent with expectations, values and standards; and to take action addressing behaviour that is inconsistent with these.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

### Characteristics

<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>The leadership group’s role to support integrity (e.g. to model, reinforce, promote, communicate and enforce) is informal; it relies on individual’s views of what their role is.</b></li> <li><input type="checkbox"/> In the absence of any formal approach, it is left to individual leaders and line managers to interpret and model values and standards.</li> <li><input checked="" type="checkbox"/> <b>The role of leaders to support and demonstrate integrity – and if this is reflected in recruitment practices and staff performance processes – relies on those undertaking those processes.</b></li> <li><input type="checkbox"/> There is little recognition that leadership roles are positions of trust. Employment screening processes (e.g. police clearances, verification of qualifications) are rarely, if ever, undertaken.</li> <li><input type="checkbox"/> Development of leaders and line managers occurs as a result of individual development discussions with those who conduct the process.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> A statement is being developed (e.g. terms of reference, charter) that explains the leadership group’s role to support integrity.</li> <li><input checked="" type="checkbox"/> <b>Some leaders and line managers can explain what integrity looks like, its importance, and their role to promote, reinforce it and take action when behaviours are inconsistent with obligations.</b></li> <li><input type="checkbox"/> The role of leaders to support and demonstrate integrity is being reflected in recruitment and performance documents and processes.</li> <li><input type="checkbox"/> There is a growing recognition that leadership roles are positions of trust. Employment screening is being implemented for these roles.</li> <li><input checked="" type="checkbox"/> <b>Development of leaders and line managers includes building their skills to deal with integrity matters effectively (e.g. having difficult conversations about conduct).</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The leadership group has a shared understanding of its role to support integrity. The group consistently demonstrates and supports this through its actions.</li> <li><input type="checkbox"/> Leaders and line managers have a shared understanding and can explain how they shape culture, what integrity looks like, its importance, and their role to promote and reinforce it (e.g. taking action when behaviours are inconsistent with obligations).</li> <li><input type="checkbox"/> Integrity forms part of the recruitment and performance processes for leadership roles. Leaders demonstrate how they support integrity through their actions and decisions (e.g. in their performance processes).</li> <li><input checked="" type="checkbox"/> <b>Leadership roles are identified positions of trust. Employment screening occurs for all new leadership roles.</b></li> <li><input type="checkbox"/> Development of leaders and line managers includes building their skills to support integrity and prevent misconduct and corruption (e.g. recognise red flags, address issues early and make proportionate decisions when issues occur).</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The leadership group’s cohesive approach to integrity is recognised externally. The authority head and leadership group are often sought to provide advice to their peers on integrity matters as a result.</li> <li><input type="checkbox"/> Leaders and line managers have a good understanding of their role to uphold the reputation of their authority and the broader sector in which they work.</li> <li><input type="checkbox"/> Performance processes assess both <u>what</u> leaders achieve and <u>how</u> they achieve it (e.g. projects delivered effectively manage internal and external risks).</li> <li><input type="checkbox"/> Development of leaders and line managers incorporates mentorships and coaching designed to grow their personal capability, insights and skills to lead with integrity.</li> </ul>
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**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town of Port Hedland’s (the Town) maturity level is **Developing**.

**Basis for assessment**

- Employment screening is carried out for every role across the organisation.
- An ELT charter does not yet exist. However, this is something that is flagged to do with commencement of the incoming CEO.
- There is no regular training program for leaders on integrity, managing employee conduct etc.

**Key gaps**

- Integrity responsibilities not embedded in recruitment and performance processes.
- No consistent leadership expectations linked to integrity.

**Improvement opportunities to consider in developing the Framework**

- Add integrity responsibilities into leadership role descriptions and performance expectations.
- Provide short, practical training for leaders on having integrity conversations.

## Element 9: Organisation culture

Integrity is part of organisation culture. It is actively managed to ensure integrity is sustained.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

Characteristics			
<ul style="list-style-type: none"> <li><input type="checkbox"/> There are few actions and initiatives (e.g. clear expectations, values, communication about integrity, integrity education) to build and sustain integrity.</li> <li><input type="checkbox"/> There is little understanding about recruiting for integrity (e.g. values based recruitment). Staff employment screening (e.g. police clearances, previous disciplinary matters, verification of qualifications) is rarely, if ever, undertaken.</li> <li><input type="checkbox"/> Reporting pathways exist to meet compliance obligations (e.g. public interest disclosure) but are not widely promoted and confidence in them is low.</li> <li><input checked="" type="checkbox"/> <b>Integrity communications only occur in response to a significant integrity breach.</b></li> <li><input type="checkbox"/> Some staff can describe 'how we do things around here', but they are unable to link this to expectations or the code of conduct.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Actions and initiatives to build and sustain integrity are being developed. This includes evaluation activities (e.g. staff surveys to test reporting confidence).</li> <li><input type="checkbox"/> Recruiting for integrity and the requirement for staff employment screening is being documented and promoted to recruiting managers.</li> <li><input type="checkbox"/> Reporting pathways are being developed for staff and external stakeholders. These are clear and concise, include external avenues and strong statements about protection for those who speak up.</li> <li><input type="checkbox"/> An integrity communications plan is being developed. Key integrity messages are communicated periodically (e.g. for International Anti-Corruption Day).</li> <li><input checked="" type="checkbox"/> <b>Most staff can describe 'how we do things around here' as it relates to their immediate work environment referencing the code of conduct, and policies and procedures relevant to their role.</b></li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Actions and initiatives to build and sustain integrity are in place. Evaluation activities are conducted regularly and improvements implemented.</b></li> <li><input checked="" type="checkbox"/> <b>Recruiting for integrity and staff employment screening occurs for all new staff. The type of screening is proportionate to the position and integrity risks.</b></li> <li><input checked="" type="checkbox"/> <b>Reporting pathways are in place and well known by staff. These provide for external stakeholders to also report integrity matters</b> and for anonymous reporting.</li> <li><input type="checkbox"/> An integrity communications plan is in place and messages are sent to staff regularly (e.g. dedicated web/intranet site, campaigns on integrity topics run throughout the year).</li> <li><input type="checkbox"/> Staff can describe 'how we do things around here' from an authority wide perspective and can link this to expectations, values, standards and the need to follow policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Data and information that might indicate issues with integrity are identified, monitored and action taken (e.g. business units with high reports of integrity breaches are supported to make better decisions).</li> <li><input type="checkbox"/> There is a process in place to ensure identified positions are rescreened periodically.</li> <li><input type="checkbox"/> Data and information on the use of reporting pathways are analysed to inform continuous improvement (e.g. absence of reporting from certain teams or employment groups).</li> <li><input type="checkbox"/> De-identified data from reporting is used to inform integrity communication messages.</li> <li><input type="checkbox"/> Staff can consistently describe 'how we do things around here', referencing authority and sector wide expectations, values, standards, policies and procedures.</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town’s maturity level is **Developing**.

**Basis for assessment**

- Recruiting for integrity and staff employment screening occur for all new staff.
- Reporting pathways are available and include avenues for internal and external stakeholders, including Public Interest Disclosure processes; however, promotion and ongoing confidence testing are not yet fully systematic.

**Key gaps**

- Develop and implement a structured integrity communications plan (year-round) that uses de-identified insights from reports, complaints and investigations to reinforce learning and prevention.
- Improve organisation-wide capability to describe 'how we do things around here' from an authority-wide perspective (not only at the team level) and link this consistently to expectations, values and standards.
- Strengthen the use of culture and reporting data (including trend analysis and segmentation) to proactively identify areas needing additional support or intervention.

**Improvement opportunities to consider in developing the Framework**

- Implement an annual integrity communications and engagement plan with a clear calendar (e.g. integrity week, speaking up, conflicts of interest, procurement probity, information handling).
- Provide regular de-identified 'lessons learned' communications (case themes, control improvements, what good looks like) to strengthen practical understanding and reduce repeat issues.

## Element 10: Integrity education and capacity

Integrity education helps build staff capacity to act with integrity.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>
<p><b>Characteristics</b></p>			
<ul style="list-style-type: none"> <li><input type="checkbox"/> Induction, if conducted, relies on the knowledge of individual line managers.</li> <li><input checked="" type="checkbox"/> <b>Some integrity education occurs beyond induction to meet compliance obligations.</b></li> <li><input type="checkbox"/> Leaders and line managers rarely follow up if their staff have attended integrity education provided.</li> <li><input checked="" type="checkbox"/> <b>Whether other actions and initiatives (e.g. staff performance processes) to educate and reinforce integrity are undertaken relies on individual line managers.</b></li> <li><input type="checkbox"/> Staff are unsure about who provides advice about integrity matters as it is not documented. If provided by individual line managers, the quality of advice relies on their knowledge.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> An induction program is being developed to incorporate expectations, standards, policies and procedures and guide ethical decision making.</li> <li><input type="checkbox"/> Integrity education is being developed to help manage key integrity risks (e.g. conflicts of interest, information management). The integrity education and training plan includes what is provided, to whom and when, which high risk positions need additional training, and how activities are evaluated (e.g. how participation is tracked).</li> <li><input checked="" type="checkbox"/> <b>Most leaders and line managers are active in attending any integrity education provided, encourage their staff to do the same and follow up with staff on mandatory education requirements.</b></li> <li><input type="checkbox"/> Additional actions and initiatives to educate and reinforce integrity (e.g. staff performance processes and raising integrity consciousness) are being developed or reviewed.</li> <li><input checked="" type="checkbox"/> <b>Staff know that line managers and certain functional area leaders (e.g. finance, human resources) provide advice about integrity matters. Quality still relies on an individual's knowledge.</b></li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Induction is regularly updated to ensure it is contemporary, accounts for lessons learned from integrity breaches and reflects any changes to operating conditions (e.g. new policies, changed risks).</b></li> <li><input type="checkbox"/> An integrity education and training plan is in place and includes specific education on individual and organisational factors (red flags) for those in high risk roles. Participation in and feedback from sessions are collected and analysed to inform improvements.</li> <li><input type="checkbox"/> Leaders and line managers support and champion integrity education. They reinforce the importance of attending integrity education sessions.</li> <li><input type="checkbox"/> Staff performance processes and actions and initiatives to raise integrity consciousness reinforce key integrity messages and support good decision making.</li> <li><input type="checkbox"/> It is well documented in the code of conduct, policies and procedures who provides expert advice on integrity matters. Leaders and line managers understand their role to provide general advice and how to escalate matters as required.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Integrity education is, where relevant, also in place for external stakeholders (e.g. labour hire staff, contractors and suppliers).</li> <li><input type="checkbox"/> Individuals are followed up (e.g. randomly and periodically) to determine if and how knowledge gained during integrity education is being applied in practice in the workplace.</li> <li><input type="checkbox"/> Leaders and line managers support practitioners attending external learning opportunities. A process is in place to ensure this learning is shared with others with roles and responsibilities under the integrity framework.</li> <li><input type="checkbox"/> Those who provide advice about integrity matters meet periodically to discuss advice being sought and provided, helping ensure a consistent approach with policies and procedures and advice from external integrity bodies.</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

Our self-assessment has determined that the Town’s maturity level is **Emerging/Developing**

**Basis for assessment**

- Induction content is maintained and updated to reflect key integrity requirements, and mandatory Code of Conduct training is reinforced through corporate reminders.
- Integrity education beyond induction occurs, but a consolidated, risk-based training plan and consistent tracking/analysis of participation and effectiveness are not yet fully in place.
- Public Interest Disclosure Officer’s do not receive any formal training.

**Key gaps**

- Develop a formal integrity education and training plan that is role-based (including high-risk roles) and specifies content, frequency, evaluation methods and reporting.
- Strengthen systematic tracking of completion and follow-up for mandatory learning, with clear accountability for line managers and escalation for non-completion.
- Document and promote a clear integrity advice and escalation map so staff know where to obtain specialist guidance and how to escalate matters appropriately.

**Improvement opportunities to consider in developing the Framework**

- Develop and implement an Integrity Education Plan.
- Implement training tracking and reporting with completion reporting to ELT and directorate follow-up for overdue modules.

## Element 11: Response to integrity breaches

Integrity breaches are responded to in a timely and proportionate way to ensure integrity is sustained.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

Characteristics			
<ul style="list-style-type: none"> <li><input type="checkbox"/> If procedures exist, they are in place to meet compliance obligations; they provide insufficient guidance.</li> <li><input type="checkbox"/> The quality of processes and decisions varies. Basic case information (e.g. number of processes started and completed) is used for reporting.</li> <li><input type="checkbox"/> The use of data, lessons learnt from past cases and the findings of external bodies are rarely, if ever, considered.</li> <li><input type="checkbox"/> Whether integrity breaches are responded to relies on the knowledge and skills of individual line managers.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Procedures and guidance on responding to breaches – including awareness raising resources to inform those responding to integrity breaches – are being developed to promote better quality processes and consistent decision making.</b></li> <li><input checked="" type="checkbox"/> <b>Central recording of case information is being developed to streamline reporting.</b></li> <li><input checked="" type="checkbox"/> <b>The use of data, lessons learnt from past cases and findings of external bodies are being considered as procedures are being developed.</b></li> <li><input checked="" type="checkbox"/> <b>Most line managers have an understanding of what a breach looks like and how to respond.</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Procedures, guidance and awareness raising materials inform those involved in responding to integrity breaches, and support quality processes and consistent decision making.</li> <li><input type="checkbox"/> A quality assurance process is in place to check for consistent application of procedures.</li> <li><input type="checkbox"/> A central register captures detailed case information. It is used to monitor the progress of processes, analyse trends and outcomes, and for reporting.</li> <li><input type="checkbox"/> The use of data, lessons learnt from past cases and findings of external bodies are used to inform process improvements.</li> <li><input type="checkbox"/> Decision makers, line managers and staff conducting processes have the required knowledge and skills. They are confident to respond to, manage and escalate matters as needed.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Procedures, guidance and awareness raising materials are updated regularly. This reflects results of the quality assurance process, compliance changes, contemporary practice and advice from external integrity bodies.</li> <li><input type="checkbox"/> Detailed case information is captured in a central system with advanced features such as live analytics and dashboards. It provides useful intelligence to inform trend analysis and prevention strategies.</li> <li><input type="checkbox"/> Individual (e.g. motivations) and organisational (e.g. control weaknesses) factors that might have contributed to a breach are analysed to help prevent future breaches.</li> <li><input type="checkbox"/> Decision makers, line managers and staff conducting processes proactively build their own capacity where required (e.g. staying up to date with contemporary practice, industrial decisions).</li> <li><input type="checkbox"/> Those who provide information as part of a process are followed up regarding their experience of the process and any suggestions for improvement.</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

**Basis for assessment**

- Procedures and guidance are being developed/reviewed to drive consistent decisions and quality processes.
- Central recording is progressing; audit log currently used for tracking any overarching control/process actions.
- Managers generally understand what a breach looks like and how to respond.

**Key gaps**

- Procedures not yet fully embedded with subsequent quality assurance.
- No single case management view with analytics/consolidated reporting; limited feedback to staff on lessons learned and trends.

**Improvement opportunities (next 12 months)**

- Review breach response procedures and quick-reference guides.
- Consider a central register with QA checks (subject to confidentiality – need to investigate most appropriate solution).

## Element 12: Self-analysis and review

Analysis and review activities of actions to support integrity are undertaken as part of continuous improvement.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

### Characteristics

<ul style="list-style-type: none"> <li><input type="checkbox"/> Analysis and review activities of actions to support integrity rarely occurs unless it relates to compliance.</li> <li><input type="checkbox"/> Little thought has been given to whether there is value in sourcing external help with analysis and review activities.</li> <li><input type="checkbox"/> Where analysis and review activities are conducted, findings and recommendations are not always implemented.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Analysis and review activities of actions to support integrity are sometimes undertaken beyond compliance. Available tools are used (e.g. snapshot tool and maturity self-assessment tool).</b></li> <li><input checked="" type="checkbox"/> <b>Further consideration of requirements – including the value of sourcing external help with analysis and review – are being developed as part of the integrity framework.</b></li> <li><input checked="" type="checkbox"/> <b>Processes for coordinating the implementation of findings from self-analysis and reviews, and recommendations from the reviews of external integrity bodies are being developed. This considers how monitoring and follow up occur.</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review of the integrity framework is scheduled. Analysis and review activities are aligned to or part of risk analysis and audit processes. Analysis is undertaken to recommend improvements to the framework considering changes in legislative and operating conditions (e.g. structural and legislative).</li> <li><input type="checkbox"/> External assistance to undertake a review is sourced where needed (e.g. where a greater level of expertise and objectivity is required).</li> <li><input type="checkbox"/> A position or team is assigned to coordinate implementation of findings and recommendations from self-analysis and reviews, and recommendations from the reviews of external integrity bodies (related to the authority or not) of the integrity framework (and its component parts). Progress is reported to the leadership group.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Analysis and review of the integrity framework and reporting on implementation of improvement actions align with strategic and operational planning and budget cycles.</li> <li><input type="checkbox"/> Results from self-analysis and review, and recommendations from the reviews of external integrity bodies (related to the authority or not) inform improvements to the integrity framework (and its component parts). Revisions (where relevant) are shared with the workforce.</li> <li><input type="checkbox"/> Benchmarking of the integrity framework and sharing of ideas occurs (where relevant and possible) with similar types of authorities to identify whether any further improvements can be made.</li> </ul>
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**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

**Basis for assessment**

- Self-assessments occur beyond compliance; external support used selectively (e.g., probity for procurement).

**Key gaps**

- No formal, scheduled review process for assessing the Fraud Control Plan/Integrity Framework or its components.
- Follow-up responsibilities are not yet clearly assigned, making it harder to track and close out findings from self-assessments or external integrity bodies.
- External expertise is not always used when more objectivity or specialised capability is needed. There have been improvements in this space with engagement of Probity Auditors for certain procurement activities.

**Improvement opportunities to consider in developing the Framework**

- Set a review schedule; assign ARI to maintain a single recommendations register with quarterly ELT/ARIC reporting.
- Define when to use external expertise.

## Element 13: Oversight

Oversight is about providing the authority head assurance that the authority’s approach to integrity is working as intended.

**Maturity levels and their indicators:** Each maturity level has 4 indicators that provide an overarching description of what the approach to integrity looks like at each level. Each level of maturity builds on the previous.

Emerging	Developing	Embedded	Excelling
<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an unclear approach to integrity, meaning it is partially or not documented and not fully compliant.</li> <li>• Integrity is not defined or well understood by staff.</li> <li>• Integrity actions and initiatives tend to be unplanned, inconsistent and reactive.</li> <li>• Accounting for integrity only relates to meeting compliance obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level are documenting their approach to integrity and it is mostly compliant.</li> <li>• What integrity means is becoming clearer to staff as the tone from the top is being communicated.</li> <li>• Integrity actions and initiatives are being planned for and coordinated but not yet integrated.</li> <li>• Accounting for integrity is moving beyond compliance obligations and more towards improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have a clear approach to integrity, meaning it is fully documented and compliant.</li> <li>• Integrity is well communicated by leaders, understood by staff and integrated into business practices.</li> <li>• Integrity actions and initiatives are planned, fit-for-purpose, implemented and continuously refined.</li> <li>• Accounting for integrity is based on improvements being made from periodic assessments and supported by leadership commitment.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorities at this maturity level have an approach to integrity that is fully integrated into all decision making and planning.</li> <li>• Integrity is modelled and reinforced by leaders and practiced by staff who understand their obligations.</li> <li>• Integrity actions and initiatives are flexible enough to meet integrity challenges and respond to new and emerging risks.</li> <li>• Accounting for integrity is based on improvements being made from ongoing assessment. Improvements are prioritised and implementation is monitored as part of a continuous improvement approach.</li> </ul>

Characteristics			
<ul style="list-style-type: none"> <li><input type="checkbox"/> The authority head relies on informal reports about how integrity is being practiced, managed and accounted for (approach to integrity).</li> <li><input type="checkbox"/> Monitoring of the approach to integrity relies on members of the leadership group ensuring it is undertaken in their respective areas, rather than any formal process.</li> <li><input type="checkbox"/> As required, the audit committee assures finance processes and reports are sent to the authority head.</li> <li><input type="checkbox"/> Any oversight activities are ad hoc and focussed internally.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>The authority head is directing the development of processes and structures to obtain the information needed for oversight of the approach to integrity. This is being documented in an integrity framework.</b></li> <li><input checked="" type="checkbox"/> <b>The leadership group understands their role to monitor the approach to integrity in their respective areas and provide data on request to support assurance and oversight.</b></li> <li><input checked="" type="checkbox"/> <b>As the integrity framework is being developed, the collection and provision of information (beyond that required for compliance) to the authority head for assurance, is being identified and documented.</b></li> <li><input checked="" type="checkbox"/> <b>Internally focused oversight activities are routinely performed and documented.</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Processes and structures are in place to provide the authority head with information to assist their oversight of the approach to integrity (e.g. reports).</li> <li><input type="checkbox"/> The leadership group are aware of their assurance and oversight obligations for their respective areas and are well prepared to provide updates at leadership group meetings.</li> <li><input type="checkbox"/> A committee has been established (or the role of an existing committee has been expanded) with specific responsibilities to oversight the integrity framework (and its component parts) and report to the authority head.</li> <li><input type="checkbox"/> Oversight activities associated with outsourced programs and services are being identified and documented.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The authority head can provide assurance to external integrity bodies and other stakeholders (e.g. board, council, minister) that the approach to integrity is sound.</li> <li><input type="checkbox"/> The leadership group is well versed in assurance and oversight. Members are able to provide information and insights about the authority’s approach to integrity and can discuss how this compares to other similar authorities (if benchmarking has been conducted).</li> <li><input type="checkbox"/> A committee provides the authority head with regular and fulsome reports about the integrity framework (and its component parts).</li> <li><input type="checkbox"/> Oversight extends to outsourced programs and services to ensure they are adequately controlled and reported on.</li> </ul>

**Comments**

Maturity level			
Emerging	Developing	Embedded	Excelling

**Basis for assessment**

- Oversight and assurance activities are in place through established governance structures (e.g. ELT and ARIC), internal and external audit programs, and the Audit Log used to track action implementation.
- What’s still developing is regular integrity performance reporting that looks beyond compliance and helps identify issues early.

**Key gaps**

- No consolidated integrity reporting calendar or KPI dashboard; escalation thresholds unclear.

**Improvement opportunities to consider in developing the Framework**

- Develop a simple Integrity Reporting Calendar including a list of recurring reports e.g. gifts, conflicts, PDI’s, training and relevant audit actions.
- Consider setting some simple KPI’s e.g. % of staff who completed mandatory training, Number of declared gifts/conflicts, Number of integrity-related reports/PIDs, Control weaknesses identified, Number of contract compliance issues, Internal audit findings overdue
- Report on the performance of the Fraud Control Plan/Integrity Framework to ELT/ARIC annually.

Attachment 2 – VendorPanel Pre-Qualified Supplier Request Activity Q3

VendorPanel Town of Port Hedland Pre-Qualified Supplier Panel Requests - Q3 JAN MARCH 2026								
Panel Name	No. of Requests	No. of Suppliers Requested	Declined to Respond	Responses (Submitted)	Successful	Not Successful	Undecided	Not responded
Pre-Qualified Construction Panel (RFT 2324-01)	1	6	0	1	1	5	0	0
Pre-Qualified Panel for Trade Services (RFT 2324-05)	2	8	0	2	1	7	0	0
Pre-Qualified Civil Construction Contractors & Trades (RFT 2324-19)	0	0	0	0	0	0	0	0
Pre-Qualified Panel of Construction Professionals (RFT 2324-20)	0	0	0	0	0	0	0	0
Pre-Qualified Civil Construction (RFT 2324-22)	0	0	0	0	0	0	0	0
Graphic Design Panel (RFT 2425-11)	0	0	0	0	0	0	0	0
RFT 2324-20 Panel Construction Professionals + other supplier list	1	15	0	2	1	1	0	11