

# Building Integrity

Embedding good practice in the  
South Australian public sector

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**Government  
of South Australia**

Office of the Commissioner  
for Public Sector Employment

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The Government of South Australia acknowledges Aboriginal people as the first peoples and nations of South Australia.

The South Australian Government and public sector recognise and respect their cultural connections as the traditional owners and occupants of the land and waters of South Australia and that they maintain a unique and irreplaceable contribution to the state.

# A message from the Commissioner for Public Sector Employment



Trust is essential to the success of the public sector as it goes about its work for the government and all South Australians. The nature of our roles means that we are entrusted with considerable resources and authority, which requires the highest standards of integrity and accountability.

In the work environment, integrity can be compromised when there's ambiguity about expectations and the processes to handle these issues. Similarly, a culture of transparency is necessary so that employees at all levels can feel safe and confident that any challenges to integrity are proactively and openly discussed. When employees can see best-practice decision-making on these matters and leaders are prepared to talk about complex subjects where the correct choice is not always clear, integrity flourishes.

'Building Integrity' is the South Australian public sector's framework to embed good practice standards into our agencies. By following its guidance, upholding integrity will not only be a critical consideration of our work, but it will be the norm. South Australians deserve nothing less.

A handwritten signature in black ink that reads "Erma Ranieri".

**Erma Ranieri PSM (She/Her)**  
**Commissioner for Public Sector Employment**

## BACKGROUND

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Honesty and integrity are core values of the South Australian public sector. The Code of Ethics reflects the expectation that all employees should role-model these values in everything they do.

Integrity is also an organisational matter, involving our policies and processes and the operating culture of our agencies.

When integrity is compromised, public trust in our actions can be eroded. An agency's reputation can still be put at risk even when actions are unintentional or confined only to one person.

Several recent reports by authorities such as the Independent Commissioner Against

Corruption, parliamentary committees and members of parliament have identified events where integrity has been compromised.

They have highlighted the need to strengthen the sector's systems and practices which hold people, including contractors and other business representatives, to account.

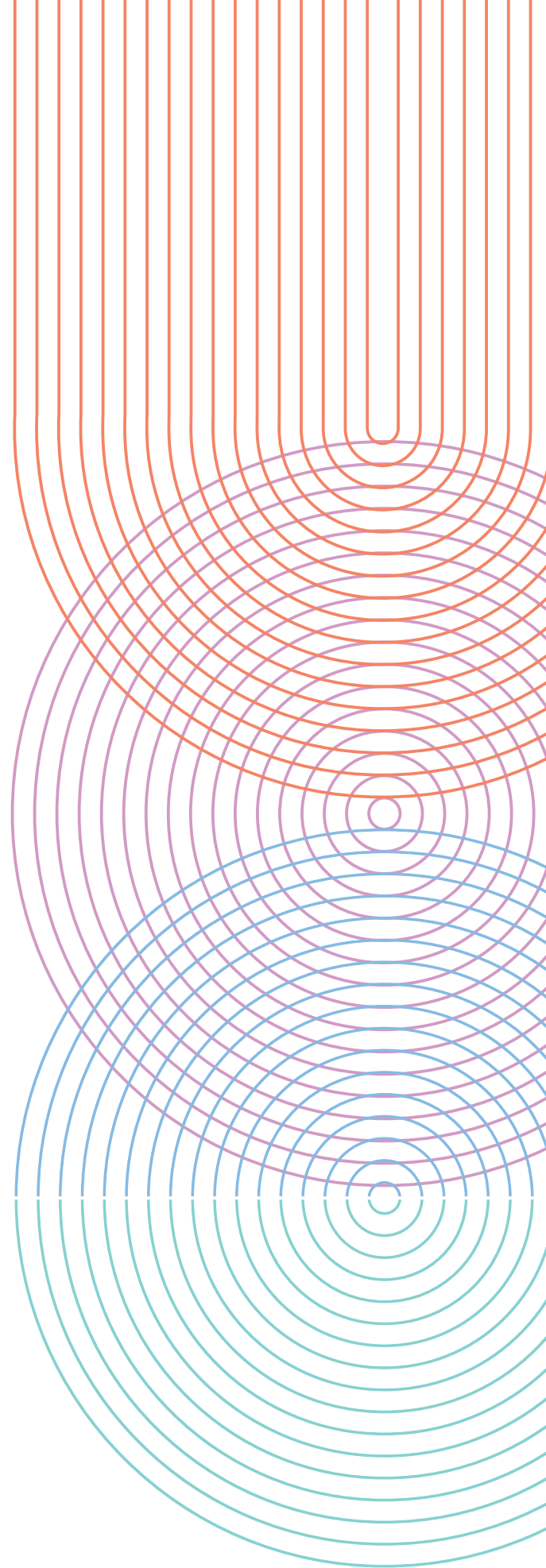
Maintaining a workplace culture with strong ethics and integrity is fundamental to good organisational performance and the success of the public sector.

# The South Australian Public Sector Values describe integrity as acting truthfully, consistently and fairly.

This means:

- using our authority responsibly
- being open and transparent in our actions and decision making
- reporting improper conduct
- avoiding or appropriately resolving any real or perceived conflicts of interest.

We want all employees in the public sector to make a difference to the community we serve, be faithful to our values and to be proud of how we go about our work.



# Building integrity in the public sector

Building and sustaining the community and government's trust requires deliberate and collaborative efforts from all parts of the South Australian public sector.

The Commissioner for Public Sector Employment is legislated under the Public Sector Act 2009 to ensure:

- accountability within the sector
- the sector's governance is consistent and transparent
- employees are managed effectively and fairly.

The Integrity Framework brings together existing and new resources to set out how employees and leaders can strengthen integrity in our sector and how they can adhere to the values and the Code of Ethics. It also describes how public sector employees can embed integrity in their day-to-day work, regardless of the nature of their role.

**Integrity breaches can have wide reaching impacts, including:**

- increased distrust in the sector, agency, or person
- increased investigations into misconduct
- increased complaints, both from employees and members of the public
- decreased productivity due to impact on team culture
- increased staff absenteeism and turnover.

# The Integrity Framework

This Integrity Framework aims to achieve improved and sustained trust, with a culture of integrity reflected in employees' decision making across all levels of the sector. Building integrity in our practices requires:

1. The right sector-wide directions, policies and systems.
2. The right agency systems, processes and policies.
3. Our employees consistently act in a respectful and appropriate manner, no matter their position.



## ELEMENTS OF THE INTEGRITY FRAMEWORK

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The three elements in practice across the sector include:

### Sector-wide direction, policies and systems to enable and support integrity

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- Directions are issued in accordance with legislative obligations and frameworks.
- The proper policies and practices are in place to support a culture of integrity at all points of the employee lifecycle.
- Sector-wide training programs include raising awareness of relevant integrity risks.
- Systems support robust and reasoned decision making.
- Conflicts of interest and gifts and benefits are declared and managed appropriately.

### Respectful and appropriate behaviours

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- Our people know what is expected in their behaviour and conduct.
- Our people provide frank and fearless advice, lead by example, demonstrate courage and fairness, and are empowered to speak up when necessary.
- Our people understand how the public sector values relate to their role, and how to incorporate these values in everyday decision making.
- Our people seek advice when necessary, and are held accountable for their actions.
- Our leaders demonstrate exemplary behaviours, and role model accountability for decisions and actions.

### Agency policies and systems to enable and support integrity

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- Agencies have policies in place to support robust and transparent decision-making.
- Employees use agency systems and policies, and are held accountable if they do not.
- Agencies have effective and current risk management plans and strategies in place to identify and address non-compliance.
- Agencies have appropriate recruitment processes in place to select employees with high levels of integrity, and clearly articulate expectations when onboarding.
- Employees understand and adhere to agency reporting requirements, which includes wider public officer reporting obligations.



## IMPLEMENTING INTEGRITY PRACTICES

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The framework's elements are supported by different policies, processes, systems and expectations, including those listed below. These supports embed integrity in everyday decision-making to ensure actions are robust, consistent and transparent.

### Sector-wide direction, policies and systems to enable and support integrity

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- Commissioner's Determinations and Guidelines
- Premier's Directions
- Treasurer's Instructions
- Department of the Premier and Cabinet Circulars
- Public Sector Act 2009
- Other employing legislation (e.g. Health Care Act 2008, Education and Children's Services Act 2019)
- Public Sector (Honesty and Accountability) Act 1995
- State Procurement Policy
- Eligibility for Re-Employment Register
- Public Interest Disclosure Act 2018
- Ombudsman Act 1972
- Protective Security Framework.

- Independent Commission Against Corruption Act 2012
- Dispute and grievance provisions in awards and enterprise agreements

### Respectful and appropriate behaviours

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- Code of Ethics for the South Australian Public Sector
- Public Sector Values and Behaviours
- Performance Management and Development
- Complaint management
- Fraud and corruption control
- Training programs
- Profession-specific codes of conduct
- Effective financial management
- Responsible asset management and system utilisation.

### Agency policies and systems to enable and support integrity

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- Induction and onboarding
- Recruitment and selection policies and procedures
- Agency procurement processes
- Internal review processes
- Agency risk management frameworks.

# Responsibilities in practice

Decisions are made everyday which seem straight forward and reasonable to the decision-maker but may be viewed very differently by others. It is critical that leaders and decision-makers consider the possible perception of their conduct when they act. Ways to embed integrity in decision making include:

## **Recruitment and appointment decisions**

- Be open minded in all appointment decisions. The appearance of a pre-conceived outcome will be viewed unfavourably if others feel they haven't had the opportunity to be appropriately considered.
- Have clear and reasonable justification when using direct appointment methods and be transparent about your rationale.
- Declare a conflict of interest when on a selection panel if you know an applicant and think there is a risk that your participation may be biased or perceived as such.

## **Allowance and classification decisions**

- When awarding allowances consider whether it is genuinely required or is being applied out of context. For example, additional duties allowances are for recognition of carrying out higher-level duties. They should not be used in place of a retention allowance, or to reward someone for carrying out their regular duties.

- Consider sharing acting opportunities between several employees rather than one employee only or run an informal Expression of Interest process to give all relevant employees the opportunity to be considered.
- Avoid using reclassification as a reward. Classification should reflect the value of the duties of the role.
- Increment acceleration requires sufficient evidence of the employee's experience. Inadequate consideration can contribute to team culture issues if one employee is perceived as benefiting from favouritism.

## **Outside employment decisions**

- When considering a request for secondary outside employment, ensure the employee understands that public resources and work time cannot be used to support the secondary employment.
- Ensure any conflict of interest associated with outside employment is declared and managed. This also needs to be managed while the employee is on paid leave or leave without pay because a potential conflict can still impact their public sector role upon their return.

## **Performance decisions**

- Give and receive feedback openly, constructively and respectfully. Feedback should be timely. Don't wait until a scheduled performance

conversation to address issues or provide clarification.

- Have the difficult conversations. These build relationships between the manager and employee, and build team trust that the manager will take action when needed.
- Follow through on performance issues. Implement formal processes where necessary.

### **Separation decisions**

- When deciding not to renew a contract, prepare clear rationale about the reasons for the decision so it's ready to provide to the employee if it's requested.
- When extending one contract but not another, prepare an appropriate explanation. This could be provided to the employee if they seek greater clarity about the decision.

### **Contracts and procurement processes**

- Ensure effective contract management and recordkeeping practices are in place for accountability and transparency.
- Contracts are appropriately designed for ease of compliance, and expectations are regularly communicated with suppliers.
- Approving officers do not 'rubber stamp' purchases, but apply genuine scrutiny to ensure compliance with policy and procedures.



# Reporting integrity concerns

A range of mechanisms are available to employees to report and act on any concerns about integrity, which should consider:

- the seriousness of the concern
- the nature of the concern and whether there is a requirement to report it
- the employee who is believed to have been responsible.

Guidance on what should be formally reported can be found on the [Office for Public Integrity website](#).

Mechanisms to address or report a concern may include:

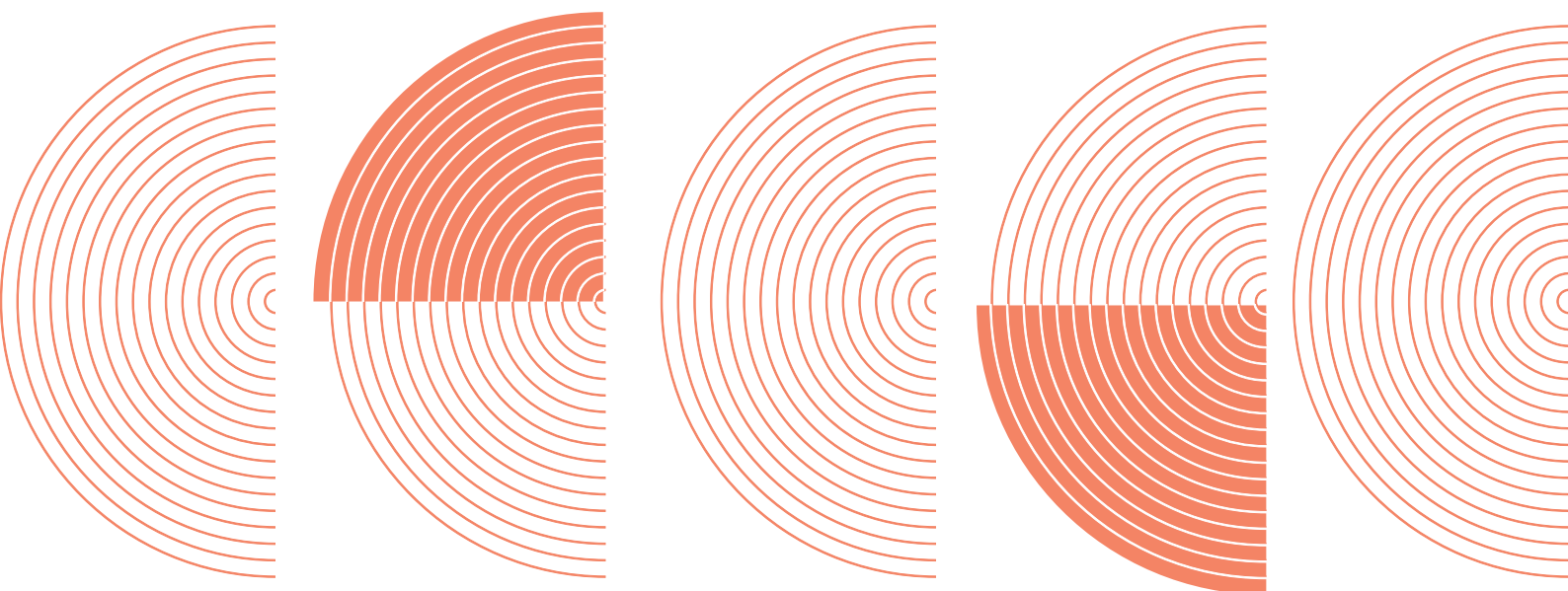
- discussing it with your HR contact
- if comfortable, talking directly to the employee concerned
- advising a manager or senior leader
- referring to any relevant internal policy or procedure
- making a report to the [SA Ombudsman](#).
- if it appears to be misconduct, maladministration or corruption, reporting the concern to the [Office for Public Integrity](#).
- if it appears to be related to public administration, reporting the concern to a chief executive, or the Commissioner for Public Sector Employment under the [Public Interest Disclosure Act 2018](#).

There are certain circumstances in which it is necessary to maintain the anonymity of the person disclosing the concern, particularly if the report is made under the Public Interest Disclosure Act 2018. Agencies are responsible for ensuring they are familiar with circumstances in which the identity of the report must be maintained.

# Integrity is everyone's responsibility

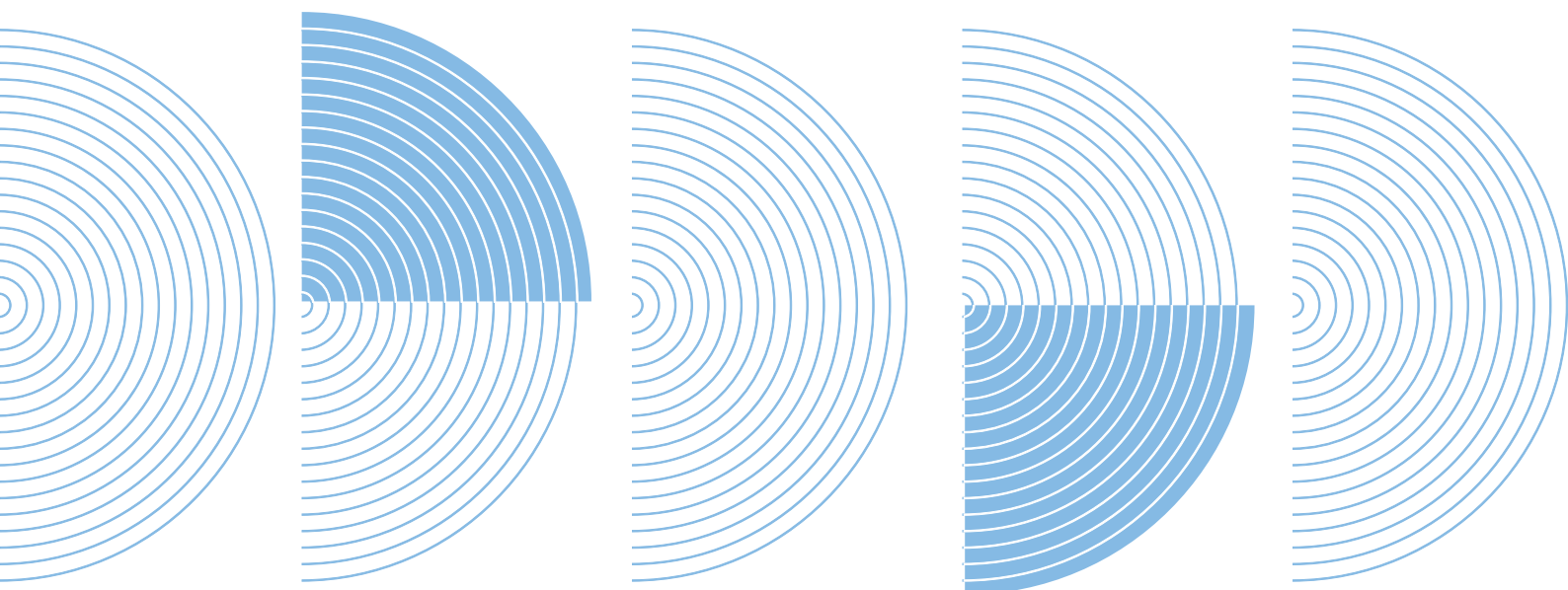
## As an individual, you can:

- show tolerance of others
- demonstrate respectful and inclusive behaviour
- consistently uphold and act with the highest standard of honesty, transparency and accountability
- manage your behaviour
- be mindful of appropriate and ethical conduct
- seek advice if in doubt after witnessing unethical or questionable behaviour or actions
- understand responsibility for your behaviour also applies outside the workplace
- respectfully call out conduct which may be perceived as dishonest, disrespectful, or outside the expectations of the agency, and public sector
- be familiar with the Office for Public Integrity and Ombudsman SA's reporting obligations.



### **As a leader, you can:**

- hold individuals and your teams to account for behaviours, actions and individual performance
- demonstrate exemplary behaviours and lead by example
- regularly seek feedback on your behaviours and actions and encourage your team to do the same
- promote appropriate reporting of matters
- ensure reporting structures are in place in line with legislative requirements and department and sector policies and procedures
- define duties and conduct that is expected of the team
- conduct regular performance conversations
- create a safe, inclusive team environment
- encourage others to seek clarification when unsure about speaking up and reporting unethical behaviours
- take responsibility to identify, manage and report suspected misconduct.



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