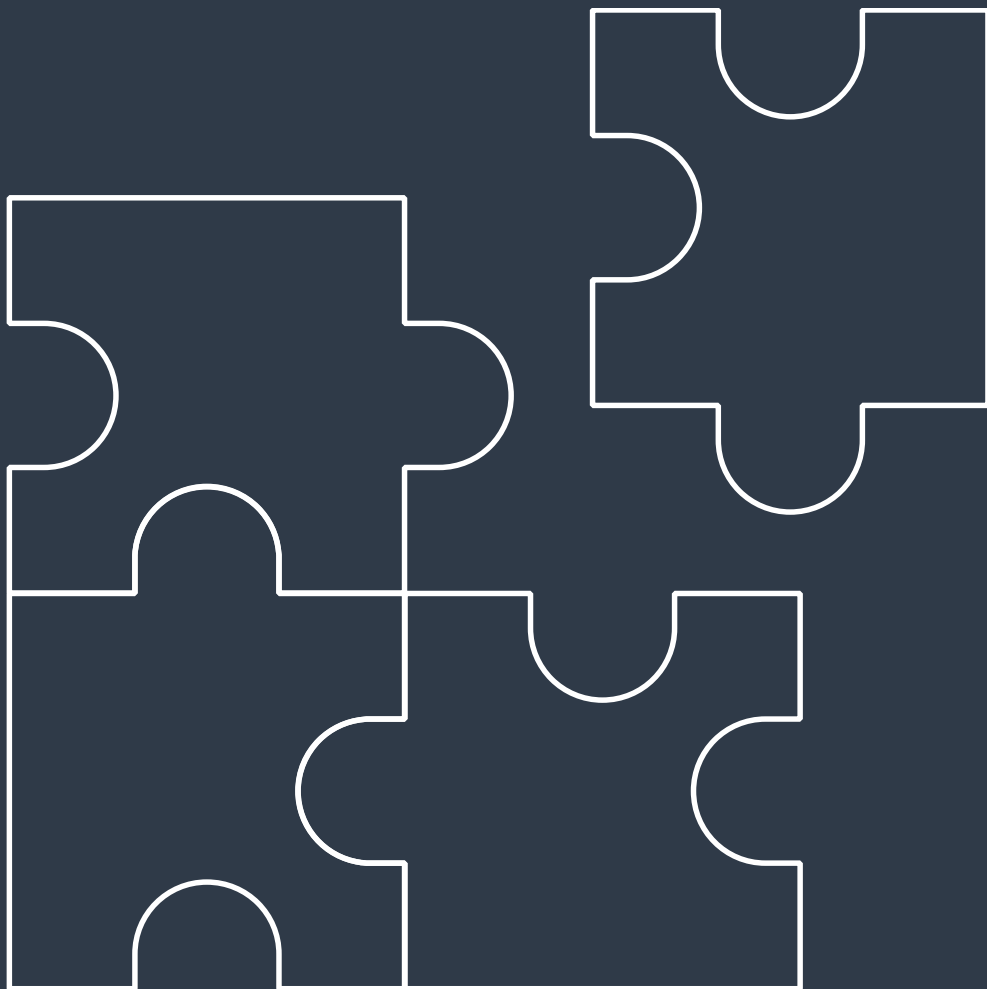




National Anti-Corruption Commission

Self-Assessment Guide and Frequently Asked Questions

Commonwealth Integrity Maturity Framework



Introduction

The Commonwealth Integrity Maturity Framework provides accessible information to support Commonwealth agencies to design, implement and review the effectiveness of their integrity frameworks so that they are tailored to their risk profiles, size and contexts.

The following suite of products have been produced to support the framework:

Integrity Maturity Framework

- The Integrity Maturity Framework is a set of 8 integrity principles, that are derived from the key Commonwealth integrity laws, policies and procedures. Each principle summarises the corresponding governance obligations and controls.
- Each integrity principle is accompanied by a 4-level maturity scale, with each level of maturity building on the previous level.

Self-Assessment Guide and FAQ

- The Self-Assessment Guide and FAQ provides guidance for Commonwealth agencies to undertake a self-assessment of their integrity maturity, by interpreting and applying the most appropriate indicators and indices.

Towards Integrity Maturity: Mapping the Commonwealth integrity landscape

- This is a directory of the Commonwealth integrity landscape. It describes the roles of the Commonwealth integrity agencies and the wide range of integrity-related laws, policies and procedures that govern the actions of Commonwealth officials and agencies.



Guide to undertaking a self-assessment

Commonwealth agencies that self-assess their integrity maturity can use the outcome of those self-assessments to plan to strengthen their pro-integrity culture and controls and address integrity risks. This is a process of continuous improvement.

Beginning the integrity journey

The integrity maturity self-assessment is a participative diagnostic tool. It is a foundational exercise that is encouraged to be embedded into ongoing integrity controls. The self-assessment is guided by its participants and informed by risk assessment, integrity metrics, monitoring and reporting.

Importantly, the self-assessment is not an audit exercise or a training course and should not be considered as a once-off assessment.

After undertaking the assessment, the results can be used to inform plans to improve or maintain integrity levels in each agency. The assessment is intended to be re-taken to assess the effectiveness of implemented integrity controls and practices.

Focusing on prevention

The self-assessment tool focuses on strategies for preventing integrity breaches. It aims to strengthen the resilience and maturity of Commonwealth agencies by identifying and managing integrity risks and vulnerabilities. The purpose is not to detect, investigate, or sanction integrity failures.

Encouraging participative assessment and learning

Important objectives of the maturity self-assessment include:

- agency-wide learning about what it means to sustain a positive, resilient culture of integrity in the workplace
- collaborative identification and shared understanding of integrity risks and vulnerabilities, including specific risks arising from the agency's mandate, powers and functions
- understanding and ownership of measures to strengthen integrity maturity and maintain resilience.

Aiming for appropriate maturity levels

Continuous improvement in maturity is important, given integrity risks change over time.

However, it may not be appropriate or necessary for each agency to aspire to the highest maturity indicators.

When agencies consider an appropriate level of integrity maturity to aim towards, they should be guided by:

- the most likely and harmful integrity risks
- deciding whether existing integrity controls adequately mitigate such risks, or whether new controls are warranted
- confirming that residual risks are consistent with the organisation's integrity risk tolerance. Sharing lessons learned and expertise.

Many Commonwealth agencies are exposed to similar or related integrity threats and vulnerabilities. Commonwealth agencies can benefit by sharing lessons learnt on strategies to manage risk, how to build maturity and resilience, and how to conduct integrity maturity assessments.

Commonwealth agencies could consider inviting representatives from other organisations to discuss approaches to improving integrity cultures.

How to undertake a self-assessment

Step 1: Determine scope and participants

- **Scope:** The maturity self-assessment should consider integrity measures across the whole agency. Individual business units can also use the self-assessment to better understand their level of integrity maturity. When tailoring the self-assessment to an agency's operational context, leaders can choose to identify specific areas of integrity focus or concern.
- **Participants:** Agencies should draw on the insights of a broad range of internal stakeholders when undertaking a self-assessment. This will support agency-wide learning and ownership of the maturity assessment and recommendations. An officer with responsibilities for integrity or governance is well-placed to coordinate the self-assessment process.
- **Examples of business areas that could participate the assessment process include:**
 - Staff involved in enterprise risk areas
 - staff already responsible for undertaking maturity assessments, such as protective security and fraud prevention
 - staff from integrity-related areas, such as internal audit, procurement and human resource management.

Step 2: Collate information on integrity performance

Agencies could consider drawing on the following types of information to inform the assessment process:

- Reports from Parliament, oversight agencies, civil society and the media.
- Government assessments and reports and associated maturity ratings, including those produced under the:
 - Commonwealth Risk Assessment Policy (Integrity Principle 4)
 - Commonwealth Fraud Control Policy (Integrity Principle 5)
 - Protective Security Policy Framework (Integrity Principle 7).
- Organisational data and information: staff survey results, perception or witnessing of misconduct or corruption, reports of harassment, bullying or discrimination (e.g. APS Census); complaints, code of conduct reports and investigation results, integrity testing results (where applicable); sanctions or disciplinary action; performance management data, unscheduled absence rates, rates of staff turnover; work health and safety data; integrity training rates.

Step 3: Conduct a tailored integrity maturity self-assessment

For each of the 8 integrity principles, agencies should determine the maturity level that best reflects the agency's current approach. In undertaking this exercise, reference to the information collated and stakeholder feedback.

Commonwealth agencies are reminded that the self-assessment tool is intended to support agencies to review the effectiveness of their integrity frameworks. As such, a degree of judgement may be required to

determine the most appropriate maturity level. Examples of situations where agencies need to exercise judgement include:

- An agency finds that it meets the criteria for different levels of maturity across a single principle.
- An agency finds that it has different levels of maturity for different aspects of a given integrity principle.
- An agency's current approach to integrity may not address all the characteristics in the relevant maturity indicator (and it may not need to).

Further support for planning a self-assessment

The following topics and tasks could be used to inform planning for a self-assessment.

Orientation

What does it mean to sustain a positive, resilient culture of integrity in this workplace?

Integrity performance

What do we know about the status of integrity in this agency? What can we learn from relevant official reports, media coverage, internal integrity metrics and monitoring, and related maturity assessments?

Risk assessment

What are the current and emerging integrity threats and vulnerabilities associated with the agency's mandate, powers and functions, and consequent integrity risks? Of the risks identified, which are the most

likely and the most potentially harmful? Are the integrity risks already managed effectively, or do they require improved governance controls?

Maturity assessments

Based on the most likely and harmful integrity risks, assess the level of maturity under each of the 8 integrity principles, using the maturity indicators provided for each principle.

Note: Maturity assessments are routinely conducted for the Commonwealth Risk Management Policy (Principle 4) and the Protective Security Policy Framework (Principle 7). The maturity ratings of those assessments should be used to inform this process.

Reporting

The maturity assessment report could be structured to include:

- Integrity performance: What we know about the status of integrity in the agency.
- Risk assessment results: Which integrity risks were identified? Which are the most likely and most harmful?
- Maturity assessment results: What is the assessed maturity level for each of the 8 integrity principles?
- Improvement plan: For each of the 8 integrity principles, plan to either maintain the current level of maturity, or seek a higher level of maturity over time in consideration of the agency's operating context, risks and constraints. The plan should indicate which improvements should be given priority and who should be responsible for each action.

Next Steps

- **Disseminate:** share the self-assessment and improvement plan within the agency. This may include circulating the report for comment or endorsement with the agency head, leadership group and other relevant stakeholders, such as the audit and risk committee.
- **Implement:** implement the plan and monitor improvements. This will require leadership support.
- **Repeat:** schedule a follow-up integrity maturity self-assessment. This may it may coincide with the agency's own review cycle.



Frequently asked questions

1. What is the purpose of the Integrity Maturity Framework?

The framework provides accessible information to support Commonwealth agencies to implement effective integrity frameworks tailored to their risk profiles, size and contexts. Commonwealth agencies can also use it to help put in place action plans to uplift their integrity maturity or maintain their integrity maturity.

2. Which Commonwealth agencies can assess their integrity maturity?

The maturity model is designed for broad use across all Commonwealth agencies wishing to assess their integrity maturity.

3. How will Commonwealth agencies assess their integrity maturity?

Please refer to our Self-Assessment Guide for detailed information on undertaking a self-assessment. Basic principles for self-assessment include:

- **Participative assessment and evidence:**
involve a cross-section of employees and gather evidence to support assessment against the maturity indicator elements.
- **Risk assessment:**
identify integrity threats and vulnerabilities associated with the agencies mandate, powers and functions, and consequent integrity risks.

4. What kind of support will be available to conduct maturity assessments?

Various resources are available, including *Towards Integrity Maturity: Mapping the Commonwealth Integrity Landscape*, the 8 integrity principles and maturity indicators and the integrity maturity index.

5. Is it compulsory to assess integrity maturity?

No. Integrity maturity self-assessment is optional. However, agencies may wish to undertake one to design, implement and review the effectiveness of their integrity frameworks.

6. Is it expected that Commonwealth agencies will develop an action plan to improve their maturity?

Commonwealth agencies are free to decide how to use the integrity maturity resources. However, Commonwealth agencies that undertake a maturity assessment are encouraged, under principle 8, to undertake: reporting and decision making on recommendations to reach desired maturity levels, and to sustain a culture of integrity where institutional systems, policies and practices are purposeful, proportionate, legitimate and trustworthy.

7. Who will see the results of maturity assessments?

Commonwealth agencies are free to choose to whom they provide the results of maturity assessments.

Principle 4: Manage risk and develop a positive risk and pro-integrity culture encourages Commonwealth agencies to communicate and consult about risk in a timely and effective manner to internal and external stakeholders; and share risks, risk treatments and capabilities with other Commonwealth agencies.

8. Will the National Anti-Corruption Commission (the Commission) benchmark Commonwealth agencies' maturity?

No. However, Commonwealth agencies are encouraged to consider involving other Commonwealth agencies in integrity maturity assessments, and to share risks, risk treatments and capabilities with other Commonwealth agencies. This avoids positivity bias and promotes shared learning.

9. Do all Commonwealth agencies have to aim for the highest level of maturity?

No. In some circumstances Commonwealth agencies may be satisfied with lower levels of maturity, provided that integrity risks are: well understood, effectively managed under current arrangements, consistent with the agency's risk appetite, and consistent with mandatory obligations (e.g. under the PGPA Act).

10. How does this project fit in with the other maturity models that exist?

This project has drawn together various Commonwealth statutory obligations and policies relevant to organisational integrity. Some of these elements have existing maturity models (e.g. PSPF and Commonwealth Risk Assessment Policy). The project has also drawn from the Australian Public Service Commission's Integrity Metrics Maturity Model and Western Australian Public Sector Commission's Integrity Framework Maturity Self-Assessment Tool.

11. Why the 4 levels of maturity?

Various maturity models were reviewed to achieve a workable balance between simplicity and completeness.

Other Commonwealth agencies also use a 4-level model, including AGD (PSPF) and the Defence Signals Directorate (Essential Eight Cyber Maturity Model). The Western Australian Public Sector Commission's Integrity Framework Maturity Self-Assessment Tool has informed the development of this project and uses a 4-level maturity model.

12. How will the Commonwealth Integrity Maturity Framework relate to the establishment of the Commission?

One of the functions of the Commission is to support corruption prevention among Commonwealth agencies.

The Commonwealth Integrity Maturity Framework assists agencies to review and uplift their integrity frameworks.