



Integrity Governance Policy

1. Purpose

To ensure a consistent, robust and formalised approach to integrity governance across the WA health system, that provides mechanisms to establish and maintain a culture of integrity. The *Integrity Governance Policy* specifies the principles and minimum requirements with which WA health system entities must comply.

Integrity governance is the formal arrangements by which an organisation establishes, monitors and evaluates structures, systems and processes to promote a culture of integrity, and enable appropriate response to risks and issues. Integrity governance structures include mechanisms to escalate risks to the peak governance body of the organisation, for review and mitigation.

Section 45(13)(e) of the *Public Sector Management Act 1994* requires the Department of Health Chief Executive Officer (Department CEO) to “*maintain appropriate standards of conduct and integrity among the employees of his or her agency*”. Section 109(7)(e) of the *Health Services Act 2016* requires the Health Service Chief Executive to “*maintain appropriate standards of conduct and integrity among staff members of the health service provider.*”

This Policy is consistent with the purpose of the *Integrity Policy Framework* which is to ensure an effective and consistent approach to integrity governance across the WA health system.

This Policy is a mandatory requirement under the *Integrity Policy Framework* pursuant to section 26(2)(l) and section 20(1)(b) and (d) of the *Health Services Act 2016*.

This Policy is also a mandatory requirement for the Department of Health pursuant to section 29 of the *Public Sector Management Act 1994*.

2. Applicability

This Policy is applicable to all WA health system entities.

3. Policy requirements

WA health system entities must:

- establish and document Integrity Governance (IG) Arrangements including structures, systems and processes to ensure integrity risks are identified and managed
- ensure IG Arrangements are endorsed by the governing body (such as the Health Service Provider Board or Department CEO)
- evaluate and amend IG Arrangements as required

- review IG Arrangements every two years.

The documented IG Arrangements must:

- describe the principles, organisational structures and mechanisms utilised in relation to the identification and management of integrity risks within the WA health system entity, including the roles, accountabilities, and responsibilities for the IG Arrangements
- be consistent with the WA health entity's established risk management practices and aligned to MP 006/16 *Risk Management Policy* for Health Service Providers and the Risk Management Policy for the Department of Health
- outline the components of the IG structures
- outline mechanisms to ensure compliance with relevant legislation and policies, including but not limited to the Integrity Policy Framework
- incorporate integrity promotion, mandatory training and education for all Department of Health employees and Health Service Provider staff members, including but not limited to Accountable and Ethical Decision Making training (AEDM)
- specify how reporting obligations related to relevant legislation and policies, including but not limited to, the Integrity Policy Framework will be met.

4. Compliance monitoring

WA health system entities are responsible for ensuring compliance with this Policy.

The System Manager will monitor compliance and performance with this Policy and may request documentation specifying the IG Arrangements from a Health Service Provider, for assurance purposes, as evidence in relation to the requirements of this Policy. The System Manager will work with Health Service Providers to agree on the information to be provided and timeframes within which this information would be required.

Health Service Providers must provide on an annual basis to the Department CEO a report related to AEDM training compliance. The reporting format will be developed in consultation.

The Department of Health (System-wide Integrity Services), as a Department of State, is responsible for monitoring and reporting Department of Health compliance with this Policy to Executive.

5. Related documents

The following documents are mandatory pursuant to this Policy:

- N/A

6. Supporting information

The following information is not mandatory but informs and/or supports the implementation of this Policy:

- [Commissioner's Instruction No. 8: Codes of conduct and integrity training](#)

7. Definitions

The following definition(s) are relevant to this Policy.

Term	Definition
Accountable and Ethical Decision Making training	A training program to support Department of Health employees and Health Service Provider staff members to make accountable and ethical decisions.
Employee	Pursuant to section 3 of the <i>Public Sector Management Act 2016</i> an employee means a person employed in the Public Sector by or under an employing authority (for example the Department of Health).
Integrity	The expected standards of behaviour and actions of Department of Health employees or Health Service Provider staff members which reflect honesty, accountability, transparency, impartiality, and acting with care and diligence.
Integrity governance	The formal arrangements by which an organisation establishes, monitors and evaluates structures, systems and processes to promote a culture of integrity, and appropriately respond to issues. Integrity governance structures include mechanisms to escalate risks, to the peak governance body of the organisation, for review and action.
Staff member	Pursuant to section 6 of the <i>Health Services Act 2016</i> , a Staff Member of a Health Service Provider means: (a) an employee in the Health Service Provider (b) a person engaged under a contract for services by the Health Service Provider.
WA health system entity	<ul style="list-style-type: none">All Health Service Providers as established by an order made under section 32(1)(b) of the <i>Health Services Act 2016</i>Department of Health as an administrative division of the State of Western Australia pursuant to section 35 of the <i>Public Sector Management Act 1994</i>. Note: Contracted health entities are not considered WA health system entities.

8. Policy contact

Enquiries relating to this Policy may be directed to:

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9. Document control

Version	Published date	Effective from	Review date	Effective to	Amendment (s)
MP 0114/19	10 July 2019	10 July 2019	July 2020	10 January 2020	Original version
MP 0114/19 v. 1.1	10 January 2020	10 January 2020	July 2020	11 February 2022	Minor amendment to section 4 to remove a punctuation error.
MP 0114/19 v. 2.0	11 February 2022	11 February 2022	February 2023	Current	Amendments as per below
<ul style="list-style-type: none">• Minor re-wording throughout the Policy.• Extend applicability to all WA health system entities.• Inclusion of Commissioner's Instruction No. 8: Codes of conduct and integrity training as Supporting Information.• Amendments to definitions.					

10. Approval

Approval by	Dr David Russell-Weisz, Director General, Department of Health
Approval date	4 July 2019

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