



Integrity Governance Policy

1. Purpose

Integrity governance formalises arrangements by which an organisation establishes, monitors and evaluates structures, instruments, 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 governing body of the organisation, for review and mitigation.

This policy will 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. It specifies the minimum requirements with which WA health entities must comply.

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 Chief Executive of a Health Service Provider (HSP) 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* to ensure an effective and consistent approach to integrity governance across the WA health system.

This policy must be read in conjunction with [Commissioner’s Instruction 40: Ethical Foundations](#).

This policy is a mandatory requirement for HSPs 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 entities.

3. Policy Requirements

WA health entities must:

- set clear expectations of Department of Health employees and HSP staff members to promote a culture of integrity

- require Department of Health employees and HSP staff members to complete formal integrity training on commencement and formal refresher integrity training no less than every 3 years
- establish and document an Integrity Framework which includes structures, instruments, systems and processes to identify and manage integrity risks
- provide assurance to their local governing body that the Integrity Framework is working as intended.

WA health entities must ensure the Integrity Framework:

- describes the principles, organisational structures and mechanisms utilised in relation to the identification and management of integrity risks in accordance with [MP 0006/16 Risk Management Policy](#) for HSPs and the [Risk Management Policy](#) for the Department of Health
- includes the roles, accountabilities, and responsibilities under the framework
- outlines mechanisms to ensure compliance with relevant legislation and policies, including but not limited to the Integrity Policy Framework
- incorporates integrity promotion, mandatory training and education for all Department of Health employees and HSP staff members
- specifies how reporting obligations related to relevant legislation and policies, including but not limited to the Integrity Policy Framework, will be met
- is endorsed by their local governing body
- is reviewed, evaluated, and amended as required, every two years.

4. Compliance Monitoring

The System Manager, through System-Wide Integrity Services, will:

- request from a WA health entity a copy of the Integrity Framework at the end of each financial year
- request from a WA health entity a report related to integrity training compliance on a six-monthly basis
- assess this documentation and data, and prepare an annual compliance report for the Department CEO as at the end of each financial year.

5. Related Documents

The following documents are mandatory pursuant to this policy:

- [Commissioner's Instruction 40: Ethical Foundations](#)

6. Supporting Information

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

- [Public Sector Commission Integrity Framework Template](#)
- [Public Sector Commission Integrity Framework Guide](#)

7. Definitions

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

Term	Definition
Department of Health employee	<p>Under the <i>Public Sector Management Act 1994</i>: a person employed in the public sector by or under the Department of Health.</p> <p>Under the <i>Health Services Act 2016</i>: a person employed under section 22.</p>
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, instruments, systems and processes to promote a culture of integrity, and appropriately respond to issues. Integrity governance structures include mechanisms to escalate risks, to the governing body of the organisation, for review and action.
Staff member	<p>Pursuant to section 6 of the <i>Health Services Act 2016</i>, a staff member of a Health Service Provider means:</p> <ul style="list-style-type: none"> a) an employee in the Health Service Provider b) a person engaged under a contract for services by the Health Service Provider.
WA health entities	<p>WA health entities include:</p> <ul style="list-style-type: none"> (i) Health Service Providers as established by an order made under section 32 (1)(b) of the <i>Health Services Act 2016</i>; and (ii) the 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>.
WA health system	<p>The WA health system is comprised of:</p> <ul style="list-style-type: none"> (i) the Department; (ii) Health Service Providers; and (iii) contracted health entities, to the extent they provide health services to the State.

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	Amendment(s)
MP 0114/19	10 July 2019	10 July 2019	July 2020	Original version
MP 0114/19 v.1.1	10 January 2020	10 January 2020	July 2020	Minor amendment to section 4 to remove a punctuation error.
MP 0114/19 v.2.0	11 February 2022	11 February 2022	February 2023	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. 				
MP 0114/19 v.3.0	2 October 2023	2 October 2023	October 2026	Policy review and amendments as detailed below.
<ul style="list-style-type: none"> • Purpose section amended to align with CI40 requirements and reflect recent amendments to the <i>Health Services Act 2016</i>. • Policy requirements section amended to reflect CI40 requirements: <ul style="list-style-type: none"> ○ Inclusion of a requirement to set clear expectations to promote a culture of integrity ○ Reference to Accountable and Ethical Decision Making training changed to integrity training ○ Introduction of requirement for refresher training ○ Reference to documented Integrity Governance Arrangements changed to an Integrity Framework ○ Addition of requirement to provide assurance to the governing body that the framework is working as intended. • Compliance monitoring section updated to reflect the policy requirements. • Related document: Inclusion of CI40 to reflect its mandatory status. • Supporting Information: Replaced repealed CI 8: Codes of conduct and integrity training with the Public Sector Commission Integrity Framework Template and Integrity Framework Guide. 				

10. Approval

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

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