



# Integrity Governance Policy

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## 1. Purpose

To ensure a consistent, robust and formalised approach to the integrity governance across the WA health system, that provides mechanisms to establish and maintain a culture of integrity. The *Integrity Governance Policy* (the Policy) specifies the principles and minimum requirements with which Health Service Providers must comply, in order to meet the obligations contained within the Public Sector Commission – Commissioner’s Instruction No 8 Codes of Conduct and integrity training.

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

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 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*.

## 2. Applicability

This Policy is applicable to all Health Service Providers.

## 3. Policy requirements

The Health Service Provider is responsible for ensuring that Integrity Governance (IG) Arrangements are established including structures, systems and processes to ensure integrity risks are identified and managed appropriately to promote a culture of integrity and to ensure compliance with legislation.

The Health Service Providers must establish and document the IG Arrangements that are endorsed by the governing body (such as the Health Service Provider Board), and ensure they are evaluated and amended as required. The IG Arrangements must be reviewed every two years. The requirement to establish IG Arrangements is effective 3 months from the date of this Policy coming into effect.

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 Health Service Provider, including the roles, accountabilities, and responsibilities for the IG

Arrangements within the Health Service Provider, which are consistent with their established risk management practices and aligned to the Risk Management Policy;

- outline the components of the integrity governance 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<sup>1</sup> and education for all staff; and
- 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

Health Service Providers are responsible for complying with this Policy.

- The System Manager 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 Department of Health will work with the Health Service Providers to agree on the information to be provided and timeframes within which this information would be required.

#### 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:

- N/A

#### 7. Definitions

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

Term	Definition
Assurance	Aspect of corporate governance in which management provides accurate and current information about the efficiency and effectiveness of its policies and operations, and the status of its compliance with the statutory obligations.
Compliance	Adherence to the requirements of laws, industry and organisational standards, codes and policies, principles of good governance and accepted community and ethical standards.

<sup>1</sup> Public Sector Commission – Commissioner’s Instruction No. 8 Codes of conduct and integrity training

Health Service Policies	Governance Policies that apply to all Health Service Providers which are mandatory and usually relate to organisation-wide issues or risks, covering both clinical and corporate governance issues.
Integrity	<p>For the purpose of this Policy, Integrity broadly refers to the expected standards of behaviour and actions of staff which reflect honesty, accountability, transparency, impartiality, and acting with care and diligence.</p> <p>Integrity governance is the formal arrangements by which an organisation establishes, monitors and evaluates structures, systems and processes implemented to promote a culture of integrity, and appropriately respond to issues. Integrity governance structures include the mechanisms to escalate risks, to the peak governance body of the organisation, for review and action.</p>
Legislation	Acts, rules, and regulations enacted by Parliament and enforced by the imposition of penalties.

## 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	Current	Minor amendment to section 4 to remove a punctuation error.

## 10. Approval

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

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