



Government of **Western Australia**  
WA Country Health Service

# Integrity Governance Arrangements

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## Document History

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## Endorsement/ Sign Off

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## 1. Introduction and Background

The Integrity Governance Policy (0114/19) was published 10 July 2019 as 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* (WA) (HSA).

As a Health Service Provider, WA Country Health Service (WACHS) 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 WACHS Board, Chief Executive (CE) and the Executive Group have oversight and require assurance from an integrity and ethical governance perspective.

All staff share in the responsibility to behave ethically and promote a culture of integrity in the workplace.

The Integrity Governance (IG) Arrangements in this document outline:

- the principles, organisational structures and mechanisms utilised in relation to the identification and management of integrity risks within WACHS including the roles, accountabilities, and responsibilities for the IG Arrangements, consistent with the established risk management practices and aligned to the Risk Management Policy;
- the components of the integrity governance structures;
- the mechanisms to ensure compliance with relevant legislation and policies, including but not limited to the Integrity Policy Framework;
- the integrity promotion, mandatory training and education for all staff; and
- how reporting obligations related to relevant legislation and policies, including but not limited to, the Integrity Policy Framework will be met.

The IG Arrangements will be reviewed every two (2) years. High risk elements will be considered in planning the WACHS Internal Audit program.

## 2. WACHS Mission, Vision and Values

### 2.1 WACHS Vision and Values

WACHS strives to deliver and advance high quality care for country WA communities. The WACHS vision to be a global leader in rural and remote healthcare captures the essence of what we do and what we inspire each other to do every day.

What we do makes a difference to the lives of the people in our community, and our values reflect how we expect each other to conduct themselves every day.

Our values reflect the qualities that we demonstrate to each other and our community every day. Our staff make a difference every day to the patients, families and consumers they provide care, advice and support to. The WACHS values capture the shared responsibilities that we uphold as most important.

**Community** – We live and work in country communities. We are invested in the health, wellness and viability of country communities and the vibrancy, diversity and future of country WA.

**Compassion** – We are inclusive, respectful, and considerate. We care deeply about the people in our care and country communities.

**Quality** – We provide safe, high-quality care, constantly striving to innovate, improve and achieve trust in our care.

**Integrity** – We bring honesty, collaboration and professionalism to everything that we do.

**Equity** – We are passionate about fairness in healthcare for all Western Australians, especially the most vulnerable and disadvantaged people and communities.

**Curiosity** – We continually enquire and seek to understand, using the best evidence, insight and research to improve care.

### 2.2 Code of Conduct

The [WA Health Code of Conduct](#) identifies the core values, fundamental to any work, and translates them into principles that guide conduct in the workplace. It defines the standards of ethical and professional conduct and outlines the behaviours expected of all WA Health staff. This Code applies to trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within the Department or a WA health system Employing Authority. For the purpose of the Code, these persons are also referred to as Staff.

WACHS staff are formally required to acknowledge the Code when they complete the mandatory training for Accountable and Ethical Decision Making (AEDM). Employee completion of AEDM means employee acknowledgment of the Code.

### 2.3 Public Sector Commission Code of Ethics

The [Public Sector Commission \(PSC\) Code of Ethics](#) specifies the minimum standard of conduct and integrity required of all public sector bodies and employees. Under section 9 of the *Public Sector Management Act*, all public sector bodies and employees must comply with the Code of Ethics. WACHS adheres to the PSC Code of Ethics principles:

- **Personal integrity** – act with care and diligence and make decisions that are honest, fair, impartial, timely and consider all relevant information
- **Relationships with others** – treat people with respect, courtesy and sensitivity and recognise their interests, rights, safety and welfare
- **Accountability** – use the resources of the state in a responsible and accountable manner that ensures the efficient, effective and appropriate use of human, natural, financial and physical resources, property and information.

## 3. Key Legislation, Policies and Frameworks

### 3.1 Legislation and subsidiary legislation

Relevant legislation includes (but is not limited to):

- [Corruption Crime and Misconduct Act 2003](#)
- [Public Sector Management Act 1994](#)
- [Health Services Act 2016](#)
- [Criminal Code Act Compilation Act 1913](#)
- [Public Interest Disclosure Act 2003](#)
- [State Records Act 2000](#)

- [Industrial Relations Act 1979](#)
- [Financial Management Manual](#)

### 3.2 Policy

WA Health and WACHS has policies, guidelines and procedures in place that govern and support the organisation's operations and decision making. These include (but are not limited to):

- [Code of Conduct Policy](#)
- [WA Health Integrity Policy Framework](#)
- [WA Health Employment Policy Framework](#)
- [WA Health Financial Management Framework](#)
- [WA Health Procurement Policy Framework](#)
- [WA Health Risk Management Policy](#)
- [WA Health Information and Communications Technology Policy Framework](#)
- [WA Health Discipline Policy](#)
- [WA Health Complaint Management Policy](#)
- [WA Health Notifiable and Reportable Conduct Policy](#)
- [WA Health Pre-Employment Integrity Check Policy](#)
- [WA Health Criminal Record Screening Policy and Guidelines](#)
- [WA Health Managing Conflicts of Interest Policy](#)
- [WA Health Gifts, Benefits and Hospitality Policy](#)
- [WA Health Staff Air Travel Policy](#)
- [WA Health Management of Accrued Leave Policy](#)
- [WA Health Acceptable Use of Information and Communications Technology Policy](#)
- [WA Health Data Stewardship and Custodianship Policy](#)
- [WA Health Reporting of Schedule 4 Restricted and Schedule 8 Medicines Discrepancies Policy](#)
- [WA Health Storage and recording of Propofol](#)
- [WA Health Storage and recording of Restricted Schedule 4 \(S4R\) medicines](#)
- [WA Health Management of Schedule 8 and Restricted Schedule 4 oral liquid medicines](#)
- [WACHS Fraud and Corruption Control Plan](#)
- [WACHS Clinical Governance Framework](#)
- [WACHS Risk Management Policy](#)
- [WACHS Recordkeeping Framework](#)
- [WACHS Interest Register \(WIRe\) Business Rules Policy](#)

- [WACHS Gifts, Benefits and Hospitality Declaration Procedure](#)
- [WACHS PID resources and information](#)
- [WACHS Audit Policy](#)
- [WACHS Records Management Policy](#)
- [WACHS Health Record Form Management Policy](#)

The above policies will be reviewed and updated as appropriate.

## 4. Integrity Framework Governance and Responsibilities

WACHS organisational values and culture, governance and risk management framework and controls, work together to promote an overall culture of integrity.

### 4.1 Governance and Responsibilities

WACHS has developed a governance structure to identify, manage, report and escalate integrity issues up to the highest levels of governance. In addition, the WACHS Fraud and Corruption Control Plan provides the framework for the detection, response and reporting for fraud and corruption prevention.

The key WACHS committees and staff roles include:

### 4.2 WACHS Board

The Board plays a pivotal role in monitoring the integrity risks of WACHS as part of its broader corporate governance responsibilities. They maintain, model and foster the highest standards of ethical behaviour that reflect the [WA Health Code of Conduct](#), the [PSC, Commissioner's Instruction No. 7 – Code of Ethics](#) and the [PSC, Commissioner's Instructions No. 8 – Codes of Conduct and Integrity Training](#).

The WACHS Board is accountable for the delivery of clinical and corporate governance arrangements within WACHS and monitoring the implementation and application of integrity governance within the health service.

### 4.3 WACHS Board Audit & Risk Committee

The role of the WACHS Audit & Risk Committee is to provide advice, independent assurance and assistance to the WACHS Board on maintaining effective and efficient audit functions, risk, control and compliance frameworks, and with regard to the Board's external obligations as prescribed in the Financial Management Act 2006, the Auditor General Act 2006, Treasurer's Instructions and other relevant legislation. The role of the Committee is also to ensure the implementation of and adherence to the Risk, Compliance and Audit Policy Framework.

The Committee's responsibilities include, but are not limited to, oversight of compliance with Integrity and Ethical Governance Framework, including the code of conduct and code of ethics, policies and procedures. The Committee reports regularly to the full Board on key activities undertaken.



### 4.4 Chief Executive

The Chief Executive has responsibility for providing leadership and direction in relation to integrity governance matters.

### 4.5 WACHS Executive Committee and Regional Executive

While the Chief Executive assumes ultimate responsibility for the leadership, management and performance of WACHS, Executive members are responsible and accountable for the leadership, management and performance of their designated services and associated accountabilities.

### 4.6 WACHS Audit, Risk and Integrity Executive Sub-Committee (to be established)

WACHS will establish an Executive Sub-Committee into Audit, Risk and Integrity. This Sub-Committee will oversee and approve WACHS compliance management practices related to audit, risk and integrity; including reviewing the effectiveness of WACHS processes for identifying, monitoring, managing and escalating integrity and ethics (including compliance) issues. This Sub-Committee will report significant and material issues of non-compliance or risk to the CE, the Board Audit and Risk Committee and the Board. This Sub-Committee will review and evaluate the relevant WACHS reports to the System Manager.

This Sub-Committee will be responsible for ensuring the IG Arrangements are reviewed on a regular basis and updated accordingly.

### 4.7 Procurement and Contract Management Executive Sub-Committee

The Procurement and Contract Management Executive Sub-Committee meet on a quarterly basis and is responsible to the WACHS Executive Committee. Its primary role is to:

- Ensure an appropriate plan and priority setting occurs with regard to procurement and contract management activities;
- Oversee reform initiatives in procurement strategy across the organisation to ensure WACHS is well positioned to meet its strategic objectives;
- Oversee the development and review of policy in areas of procurement and contract management;
- Maintain oversight of areas of risk relating to procurement and contract management activity, and oversee mitigation strategies and assessment of the controls in place; and
- Monitor performance of procurement and contract management activities in line with ensuring value for money and achievement of outcomes.

### 4.8 Executive, Senior Managers and Line Managers

Executive, senior managers and line managers are responsible for ensuring that IG Arrangements are effectively implemented within their business units, in particular they must be:

- providing leadership, guidance and support of employees in modelling ethical behaviour;

- setting/enforcing disciplinary standards;
- identifying high risk integrity areas;
- identifying specific sources of integrity risk;
- participating in risk assessment reviews;
- implementing remedial action to address issues identified by risk assessment reviews;
- developing/modifying practices to reduce integrity risks;
- monitoring the continued operation of controls to prevent unethical conduct;
- receiving reports of suspected breaches of ethical conduct from employees and taking appropriate steps to address concerns reported;
- reporting suspected breaches of ethical conduct promptly and maintaining confidentiality; and
- ensuring the protection of complainants who report ethical conduct issues.

### 4.9 Employees

All employees have a responsibility to act ethically by complying with controls, policies and procedures, and reporting suspected breaches of ethical conduct through the internal reporting framework (encouraged in first instance) or directly to the PSC or the Corruption and Crime Commission (CCC).

WACHS will provide support and protection to any employee who reports suspected breaches of ethical conduct. To be able to actively and positively contribute to an overall ethical culture all employees should:

- recognise the value and importance of personally contributing to ethical conduct;
- develop an understanding of good work practices, systems and controls; and
- report suspected breaches of ethical conduct in accordance with policies and procedures.

### 4.10 Public Interest Disclosure officers

Public Interest Disclosure (PID) officers will investigate information disclosed, or cause that information to be investigated, and take action following the completion of the investigation in accordance with the relevant provisions of the *Public Interest Disclosure Act 2003* (PID Act).

### 4.11 WACHS Manager Audit

Internal Auditors must:

- Consider potential fraud risk and have sufficient knowledge to evaluate the risk of unethical conduct found through internal audit activities
- Consider high-risk items with a view to incorporating into Audit Plans.
- Report any suspected breaches of ethical conduct found during scheduled activities of Internal Audit.

The WACHS Manager Audit administratively reports to the Office of the CE. Extreme risks or allegations of fraudulent or corrupt conduct will be reported directly to the CE WACHS.

### 4.12 Director Industrial Relations

The Director Industrial Relations (IR) is operationally responsible for the implementation of and reporting on disciplinary/misconduct matters.

### 4.13 Director Human Resources

Human Resources plays a major role in the management of the discipline processes through the setting of relevant policies, providing information to staff and receiving reports of staff misconduct.

### 4.14 Integrity Unit

The Integrity Unit plays a key role in investigating suspected misconduct and the provision advice related to accountable and ethical decision making.

### 4.15 Manager Learning and Development

Learning and Development play a major role in the development of integrity awareness and education programs.

## 5. Reporting Integrity Conduct Matters - Employees

### 5.1 Employee reporting of integrity conduct concerns

Reporting matters of concern builds the integrity of WACHS. To assist staff in reporting concerns a range of pathways have been developed. Staff can report by:

- speaking to local Human Resources areas, which can provide staff with advice as to how the matter is to be progressed
- advising their manager or supervisor
- contacting the WACHS Manager, IU
- contacting their site or WACHS Executive Director or the CE
- making a report via the Public Interest Disclosure process

Reporting of suspected breaches of ethical conduct from all internal systems will be to the CE, to whom all members of the WACHS Executive directly report.

The WACHS Board and the relevant Executive Directors will be advised of incidents of alleged misconduct in their area of responsibility, as appropriate.

### 5.2 External Reporting of integrity conduct concerns

Staff may also choose to report concerns directly to external agencies, such as;

- Corruption and Crime Commission (CCC)
- Public Sector Commission (PSC)
- Australian Health Practitioner Regulation Agency (AHPRA)
- WA Police

### 5.3 Public Interest Disclosure

The *Public Interest Disclosure Act 2003* is aimed at encouraging the disclosure of wrongdoing within the State public sector and to ensure accountability in Government.

Information is available to all staff on the [Public Interest Disclosure intranet page](#) on the WACHS intranet.

The Director IR acts as the Principal Public Interest Disclosure (PID) Officer within WACHS. This position is responsible for ensuring all WACHS sites have registered PID Officers and is the primary contact with the PSC when a PID matter is raised.

### 5.4 Reports by Employees under Health Services Act

Section 145(1) of the HSA requires that a staff member who is charged with having committed, or is convicted or found guilty of a serious offence, within 7 days of the charge being laid or the conviction being recorded, must report the fact to the staff member's responsible authority.

Section 145(2) provides that a staff member who has a misconduct finding made against them under the Health Practitioner National Law (Western Australia) must, within 7 days of receiving the notice of the finding, report the fact to the staff member's responsible authority. This information is to include a copy of the finding.

## 6. Reporting Integrity Conduct Matters - WACHS

### 6.1 Internal Reporting

A Case Management System is used to capture misconduct cases, including fraud and corruption incidents. The system is maintained by the WA Health System-Wide Integrity Services, Governance and System Support Directorate; with WACHS specific information and data managed by Industrial Relations staff.

The WACHS Misconduct team maintains a database of misconduct matters. A quarterly report is provided to the WACHS Audit and Risk Committee in relation to disciplinary matters.

### 6.2 External reporting

WACHS will report to appropriate oversight bodies as required by the Corruption, Crime and Misconduct Act 2003 (CCMA) and HSA.

Any matter identified that may be considered a crime will be reported to the WA Police

#### 6.2.1 Serious or Minor Misconduct

The WACHS CE is the responsible person under Section 28 of the CCMA and must report any matter that they suspect, on reasonable grounds, concerns either serious or minor misconduct. This duty to notify is paramount and is to occur as soon as reasonably practicable after they become aware of the matter.

The CCC may take over any investigation or refer it back to WACHS to complete the investigations and report to the CCC on the outcome.

#### 6.2.2 Criminal Conduct and Professional Misconduct

Under s.146(1) a staff member's responsible authority must report any conduct of the staff member that the responsible authority suspects on reasonable grounds constitutes or may constitute professional misconduct or unsatisfactory professional performance under the Health Practitioner National Law (Western Australia) to:

- The professional board or authority that deals with the registration of the staff member as a health practitioner; and
- The Department CEO.

Under s.146(2) a staff member's responsible authority must, on becoming aware that a staff member has been charged with having committed, or has been convicted or found guilty of, a serious offence, report the staff member's charge, conviction or the finding of guilty to the Department CEO.

### 6.2.3 Reports from the System Manager: s.146(3) of the HSA

Under s.146(3) the Department CEO may, if it is considered appropriate to do so for the protection of a health service provider's patients, notify a HSP or any other person of a body of a report received under s.146(1) or (2).

On receipt of these reports, WACHS Misconduct checks to see if the named person is or has been a WACHS employee. No further action is required if a nil response is received.

If it is identified the person is a current WACHS employee, WACHS Misconduct will liaise with a nominated Decision Maker to further investigate.

## 7. Awareness, Communication and Training

WACHS endeavours to ensure all WACHS staff have an awareness and understanding of the issues of wrongdoing and importantly how to report matters of concern, if this type of activity is detected or suspected.

Strategies utilised to update all employees in relation to integrity and ethics issues are:

### 7.1 Accountable and Ethical Decision Making

Mandatory employee completion of the Accountable and Ethical Decision Making (AEDM) training which covers the following topics:

- Code of Ethics and Conduct
- Personal behaviour
- Communication and official information
- Fraudulent and corrupt behaviour
- Use of public resources
- Recordkeeping and use of information
- Conflicts of interest, gifts and benefits; and
- Misconduct reporting

## 7.2 Communication of the IG Arrangements

Activities to communicate overall integrity conduct issues across WACHS include:

- Standard processes for updates to fraud and corruption-related policies and guidelines.
- Global messages to staff to reinforce the WACHS culture and to discuss the importance of fraud and corruption prevention.
- Staff resources contained within the WACHS Integrity hub and the WACHS intranet on HealthPoint provides guidance to managers and staff on the identification and management of integrity risks.
- Information sessions for misconduct reporting are facilitated by the WACHS Manager, Integrity Unit when significant and material issues of non-compliance or risk are identified. Other senior WACHS staff, including but not limited to the Director of Procurement and Contract Management and Managers of Risk and Policy, are available to present to staff forums and meetings to ensure that the integrity conduct message is widely disseminated and discussed.
- Executive, Directors, Heads of Departments and Managers will also have ongoing discussions with their staff to ensure a consistent message is delivered and reinforced.
- Education activities including key messages to be included during staff induction/orientation activities.

This document can be made available in alternative formats on request for a person with a disability

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