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Foreword

CFA Chair – Mr Greg Smith AM



The strength of public trust and confidence in the Country Fire Authority is influenced and affected by the way the community, volunteers and staff perceive our integrity.

Strong ethical work practices have long been the cornerstone of the high standards of the Victorian public sector. The CFA Board members, individually and collectively, are committed to championing a culture of integrity across CFA and demonstrating the highest levels of ethical leadership.

A culture of integrity, honesty and transparency starts with leadership **“setting the tone at the top”**. The Board, Executive, Leadership Team and management at all levels of the organisation are responsible for demonstrating integrity through their directives, actions, and behaviours. Combined, their commitment to integrity ensures the ethical health of our organisation.

CFA’s Integrity Framework is our roadmap to endorsing CFA’s strategic approach to promoting an ethical and responsible culture that will prevent, detect, respond to and report on integrity matters and resonate loudly that **“this is the way we do things”**.



Greg Smith AM
CFA Chair
May 2018

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CFA Chief Executive Officer – Dr Paul Smith



Integrity is the cornerstone of good governance. It is a precondition for legitimacy of government activities and, more generally, for trust in government. That is why integrity management in CFA is one of my priorities for shaping CFA's future.

Integrity at CFA is being inclusive and equitable by demonstrating how we embrace and model our CFA values of **SAFETY – TEAMWORK – ADAPTABLE – INTEGRITY – RESPECT**.

Good governance is critical for shaping community confidence in CFA. It helps the community feel safe in the knowledge that CFA will act in their best interest, which leads to better, more transparent and more ethical decision making.

CFA's Integrity Framework is a blueprint of "**how we do things**" at CFA. Developing this framework is a significant step in managing integrity issues. The framework focusses on important frontline defenses against poor governance, how we plan to probe the management systems and how we plan to deter and prevent misconduct and corruption.

The Victorian Community we serve is diverse and forever changing. So too are the community's expectations of CFA. What was acceptable ten years ago may not be acceptable today.

We acknowledge community expectations of CFA are fluid and, in turn, so too must be our approach to managing these expectations. With this in mind, we developed a social and environmental governance measure. This measure will regularly assess, review and meet community expectations in regard to the acceptable use of government resources and will assess the ethical health of our organisation.

We are all responsible for safeguarding the ethical health of our CFA so that every Victorian will have confidence in CFA. I invite you to join me in developing a culture that embraces our values and where integrity is "**subconsciously ingrained in everything we do**".



Dr Paul Smith
CFA Chief Executive Officer
May 2018

CFA Chief Officer – Mr Steve Warrington AFSM



At CFA, our people must always work to maintain the confidence of the community we serve. Staff and volunteers, make decisions every day which affect the lives of the community we serve and we are always expected to act in the public interest.

Misconduct and corruption in public office will undermine the public's confidence and respect in CFA, the government and the public sector as a whole.

Our CFA is a unique organisation. CFA people are drawn from all walks of life and we pride ourselves as being leaders in the fire services industry, not followers.

CFA's Integrity Framework outlines how we, as one CFA, will develop and maintain a culture which acts with the highest standard of integrity, honesty and transparency through strong leadership and integrating CFA values into everything we do.

We will regularly assess, review and meet community expectations in regard to the acceptable use of government resources and assess the ethical health of our CFA.

Our CFA is regarded as one of the world's leading Fire Fighting Service and I am very proud to lead this team. I know you will join me in embracing the spirit of the Integrity Framework and continue to contribute to CFA's ethical health.



Steve Warrington AFSM
CFA Chief Officer
May 2018



Integrity Vision

“CFA’s Integrity Framework enables a culture which acts with the highest standard of integrity, honesty and transparency, through the provision of strong leadership, governance and accountability, consistent with the Code of Conduct for Victorian Public Sector Employees and/or CFA Volunteer Code of Conduct and in line with CFA values.”

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Definitions

Acronym	Definition
CMT	Complaints Management Team
FRAC	Finance Risk and Audit Committee
IBAC	Independent Broad-based Anti-corruption Commission
IFRG	Integrity Framework Reference Group
VAGO	Victorian Auditor-General's Office
VPSC	Victorian Public Sector Commission

Document	Definition
Integrity Suite	Comprises all CFA Executive Policies and Business Rules within CFA's Integrity Strategic Policy
Procurement Suite	Comprises all CFA Executive Policies and Business Rules within CFA's Procurement Strategic Policy

Term	Definition
Our People	All staff, volunteers, contractors and Board members
Contractor	A person engaged by CFA to perform a task or service

1. Overview

Being a trusted, respected and well managed organisation is crucial to our ethical health, culture, image and reputation. The strength of public trust and confidence in the Country Fire Authority (CFA) is influenced and affected by community, volunteer and staff perceptions of our integrity.

Integrity frameworks provide a systemic and comprehensive approach to probing the management systems and environment which are in place to expose, deter and prevent misconduct and corruption.

This document defines our Integrity Framework and details how integrity is implemented and integrated across the organisation. Integrity frameworks are a Victorian Public Sector responsibility and CFA is required to act with integrity under Victorian law.

Our Integrity Framework enables a culture which acts with the highest standard of integrity, honesty and transparency, through the provision of strong leadership, governance and accountability, consistent with the Code of Conduct for Victorian Public Sector Employees and/or the CFA Volunteer Code of Conduct and in line with CFA values.

Our Integrity Framework establishes a foundation of integrity at all levels of CFA ensuring that ministerial, government and community confidence in CFA as a statutory authority is strengthened.

2. Application

Our Integrity Framework applies to all our people. This includes all staff, volunteers, contractors and Board members.

3. Ownership

Our Integrity Framework and this document are owned by CFA Board.

4. Integrity

CFA's Integrity Suite of policies sets the foundation for the Integrity Framework. These policies are:

- Integrity, Fraud and Corruption Control Policy;
- Conflicts of Interests and Private Interests Policy;
- Gifts, Benefits & Hospitality Policy;
- Air Travel and Conference Attendance Policy; and
- Code of Conduct for CFA Staff Policy.



CFA's Governance Suite of policies also forms the foundation for the Integrity Framework. These policies are:

- Risk Management;
- Delegations;
- Compliance;
- Business, Continuity & Crisis Event Management; and
- Internal Control.

4.1 What is integrity?

Integrity is best understood as part of a continuum of behaviour, ranging from the desired state of working with integrity through to corruption.

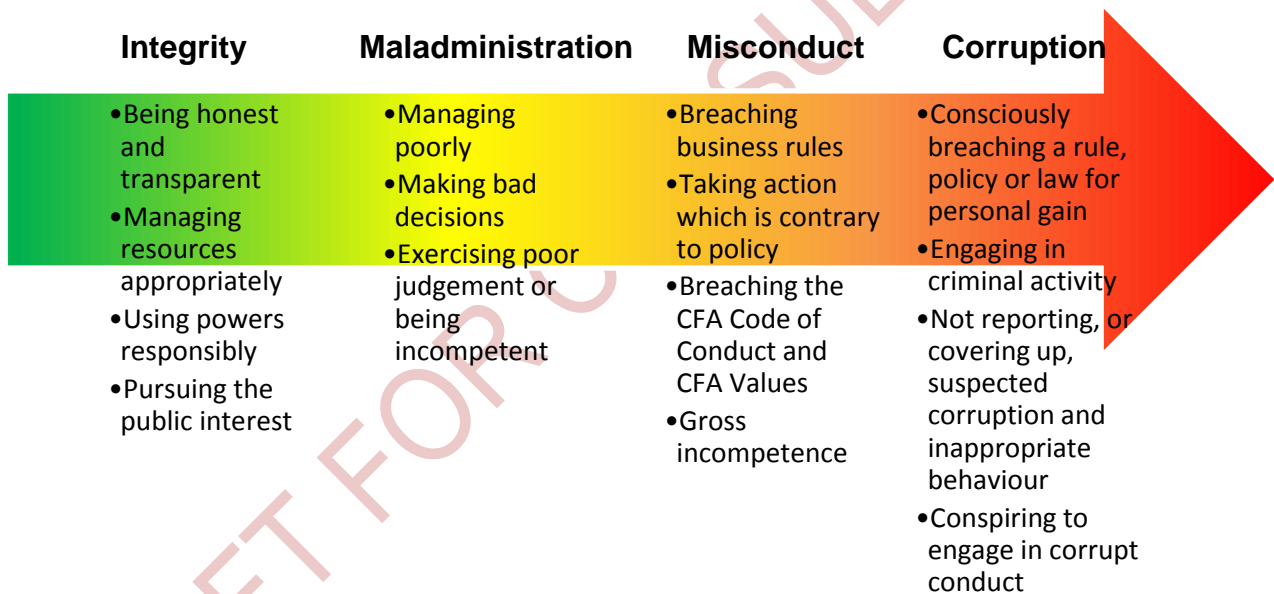


Figure 1 Range of behaviours

4.2 Integrity as a Victorian Public Sector obligation

Our people, staff and volunteers make decisions every day which affect the lives of the community we serve and we are always expected to act in the public interest. Misconduct and corruption in public office will undermine the public's confidence and respect in CFA, the government and the public sector as a whole. Our volunteers are also regarded as public officers.

As a Victorian Public Sector organisation, all CFA must comply with the *Public Administration Act 2004* (Vic). The Act reflects the government's belief that the fundamental role of the public sector is to serve the public interest. The Act sets out the requirement to:

-
- Sustain an effective and impartial public service;
 - Protect public employment from politicisation by reaffirming and promoting the principles of merit and equity;
 - Promote the highest standards of public service conduct and integrity thereby strengthening public confidence and trust in government;
 - Promote career opportunities in the public sector by ensuring a more coherent approach to workforce management and professional development;
 - Ensure the public sector workforce is capable of delivering high quality services to the Victorian community, both now and into the future;
 - Promote standards of good governance in public entities; and
 - Clarify the accountability relationship of public entities to a responsible Minister who, in turn, is accountable to Parliament.

Our people embrace the seven core public sector values of responsiveness, integrity, impartiality, accountability, respect, leadership and human rights that are defined by the *Public Administration Act 2004* (Vic).

Our key legal obligations to act with integrity are outlined in:

- *Public Administration Act 2004* (Vic);
- *Independent Broad-based Anti-corruption Commission Act 2011* (Vic);
- *Ombudsman Act 1973* (Vic);
- *Audit Act 1994* (Vic);
- *Financial Management Act 1994* (Vic);
- *Protected Disclosure Act 2012* (Vic);
- *Privacy and Data Protection Act 2014* (Vic);
- *Privacy Act 1988* (Cth);
- *Country Fire Authority Act 1958* (Vic);
- *Equal Opportunity Act 2010* (Vic);
- *VPSC Code of Conduct for Victorian Public Sector Employees*;
- *VPSC Code of Conduct for Directors of Victorian Public Entities*; and
- *CFA Volunteer Code of Conduct*.

The Victorian Public Sector is protected and overseen by a number of statutory integrity agencies, including:

1. The Independent Broad-based Anti-corruption Commission (IBAC);
2. Victorian Ombudsman;
3. Victorian Auditor General’s Office (VAGO);
4. Victoria Police;
5. Local Government Investigations and Compliance Inspectorate;
6. Commissioners for Freedom of Information, and Privacy and Data Protection;
7. Victorian Public Sector Commission (VPSC); and
8. Victorian Equal Opportunity and Human Rights Commission (VEOHRC).

The *Public Administration Act 2004* (Vic) describes integrity as follows:

- Integrity – public officials should demonstrate integrity by:



Figure 2 Integrity under the *Public Administration Act 2004* (Vic)

This requirement is reflected in the Victorian Public Sector Code of Conduct. The code applies to CFA as a statutory authority. It requires personal standards of honesty, courtesy and objectivity together with professional standards of propriety and probity.

5. Responsibility for integrity

A culture of integrity, honesty and transparency starts with leadership '*setting the tone at the top*' – the Board, Executive, Leadership Team and management at all levels of the organisation are responsible for demonstrating integrity through their directives, actions, and behaviours. Combined, their commitment to integrity ensures the ethical health of our organisation.

5.1 Integrity embedded in work practices

Through activities detailed in this framework, CFA is an organisation which:

- Implements and integrates a culture of integrity, honesty, transparency and trust;
- Is vigilant and determined in eliminating misconduct and corrupt behaviour; and
- Has well designed systems and processes to prevent the opportunity for misconduct and corruption, and detects these behaviours if they occur.

5.2 Integrity is everyone's responsibility

Our approach to embedding integrity into everyday work practices starts with developing a culture where integrity is '*subconsciously ingrained*' in all of our behaviours. The Executive, through line management, lead this cultural change.

Focusing on leadership development and setting the tone at the top ensures exemplary leadership will be demonstrated at all levels of the organisation. This is a critical success factor in driving culture change and ensuring ownership and accountability of behaviours among all our people.

To enable sustainable change in our culture, where integrity becomes subconsciously ingrained as '*the way we do things*', CFA has integrated our values into all our people, decision making and business processes. This includes:

- Recruitment;
- On-boarding;
- Induction;
- Training and development;
- Performance management;
- Discipline;
- Promotions; and
- Exiting CFA.

5.3 The three lines of defence

The three lines of defence model is based on three key layers of organisational activity which act collectively to manage integrity risks and provide assurance that systems and processes are in place and working.

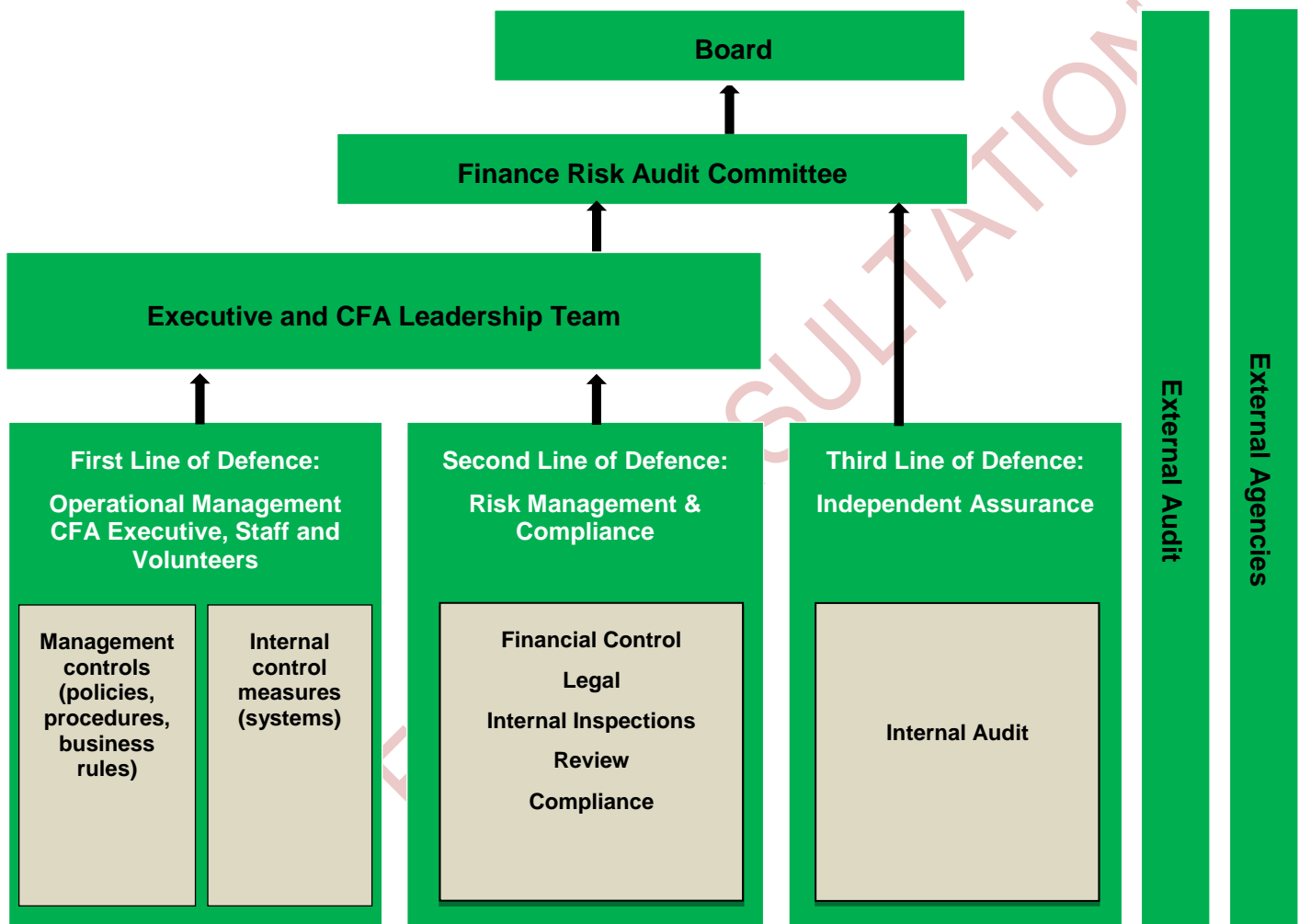


Figure 3 The three lines of defence model

Line 1: Operational management (Executive, staff and volunteers)

At the first line, our people:

- Recognise, manage and reduce integrity risks; and
- Implement corrective actions to address processes and control deficiencies.

Managers are responsible for maintaining effective internal controls and for executing control procedures on a day-to-day basis.

In order for the first line of defence to be effective, all our people are suitably trained and supported by a culture that encourages and supports the reporting of suspected misconduct and corruption.

Line 2: Risk and compliance management

We maintain risk and compliance programs to help build the first line of defence and monitor to ensure they are properly designed, in place and operating as intended.

In order for the second line of defence to be effective, our approach to risk and compliance management is comprehensive, transparent and robust.

Line 3: Internal Audit

At the third line, internal audit process provides us with independent assurance that the first two lines are in place and operating as intended.

The internal audit function maintains its independence and is overseen by our Finance Risk and Audit Committee (FRAC).

Outside the three lines

The external audit and external agencies form the fourth line of defence. These agencies operate to scrutinise CFA in its integrity management, hold it publicly accountable for its performance and act to deter fraud and corruption.

6. Integrity management model – 5 pillar model

Our integrity management model is depicted in Figure 4. The model has five areas which serve as the pillars that support the implementation and integration of high integrity standards:

1. Regularly assess, review and meet community expectations in regard to the acceptable use of government resources and assess the ethical health of our organisation;
2. Setting expectations for a culture of integrity and understanding our organisation's vulnerabilities;
3. Governance and accountability arrangements which ensure the effective oversight and coordination of key processes and integrity functions;
4. A fully integrated and tested control environment to manage and control integrity risk; and
5. Risk based assurance processes which review and test the effectiveness of our compliance and integrity controls.

Integrity Framework



The model:

- Demonstrates high standards of integrity are unconsciously ingrained within our systems and processes; and
- Recognises that maintaining a culture of integrity requires a high standard of awareness, accountability and application by our people.

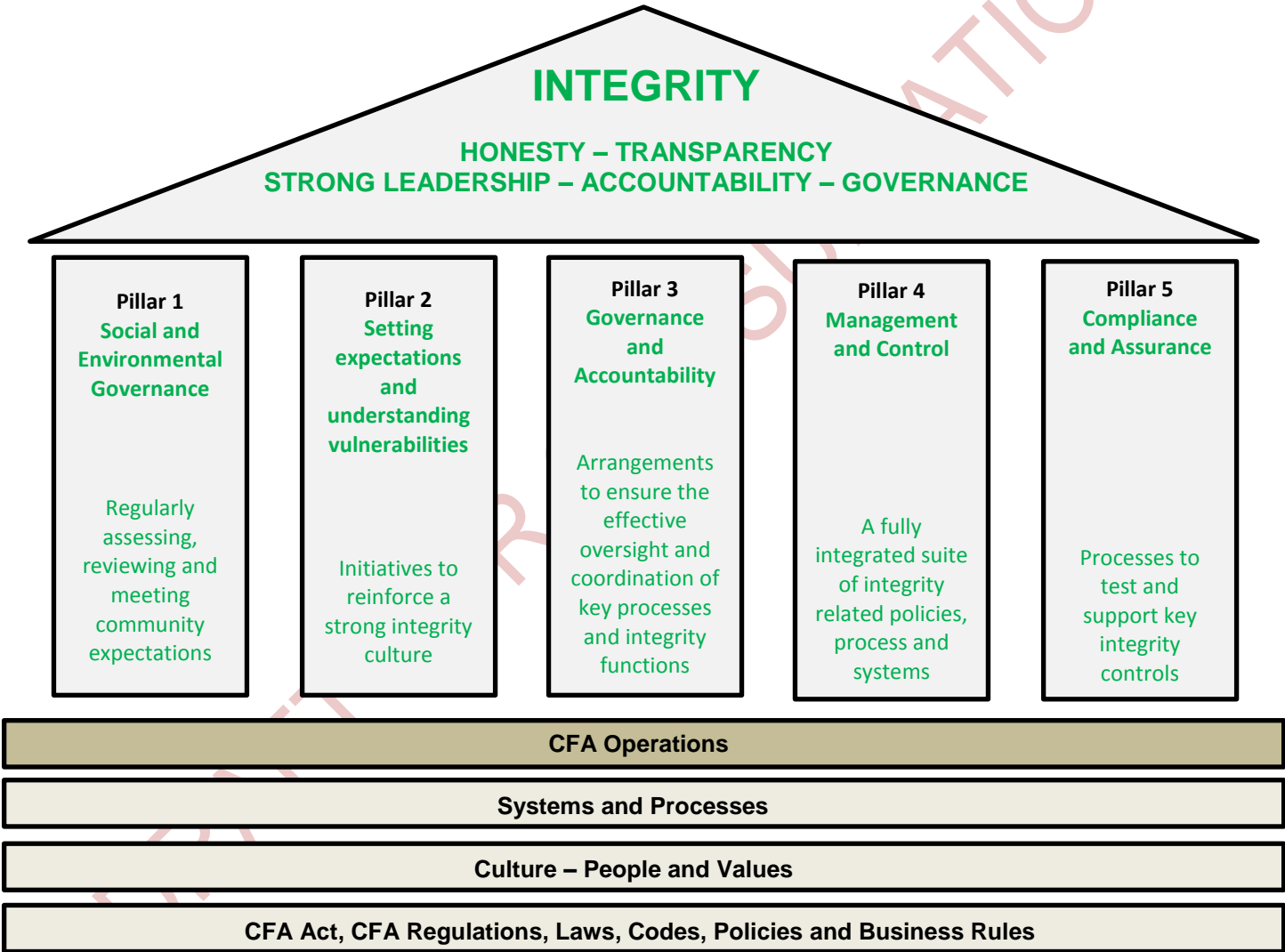


Figure 4 CFA integrity management model

In the following sections, the features of each pillar and some of the actions supporting them are described.

6.1 Pillar 1: Social and environmental governance

Overview

At CFA, our people must always work to maintain the confidence of the community we serve. In order to maintain the community's confidence in our organisation and its reputation, it is important we regularly assess, review and meet community expectations of our behaviour and resource management.

Integrity elements supporting Pillar 1

Integrity Framework Reference Group (IFRG)

Integrity Framework Reference Group (IFRG) provides assurance to the Chief Executive Officer that our integrity environment is operating effectively and efficiently. IFRG's responsibilities include:

- Reviewing the adequacy of CFA's Integrity Framework, including the effectiveness of policies, processes and systems for preventing, detecting and responding to misconduct and corruption, and governance;
- Developing and maintaining a culture of accountability, integrity and adherence to high ethical standards, through increasing access to integrity based learning and development and building confidence that grievances will be investigated in a thorough and objective manner; and
- Ensuring CFA regularly assesses, reviews and meets community expectations in regard to the acceptable use of government resources, through consultation with Community Engagement Committee, engagement surveys and regional forums.

IFRG membership consists of:

- Integrity Office;
- Director Governance;
- CFA General Counsel;
- CFA Chief Financial Officer;
- Executive Director – People and Culture;
- Executive Director – Volunteerism;
- Director – Communications and Government Relations;
- Executive Director – Infrastructure Services & Information Technology;
- DCO – Regional Services;
- ACO – Inclusion and Fairness; and
- Director – Enterprise Risk.



Community survey

CFA is one of the most highly regarded community organisations in Victoria. In order to sustain this position and minimise reputational risk, CFA maintains a culture of integrity that meets community expectations.

Monitoring CFA's general ethical health and community expectations requires ongoing consultation and engagement with our people and the community. This is achieved through various mediums, including consultation with Community Engagement Committee, engagement surveys and regional forums. By capturing and analysing the feedback from these resources, CFA will be in an ideal position to baseline the desired standard of integrity, honesty and transparency.

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6.2 Pillar 2: Setting expectations and understanding CFA's vulnerabilities

Overview

The Integrity Framework reinforces that integrity is a core value and an organisational priority.

Integrity elements supporting Pillar 2

Integrity leadership

The Board is responsible for the stewardship of CFA. Through our Chief Executive Officer, Chief Officer, Executive and Leadership Team the tone and standards are set from the top.

Integrity Framework

The Integrity Framework and IFRG contribute to the ongoing development and strengthening of CFA's integrity measures.

The Integrity Framework is reviewed, refreshed and re-published regularly to keep it current with the implementation of IFRG initiatives, approaches to public sector Integrity management and CFA and community expectations.

Integrity intranet resource

CFA maintains an intranet resource that provides all our people with a single reference point for information on CFA's approach to integrity management. The intranet resource is reviewed and updated regularly.

The intranet page is at *(CFA ONLINE- Link to be established)*

Integrity-related training programs

CFA provides regular and timely information to our people to ensure they have the tools necessary to comply with the Integrity Framework. Integrity related training programs are integrated into induction and on-boarding practices and all our people are required to revisit this annually.

Understanding vulnerabilities and weaknesses

CFA will identify the areas of greatest vulnerability and weakness for misconduct and corruption. The identification of these vulnerabilities and weaknesses will allow CFA to consult, plan and work to reduce and or eliminate them.

Adherence to CFA's Integrity Framework will address and reduce misconduct and corruption in these areas and significantly reduce the risk of reputational damage.

6.3 Pillar 3: Governance and accountability

Overview

A multi-layered approach to integrity management is adopted whereby all our people work collectively to manage integrity risks and provide assurance that controls are in place and working.

Integrity elements supporting Pillar 3

CFA Board

The Board is CFA's highest decision-making body. Through the Chief Executive Officer and Executive it manages issues, prioritises organisational resources and monitors performance.

The Board receives regular reports from IFRG on the implementation of integrity initiatives.

Finance Risk and Audit Committee (FRAC)

The FRAC provides independent assurance to the Board that CFA's risk and control environment is operating effectively and efficiently. The FRAC's responsibilities include reviewing the adequacy of CFA's:

- Risk management framework and policies to manage risks including financial risk and fraud, and the effectiveness of their implementation; and
- Internal audit plan and its fit with CFA's risk profile and work of the external auditors. This includes satisfying itself that there is appropriate coverage in the internal audit plan to address and mitigate high risk areas and activities.
- Overseeing the active management of key finance and fraud risks, ensuring compliance with CFA and whole of government finance and fraud risks policies and frameworks; and
- Reviewing the effectiveness of how CFA is monitoring its financial and fraud management compliance under the Standing Directions for the Minister for Finance and other policies and frameworks.

The Chief Executive Officer, Executive Officers and Leadership Team Members

The Chief Executive Officer is the accountable officer, who will lead the Executive and Leadership Team in demonstrating CFA's highest possible standards of integrity. Each executive officer and leadership team member is responsible for leading by example through their own behaviours and decision making. They work with our people in a culture that always embraces CFA values and seeks to subconsciously ingrain integrity into day to day practice.



Mandatory notification of suspected corruption

All heads of Victorian Public Sector agencies must notify the IBAC when they suspect on reasonable grounds that corrupt conduct has occurred or is occurring in their organisation.

The obligation to report suspected corrupt conduct rests with the Relevant Principal Officer. CFA's Chief Executive Officer is its Relevant Principal Officer. This obligation cannot be delegated.

The Executive and Leadership Team must be conscious of these mandatory reporting requirements and ensure that all incidents of suspected corruption are identified and reported to the Integrity Unit and/or the Relevant Principal Officer.

Protected disclosures

Protected disclosures can be made by all our people. Protected disclosures must be made directly to the IBAC.

CFA's General Counsel is its Protected Disclosures Officer. CFA's General Counsel is available to assist our people with information regarding the submission and management of protected disclosures directly to the IBAC.

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6.4 Pillar 4: Management and control

Overview

CFA’s integrity policies and controls are part of our overall integrity system. It has established governance arrangements and management resources to ensure that its integrity policies and procedures are coordinated. CFA’s internal systems are used to look for control weaknesses, anomalies and patterns that may indicate maladministration, misconduct or corruption.

Integrity elements supporting Pillar 4

Integrity management policies

All our people are required to comply with CFA Strategic Policies and the Chief Officer’s Standard Operating Procedures (SOP).

There are currently 13 CFA Strategic Policies. Each Strategic Policy is supported by Executive Policies and Business Rules. These Executive Policies and Business Rules are the backbone of CFA’s Integrity Framework.

Managers should ensure our people are aware of the relevant Strategic Policies and SOPs, complete annual integrity related training programs and monitor compliance.

CFA Strategic Policy	Owner
1 Communications	Communications and Government Relations
2 Integrity	Legal and Insurance Services
3 Administration	Legal and Insurance Services
4 Governance	Governance
5 Recruitment and Departure	People and Culture
6 Learning and Development	People and Culture
7 Health, Safety, Environment & Wellbeing	People and Culture
8 Honours	People and Culture
9 Financial Operations	Financial Services
10 Financial Management	Financial Services
11 Service Delivery	Fire and Emergency Management
12 Asset Management	Infrastructure Services
13 Procurement	Infrastructure Services

Table 1 CFA Strategic Policies



Chief Officer's Standard Operating Procedures	
1	Chief Officer's Standing Orders and Standard Operating Procedures
2	Fire Brigades – Structure and Management
3	Junior Members – Management of
4	Firefighting Equipment
5	Training and Competence
6	Pre-Incident Planning
7	Chain of Command
8	Fires and Incidents – Management of
9	Specialist Response
10	Health and Safety
11	Driving CFA and Brigade Owned Vehicles
12	Aircraft Operations
13	Post Incident Actions
14	Fire Brigades Groups – Role and Structure of
15	Environmental Care

Table 2 Chief Officer's Standard Operating Procedures

Integrity Suite

CFA maintains a comprehensive Integrity Suite. CFA's Integrity Suite has policies in place for managing actual, potential or perceived conflicts of interest and the provision and receipt of gifts, benefits or hospitality. These requirements are reinforced during recruitment, procurement, and contract negotiation, and through an annual declaration of private interests.

Governance Framework

CFA has a Governance Framework to establish how CFA meets its statutory obligations, is controlled and managed, and is able to respond strategically to changing demands.

The Framework is to be used in conjunction with CFA's Governance Suite and Risk Management Framework.



Governance Suite

CFA maintains a comprehensive Governance Suite. CFA's Governance Suite has policies in place for risk management, legal compliance and internal financial controls. These requirements ensure CFA is meeting its legal and regulatory requirements and performing efficiently and effectively.

Risk Management Framework

CFA has an Enterprise Risk Management Framework to enhance decision making. Risk management is embedded into considerations into different levels of planning and assessment across CFA.

The Framework is to be used in conjunction with CFA's Risk Management Policy and Risk Management Procedures.

Compliance Framework

CFA has a Compliance Framework has been developed to minimise the risk of non-compliance by integrating management processes in governance, performance, risk, internal control, compliance and audit.

The Framework is to be used in conjunction with CFA's Compliance Policy.

Procurement

CFA maintains a comprehensive Procurement Suite and has a team dedicated to supporting CFA to meet procurement requirements. The Procurement Suite identifies procurement roles and responsibilities, processes and performance standards to ensure that CFA complies with Victorian Government Purchasing Board requirements.

Suppliers must ensure that they comply with the standards of conduct set out in CFA guidelines and in other contractual obligations to CFA. CFA will subscribe to a regime that will monitor and review the performance of the contract annually and in some circumstances a targeted audit at the discretion of IFRG.

Fraud and Corruption Control

CFA takes fraud and corruption seriously and adopts a zero tolerance to misconduct and corruption. All our people have an obligation to immediately report suspected or known incidents of misconduct or corruption. All suspected misconduct or corrupt activities will be examined, investigated and/or referred to the relevant agencies. The relevant disciplinary process will be will also be initiated.

6.5 Pillar 5: Compliance and assurance

Overview

CFA maintains systems that can provide assurance that its controls are working.

Integrity elements supporting Pillar 5

Internal audit

CFA's internal audit function is overseen by the Finance & Risk Directorate.

Internal audit has a primary responsibility to advise on governance, risk management and control issues. The Finance Officers Brigade (FOB) and Compliance Unit provide significant input as the second line of defence in this process. They are required to report risks and ineffective control processes to management, FRAC and IFRG. The Internal audit function supports:

- Developing and maintaining a culture of accountability, integrity and adherence to high ethical standards;
- Facilitating the integration of risk management into day-to-day business activities and processes; and
- Promoting a culture of cost-consciousness and self-assessment

by reviewing and assessing the effectiveness of these activities.

The internal audit plan is based on the current risk profile for CFA and includes a variety of audits into activities with potential integrity vulnerabilities. The plan is developed after consultation with relevant areas of CFA, VAGO, and the FRAC.

External audit

External audits are undertaken by VAGO and other independent agencies. VAGO's performance audits assess whether CFA is meeting its aims effectively, using its resources economically and efficiently, and complying with legislation. Performance audits extend beyond the examination of the financial affairs and transactions of CFA to encompass wider management issues of significance to the community.

Issues or concerns with controls or control effectiveness may be identified through external audits and managed through the implementation of recommendations made by the Auditor-General or the independent authority. Agreed management actions from performance audits and other independent reports are monitored and reported status to the FRAC, CFA Executive and IFRG.

Appropriate workplace behaviour

The ability to identify, investigate and manage inappropriate workplace behaviour and to learn from it is an important feature of a healthy and robust organisation. CFA adheres to the relevant statutory requirements and employment agreements and does not tolerate inappropriate workplace behaviours or departure from CFA policies and values.

Complaints management and integrity investigations

The ability to manage internal complaints and to learn from them is an important feature of a healthy and robust organisation that seeks to continually improve its performance.

CFA has a Complaints Management Team (CMT – also a second line of defence) overseeing the following types of complaints:

- Staff, volunteer and contractor conduct;
- Bullying and harassment; and
- Workplace grievances.

The Integrity Investigation Team investigates:

- Misconduct and corruption;
- Matters involving children;
- Financial mismanagement; and
- Matters that have a potential to cause reputational damage to CFA.

Integrity Unit

Reporting to the Chief Executive Officer, the Integrity Unit (a second line of defence) is responsible for:

- Leading integrity related investigations, both reactive and proactive;
- Developing and leading an anonymous system of reporting suspected corrupt and fraudulent activities within CFA;
- Devising and implementing processes, frameworks and systems to ensure rigour, transparency and consistency in CFA's approach to the integrity function;
- Developing and monitoring an integrity and anti-corruption framework;
- Reviewing current policies and business rules that may impact on CFA integrity-related matters and make recommendations to the Executive; and
- Providing expertise, guidance, advice and assistance to executive and senior management on all integrity and misconduct matters.



The proactive activities and investigations of the Integrity Unit will be largely risk based – they will be informed by areas identified as vulnerabilities and weaknesses and risks identified in CFA’s risk profile to ensure activities and investigations are targeted to areas in which they are needed.

Compliance Obligation Register

CFA’s Compliance Obligation Register provides an overview of how CFA’s legislated obligations are identified, assigned, monitored and reported. The Compliance Obligation Register requires that all our people must be aware of their legislative compliance obligations and how to meet them through CFA policies, procedures and other resources.

The Compliance Obligation Register is to be used in conjunction with CFA’s Compliance Policy.

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7. Integrity Framework – Methodology

The Integrity Framework applies to all our people. It will be rolled out in five stages:

1. Scope and Development;
2. Engagement;
3. Communication and Education;
4. Monitoring; and
5. Sustaining.

See Figure 5 for details of each stage and its milestone, and Figure 6 for an Implementation Statement.

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Integrity Framework – Methodology

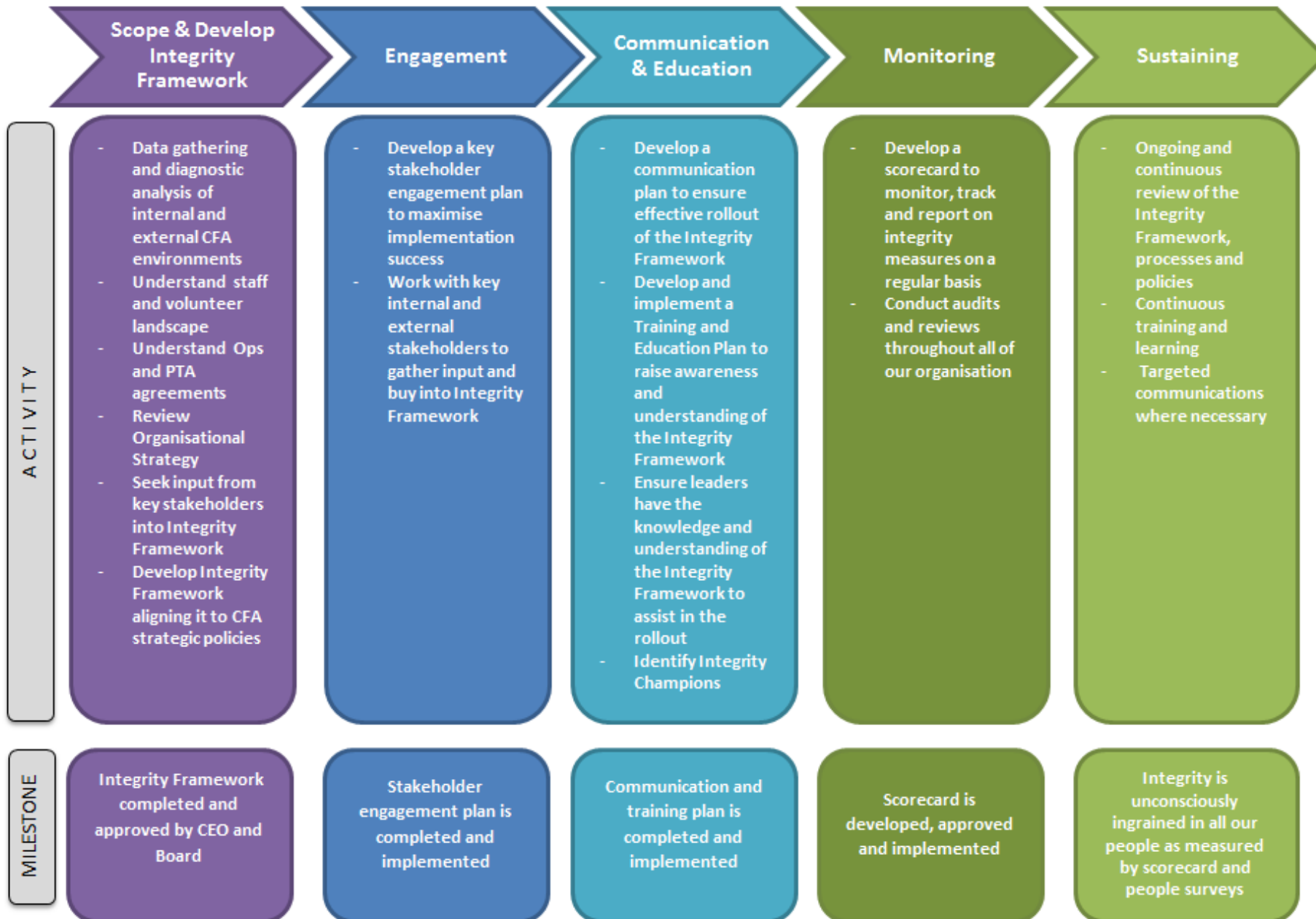


Figure 5 Integrity Framework – Methodology



Integrity Framework – Implementation Statement

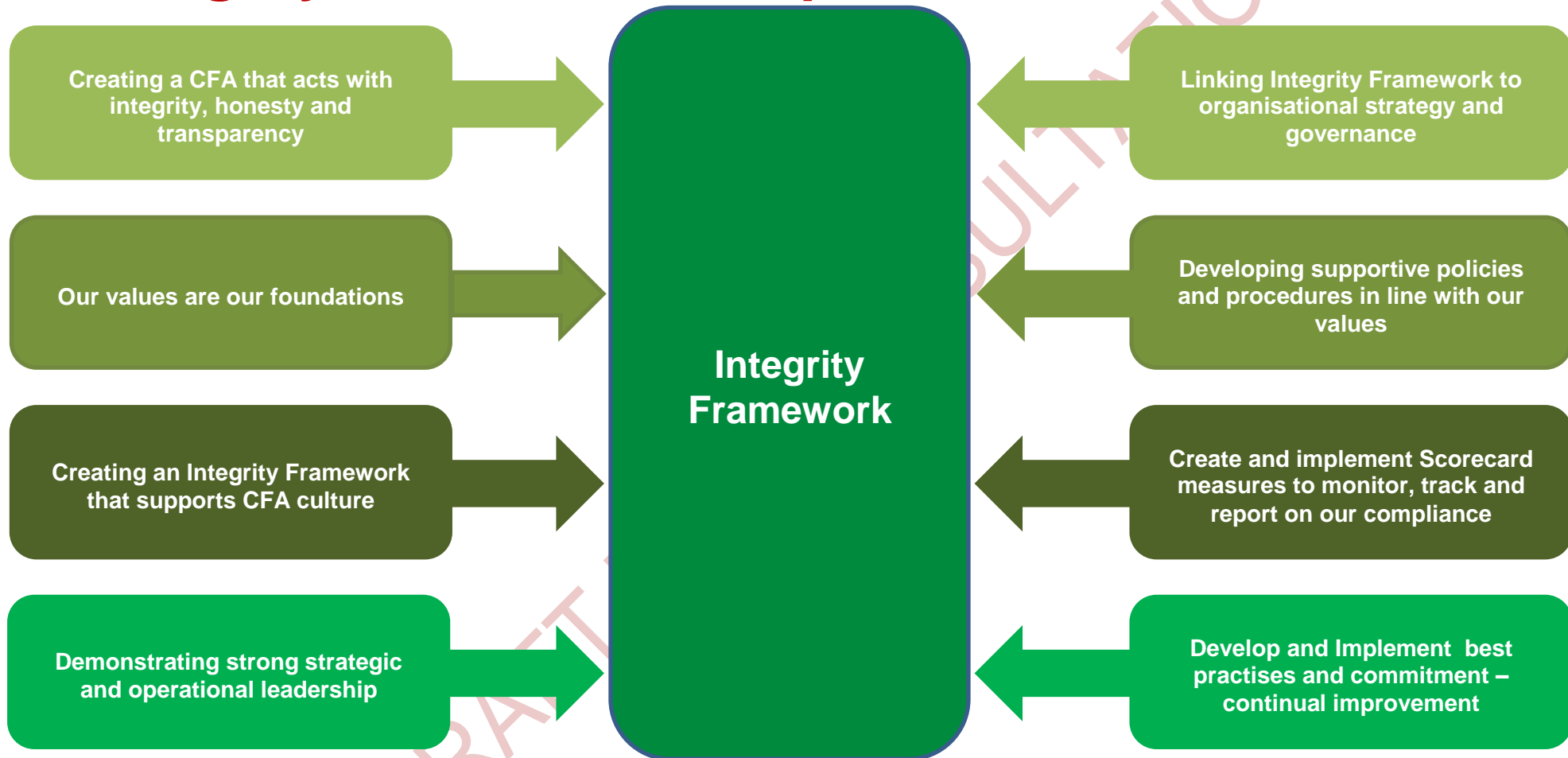


Figure 6 Integrity Framework – Implementation Statement