1. **Scope**
   The Integrity Management Policy (this ‘Policy’) applies to the conduct of all Livingstone Shire Council Councillors and employees. Further, to the extent that legislation requires or permits, this Policy also applies to the conduct of all contractors, consultants and volunteers working with the Council.

2. **Purpose**
   The purpose of the Policy is to:
   - describe Council’s commitment to establishing and maintaining an integrity culture; and
   - improve understanding of Council’s integrity standards and the manner in which it will strive to attain them.

3. **References (legislation/related documents)**
   **Legislative references**
   - Crime and Corruption Act 2001
   - Information Privacy Act 2009
   - Local Government Act 2009
   - Ombudsman Act 2001
   - Public Interest Disclosure Act 2010
   - Public Sector Ethics Act 1994
   - Right to Information Act 2009

   **Related documents**
   - Administrative Action Complaints Management Policy and Procedure
   - Code of Conduct
   - Investigation Procedure
   - Public Interest Disclosure Policy and Procedure
   - Internal Audit Plan

4. **Definitions**
   To assist in interpretation, the following definitions apply:

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complainant</td>
<td>A person who has a right to make a complaint, and who exercises that right, under any legislation that governs the manner in which Council carries out its responsibilities, or the conduct of any Council employee or Councillor.</td>
</tr>
<tr>
<td>Contractor</td>
<td>An organisation or a person acting on behalf of an organisation that is contracted to carry out specific work or provides specific services for Council. Where an individual indicated that they are undertaking specific work as a hobby, they will be included in</td>
</tr>
<tr>
<td><strong>Council</strong></td>
<td>Livingstone Shire Council.</td>
</tr>
<tr>
<td>-------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td><strong>Employee</strong></td>
<td>Local government employee:</td>
</tr>
<tr>
<td></td>
<td>(a) The Chief Executive Officer; or</td>
</tr>
<tr>
<td></td>
<td>(b) A person holding an appointment under section 196 of the</td>
</tr>
<tr>
<td><strong>Councillor/s</strong></td>
<td>The Mayor and Councillors of Livingstone Shire Council, within the meaning of the Local Government Act 2009.</td>
</tr>
<tr>
<td><strong>Integrity</strong></td>
<td>Uncompromising adherence to a code of especially moral or artistic values.</td>
</tr>
<tr>
<td></td>
<td>Integrity includes a concept of ‘good character’, which amongst other things, means that a person can be trusted to do the right thing.</td>
</tr>
<tr>
<td><strong>Management</strong></td>
<td>Employees who holds a level 3 delegation or above under Council’s Human Resource Management Delegations Policy. A Manager may not necessarily have the title of a Manager, but may still be considered one in accordance with their delegation.</td>
</tr>
<tr>
<td><strong>Model Litigant Principles</strong></td>
<td>Please refer to the following link for further information.</td>
</tr>
<tr>
<td><strong>Organisational Culture</strong></td>
<td>The basic values, assumptions and beliefs that are shared by members of an organisation, that operate unconsciously, and that define in a basic ‘taken-for-granted’ fashion an organisation’s view of itself and its environment.</td>
</tr>
</tbody>
</table>

## 5. Policy Statement

### 5.1 Integrity Management

Council will maintain an Integrity Management Policy that summarises the ways it seeks to maintain integrity and legislative compliance.

### 5.2 Organisational Culture

Council promotes an organisational culture of integrity, enabling appropriate responses to moral or legal issues that inevitably arise as Council does business.

Council accepts that:

a) there is an intrinsic connection between a culture of integrity in its organisation and the reduction of the incidence of misconduct;

b) a culture of integrity depends upon both a commitment to act with integrity and the capacity to act with integrity; and

c) the capacity to act with integrity exists through the creation of a policy which guides Councillors, employees, contractors, consultants and volunteers of Council on standards of behaviour, attitudes and beliefs.

### 5.3 Commitment

#### 5.3.1 Responsibility and Accountability

While Councillors and management must provide leadership and lead by example, all employees, contractors, consultants and volunteers of Council must take responsibility for behaving with integrity at all times.
A strong sense of personal moral responsibility is an excellent foundation for behaving with integrity. However, in order for Council to have a culture of integrity, it must embed a common set of organisational values in order to influence and guide managerial and operational decision-making.

5.3.2 Codes of Conduct

Public sector agencies are required by the Public Sector Ethics Act 1994 to operate ethically and to develop codes of conduct.

Council, as prescribed in the Public Sector Ethics Act 1994 must commit itself to maintaining relevant codes of conduct and ensure legislative expectations are drawn to the attention of all employees and volunteers.

5.3.3 Balancing Competing Responsibilities

In adopting organisational values, Council acknowledges that others may hold strong competing sets of values, such as an unwillingness to ‘dob in’ mates. In implementing the organisational values, Council will assist others to balance their competing responsibilities in a way which respects any existing ethical commitments or duties.

5.3.4 Training

Council commits to providing all Councillors, employees and volunteers with relevant, appropriate and regular training on all aspects of organisational integrity. Training will ensure that Council’s commitment to organisational integrity and the expectations which are placed on individuals to act accordingly are clearly understood. Training in this area will include, but will not be limited to:

- Council’s Code of Conduct;
- Public interest disclosure;
- Complaints management;
- Fraud control;
- Official misconduct; and
- Ethical decision making.

5.3.5 Related Policy Documents

Council maintains various policy documents to facilitate compliance with legislated integrity matters, including but not limited to:

- Administrative Action Complaints Management Policy and Procedure;
- Public Interest Disclosure Policy and Procedure; and
- Internal Audit Plan.

5.3.6 Structures

Council accepts that in a culture of integrity, ethical standards must permeate every level of its operations. Council’s internal management structures:

- Promote ethical behaviour at every level;
- Provide dedicated resources to promoting ethical behaviour; and
- Ensure that issues are appropriately reported and investigated.

As and when necessary, Council may use independent employees or external agencies to investigate complaints in accordance with the Investigation Procedure.
Council will ensure that its Audit, Risk and Business Improvement Committee is maintained and well informed so that it may assist the Mayor and management maintain integrity standards.

5.3.7 Contractors

Council recognises that contractors and consultants may not be legislatively required to meet the same standards of integrity as a public sector agency. Appropriate provisions will be included in contract documents to ensure all contractors are aware of and meet the required integrity standards.

5.3.8 Litigation

In all types of litigation Council will strive to be a model litigant in accordance with the Model Litigant Principles set out by the Queensland Government Department Justice and Attorney-General.

5.3.9 Compliance

Council is charged with the responsibility of enforcing compliance with a range of provisions in legislation and local laws. Council commits to diligence and consistency in carrying out this responsibility in the interests of the community.

Council will make local laws, conduct reviews of local laws, and repeal unnecessary local laws where necessary.

5.3.10 Assistance to Complainants

Where an internal or external complainant identifies a perceived or real failure in Council’s processes, systems or performance, Council is committed to providing reasonable assistance to the complainant to make their complaint. For example, provide access or links to required forms on its website.

5.3.11 Communication

Appropriate communication methods including, but not limited to, its intranet, employee meetings, training and toolbox meetings, will be used by Council to:

- provide regular updates to employees on ethical issues; and
- provide access to information about ethical issues.

Through these means, Council will also identify clear pathways for ethical issues to be reported or discussed.

5.3.12 Records

Council will maintain record keeping systems and ensure that appropriate levels of confidentiality of records are maintained, to encourage internal and external confidence in its ability to deal with integrity issues.

6. Changes to this Policy

This policy is to remain in force until any of the following occur:

1. The related information is amended/replaced; or
2. Other circumstances as determined from time to time by the Council.
7. **Repeals/Amendments**

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<th>Version</th>
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<th>Action</th>
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<td>1</td>
<td>23/09/2014</td>
<td>Adopted</td>
</tr>
<tr>
<td>1.1</td>
<td>31/08/2018</td>
<td>Policy reviewed and administrative amendments made to reflect the organisational restructure and update Chief Executive Officer</td>
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</table>

CHRIS MURDOCH  
CHIEF EXECUTIVE OFFICER
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<td>Dealing with a complaint involving the public official Procedure.</td>
<td>Public Interest Disclosure Procedure</td>
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<td>Complaint Statutory Declaration CCC Report Forms</td>
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<td>ECM Pathway</td>
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<td>Pathway</td>
<td>Pathway</td>
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<td>COMPLAINANT ASSISTANCE</td>
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<tr>
<td>COUNCIL’S ADMINISTRATIVE OWNER</td>
<td>CEO Manager, Human Resources</td>
<td>Mayor and CEO</td>
<td>CEO and Deputy CEO (PID Coordinator)</td>
<td>Mayor and CEO</td>
<td>CEO</td>
<td>CEO</td>
<td>CEO</td>
</tr>
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<td>ESSENTIAL TRAINING</td>
<td>• Induction All Staff • Periodic Refresher All Staff</td>
<td>• Induction Councillors • Directors, Managers and PAs • Investigators – ‘Corruption in Focus’</td>
<td>• Awareness All Staff • Full Training All Directors and Managers • Task Training Customer Service Officers</td>
<td>• Induction Councillors • Induction Staff • Task Training Customer Service Officers</td>
<td>• Directors, Managers and other decision makers</td>
<td>• Induction Awareness All Staff and Councillors • On Line All Staff • Task Training • Decision Makers</td>
<td>• On Line Directors and PAs • Task Training Customer Service Officers • Decision Makers • Records Officers</td>
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