ICAC

Do It Yourself Corruption Resistance Guide

http://www.icac.nsw.gov.au/files/pdf/ACFA1CC.pdf

The Do-It-Yourself Corruption Resistance Guide 1

# The Do-It-Yourself Corruption Resistance Guide
March
2002

The Do-It-Yourself Corruption Resistance Guide 2

This publication is available in other formats for the vision impaired. Please advise of format needed, for example, large print
or as an ASCII file. It is also available in HTML format, at www.icac.nsw.gov.au

## Thank you
The Commission acknowledges the assistance of the Premier's Department and the NSW Audit Office.

# Foreword

One of ICAC's most important recent initiatives has been its Corruption Resistance Review program (CRR), which has now been operating for over twelve months. So far, the CRR program has involved the ICAC, on its own initiative or at the invitation of an agency, systematically assessing the strength of an agency's key corruption resistance measures and suggesting ways to improve organisational integrity and corruption resistance. To date, nine CRRs have either been completed or are currently underway – four at the invitation of the agency and five at the ICAC's own initiative.

However, building corruption resistance is a process that we want to encourage all agencies to undertake on an ongoing basis. So, as part of the CRR program, we have developed this Do-It-Yourself Corruption Resistance Guide (DIY Corruption Resistance Guide) that sets out benchmarks for key corruption resistance measures and the resources that can help agencies achieve them.

The guide is designed so that agencies can assess their level of corruption resistance and progressively develop and implement corruption prevention measures to meet our benchmarks. It builds on the earlier publication –

The first four steps, which introduced the organisational integrity framework and the important role leaders play in achieving organisational integrity. The guide also complements Corruption trouble-shooting, which provides guidance and lists resources about dealing with corruption hot spots. The DIY Corruption Resistance Guide, together with The first four steps and Corruption trouble-shooting, is designed to allow agencies to develop appropriate corruption resistance strategies to fit within their usual corporate planning programs. This means agencies can integrate corruption resistance strategies with the agency's overall business planning. The ICAC's investigative and research experience strongly suggests that successful integration is good for an agency's business. 'Add-on' corruption resistance strategies, on the other hand, tend to weaken the link between effective operations and corruption resistance and are unlikely to lead to enduring improvements.

Corruption resistance is important sector-wide. All of us, whether we are in mainstream departments, government trading enterprises, statutory bodies or specialist boards and committees, need to find ways to reduce corruption and manage corruption risks effectively. By providing resources like this one, and the others referred to in this guide, the ICAC seeks to empower agencies to take on the challenge of building their corruption resistance so as to reinforce their own corporate and business objectives as part of their management planning cycle.

The ICAC wants to make sure its corruption resistance advice is up to date and useful. We hope you find this Do-It-Yourself Corruption Resistance Guide serves that purpose. Please let the ICAC know how useful you find this guide and how you think it might be improved. There is a fax-back page at the end of this report if you would like to provide some feedback.
Signed
Irene Moss AO
ICAC Commissioner

Signed
Dr Col Gellatly
Director-General
Premier's Department

# About this Guide

# The Organisational Integrity framework

Organisational integrity is about building and sustaining an agency's corruption resistance. It is a framework to integrate corruption resistance strategies into an agency's usual business and corporate planning. The organisational integrity framework is shown in the diagram (opposite). Our previous publication, The first four steps, introduced and explained the organisational integrity framework and is available on our website at www.icac.nsw.gov.au.

The framework shows how specific organisational features work together to influence an organisation's culture – its integrity and corruption resistance. The core elements, values and leadership, are essential to building a corruption resistant culture. Effective communication is the means to building the right values into everything an organisation does.

Most of the features of the framework are forms of communication and tend to be interdependent. For example:

• the right organisational **values** will only shape an agency's *culture* and improve its corruption resistance if they are communicated by senior managers in ways that are relevant to other staff and integrated with all the workings of the agency (not just with specific corruption prevention strategies);

• a **code of conduct** will only succeed in influencing behaviour if other messages given to staff, including actions of leaders and managers, are consistent with the guidance provided by the code;

• a **procurement** or **recruitment policy and procedure**, no matter how good it is, will be less effective if staff are not aware why following it is important, see their supervisors bypassing it without explanation or notice that breaches are not dealt with;

• a **complaints handling system** will only help an agency improve its services or corruption resistance if stakeholders, such as clients or tenderers, know about it and believe that the agency will do something about their complaints.

Agencies can use the framework to help implement corruption resistance measures. The framework indicates that individual measures tend to be more effective when: • they are consistent with an agency's established values; • senior management supports the values; • senior management leads by example;

The Do-It-Yourself Corruption Resistance Guide 7

**Administrative structures**

• Formal lines of communication

• Work structures (e.g that encourage communication and teamwork)

• Supervisory, accountability and decision-making systems

**Resources**

• Appropriately resourcing corruption resistance measures, as well as general agency functions
• Applying adequate resources to corruption resistance
Strategies

**Corporate strategies**

- Risk Management Plans that address corruption risks
- Fraud management plans
- eCorruption strategies
- monitoring and review programs

**Systems**

- Internal reporting, grievance handling and complaints handling
- Internal auditing and investigation
- Recruitment and performance management

**Policies and procedures**

- Gifts and benefits
- Conflicts of interest
- Secondary employment
- Procurement and disposal
- Cash handling
- Regulatory functions

**Codes of Conduct**

- Principles/objectives governing and guiding behaviour

**Public duty values**

Serving the **public interest**
Acting with **integrity**
- **Honesty**
- **Openess**
- **Accountability**
- **Objectivity (fairness)**
- **Courage**

**Demonstrating** leadership

**External environment**

- Guarantees of service
- Statements of business ethics
- Brochures/guidelines on making applications or doing business with the agency
- Complaints handling

**Training and development**

- Induction (including public duty, corruption, duty to report corruption)
- Ethical awareness/ethical decision-making
- Leadership/management
- Ethical component to all

## Organisational Integrity framework

The Do-It-Yourself Corruption Resistance Guide 8

- other mechanisms encourage their use (for example, an internal reporting system is accompanied by awareness programs for all staff, training for its administrators and possibly by designating officers who can provide assistance to would-be reporters);

- they are appropriately resourced and have adequate administrative support
- the agency periodically audits and reviews the measures;

• the agency promotes its ethical culture continually (internally and externally) and rewards ethical behaviour;
• when appropriate, staff are involved in the development and implementation of measures;
• ethics, and the application of public duty principles, is built into all training;
• the agency deals with wrongdoing appropriately.

The Do-It-Yourself Corruption Resistance Guide 9

# How to use this guide

Agencies can use the guide:

1. to assess how well they are building corruption resistance across their functions and locations;
2. to identify any gaps and the steps that need to be taken to close them; and
3. as a benchmarking tool to measure progress over time.

The guide identifies a number of corruption resistance topics that form part of the ICAC's organizational integrity framework. Agencies can assess their level of achievement against a five level scale for each topic. This self-assessment then suggests possible steps agencies could take to improve their rating.

Appropriate resources are also shown.

## How the five level scale works

Level one represents the minimum standard. The scaling is cumulative – for example, to achieve a level four ranking, an agency should also meet the standards set for levels one to three. For some topics, agencies may find that their results do not match the scaling system. For example, under leadership they may have the measures featured in level four, without having all those featured in lower levels.

Where this occurs, agencies can decide how they record their achievement - for example, depending on the magnitude of the gaps identified, they may qualify their higher ranking or they may reduce their ranking. In either case, the gaps identified provide a focus for improvement.

Self-assessment tables

Self-assessment tables for individual topics appear under the following headings:
1. core elements
2. code of conduct
3. corporate strategies
4. systems
5. policies and procedures
6. external environment
7. training and development.

Please note that some framework topics are not charted separately. Culture is an outcome determined by the quality of an agency's corruption resistance measures. Communication is the mechanism for building a corruption resistant culture and is implicit in the benchmarks set. Resources and administrative structures, as well as monitoring and review, are also implicit in the benchmarks set – the application of adequate resources, appropriate

administrative structures and effective monitoring and review mechanisms are essential to the success of the corruption resistance measures identified.

# 1. Core elements

5 The agency has a strategy to ensure that all plans, programs, systems, policies, procedures and work practices are consistent with the agency's values. This strategy is regularly monitored and reviewed for effectiveness. The agency's values are promoted to clients, contractors and suppliers.

4 The extent to which the agency's values have been promoted, understood and integrated into the agency's work has been reviewed in the last 2 years and improvements made. Failure to uphold values is dealt with appropriately.

3 The agency's leaders act in accordance with the agency's values and promote their benefits to others in the agency. All staff have received, in the last 12 months, information on the agency's values, how they relate to the agency's work and how they should guide appropriate workplace actions and decisions.

2 The agency's values have been translated, with staff involvement, into statements that are relevant to the agency. Those value statements are included in the agency's code of conduct.

1 The agency has identified an explicit set of values by which it seeks to operate. Those values are consistent with public duty principles/values.

## Why are values important?

ICAC research indicates that organisational culture has a strong influence on the way people act in their day-to-day work and that organisational culture is determined by the shared values and attitudes of those in the workplace. Therefore, it is very important that agencies identify, promote and integrate the right values if they wish to build organisational integrity. Leading by example is a key strategy. This will help create positive attitudes and ethical behaviour that will reduce opportunities for corrupt conduct.

## Action

• Assess the quality of your agency's values and the extent to which they are integrated into the agency's operations and decision-making (tip: make *'consistency with values'* a criterion in periodic reviews of your agency's policies and procedures)

• Assess the level of staff understanding, acceptance and use of the agency's values to guide their day-to-day work

## Values

## Ranking Levels of achievement

• Consider assessing staff perceptions of the values that underpin the agency's culture (e.g. conduct the ICAC Ethical Culture Survey)
• Consider assessing client, contractor and supplier perceptions about the agency's ethical culture

Resources that can help enhance your agency's level of achievement ICAC

• The First Four Steps (April 2001)
• What is an ethical culture? Key issues to consider in building an ethical organisation. A survey of NSW public sector agencies and local councils. Summary report (September 2000)
• Ethical Culture Survey Kit (September 2000)
• Ethics: The key to good management (December 1998)
• Corruption Troubleshooting (November 2001)
• Conduct Becoming ethics and public duty training kit (June 1999)
• Practical Guide to Corruption Prevention (June 1997)

Module 4: Cultural change: Understanding and Influencing attitudes and values

Other
• Principles of Good Conduct, NSW Ombudsman
• Model Code of Conduct for NSW public agencies, NSW Premier's Department
• Code of Conduct and Ethics for Public Sector Executives, NSW Premier's Department

The Do-It-Yourself Corruption Resistance Guide 12

# Core elements - Leadership

5 Completion of the leadership program (or similar) is a prerequisite to appointment to management positions. A strategy is in place to ensure leaders demonstrate an understanding of the connection between ethical leadership and organizational effectiveness. All staff demonstrate ethical leadership skills within their spheres of influence.

4 There is a strategy to monitor and review the effectiveness of the leadership program and of leaders' performance. A review has been carried out in the last 2 years.

3 The agency has a leadership program (either internal or external) that incorporates ethical leadership, ethical decision-making, the importance of identifying and acting in accordance with high ethical standards (e.g. public duty principles), and the connection between high ethical standards and organisational effectiveness. All managers are required to participate or to demonstrate participation in similar program. Other staff, especially those in supervisory positions, are encouraged to participate. All staff have received information on ethical leadership, ethical decision making and the importance of maintaining high ethical standards in the last 12 months.

2 The effective promotion of an ethical workplace is part of the assessment of the performance of senior managers and executives.

1 In recruitment of senior managers and executives, their commitment to ethical leadership and to maintaining high ethical standards is established (in accordance with Premier's Memorandum No 98-37).

## Why is leadership important?

In its 12 years of operation, ICAC has built up a picture of strong links between leadership, ethics, organisational effectiveness and corruption resistance. Leaders set the ethical tone of an organization and therefore have a critical role to play in building organisational integrity and corruption resistance

## Action

• Assess the quality of your leadership and leadership programs against this table

• Consider assessing staff perceptions of the strengths and weaknesses in the agency's leadership (e.g. conduct the ICAC Ethical Culture Survey)

## Leadership
Ranking Levels of achievement

Resources that can help enhance your agency's level of achievement
ICAC
• The First Four Steps (April 2001)
• Tips from the top (April 1999)
• Ethics: the key to good management (December 1998)
• Ethical Culture Survey Kit (September 2000)
Part five: Organisational Integrity: Key areas to consider in building an ethical workplace
• Corruption trouble shooting (November 2001)

# 2. Code of conduct

5 The code of conduct has been actively promoted both inside and outside the agency and is featured in agency publications. The code is included in contracts with private sector suppliers. Staff accept and use the code.

4 The agency's code of conduct was revised within the last 24 months, with staff input, and has been re-issued. Responsibility for updating the code of conduct is with a specific senior manager.

3 The customised code of conduct includes examples that are relevant to the different types of work carried out by staff in all areas of the agency. All staff receive training on the code via induction and refresher training. The code is linked to appropriate sanctions for non-compliance.

2 The agency has developed a customised code of conduct. The agency takes regular steps to ensure that staff are aware of the code of conduct and familiar with its provisions.

1 The agency has adopted the model code of conduct issued by the Premier's Department and made it available to staff.

## Why is a code of conduct important?

A code of conduct's principal aim is to guide behaviour in the workplace. As such it can be an important corruption resistance tool as long as it is not seen as an end in itself. An effective code of conduct relies not only on appropriate form and content but also on its continued promotion and use as a practical guide to day-to-day behaviour and decision-making. It needs to be supported by management commitment, by appropriate training and awareness programs and by systems, policies and procedures that are consistent with the broad behavioural guidance it provides.

## Action
• Assess your code of conduct and how well it is promoted against the table
• Assess the level of staff understanding, acceptance and use of the code
• Consider assessing the level of client, contractor and supplier awareness about the code

## Ranking Levels of achievement

## Code of conduct

Resources that can help enhance your agency's level of achievement
ICAC

• Practical guide to Corruption Prevention (June1997)

Module 3: code of conduct

• Ethical Culture Survey Kit (September 2000)

Part five: Organisational integrity: Key areas to consider in building an ethical workplace

• Codes of conduct: The next stage (March 2002)

Other
• Model Code of Conduct for NSW public agencies, NSW Premier's Department
• Code of Conduct and Ethics for Public Sector Executives, NSW Premier's Department

# 3. Corporate strategies

5 The agency has a comprehensive risk management plan that identifies risks, the measures taken to minimise the impact of these risks, assigns roles and responsibilities and provides for regular monitoring and review. Regular monitoring and review occurs.

4 Risk management has been specifically assigned to a senior manager for oversight. Safeguards have been developed and implemented for identified areas of risk in the agency. Key staff have been trained in risk management theory and practice.

3 All staff have been advised of the risk management plan. Staff with responsibility for monitoring areas identified in the plan have been trained.

2 Risk management planning is underway, involving agency staff and takes into account internal and external risks.

1 Risk management is practised in isolated areas of the agency and/or on an ad hoc basis. Some staff are aware of the risks.

## Why is corruption risk management important?

A corruption risk management plan is a key corruption resistance tool. It provides a ramework within which generic risks can be managed proactively, specific risks can be identified, assessed and managed and ethical behaviour and best practice can be actively promoted. This helps an organisation take a strategic approach to enhancing corruption resistance by bringing together otherwise disparate corruption risk management measures. For example, measures (such as job rotation, random reviews) designed to manage specific corruption risks within regulatory functions will be more effective if they are linked with organisation-wide measures (such as codes of conduct, corruption and ethical awareness programs, adequate resourcing). Corruption risk management may be integrated within an overall risk management plan or it may be handled by way of a separate plan aligned with the overall plan. It needs to address the full range of corruption risks not just those

associated with fraud.

The effectiveness of corruption risk management strategies relies not only on the quality of the strategies, but also on: promotion; awareness and understanding; and regular monitoring and review to ensure they are kept up to date.

## Corruption Risk Management

### Ranking Levels of achievement

### Action
• Assess your corruption risk management function against the table
• Assess the extent to which your risk management plan addresses each of the key areas outlined in this guide
• Assess the level of staff understanding and acceptance of, and compliance with, risk management strategies

### Resources that can help enhance your agency's level of achievement
ICAC

• Practical guide to Corruption Prevention (June 1997)

Module 1: Corruption Prevention Plans
Module 2: Corruption Risk Assessment and Management

• The First Four Steps (April 2001)
• Corruption Troubleshooting (November 2001)

Other
• Fraud control, Developing an Effective Strategy, NSW Audit Office and Office of Public Management, NSW Premier's Department, Volumes 1-3 (1994) Volume 4 (1998)
• Risk Management and Internal Control, NSW Treasury (September 1997)
• Guidelines for managing risk in the Australian and New Zealand Public Sector, Standards Australia (1999)

# Corporate strategies - Fraud prevention

**5** There is a strategy that recognises fraud control as part of the agency's overall risk management function. All staff demonstrate their responsibility to continually assess and manage fraud and other corruption risks in their area of responsibility. There is a system for monitoring and evaluating sources of best practice information and for disseminating relevant information effectively.

**4** The agency has reviewed its fraud control strategies in the last 12 months, with staff involvement, and made necessary improvements.

**3** All staff receive information and other forms of awareness-raising about fraud and effective fraud risk management.

**2** The agency has a fraud management plan (or a risk management plan that addresses fraud risks) which assigns roles and responsibilities.

1 The agency has an internal mechanism for identifying fraud (such as part of an audit function).

## Why is fraud prevention important?

Fraud is a form of corruption that features strongly in ICAC investigations. Fraud wastes scarce funds and resources and can damage an organisation's reputation and competitiveness. It is therefore important that fraud risks are identified and managed effectively and that staff are kept up to date on emerging risk areas and proven strategies for properly managing them.

## Action

• Assess your fraud management strategies against the table
• Assess the level of staff understanding and acceptance of, and compliance with those strategies

## Fraud Prevention

### Ranking Levels of achievement
The Do-It-Yourself Corruption Resistance Guide 19

### Resources that can help enhance your agency's level of achievement
ICAC
• Practical Guide to Corruption Prevention (June 1997)
Module 2: Corruption Risk Assessment and Management
Other
• Fraud control, Developing an Effective Strategy, NSW Audit Office and Office of Public Management, NSW Premier's Department Volumes 1-3 (1994), Volume 4 (1998)
• Risk Management and Internal Control, NSW Treasury (September 1997)
• Guidelines for managing risk in the Australian and New Zealand Public Sector, Standards Australia (1999)

The Do-It-Yourself Corruption Resistance Guide 20
## Corporate strategies - eCorruption

5 Internal and external eCrime/eCorruption risks are the responsibility of business managers. The agency complies fully with statutory requirements relating to record keeping and privacy. Authentication protocols, in addition to accounts passwords, are used for all appropriate business systems. All IT contractors and external service providers have been pre-qualified by DPWS.

4 All agency policies and procedures, as well as the business processes themselves, are regularly reviewed in order to manage changing eCorruption/eCrime risks. Performance audits include eCrime/eCorruption risk management issues. All managers are provided with a base level of IT familiarity training.

3 All business process re-engineering that has some link with technology includes consideration of changes in corruption risk profile.

2 Responsibility for IT dependent business systems rests with business managers.

1 The IT section of the agency has and maintains an active IT security regime. The agency complies with Premier's Circular No. 99-9 and Office of Information Technology guidelines relating to IT security (see under Resources).

## Why is eCorruption important?

The term 'eCorruption' can be defined as "any misconduct, corruption (or possibly crime) which is committed by an employee, contractor or any other authorised person, using the computer system(s) of a public sector organisation".

The term overlaps with, but is distinct from, 'eCrime', which describes criminal actions involving a computer system. Note that eCorruption captures actions that are lawful yet unacceptable in a public sector environment.

New and emerging information technology is a cornerstone of the NSW Government's plans for reforming public sector services, administration and obligations. The risks of eCorruption are associated with the very characteristics that make emerging technologies an advantage in the operation of government agencies. These include automation, increased speed of transactions, greater

## eCorruption
### Ranking Levels of achievement
**The Do-It-Yourself Corruption Resistance Guide 21**

accessibility of information, the ability of employees, customers and registered suppliers to interact remotely from any location, reduced face to face interaction, the ability to download content and the opportunity to implement re-engineered, enterprise-wide business processes. Therefore, managing eCorruption risks is central to effective corruption resistance.

### Action
• Assess your eCorruption risk management against this table
• Assess the level of staff understanding and acceptance of, and compliance with the agency's eCorruption risk management strategies

### Resources that can help enhance your agency's level of achievement
ICAC
• The need to know: eCorruption and unmanaged risk (February 2001)
• eCorruption: eCrime Vulnerabilities in the NSW Public Sector Summary Report (September 2001)

Other
• Employer Communication Devices Policy and Guidelines, Premier's Department (January 1999)
• Protocol for Acceptable Use of the Internet and Electronic Mail, Premier's Department (March 1999)
• Information Security Guidelines, Office of Information Technology

1. Information Security Risk Management (January 2001)
2. Examples of Threats and Vulnerabilities (January 2001)
3. Information Security Baseline Controls (May 2001)
• Better Practice guide – e-ready,e-steady, e-government, Audit Office (September 2001)
• Performance Audit Report – e-government, Audit Office (September 2001)
**The Do-It-Yourself Corruption Resistance Guide 22**

# 4. Systems
5 A strategy is in place, with roles assigned, to ensure the agency's internal reporting system (IRS) and investigations policy and procedures are regularly reviewed and updated. Staff are regularly encouraged to use the IRS. An evaluation of the internal reporting

system's usage has been carried out and the results incorporated as necessary into policy and practice. Staff have used the IRS. Investigation outcomes have informed relevant corruption prevention strategies (eg.operational procedures revised, training enhanced).

4 The agency can demonstrate that staff have used the internal reporting system. All internal investigations are carried out according to the policy, except for unusual circumstances for which there are documented reasons. The policies have been reviewed within the last 12 months and the results of the review have been incorporated into a revised policy and guidelines as appropriate.

3 Information sessions have been held on the internal reporting system and the internal investigations policy for all staff within the last five years. This training included the Protected Disclosures policy and guidelines.

2 The agency has an internal investigations policy and procedure that assigns roles and responsibilities and specifies investigative skills required, as well as providing process guidance. Alternatively, internal investigations are outsourced.

1 The agency has an internal reporting system which assigns roles and responsibilities  and includes agency procedures for handling Protected Disclosures in line with the Ombudsman's guidelines. Information about this procedure is available to staff.

## Why are internal reporting systems and investigations important?
Internal reporting systems are contemplated by the Protected Disclosures Act 1994 to encourage the reporting of corruption, maladministration and serious and substantial waste within public sector functions. An effective internal reporting system is an invaluable mechanism for early detection of corruption and other unethical behaviour.

The existence of a reporting system alone will not encourage reports of corruption. To be effective in dealing with corruption people need to know about the system, understand what constitutes corruption

# Internal reporting systems and investigation
## Ranking Levels of achievement

The Do-It-Yourself Corruption Resistance Guide 23

and why it is important to expose it and, importantly, feel confident their report will be dealt with appropriately and that they will be protected from detrimental action. This tends to be dependent on leaders and managers clearly communicating a strong commitment to the system, providing appropriate training and awareness raising for both potential users and administrators of the system and establishing clear administrative and responsibility structures. It is also dependent on the existence of a sound internal investigation system.

## Action
• Assess your internal reporting policies and procedures against the table (and use the NSW Ombudsman's Protected Disclosures Guidelines as a benchmark)
• Assess the extent to which staff are prepared to report wrongdoing (for example, through an ethical culture survey) • Assess the extent to which information about internal reports and investigations is used to inform corruption resistance strategies

## Resources that can help enhance your agency's level of achievement
ICAC
• Practical guide to Corruption Prevention (June 1997)

Module 17: Internal Investigations

• Internal Investigations Handbook (October 1997)
• Tips from the top: Senior NSW public sector managers discuss the challenges of preventing corruption (April 1999)
• Internal Reporting Systems (February 1995) (jointly with Audit Office and NSW Ombudsman)
• Ethical Culture Survey Kit (September 2000)

Other
• Protected Disclosures Guidelines, NSW Ombudsman, Third Edition (January 1999)
• Options for Redress: Guidelines for redress for detriment arising out of maladministration, NSW Ombudsman (2000)

The Do-It-Yourself Corruption Resistance Guide 24

# Systems - Internal audit

5 The agency has an audit charter. There is a strategy for regularly reviewing the internal audit plan and implementing the outcomes of the reviews. Remedial outcomes have been implemented. Internal auditors' skills are maintained and enhanced effectively.

4 The internal audit process includes random sample auditing of the agency's key corruption risk areas as a regular function of the auditing process. The internal audit function is routinely informed about suspected wrongdoing.

3 The internal audit function is directly responsible to senior management. An audit committee oversees the internal audit function. Responsibility for directing the implementation of internal audit findings and recommendations has been allocated to a senior manager.

2 Internal auditors are qualified according to industry standards or are being provided with the necessary training.

1 The agency has an internal audit plan that identifies key risks relevant to the work of the agency. Internal audits are conducted.

## Why is internal audit important?
Internal audit provides for systematic scrutiny of an organisation's operations, systems and performance.

As such, the internal audit function is an essential corruption prevention strategy. However, it will only contribute to an organisation's corruption resistance if corruption risk management strategies are subject to regular auditing and if audit findings are used to improve the effectiveness of those strategies.

## Action
• Assess your internal audit function against the table
• Assess the extent to which the audit program is informed by the agency's risk management plan and other corruption resistance strategies (e.g. complaints and internal reporting and investigation outcomes) and vice versa.

## Internal audit
Ranking Levels of achievement

## Resources that can help enhance your agency's level of achievement
• Monitoring and reporting on performance audit recommendations, Audit Office website www.audit.nsw.gov.au
• Risk Management and Internal Control, NSW Treasury (September 1997)
• Fraud control, Developing an Effective Strategy, NSW Audit Office and Office of Public Management, NSW Premier's Department, Volume 2 (1994)

# Systems - Recruitment and selection

5 A strategy is in place for monitoring selection outcomes against the requirements of the agency's policy and action is taken to review procedures as appropriate.

4 Training in recruitment and selection is carried out regularly and includes training in the ethical issues that arise. Direct appointments occur infrequently and only in accordance with government policy. The reasons for direct appointments are documented in each case. Adherence to ethical standards is included in all position descriptions and advertisements.

3 There is an agency specific recruitment and selection policy. Dealing with conflicts of interest is covered in the policy. The policy requires that staff be trained in selection techniques before they sit on panels. The autonomy of independent selection panel members is safeguarded.

2 There are internal policies that cover higher duties and short-term temporary vacancies.

1 Job vacancies are filled according to merit principles; government recruitment and selection policies; and legislation and regulations relevant to employment in the agency.

Most job vacancies are advertised in the press.

## Why is recruitment and selection important?
The recruitment process is often the first contact many people have with the agency. Therefore, it sets the tone. ICAC's experience suggests this is the function where managers are most likely to argue that the ends justify the means. An unethical recruitment process can have a serious effect on the morale of the organisation and therefore on its resistance to corruption.

According to ICAC research, staff commitment, satisfaction and turnover are all related to how well individuals' values match those of the organisation (Ethics: The Key to Good Management).

Furthermore, high levels of commitment and satisfaction, together with low turnover, tend to indicate greater corruption resistance (Minimising Corruption: Some Lessons from the Literature). Agencies can enhance their resistance to corruption by:-

## Recruitment and selection
### Ranking Levels of achievement
• Making their ethical position clear in the recruitment process, so that self selection can begin at that point
• Recruiting people who will understand and feel comfortable with the organisation's values • Asking applicants to show some understanding of high ethical performance.

### Action
• Assess your recruitment and selection policies and procedures against the table

• Assess the level of staff understanding and acceptance of, and compliance with those policies and procedures
• Consider examining a random selection of recruitment and selection processes to establish the level of compliance

Resources that can help enhance your agency's level of achievement
ICAC

• Recruitment and selection: Navigating the best course of action (March 2002)
• Corruption troubleshooting (November 2001) Other
• Personnel Handbook, Public Sector Management Office, www.premiers.nsw.gov.au
• Guidelines for Selection Panels and Job Applicants, www.premiers.nsw.gov.au
• What are Common Selection Criteria?, ODEOPE, www.eeo.nsw.gov.au

Note that ODEOPE (Office of the Director of Equal Oppportunity in Public Employment) is preparing guidelines and training materials on merit selection techniques which are due for publication during 2002.

# Systems - Performance management

5 There is a strategy in place that links performance management with the agency's core values and objectives, code of conduct and training and development. The system provides access to grievance and dispute processes. There is a strategy in place to ensure the system is regularly monitored and reviewed, with staff involvement. Staff demonstrate their commitment to and trust in the system.

4 The agency has reviewed its performance management system in the last 24 months, with staff involvement, and made necessary improvements. As well as formal review, the system encourages ongoing monitoring of, and feedback on, performance.

3 The performance management system is consistent with the Premier's Department policy and guidelines. All staff receive training on the use and benefits of the performance management system. Performance goals include identified training courses for career development.

2 The agency has a performance management system which requires the development of individual work plans with relevant performance measures including those that assess staff on maintaining high ethical standards, taking personal responsibility and displaying ethical leadership.

1 Performance standards are clearly articulated in agency job descriptions and are consistent with the relevant industrial instrument.

## Why is performance management important?

The Commission has included performance management because its experience has shown this function to be a key corruption prevention tool. When it operates effectively, performance management can enhance trust within an organisation and encourage people to take personal responsibility for maintaining high standards of behaviour. Both these attributes are indicators that an organisation is resistant to corruption.

## Performance management
Ranking Levels of achievement

## Action
• Assess your performance management system against the table
• Assess staff perceptions of, and commitment to, the system, both as managers of and participants in the system

## Resources that can help enhance your agency's level of achievement
• Performance Management, Policy and Guidelines, NSW Premier's Department (December 1998)
• Model Contract of Employment, SES Guidelines, Premiers Department (June 2000)
• Performance Agreement Guidelines (SES), Premiers Memorandum 99-5

# Systems - Grievance handling

5 The agency has a strategy to ensure the grievance handling policy and procedure is regularly monitored and reviewed, and to ensure that relevant information informs the agency's corruption risk management strategies.

4 Promotion of the Grievance handling policy and procedure occurs regularly. The level of use of the policy and procedure and handling of grievances has been reviewed in the last 12 months and necessary changes made to the policy and procedure.

3 All staff have received information on the grievance handling policy and procedure in the past 12 months. All grievance-handling officers receive appropriate training.

2 The agency keeps centralised records of grievances, even though grievances are generally able to be handled in the local workplace (which may be geographically separate from the central office).

1 The agency has a grievance handling policy and procedure, which assigns roles and responsibilities and is in accordance with relevant government policies and guidelines.

## Why is grievance handling important?

An effective grievance management system provides agencies with valuable information to help them improve their corruption resistance. For example, information from grievances might highlight the need to do more to make sure staffing policies are applied objectively, ethics or skills training is adequate or the agency's structure is conducive to the detection of corruption. A grievance system's effectiveness depends on it being promoted to staff, on grievances being dealt with honestly, objectively, confidentially and promptly and on relevant information being captured in a way that allows it to be used to indicate the need for change.

## Action
• Assess your grievance handling system against the table
• Assess the extent to which information on grievances and outcomes informs the agency's corruption resistance strategies
• Assess staff understanding, acceptance and use of the system

## Grievance handling
### Ranking Levels of achievement
## Resources that can help enhance your agency's level of achievement
• Chapter 10, Personnel Handbook, PSMO, www.premiers.nsw.gov.au
• Chapter 8, SES Guidelines, Premiers Department (June 2000)
• Policy and Guidelines, Dealing with Employee Work-Related Concerns and Grievances, ODEOPE (1996) www.eeo.nsw.gov.au

# Systems - Complaint handling

5 A strategy exists to fully utilise the information provided by complaints to inform and enhance corruption risk management strategies. Stakeholders fully utilise the complaints process.

4 Information from complaints (data) is collected and recorded in a way that allows for comprehensive analysis of the level of effectiveness of the system and the identification of emerging complaint patterns. The complaints handling system has been reviewed in the last 12 months and necessary changes introduced.

3 All staff have received information on the complaints handling policy and procedure in the past 12 months. All complaints handling officers receive appropriate training. The complaints handling procedure is promoted to clients, contractors and others the agency deals with.

2 The agency keeps centralised records of complaints, even though complaints can generally be handled in the local workplace (which may be geographically separate from the central office).

1 The agency has a complaints handling policy and procedure in place, which assigns roles and responsibilities and is consistent with relevant guidelines.

## Why is complaint handling important?

An effective complaints management system provides organisations with valuable information to assist with continuous improvement to their corruption resistance. Its effectiveness depends on it being promoted to clients, contractors and suppliers, on complaints being dealt with honestly, objectively and promptly and on relevant complaint information being captured in a way that allows it to indicate the need for change.

## Action
• Assess your complaints management system against the table
• Assess the extent to which information on complaints and outcomes inform the agency's corruption resistance strategies

## Complaint handling

### Ranking Levels of achievement

• Assess staff understanding and acceptance of, and compliance with the complaints management system
• Consider assessing client, contractor and supplier awareness and acceptance of the system

### Resources that can help enhance your agency's level of achievement
• The Compliant Handler's Tool Kit, NSW Ombudsman
• Investigating Complaints: A manual for Investigators, NSW Ombudsman
• Options for redress: Guidelines for Redress of Detriment Arising out of Maladministration, NSW Ombudsman
• Information to Providers, Health Care Complaints Commission, www.hccc.nsw.gov.au
• An easy-to-follow guide to…Good Complaint Handling, Community Services Commission, www.csc.nsw.gov.au

# 5. Policies and Procedures

**5** The agency regularly reviews and re-issues its gifts and benefits policy. The agency publicises its gifts and benefits policy to clients, contractors and suppliers. Gifts and benefits are covered in the agency's statement of business ethics. Staff and stakeholders accept and comply with the policy.

**4** A copy of the gifts and benefits policy and procedures is routinely provided to all new recruits. Staff are provided with regular reminders about the policy. The register is regularly reviewed.

**3** Gifts and benefits received by staff are routinely noted in an official register. The issue is included in agency training programs dealing with related matters.

**2** Tenders and EOI documents issued by the agency inform potential suppliers that gifts and benefits should not be offered to employees.

**1** The agency has a gifts and benefits policy and procedures. The procedure includes relevant agency-based examples and outlines the responsibilities of managers in promoting and enforcing the policy and procedures for dealing with offers of bribes. A register of gifts and benefits exists and staff are aware of its purpose.

## Why are gifts and benefits important?
Exposure to offers of gifts and benefits is almost inevitable for public sector staff engaged in providing customer or client service, procuring goods or services, carrying out regulatory work or carrying out any work that involves dealing with those outside the public sector. Gifts and benefits may be offered out of gratitude or recognition or as a gesture of goodwill. However, a common motivation for much gift giving is to create a favourable impression or to induce the recipient to provide preferential treatment.

Acceptance of a gift or benefit can create a sense of obligation that may compromise honesty and impartiality. Therefore a gifts and benefits policy and procedure is an important part of an organisation's corruption resistance framework.

## Gifts and benefits
### Ranking Levels of achievement
The Do-It-Yourself Corruption Resistance Guide 35

### Action
• Assess your gifts and benefits policy and procedure against the table
• Consider examining the gifts and benefits register for patterns of gift acceptance and/or disclosure.
• Assess staff (at all levels) understanding, acceptance and use of the policy and procedure.

### Resources that can help enhance your agency's level of achievement
ICAC

• Gifts, Benefits or just Plain Bribes? (June 1999)
The Do-It-Yourself Corruption Resistance Guide 36

# Policies and Procedures - Conflicts of interest
**5** There is a strategy in place to ensure that conflicts of interest are widely understood and well managed. The agency promotes its conflicts of interest policy and guidelines for disclosing conflicts of interest both within the agency and to those who would do business with the agency.

**4** The agency has reviewed the way it manages conflicts of interest in the last 12 months and has made necessary improvements.

3 All staff receive training on conflicts of interest and how such conflicts should be managed in the context of their work.

2 Procedures for disclosing and dealing with conflicts of interest are included in the agency's procurement and disposal policy, recruitment and selection process, regulatory functions and secondary employment policy.

1 The agency has a conflicts of interest policy, which is referred to in its code of conduct.

## Why are conflicts of interest important?
Most, if not all, corruption arises because of conflicts between the public interest and private, professional or commercial interests. This makes understanding and managing conflicts of interest one of the most important aspects of building an organisation's corruption resistance.

## Action
• Assess your conflicts of interest policy against the table
• Assess the extent to which conflicts of interest are addressed in relevant administrative and operational policies and procedures
• Assess the extent to which staff understand, accept and comply with the policy
• Consider assessing the extent to which those who would do business with the agency understand, accept and comply with the policy

## Ranking Levels of achievement

## Conflicts of interest
The Do-It-Yourself Corruption Resistance Guide 37
## Resources that can help enhance your agency's level of achievement
ICAC
• Practical Guide to Corruption Prevention (June1997)

Module 9: Conflicts of interest
Other
• Good Conduct and Administrative Practice, Ombudsman's Office (May 1995)

The Do-It-Yourself Corruption Resistance Guide 38

# Policies and Procedures - Secondary employment
5 There is a strategy in place that ensures that the secondary employment policy and procedures are regularly updated and evaluated. Staff observe the conditions of the policy.

4 Promotion of the secondary employment policy within the agency occurs regularly. The policy has been reviewed and agency approvals monitored within the last 12 months and the results incorporated into policy and practice as required.

3 All staff have been provided with information about the secondary employment policy and its relevance to staff within the last 12 months.

2 Applications for secondary employment are dealt with locally, with records of approvals available in a central area of the agency.

1 The agency has a policy and procedures for dealing with secondary employment. The procedure includes examples of conflicts of interest relevant to the agency and outlines the approval process, timeframes and delegations for reviewing approvals. The policy and procedures are available to staff.

## Why is secondary employment important?

Staff undertaking secondary employment can expose an organisation to significant corruption risks if not managed effectively. Secondary employment can provide fertile ground for conflicts of interest to develop. Conflicts of interest can lead to, for example, disclosure of confidential information such as personal data, intellectual property or details of competitors' tenders or research proposals. Secondary employment can lead to misuse of an organisation's resources or impinge on the time the staff member should be using for primary employment. Secondary employment can also compromise an organisation's reputation where a staff member is engaged in secondary employment with an industry whose values or ethics are inconsistent with those of the organisation.

## Ranking Levels of achievement
## Secondary employment

The Do-It-Yourself Corruption Resistance Guide 39

### Action
• Assess your secondary employment policy and procedure against the table
• Consider examining records of usage and a random selection of approvals to establish the level of compliance with the policy and procedure
• Assess the level of understanding, acceptance and usage amongst staff, as both administrators and applicants.

### Resources that can help enhance your agency's level of achievement
ICAC
• Practical Guide to Corruption Prevention (June 1997)

Module 16: Secondary employment
• Preserving Paradise, Good governance for small communities – Lord Howe Island (November 2001)

Other
• Chapter 5, Personnel Handbook, Premiers Department, www.premiers.nsw.gov.au

The Do-It-Yourself Corruption Resistance Guide 40
## Policies and Procedures - Procurement and disposal

**5** The agency has well documented processes which are regularly updated, with roles and responsibilities assigned to key positions involved in procurement. Contractors and other proponents are made aware of the agency's probity standards in relation to the tendering process. Contractors sign up to a set of business ethics. The agency engages in procurement planning to manage its purchasing patterns.

**4** Monitoring and auditing of tender processes, including procurement trend analysis, has been specifically identified and allocated as a function within the agency.

**3** Monitoring and evaluation of performance of contractors and products is built into each tender or purchasing decision. Relevant staff receive regular training in the agency's procurement processes.

**2** Accountability for all processes and decisions is well planned and clearly documented for all areas of the agency where procurement and disposal decisions are made. Tenders and EOI documents issued by the agency inform potential suppliers that gifts and benefits should not be offered to agency staff.

**1** Procedures for the procurement and disposal of goods and services have been documented in line with the relevant legislation, policies and regulations and tailored to reflect the agency's

needs and circumstances. Probity and corruption prevention strategies are built into the agency's procedures. Information on responsibilities and procedures is available to staff involved.

## Why is procurement and disposal important?

The NSW public sector, including local government, is the largest purchaser of goods and services in NSW. Almost half the Commission's investigative work, and much of its corruption prevention advice, has been in the areas of purchasing and tendering. Asset disposal is also a significant public sector activity prone to corruption. Effective management of corruption risks is essential in these areas if an organisation is going to preserve the integrity of its operations.

## Ranking Levels of achievement
## Procurement and disposal

## Action

• Assess your procedures for procurement and disposal against the table
• Assess the extent to which they address corruption risks identified by the agency's risk assessment.
• Consider examining a random selection (or recent performance audit reports) of procurement or disposal processes to establish level of compliance
• Consider obtaining tenderers' views of those processes

## Resources that can help enhance your agency's level of achievement

ICAC
• Practical Guide to Corruption Prevention (June 1997)

Module 12: Purchasing
Module 13: Disposal and sale of assets
• Direct Negotiations in procurement and disposals: dealing directly with proponents (June 1997)
• Probity Auditing: when, why and how. (December 1996)
• Contracting for Services: the probity perspective (May 1995)
• Contracting for Services: probity checklist (July 1995)
• Taking the con out of contracting guidelines (September 2001)
• Garbage, drains and other things (July 2001)
Page 21 - Creating corruption-resistant contracts
Department of Public Works and Services
• Code of Practice for NSW Government Procurement
• Code of Tendering for NSW Government Procurement
• Implementation Guidelines for NSW Government Procurement
• NSW Procurement at-a-glance
• NSW Government Procurement Manual
• Electronic Procurement Implementation Strategy
Note: www.dpws.nsw.gov.au contains a wealth of information and resources on government procurement and procurement planning.

# Policies and Procedures - Cash handling

5 Random audits are carried out, with reports and recommendations for action provided to a senior manager. These are then implemented.

4 Cash records and banking records are regularly reconciled and audited and appropriate follow up action taken on any findings as necessary.

3 Customised training is provided to staff that are involved in or supervise cash handling. Systematic training is also provided to relieving staff.

2 A comprehensive register has been established listing all the locations where cash handling occurs. The register is regularly updated. Computer systems have been modified to ensure that risks are managed and/or minimised.

1 A policy and guidelines have been developed for cash handling. These include specific procedures for tracking, receipting, securing, transferring and banking cash and for rotating staff. They also deal with the proceeds of fundraising ventures, if appropriate. Staff are made aware of their obligation not to use public monies for private purposes.

## Why is cash handling important?

Cash takings represent a significant temptation for opportunistic and potentially corrupt individuals.
While cash takings might represent only low value in terms of individual transactions and be only a small proportion of an organisation's budget, they can represent quite considerable amounts of money annually. With emphasis on commercial activities and user-pays principles, the public sector needs to manage risks associated with cash handling.

### Action
• Assess your cash handling policies and procedures against the table
• Assess the extent to which they address corruption risks identified in the agency's risk assessment
• Consider a random review of cash handling processes to assess level of compliance

### Ranking Levels of achievement
## Cash handling
The Do-It-Yourself Corruption Resistance Guide 43
Resources that can help enhance your agency's level of achievement
ICAC
• Practical guide to Corruption Prevention (June 1997)

Module 11: Cash handling
• Monitoring cash handling in public hospitals (October 1994)
The Do-It-Yourself Corruption Resistance Guide 44

# Policies and Procedures - Regulatory functions

5 The agency has informed the public about its regulatory role, the regulatory standards that apply and the rights and responsibilities of those regulated (including appeal and complaints mechanisms). The distinction between regulatory and customer service roles is clearly articulated. Regulatory staff understand and accept the need to manage relevant corruption risks and to identify new risks as they occur.

4 Regular audits are carried out of the processes involved in regulation and the findings are acted upon. Management of relevant corruption risks is enhanced by, for example, rosters, job rotation, random checks, and secondary employment policies, which minimise corruption opportunities.

3 Findings from the risk assessment have been integrated into improved procedures for minimising corruption. Training in corruption risks is provided for staff involved in regulatory functions.

2 A risk assessment has identified areas where safeguards need to be established to ensure that regulatory functions are corruption resistant.

1 The internal audit function includes monitoring of regulatory functions in its charter.

Adequate arrangements are in place for supervision of regulatory staff.

## Why are regulatory functions important?
ICAC experience shows that there are significant corruption risks associated with public sector regulatory functions. For example, one ICAC investigation involved a government inspector soliciting bribes from business proprietors in return for speeding up an approval process. Another involved an inspector's personal relationship with a hotel owner which led to the hotel's gaming machine revenues being understated, therefore reducing license fees payable. Government regulation is an essential mechanism for achieving a wide range of social, economic and environmental goals. The integrity of regulatory functions is essential for preserving public trust in the public sector. Corruption in regulatory functions can impact on work safety, building safety, environmental health and safety on the roads, to name but a few. It can also have an impact on government revenue. Therefore, it is particularly important to build resistance to corruption in these areas.

## Ranking Levels of achievement

## Regulatory functions
The Do-It-Yourself Corruption Resistance Guide 45

## Action
• Assess your regulatory functions against the table
• Assess the extent to which they address corruption risks identified by the agency's risk assessment
• Assess the level of staff understanding and acceptance of, and compliance with, policies and procedures associated with the agency's regulatory functions
• Consider assessing the level of understanding and acceptance of those policies and procedures by those regulated
• Assess the extent to which those policies and procedures are informed by the outcomes of complaints and internal reports

## Resources that can help enhance your agency's level of achievement
ICAC
• Strategies for Preventing Corruption in Government Regulatory Functions (March 1999)
The Do-It-Yourself Corruption Resistance Guide 46

# 6. External environment
5 There is a strategy in place to ensure that all interaction with the agency's external environment is actively managed so that high ethical standards are maintained, corruption risks managed and corruption and other inappropriate conduct readily identified and reported.

4 The agency has reviewed the way it manages its external environment in the last 12 months and has made necessary improvements.

3 The agency promotes its values/ethical standards, code of conduct, attitude to gift giving, complaints handling policy and procedure, guarantee of service, expectations of those who do business with it and so on.

2 Stakeholders have access to information about the agency and how it does business, including guidance on regulatory functions, applying for services and so on.

1 The agency has identified who its stakeholders are (including actual and potential clients, customers, contractors, suppliers etc).

## Why is the external environment important?

Much of the public sector corruption and other unethical behaviour that comes to the Commission's attention involves an external party – a client, contractor, supplier or someone seeking to do business with the agency. Therefore, agencies seeking to optimise their resistance to corruption need to actively manage their external environment. This includes promoting the way they do business and their expectations of those doing business with them. It also includes making ethical performance by contractors and suppliers and compliance with public sector principles a condition of engagement in public sector work.

### Action
• Assess your agency's management of its external environment against the table
• Assess the level of client, contractor and supplier understanding of the way the agency does business and the ethical standards the agency upholds and expects of those it deals with

Ranking Levels of achievement
## Managing external environment
The Do-It-Yourself Corruption Resistance Guide 47

## Resources that can help enhance your agency's level of achievement
ICAC
• Practical Guide to Corruption Prevention (June 1997)

Module 9 Conflicts of interest
Module 3 Code of Conduct
• Ethical Culture Survey Kit (September 2000)
Part five: Organisational Integrity: Key areas to consider in building an ethical workplace
• Corruption Troubleshooting (November 2001)

The Do-It-Yourself Corruption Resistance Guide 48
## 7. Training and Development
5 There is a strategy in place to ensure that all staff development and training is consistent with the agency's values and addresses relevant corruption risks. Staff demonstrate the effectiveness of the training and development.

4 The agency has reviewed its training and development program in the last 12 months to ensure it incorporates the subject matter identified in (1) and (2), below, and has made any necessary improvements.

3 All staff receive induction training within 3 months of joining the agency, and have access to refresher training (relating to training described below) every two years.

2 The agency has training programs for existing staff on risk management, managing conflicts of interest, applying the agency's values to their work and ethical decision making, as well as providing refreshers on (1).

**1** The agency has an induction program for all new staff (including a program for senior appointees) that includes training on the agency's code of conduct, public duty, what corruption is and how to report corruption.

## Why is training and development important?

If an agency is to optimise its resistance to corruption, all members of the agency need the appropriate skills, competencies and knowledge to carry out the agency's functions effectively. They also need an appreciation and understanding of the ethical values of an agency and its application to the daily work routine.

Staff and management need practical corruption prevention and ethics training. Corruption prevention strategies and ethics need to be reflected in all other training and development programs.

### Action
• Assess your training and development programs against the table
• Assess the level of staff achievement against key learning outcomes
Ranking Levels of achievement

## Staff training and development
The Do-It-Yourself Corruption Resistance Guide 49
Resources that can help enhance your agency's level of achievement
ICAC
• Conduct Becoming ethics and public duty training kit (June 1999)
• Ethical Culture Survey Kit (September 2000)
Part five: Organisational Integrity: Key areas to consider in building an ethical workplace
The Do-It-Yourself Corruption Resistance Guide 50

# Conclusion
So, what do you do once you have completed a self-assessment? Well, if you have scored mostly fives, congratulations! Your agency is likely to be highly resistant to corruption, or, if corruption does occur, able to detect and deal with it quickly.

On the other hand, if you have scored mostly ones, your agency meets only the minimum standards set and we would strongly encourage you to make the strengthening of your agency's corruption resistance framework a high priority.

Most agencies will probably find their scores vary across the range available, indicating the relative strengths and weaknesses of their corruption resistance framework. These scores can help agencies develop priorities within an overall corruption risk management plan. If you have scored mostly in the range from two to four, your agency has obviously made some effort to address corruption risks effectively. Those topics scoring two or three should be given some priority for further attention. For those topics scoring four, we suggest enhancements be considered in conjunction with any planned reviews of the topic areas. If your agency did not register a score against the topics covered, you need to give urgent attention to meeting the minimum standards and to implementing a realistic program of progressively enhancing your agency's corruption resistance.

For further advice on building a strong corruption resistance framework or on strengthening the topic areas covered by this guide, you can contact the ICAC's Corruption Prevention Unit or check our website. Contact details appear on the next page.

Last but not least, a word of caution – over time, corruption risks change and strategies for managing them evolve. On this basis, we encourage agencies to review their corruption resistance status periodically.

The Do-It-Yourself Corruption Resistance Guide 51

## Useful websites

www.icac.nsw.gov.au NSW Independent Commission Against Corruption
www.premiers.nsw.gov.au NSW Premier's Department
www.nswombudsman.nsw.gov.au NSW Ombudsman
www.audit.nsw.gov.au NSW Audit Office
www.treasury.nsw.gov.au NSW Treasury
www.dpws.nsw.gov.au Department of Public Works and Services
www.dlg.nsw.gov.au Department of Local Government
www.standards.com.au Standards Australia
www.eeo.nsw.gov.au Office of the Director of Equal Opportunity in Public Employment
The Do-It-Yourself Corruption Resistance Guide 52

## Contacting the ICAC

For further advice on carrying out a self assessment contact the ICAC Corruption Prevention Unit on
8281 5999
The ICAC resources mentioned in this guide, as well as new resources, can be obtained via the ICAC
website or by contacting the ICAC Publications Officer on 8281 5999.