

Integrity Metrics

Resource





The Australian Public Service Commission acknowledges the Traditional Owners of the lands, waters and seas that we live and work on and thank them for their continued custodianship. We pay our respects to Elders, past present and emerging.



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1. Introduction

Creating and maintaining a strong culture of integrity is crucial to public confidence and trust in the Australian Public Service (APS). Fostering trust in integrity is a key priority for the Australian Public Service Commission (the Commission). In order to support agencies to strengthen their integrity culture, the Commission provides advice and guidance and continues to promote a high standard of integrity.

One such way to improve the integrity culture and maturity of an organisation is through measuring, monitoring and reporting on integrity performance. This resource has been developed to assist APS agencies in undertaking such practices.

1.1. Why should agencies measure integrity?

Demonstrating a commitment to upholding and embedding integrity ensures that agencies and their employees can continue to deliver with the highest standards of professionalism.

Agencies that can effectively measure, monitor and report on their integrity performance will be better positioned to identify risks; action and remedy integrity issues; and embed integrity into all aspects of workplace culture and practice. By monitoring integrity measures over time, agencies can note any trends occurring and/or integrity maturity levels within the organisation.

The information gathered from integrity measurement activities is important for all areas of an agency. Some specific examples include:

- Leadership teams can review the integrity performance of the organisation as a whole and make informed decisions.
- Corporate teams can use the information to make informed decisions on organisation-wide policies and processes.
- Business areas can assess information relevant to their teams and functions.

1.2. Is measuring integrity performance mandatory?

No. Measuring integrity performance is not mandated; however, it is considered good practice for agencies to undertake this activity at regular intervals.

The approach to integrity measurement, monitoring and reporting should be driven by each individual agency and adapted to meet their own unique requirements. It is noted that an agency's approach to integrity measurement will be guided by:

- maturity level
- size
- resourcing
- functions
- internal policies
- strategic priorities
- risk profile
- legislated requirements (e.g. as outlined in the *Public Service Act 1999* and *Privacy Act 1988*).

Agencies are not required to report on integrity performance to the Commission.

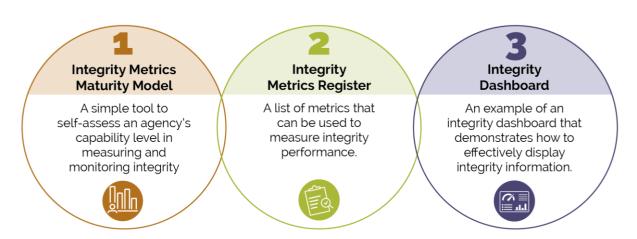
1.3. Using this resource

It is important to acknowledge that not all APS agencies are at the same level of maturity when it comes to measuring integrity performance. Some agencies are quite advanced in this area, whereas others are at the beginning stages.

This resource is designed to support agencies to understand their current integrity measurement capability and make informed decisions on where to focus future effort to lift integrity measurement, monitoring and reporting.

Key users of this resource will most likely be corporate teams that have responsibility for reporting on organisational performance; for example, human resources, governance, audit, risk and security.

This resource contains three tools that are complementary and work best when combined:



A good place to start is with the **Integrity Metrics Maturity Model**. The outcome of a self-assessment against the model will determine how the other tools are best applied. For example, agencies that already have an *optimised* system for integrity reporting may find value in simply using the Integrity Metrics Maturity Model to ascertain their strengths and areas for improvement. Agencies that are assessed to be in the *initial* stages of maturity can refer to the Integrity Metrics Register and Integrity Dashboard to begin building data for periodic reporting in order to lift their capability in integrity measurement and reporting.

Once the organisation's level of maturity is understood, usage of the **Integrity Metrics Register** to select key measures for reporting can be tailored to focus on identified areas for improvement.

Finally, measures selected from within the Integrity Metrics Register can be displayed using the **Integrity Dashboard** to enable quick and easy access to key points of information as well as communicate integrity trends over time.

1.4. Enquiries and Feedback

Please direct any enquiries or feedback on this resource to EmploymentReform@apsc.gov.au. We welcome your comments and suggestions for how this resource can be improved.

For more information on integrity in the APS, see the Commission's website.

2. Integrity Metrics Maturity Model

The Integrity Metrics Maturity Model is a self-assessment tool designed to help agencies review the current status of their approach to integrity measurement and make informed decisions on where additional focus may be required to uplift their integrity measurement and reporting capability.

All agencies will be at different levels of maturity and will have different risk profiles and available resources to dedicate to integrity. The optimal end state will also be different for each agency. There is no 'one size fits all'. Smaller agencies in particular will need to pay attention to implementing proportionate and fit for purpose solutions that support development of maturity while still being sustainable. This may mean that some agencies will be more efficient at the *defined* level for particular categories.

The benefit, however, is that agencies that take time to understand their current maturity levels in integrity measurement will be better positioned to implement solutions that lead to measurable improvements in this function.

2.1. How to use the maturity model

Agencies are encouraged to undertake an initial self-assessment to establish their current level of maturity, and then review the model at regular intervals to measure progress.

Table 1: Integrity Metrics Maturity Model

Category	Level 1 – Initial	Level 2 – Defined	Level 3 – Optimised
Measurement and monitoring	Agency does not undertake dedicated integrity measurement, monitoring and reporting functions.	Agency undertakes some general integrity measurement, monitoring and reporting.	Agency undertakes detailed and comprehensive integrity measurement and monitoring, which is coupled with detailed analysis that connects integrity metrics to other measures to identify risk.
Data complexity	Agency relies on reports , such as investigation findings and audit and risk reporting, to demonstrate compliance with the APS Values, Code of Conduct and other legislated reporting activities.	Agency uses basic data to inform integrity measurement and presents information at a point in time.	Agency uses a broad range of data to inform integrity measurement and monitors changes by monitoring change over time.
Governance	There is no dedicated governance process for reviewing integrity reports and issues.	Integrity-related reporting is reflected within agency's established governance, risk and/or audit reporting processes.	Integrity is reported through dedicated integrity governance structures and processes and directly informs decision making processes.
Frequency	Integrity measurement and reporting may occur on an ad-hoc basis or in response to an integrity-related event or issue.	Integrity measurement and reporting is a twice yearly or annual process .	Integrity measurement and reporting is an ongoing, frequent, routine business function. For example, a standing agenda item at Executive Board meetings.
Performance management	Integrity is not explicitly referenced in employee performance agreements or duty statements.	Integrity is referenced in employee performance agreements.	Integrity is a core consideration in employee duty statements, performance agreements and performance assessments.

3. Integrity Metrics Register

The Integrity Metrics Register provides examples of a range of metrics that can be used to measure agency and employee integrity.

The Register includes a list of metrics across four categories:

- Human resources
- Declarations and self-reporting
- Security
- Risk, fraud and corruption.

Each metric includes a description, examples and indicators that are relevant to measuring integrity.

3.1. How to use the Register

Agencies are encouraged to refer to the Register when identifying suitable information sources that can inform them about the state of integrity for the organisation and employees. This data can then be analysed to form a clear and accurate perspective on current or past states. Reports can then be prepared from this analysis.

Metrics should be collected consistently so as to measure trends over time. They can be benchmarked against previous levels and evaluated within the context provided by the Integrity Metrics Maturity Model.

Agencies may record and report metrics differently. The Register provides examples to outline some of the types of data that can be collected. Specific metrics should be adapted to agency needs, risks, benchmarks and capacity.

When developing metrics specific to your agency, consider how they may be more useful when focused according to specific parameters or categories, such as work groups or teams, length of tenure, working location, classification level, specific time periods (quarters) and so on. Consideration should also be given to the specific profile of the workforce, especially whether a large contractor workforce is in place and should be included in such reporting. Detailed metrics can easily be generalised but not the reverse.

Agencies will also need to take into account that the disclosure of integrity-related metrics needs to be balanced with privacy implications.

The Register can be used in conjunction with the Integrity Metrics Maturity Model and the Integrity Dashboard example provided below.

Table 2: Integrity Metrics Register

Metric	Description	Examples	Integrity indicators and considerations
HUMAN RESOURC	ES METRICS		
Employee perception survey data	Responses to integrity related questions including perceptions of behaviours or integrity issues.	 Questions in the APS Employee Census relating to APS Values, bullying and harassment, corruption, and fraud Individual agency pulse surveys 	Responses may indicate: • integrity concerns • levels of integrity awareness and capability.
Performance management data	Data that indicates whether appropriate performance management practices are in place and whether performance is being appropriately managed across the organisation.	 Percentage of staff that have a performance agreement in place Percentage of staff that have undertaken a midor end-of-cycle assessment Performance ratings across the agency Percentage of successful probation periods for new staff Active number of underperformance cases Number of upheld complaints due to defective administration, e.g. upheld Commonwealth Ombudsman complaints or Compensation for Detriment caused by Defective Administration (CDDA) claims 	High rates of performance agreements in place, and regular performance conversations occurring, may indicate employees and managers are clear on expected deliverables, behaviours, career goals and development needs. Unsuccessful probation periods may indicate poor induction processes, a lack of mentoring and guidance, or poor recruitment processes.
Unscheduled absence	Monitoring of unscheduled absences.	 Number of days of unscheduled absence Reasons for unscheduled absence Number of employees whose unscheduled absence has reached or exceeded organisational thresholds 	Higher than usual unscheduled absences or changes to attendance patterns may indicate: • health concerns for employees, including stress and burnout • cultural concerns within teams.

Metric	Description	Examples	Integrity indicators and considerations
Overtime and leave balances	Records of overtime, flex- time/time off in lieu (TOIL) and excess leave balances.	 Days of overtime worked (APS1-6). Flex-time accumulated; maximums and minimums reached (APS1-6) TOIL accumulated; maximums and minimums reached (EL and SES). Instances of accumulated leave over 40 days 	High levels of overtime, flex-time, or TOIL may indicate excessive workload or performance concerns, which may impact upon staff integrity. Regular overtime or after hours work can raise integrity concerns in terms of unsupervised work. High leave balances may indicate: • employees are not accessing their leave entitlements • increased chance of stress and burnout • feeling that they cannot take leave due to workload.
Code of conduct reports and investigations	Monitoring number, type, action time and outcomes of reports and investigations.	 Number of code of conduct investigations Type of code of conduct investigations Time taken for code of conduct investigations Outcomes of code of conduct investigations 	Monitoring code of conduct reports is important in identifying and responding to inappropriate behaviour, preventing it from reoccurring, and demonstrating to the agency that employees will be held accountable if they are found to have breached the Code.
Compensable claims	Monitoring number, type, action time and outcomes of compensable claims.	 Number of compensable claims Types, time taken to resolution, and outcome of compensable claims 	Changes to the number of compensable claims may indicate broader integrity concerns within a business area, i.e. those claiming compensation for workplace injury due to stress or other workplace concerns.

Metric	Description	Examples	Integrity indicators and considerations
Work, health and safety (WHS) reports and incidents	Monitoring number, type, action time and outcomes of WHS reports.	 Number of work, health and safety incidents by group/division Type of incident: injury/illness, hazard, near miss or other 	Changes to the number of WHS reports may indicate broader integrity concerns within a business area, such as not making employee safety a business priority.
Training completion rates	Monitoring and reporting on training that has an integrity focus. This includes the mandatory integrity training for all employees new to the APS.	 Percentage that have completed mandatory integrity training within the required timeframe Number and topics of integrity-related training completed Time taken to complete integrity-related training 	Providing and monitoring completion of integrity training will assist with uplifting integrity awareness and capability. Also ensures that agencies are meeting their obligations as outlined the Commissioner's Directions.
Evaluation and feedback reports	Regularly reviewing evaluation and feedback reports on integrity-related activities, training and events.	Feedback scores or qualitative evaluation findings	Reviewing and actioning feedback ensures that agencies can be responsive to the needs of employees.
Issue resolution timeframes	Monitoring issue resolution timeframes.	 Time taken from the reporting of an integrity- related issue to its resolution, benchmarked against previous records of this process for the same category of issue 	Long timeframes to resolve issues may indicate that integrity concerns are not being taken seriously, that resourcing is not sufficient or that processes need to be improved.
Cessation processes	Exit interviews and surveys provide an invaluable source of integrity information.	 Rate of completion of exit interviews/surveys Correlation of perceived integrity issues in exit surveys with broader agency responses to Census/pulse survey questions Number of investigations opened as a result of information disclosed in exit interviews 	Staff members who are leaving an agency are most likely to raise integrity concerns during exit processes – they have nothing to lose or to fear given they are ceasing employment. This is a key opportunity to collect important information on integrity issues.

Metric	Description	Examples	Integrity indicators and considerations
DECLARATIONS AN	D SELF-REPORTING METRICS		
Conflict of interest declarations	Monitoring and reporting on conflict of interest declarations and conflict of interest management plans.	 Number of conflict of interest declarations, benchmarked against previous records for an equivalent period Types of conflict of interest declared 	Encouraging, monitoring and reporting on conflict of interest declarations supports employees to work with integrity, be accountable and be transparent.
Gifts and benefits reporting	Monitoring and reporting on gifts and benefits.	 Gifts, benefits or hospitality accepted, measured against gifts or hospitality offered Percentage of gift declarations approved within the required timeframe 	Encouraging, monitoring and reporting on gift and benefits supports employees to work with integrity, be accountable and be transparent.
Outside employment and volunteering	Monitoring and reporting on requests for approval of outside employment and volunteering.	 Nature and frequency of outside employment and volunteering requests Number of requests for approval of outside employment/volunteering and percentage of requests approved 	Encouraging, monitoring and reporting on outside employment and volunteering requests supports employees to work with integrity, be accountable and be transparent.
SECURITY METRICS			
Pre- employment suitability screening	Monitoring and reporting on numbers of employees, contractors and consultants who undergo pre-employment suitability screening (in addition to security clearance processes)	 Number of employees, contractors and consultants who undergo pre-employment suitability screening Number onboarded without undergoing pre-employment screening Number found suitable or unsuitable based on pre-employment screening 	Pre-employment suitability screening, in addition to security clearance screening, provides an additional mechanism to ensure employees, contractors and consultants are suitable to operate in the context of the agency. High numbers operating without having undergone preemployment suitability screening may indicate an integrity risk. High numbers

Metric	Description	Examples	Integrity indicators and considerations
			failing pre-employment screening may indicate failures in recruitment or procurement processes.
Security clearances	Tracking and reporting on security clearance status and processing.	 Security classification levels of staff and contractors, consultants and outsourced service providers Number of APS clearances granted, renewed, denied and revoked Security clearance mismatches (number of personnel with a lower clearance than is required for their position) Number of people operating without a clearance while it is pending Number of staff or contractors PSPF noncompliant on separation 	Monitoring security clearance processes ensures that the agency is aware of potential onboarding delays, high risk role requirements and so on. A high number of pending security clearances for staff already engaged presents a higher risk to integrity.
Breaches (personal, physical and ICT)	Monitoring and reporting on breaches.	 Number and severity of personal security incidents Number and severity of physical security breaches Number and severity of ICT security breaches 	Changes to the number of breaches may indicate broader integrity concerns within a business area. This may indicate that business processes need updating or better awareness.
Access controls	Monitoring and reporting on access controls	 Access controls are used appropriately in relation to physical and information assets Number and severity of instances of unauthorised access 	Inappropriate access may indicate broader integrity concerns, including the requirement for staff training, policy and processes.

Metric	Description	Examples	Integrity indicators and considerations
Protective Security Policy Framework	Under the PSPF, all non-corporate Commonwealth entities must report to their portfolio minister and the Attorney-General's Department each financial year on security.	 Entities report on their level of maturity against: the desired 4 protective security outcomes (security governance, information, personnel and physical security) the 16 core requirements that articulate what entities must do to achieve the 4 protective security outcomes. 	These reports assure government that entities continue to implement sound and responsible protective security practices, and identify and mitigate security risks and vulnerabilities. While we don't want to duplicate reporting, an analysis or reference to compliance may be useful in informing integrity issues.
RISK, FRAUD AND (CORRUPTION METRICS		
Fraud and corruption reports and investigations	Monitoring number, type, action time and outcomes of fraud and corruption reports and investigations.	 Number of fraud allegations versus number of substantiated cases of fraud. Types of fraud and corruption committed Reporting channels for allegations of fraud and corruption (handled internally or reported to law enforcement agencies) Outcomes and time to resolution for fraud and corruption investigations or referrals to law enforcement agencies 	Monitoring fraud and corruption reports is important in identifying and responding to illegal behaviour, preventing it from reoccurring, and demonstrating to the agency that employees and contractors will be held accountable if they are found to have participated in fraudulent or corrupt behaviours.
Privacy breaches	Monitoring number, type, action time and outcomes of privacy breaches.	 Number of reported privacy breaches by group Types of privacy breach by group Outcomes and time to resolution for privacy breaches by group 	An increase in privacy breaches may indicate broader integrity concerns within a business area such as poor induction and business processes.

Metric	Description	Examples	Integrity indicators and considerations
Public Interest Disclosures	Monitoring number of Public Interest Disclosures (PID).	 Number of PID made Time taken to review PID reports Action taken in response to the report and outcome 	Changes to the number of PID may indicate broader integrity concerns within an agency. Emphasis on a particular area may highlight the need for reformed integrity practices in relation to that area.

4. Integrity Dashboard

An Integrity Dashboard provides a visual representation of an agency's integrity performance and is an effective way to deliver information to leaders. It provides a snapshot of key integrity indicators that can be used to assess the integrity of an agency, as well as identify areas of concern and areas of strong performance.

4.1. How to develop and use an Integrity Dashboard

Agencies are encouraged to develop dashboards that are appropriate for their unique functions, risk profile, size and strategic priorities. When designing the dashboard, agencies should consider:

- What is the purpose of the dashboard? This is guided by what the audience wants or needs to know.
- What value will be gained from the data? How will this inform future actions?
- Is the most important and valued information the easiest to locate in the dashboard?
- Does the data illustrate performance against past results? Are there any trends that can be reported on?

An effective dashboard should include a holistic set of integrity metrics that can provide details on a variety of integrity-related functions. These metrics should be developed with the aid of the Integrity Metrics Register and Integrity Metrics Maturity Model.

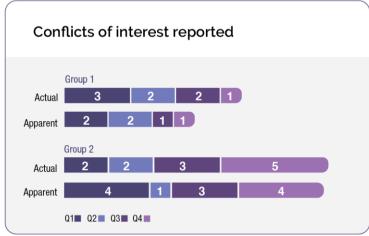
The value gained from an Integrity Dashboard is seeing how an agency is tracking against the certain metrics. It may take a number of reports for agencies to establish a benchmark and determine what an optimal result may look like.

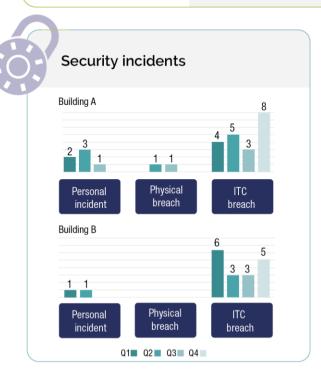
An example dashboard is provided on the following page.



Integrity dashboard example













Cybersecurity awareness training rollout Gifts and benefits annual reporting due