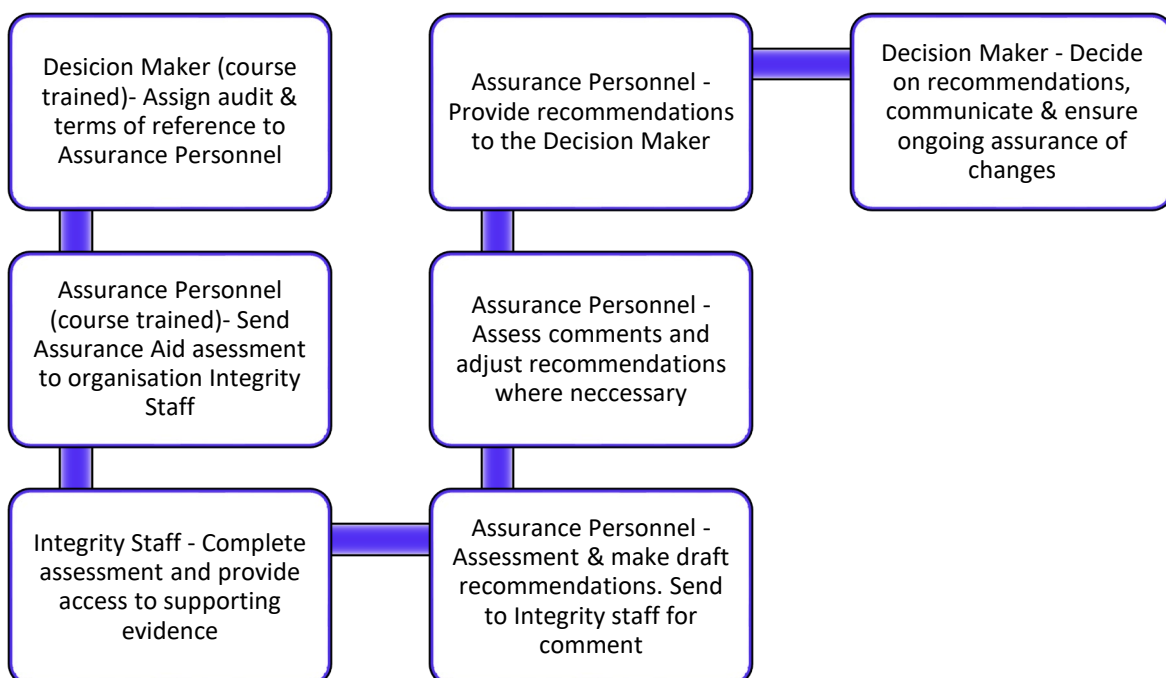# Preventing Systemic Failures in Integrity Systems

Course aid - Assurance tool

The following assurance tool can be used to guide, assess and implement measures to prevent systemic failures in integrity systems.

Pathway to assurance

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Desicion Maker (course          Assurance Personnel -         Decision Maker - Decide
trained)- Assign audit &        Provide recommendations       on recommendations,
terms of reference to           to the Decision Maker         communicate & ensure
Assurance Personnel                                           ongoing assurance of
                                                              changes

Assurance Personnel             Assurance Personnel -
(course trained)- Send          Assess comments and
Assurance Aid asessment         adjust recommendations
to organisation Integrity       where neccessary
Staff

Integrity Staff - Complete      Assurance Personnel -
assessment and provide          Assessment & make draft
access to supporting            recommendations. Send
evidence                        to Integrity staff for
                                comment
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Strategic aims

Core system component	Culture	Assurance	Resilience	Education
Strategic Aim	The organisation's culture shows stakeholders that they can trust the integrity systems. There must be a minimal difference between the organisation's documented standards of integrity and their implementation.	Effective and transparent assurance programs that create a positive reputation and stakeholder trust.	Effective resilience in integrity systems that can challenge and expose concerns before they become systemic.	An effective educational program that promotes system transparency. Education that reflects the culture of the organisation, increases assurance capabilities and shows resilience to stakeholders.

Transparency indicators & navigation menu

Core	Transparency Indicators
Culture	Example-driven implementation
	Written standards
Assurance	Independence
	Discretion
	Testing
	Oversight
Resilience	Skill
	Readiness
	Information autonomy
	Stakeholder centric
	Based on complete & detailed risk
	Screened
Education	Focussed on awareness
	Relevant & accessible

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
Culture		The organisation's culture shows stakeholders that they can trust the integrity systems. There will be a minimal difference between the organisation's documented standards of integrity and their implementation.	(+) Sufficient examples of leadership set by integrity staff. (-) contrary demonstration of leadership behaviour.		
	Example-driven implementation	Example driven leadership in integrity must include senior management, integrity teams and champions. There must be a visible, top-down approach to positive integrity measures	(+) Evidence of leadership set by senior management, integrity teams and champions. (+) Evidence of a top-down approach to integrity from the highest levels. (+) Evidence that integrity staff lead by example and apply a higher standard of scrutiny and satisfaction to their own actions, compared to what is expected of others. (+ Evidence that example driven standards are documented in writing. (-) Contrary demonstration of leadership behaviour. (-) Positive messaging from senior management not clearly visible. (-) Poor behaviour by any integrity staff, including actions that are inconsistent, unfair, and not led by example (clear = frequent, available on non-conflicting).		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
	Written standards	Having a clear written description of the standards expected in the organisation.	(+) Favourable results from a detailed analysis of integrity risks against the written standards, to find gaps. (+) Evidence of written standards for integrity systems that provide: • all staff with the benchmarks for ethical interactions • victims with advice on protections and avenues for reporting • investigators with clear information to measure allegations against • and a management team with the authority to take action and protect the organisation. (-) Evidence that is contrary to the above aims and/ or not transparently available + provided to all stakeholders. (-) Evidence that integrity staff are generating influence with their own beliefs or conflicting interests.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
Assurance		Effective and transparent assurance programs that create a positive reputation and stakeholder trust.	(+) A good assurance program that measures the gap between what the organisation expects and what they actually do. (-) An integrity system with a poor reputation (i.e. from anonymous stakeholder analysis).		
	Independence	Independent integrity systems that promote fairness and create trust for the most vulnerable, including victims and those wrongfully accused.	(+) Evidence of ways to minimize people-based bias with integrity staff, including: • multiple and dotted lines of reporting • a mandatory declaration process for integrity staff's personal connections • external auditing by impartial experts, and • rotations within teams and with other organisations. (+) Evidence of information reporting and assurance models in integrity systems that are run by autonomous processes. Discretion has been considered in the design. (-) Evidence of deliberate or unconscious bias by integrity staff. (-) Evidence of a failure to discover or manage bias factors that are unique to each incident including managing favouritism or fear.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
	Discretion	Discretionary avenues in integrity systems to capture the full picture of integrity issues.	(+) Processes that ensure anonymity in your integrity surveys. (+) Stakeholders are able to report integrity incidents anonymously including the use anonymous reporting channels (i.e. website forms and private email reports). (+) Discretionary requirements form part of regular testing routines. (-) Evidence that victims may be reluctant to report integrity issues for fear of retribution. (-) Lack of approach to discover weak points in systems with anonymous survey information.		
	Testing	Testing of integrity systems that identifies potential failure points and improves the preparation and skill of integrity staff.	(+) Testing integrity systems both during and post-implementation to ensure they function as intended. (+) Use of pressure-testing models that aim to identify points of failure, not just success. (+) Use of desktop exercises to help prepare integrity staff. (+) Reporting of test results to oversight staff to improve transparency. (-) Lack of practice or evidence of an under-prepared response.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
	Oversight	Oversight that identifies potential issues in the operations of integrity systems.	(+) Oversight staff have direct (not by request) access to assurance information. (+) Assurance information for integrity systems will expose any differences between the written standards and what they achieve. (+) Assurance position responsibilities are independent of the integrity function (+) Using an increased frequency of auditing to identify problems sooner (+) Benchmarks are set for the skills and ongoing training of oversight staff. (-) A lack of evidence confirming performance and accountability measures of integrity systems. (-) Oversight lacking in independence, capability, frequency or attention to detail.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
Resilience		Effective resilience in integrity systems that can challenge and expose concerns before they become systemic.	(+) Integrity staff who are skilled and display adequate system and personal preparation. (+) Systems designed with information autonomy, ethics and risk in mind. (+) Staff screening programs commensurate to the risk in each position.		
	Skill	An integrity system with skilled staff to upkeep compliance with applicable laws, policies and standards.	(+) Minimum experience and qualifications for integrity positions has been set. (+) A program for mentoring under-experienced and underqualified staff is in place. (+) Survey and test for skill gaps, sourcing learning pathways where required. (+) Implemented aptitude testing for integrity staff to measure desirable behaviour characteristics like honesty and resilience. (+) Implemented regular training to upkeep standards for key governance information relating to disclosure, investigations and determinations. (-) Evidence or possibility of compromise to the security of victims, alleged offenders and evidence. (-) An unsupervised decision-maker who lacks experience or one who fails to recognise conflicting interests or procedural fairness violations.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
	Readiness	High readiness of integrity staff that is sufficient to minimise the initial harm of an integrity incident.	(+) A genuine review of integrity risks against a wide range of unlikely but plausible external events to improve the foresight of risk. (-) Staff integrity reviews or decisions that limit the effective scope of integrity systems or lead to poor and inconsistent outcomes for standards and stakeholders.		
	Information autonomy	A flow of integrity information that is not impeded by behaviour.	(+) Automated integrity systems to bypass potential for impedance of information. The automated reporting system can transmit information directly from a reporter to intended recipients without interference. (+) Review of the information needs of stakeholders to further enhance transparency by providing live access to non-sensitive integrity information. (-) Evidence of integrity staff with a bias, lack of oversight, demanding workload levels, lack of skill or preparedness. (-) Adverse signs or incidents involving quality and speed of integrity information. (-) Behaviour that affects information quality. (-) Behaviour that slows information flow or that has led to breaches of law, witnesses not being available, evidence being tampered with, and extended victim traumatisation.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
	Stakeholder centric	An integrity system that focuses on stakeholder needs. A system that emphasises the stakeholders' vulnerabilities and protections.	(+) System processes assessed and prioritised in design from the perspective of the most vulnerable stakeholders to the least. A system that resolves conflicting priorities in favour of the most vulnerable stakeholder and the objectives from a detailed analysis of risk. (+) System design that factors into account all stakeholders (especially those without an active say). (-) A reporting system that lacks consequences for unauthorised disclosure or deters victims from providing information. (-) An investigation system that lacks privacy, that can expose the identity of witnesses and alleged offenders.		
	Based on complete & detailed risk	A detailed approach to risk that scopes the widest visibility of potential integrity issues and leads to more effective controls.	(+) A review that scopes potential failure points, not just success points, to identify an organisation's integrity risks. (+) Risk reviews that cover integrity events in historical information, surveys, past incidents, governance information and external events. (+) Transparent risk treatments & controls like those in the CARE system. (-) Lack of in-depth risk assessments, and/or advice to senior management to determine whether adequate controls exist in order to prevent potential harm. (-) Integrity risks that are untreated.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
	Screened	Screening that identifies conflicting ethical standards before they become a major influence on organisational culture.	(+) Screening requirements for staff are equal to the risk in their role. (+) Screening requirements form part of pre-employment screening and ongoing aftercare. (+) Conducting character assessments (i.e. aptitude testing) of integrity staff on their honesty and resilience. (-) Conflicts of interest that could or have had a detrimental effect on the organisation's integrity. (-) Not monitoring the personal circumstances of staff that change during employment with the organisation. (-) No corrective action or accountability for Integrity staff with low levels of personal resilience or honesty. (-) Lack of integrity staff intervention when resilience is required.		

Core	Transparency indicators	Strategic aim	Assurance measures (+Positive or -Negative impact)	Evidence	Assessment
Education		An effective educational program that promotes system transparency, reflects the culture of the organisation, increases assurance capabilities and shows resilience to stakeholders.	(+) Education that is relevant, accessible and focused on stakeholder awareness.		
	Focussed on awareness	Education that aims to improve stakeholder awareness not just delivery of knowledge.	(+) Using survey's to measure awareness and track the educational program. (+) Anonymous and accessible surveys for a greater understanding. (-) An education program that only focuses on achieving the delivery and not measuring stakeholder awareness.		
	Relevant & accessible	A relevant and accessible educational program will improve the connection with your stakeholders and enhance their diverse response to integrity risks.	(+) A review of educational needs is done through a stakeholder's lens to find the gaps. (+) A plan that identifies relevant educational aims for each stakeholder. (+) Education that is non-sensitive, is available to a wide range of stakeholders to improve transparency. (+) doubts about what information to release follow a sensitivity assessment. (-) Victim/s who loses trust and conceal their integrity concerns or expose them in public forums. (-) integrity teams miss opportunities to upskill their education and reduce the capabilities of integrity systems.		