1. Purpose

The Compliance and Integrity Framework (Framework) is an overarching document that outlines Council’s approach to ensure that the integrity of the Casey City Council is of the highest order. The Framework provides a responsive and accountable framework that enables business to be conducted in compliance with legal and internal policy requirements. This includes legislative and common law requirements, industry codes and organisational standards, as well as standards of good corporate governance, risk management, best practices, ethics and community expectations. It is aimed at providing transparency about our approach to compliance and to foster public confidence.

2. Definitions

- **Council**
  means Casey City Council, being a body corporate constituted as a municipal Council under the Local Government Act 1989

- **Councillors**
  means the individuals holding the office of a member of Casey City Council

- **Council officer**
  means the Chief Executive Officer and staff of Council appointed by the Chief Executive Officer.

- **Compliance**
  Adhering to the requirements of laws, industry and organisational standards and codes, principles of good governance and accepted community and ethical standards

- **Compliance Framework**
  Structured set of guidelines that detail an organisation’s processes for maintaining accordance with established regulations, specifications or legislation.

- **Integrity**
  the quality of being honest and having strong moral principles, and operating within the rule of law.

Council policy documents change from time to time and it is recommended that you consult the electronic reference copy at [www.casey.vic.gov.au/policiesstrategies](http://www.casey.vic.gov.au/policiesstrategies) to ensure that you have the current version. Alternatively you may contact Customer Service on 9705 5200.
3. **Scope**

   The *Framework* includes the instruments, processes, structures and conditions required to promote compliance and integrity, and are aligned with the organisation's strategic objectives. This framework is based on the principles contained in the AS ISO 19600:2015 Compliance Management Systems Guidelines.

4. **Context**

   An effective, organisation-wide compliance management system enables an organisation to demonstrate its commitment to compliance with relevant laws, including legislative and common law requirements, industry codes and organisational standards, as well as standards of good corporate governance, risk management, best practices, ethics and community expectations.

   Compliance and integrity are outcomes of an organisation meeting its obligations, and is made sustainable by embedding it in the culture of the organisation and in the behaviour and attitude of people working for it. While a best practice organisation maintains the rigorous independence of its governance, legal and audit functions, it must also ensure that compliance and integrity management is integrated with the organisation’s financial, risk, quality, environmental and health and safety management processes and its operational requirements and procedures.

   Enforcing compliance and integrity means ensuring that the business adheres to its external (common law, legislation, regulations, expectations of integrity agencies, rules, standards etc.) and internal (policies and procedures) obligations and risk control mechanisms.

   This framework should be read in conjunction with the Governance Charter, which articulates the various roles, responsibilities and authorities of the Council and the administration in developing the vision for the future of our community and the management of Council operations and performance.

5. **Framework**

   In an ethical culture, employees and managers understand why doing the right thing is important for the organisation’s long-term viability, and they have the determination, courage and freedom to see that the right thing gets done. An ethical culture supports independent thinking employees and managers who make decisions consistent with the principles of Good Governance and the organisation’s values.

   The benefits of a positive ethical culture include:

   - Employees feel a sense of responsibility and accountability for their actions and for the actions of others
   - Employees freely raise issues and concerns without fear of retaliation
   - Managers model the behaviours they demand of others
   - Managers communicate the importance of integrity when making difficult
• Leadership understands the pressure points that drive unethical behaviour
• Leadership develops processes to identify and remedy those areas where pressure points occur

5.1 Approach

The Australian Standard AS ISO 19600:2015 Compliance Management Systems Guidelines, has adopted a “high-level structure” to assist in the implementation of specific compliance and integrity related requirements in any management system.

The flowchart in Figure 1 is consistent with other management systems and is based on the continuous improvement principle (“Plan-Do-Check-Act”).
Figure 1 — Flowchart of a compliance management system

- Good governance principles
- Establishing Compliance and Integrity Framework
- Identification of compliance and integrity obligations and evaluating risks
- Leadership commitment, Responsibilities at all levels, Support functions
- Operational planning and control of compliance risks
- Planning to address compliance and integrity risks and continuous improvement
- Performance evaluation and compliance reporting
- Managing non-compliance and continuous improvement

Establish → Improve
5.1.1 Identification of compliance and integrity obligations

Council is committed to meeting its compliance and integrity obligations.

Compliance and integrity risks are analysed with controls in place and reviews annually. Internal audit plan checks these in the three year audit schedule.

5.1.2 Management of compliance obligations

In accordance with the Code of Conduct for Employees, and the principle of respect for the rule of law, all Council employees should be conscientious in seeking to comply with relevant obligations in the course of their duties.

Obligations are designated to responsible officers. There may be multiple responsible officers for certain obligations. Responsible officers are required to:

- Confirm that they are seeking, in the course of their operational activities, to ensure compliance with each obligation for which they are the designated responsible officer
- Report on any incidents of non-compliance and the remedial action taken to address them, including any ongoing non-compliance issues.
- Responsible officers are expected to maintain a sound knowledge of their designated obligations, and should convey advice of new obligations or changes to existing ones to the Manager Governance, and to the Manager Legal Services in the case of changes to common law or legislative obligations, or to those emerging from the investigations or reports of integrity agencies.

5.1.3 Principal systems, policies and documents in place to manage compliance

Council has a number of systems, policies and documents in place to manage compliance, including, but not limited to:

- Code of conduct for employees
- Code of Conduct for Volunteers
- Code of Conduct for Councillors
- Disciplinary code
- Governance charter
- Prevention of fraud & corruption policy
- Pro-bity in procurement and contract processes
- Records management policy
- Risk management framework
- Trademark behaviours
- And all relevant compliance and integrity policies.
Responsibilities

Council

Council will actively demonstrate a commitment to a compliance culture, with the aim of promoting good governance, accountability, and transparency of decision making.

CEO

The CEO is responsible to Council for the management of compliance and integrity obligations.

EMG

Leading by example and demonstrating their active commitment to, and support for the compliance and integrity culture, performance targets, and policy and procedures.

Managers

Demonstrating their active commitment to, and support for the, compliance and integrity culture, performance targets, and policy and procedures.

Manager Governance

Leadership in promoting good governance to ensure compliance and integrity.

Responsibility for advice, education and support across the organisation.

Manager Legal Services

Leadership in promoting legal and integrity agency requirements to ensure compliance and integrity.

Responsibility for advice, education and support across the organisation.

Employees

In accordance with the Code of Conduct for Employees, and the principle of respect for the rule of law, all Council employees should be conscientious in seeking to comply with relevant obligations in the course of their duties.

Audit & Ethics committee

The Committee’s role is to monitor, review and advise the Council on the standard of its financial control, risk management and corporate governance.

6 Administrative Updates

It is recognised that, from time to time, circumstances may change leading to the need for minor administrative changes to this document. Where an update does not materially alter this document, such a change may be made administratively. Examples include a change to the name of a Council department, a change to the name of a Federal or State Government department, and a minor update to legislation which does not have a material impact.

However, any change or update which materially alters this document must be by resolution of Council.
7 **Review**

The next review of this document is scheduled for completion by 30 June 2022.

**Breaches**

8 **Breaches**

Breaches of this policy may result in action being taken in accordance with Council’s Disciplinary Code.