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Commission

Prevention Prompts

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Determining how best to manage workplace integrity hazards[1]

Identifying 'integrity hazards' (defined below) and their associated corruption risks, then determining how best to manage them are significant and practical steps that agencies can take to prevent corruption or serious misconduct (before it occurs). Organisations use Occupational Health and Safety (OHS) strategies to minimise workplace injuries by identifying work-related safety hazards (such as lifting heavy objects), assessing the risks of injury (for instance, back injury) arising from these hazards, determining strategies to treat the risk (for example, by reducing the size of the loads to be transported or by using a trolley to transport material) and communicating these hazards and treatment strategies. A similar hazard identification, treatment and communication process can be used to minimise corruption.[2]

The term 'integrity hazard' is used here to refer to anything that has the potential to harm or compromise the integrity of an employee. Integrity hazards can result from the nature of the work, work practices or procedures and are associated with risks of corruption occurring (or 'corruption risks'). For example, police highway patrol officers may encounter drivers, particularly where the driver's employment is at risk, who might try to avoid traffic infringement notices. Encountering such drivers is an integrity hazard associated with the nature of highway patrol work, irrespective of the particular individual who carries out the work. A potential corruption risk associated with this hazard would be a motorist offering a bribe and an officer accepting it.

This is the second in a series of three resources based on applying OHS strategies to the task of minimising corruption. It provides five sets of prompts to help select the most appropriate treatment strategies, clearly describe these treatment strategies, and monitor and review these strategies with a view to improving them based on experience.

This set of prompts should be used in conjunction with *Prevention Prompts No. 1*, which provides prompts to help identify and understand workplace integrity hazards and associated corruption risks and *Prevention Prompts No. 3*, which focuses on helping employees to recognise and respond appropriately to the integrity hazards that they may face.

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[1] The information in this *Prevention Prompts* is based on work undertaken in the PIC's Project Manta. The results of Project Manta have been published in two reports: *Project Manta Report 1 Identification and Communication of Command Misconduct Risks* and *Project Manta Report 2 Managing Command Misconduct Risks*. These reports can be found on the PIC's website: http://www.pic.nsw.gov.au/ResearchAndPreventionReports.aspx

[2] For more information on this approach to preventing corruption refer to the PIC's Research and Issues Paper entitled: *Preventing Corruption: Lessons from Occupational Health and Safety*, which can be found on the PIC's website: http://www.pic.nsw.gov.au/ResearchAndIssuesPapers.aspx

1. Begin by considering a wide range of possible treatment strategies

Don't get stuck in a rut and unnecessarily limit your approach to minimising the risk of corruption.

Don't forget that there are many possible treatment responses to any integrity hazard. To help you consider different possible treatment strategies for your significant workplace integrity hazards and associated corruption risks, systematically work through each of the following eight prompts:

1. What information is available to employees to clarify organisational expectations of their behaviour in this area? Can this information be improved?
2. Are there opportunities to improve employees' access to, familiarity with and relevance of such information?
3. Is it possible to reduce opportunities for the specific form of misconduct to occur?
4. Are there opportunities to detect, and hence deter, such corruption by increasing the risks of being caught for those who engage in such corrupt conduct?
5. Are there opportunities to better equip employees to respond appropriately if they are in a position where they are at risk of engaging in a particular form of corrupt conduct?
6. Are there opportunities for senior management to set a positive example in this area?
7. Are there opportunities to identify and publicise the harms associated with the misconduct to increase the opposition to such conduct by colleagues?
8. Are there opportunities to focus on the organisational culture so that such misconduct is seen as antithetical to the way things are done in your organisation and contrary to the types of behaviours that are rewarded?

2. Involve those who know the work best

Where possible, involve staff in the process of developing treatment strategies.

Use input from those who know the work the best and check with them whether they consider that the proposed strategies:

1. are practical?
2. do not impede the flow of work?
3. are able to be maintained?
4. are easy to understand?

3. Check that the proposed treatment strategy or strategies fit the risk[3]

Don't be frightened of initially trialling a strategy to minimise a corruption risk because the strategy can always be modified based on the information you get by monitoring and reviewing the effectiveness of the strategy.

The best treatment strategies are those that are based on a good understanding of the nature of the risk and that are tailored to address the specific risk.

Before finalising a treatment strategy check that the strategy does actually address the significant risks by using the following three prompts to check the strategy:

1. Does the proposed treatment strategy address the specific aspects that may put an employee at risk (such as the complexity of a policy, the opportunity of theft, or frustrations with a process)?
2. Does the proposed strategy address the specific type of corrupt conduct or misconduct (such as taking inappropriate short cuts, theft, showing bias in applying the law, unauthorised release of confidential information)?
3. Does the proposed strategy focus on the types of employees or work roles that might face the risk (such as, those undertaking a particular type of work (e.g. licensing) or those working in the specific location or those with a specific length of service that is associated with the risk).

4. Provide a clear description of the intended treatment strategy

If the description of the treatment strategy is not clear, those who are supposed to implement it may be confused and the intended treatment strategy may not be adequately executed.

Check with those who need to implement the treatment strategy:

1. Does the description of the strategy clarify *who* is to do *what* and *when*?
2. Does it include a statement of the intent of the strategy (such as whether it is intended to deter corruption, reduce opportunities for corruption, clarify organisational expectation for employee behaviour)?
3. Is it clear *who* is responsible for monitoring and reviewing the treatment strategy, *how* they are to do this and *when* they are to do this?

5. Monitor and review treatment strategies

Strategies to minimise corruption risks need to be regularly monitored and reviewed to see whether they can be improved. Also organisations and work

[3] See *Prevention Prompts No. 1: Identifying and understanding workplace integrity hazards* for prompts on how best to understand and more clearly specify the corruption risks associated with each significant integrity hazard.

environments change. The risk treatment strategies that may seem effective at one time may not always be effective. Regularly monitor and review treatment strategies to check:

1. Have the strategies been properly put in place? For any strategies that have not been fully implemented, what is the impact on the corruption risk where the treatment has not been fully implemented?
2. Have you obtained staff or customer feedback on the strategy? What did that feedback tell you?
3. Have there been any complaints or investigations relevant to this type of corruption risk? If so, what do they tell you about the effectiveness of the strategy?
4. Have you conducted any compliance audits? What did these audits tell you about the effectiveness of the strategy?

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