The Council of the City of Cockburn

Audit Risk and Improvement Committee

Agenda

Tuesday, 24 November 2026

Audit Risk and Improvement Committee Meeting
Tuesday, 24 November 2026

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Agenda

Committee Membership

Ms S Zulsdorf (Presiding Member)	Independent Member
Mr L Estrade	Independent Member
Cr K Allen	
Deputy Mayor P Corke	
Cr C Reeve-Fowkes	
Cr H Srhoy	
Cr C Stone	
Cr T Widenbar	
Cr C Zhang	

1. Declaration Of Meeting

Acknowledgement of Country

The City of Cockburn acknowledges the Nyungar people of Beeliar Boodjar. Long ago, now and in the future they care for Country. We acknowledge a continuing connection to Land, Waters and Culture and pay our respects to the Elders, past and present.

2. Appointment of Presiding Member (when required)

N/A

3. Disclaimer

Members of the public, who attend Council Meetings, should not act immediately on anything they hear at the Meetings, without first seeking clarification of Council's position.

Persons are advised to wait for written advice from the Council prior to taking action on any matter that they may have before Council.

4. Acknowledgement of receipt of Written Declarations of Financial Interests and Conflict of Interest (by Presiding Member)

5. Apologies and Leave of Absence

6. Public Question Time

7. Confirmation of Minutes

7.1 Minutes of the Audit Risk and Improvement Committee Meeting - 22/9/2026

Recommendation
That Committee confirms the Minutes of the Audit Risk and Improvement Committee Meeting held on Tuesday, 22 September 2026 as a true and accurate record.

8. Deputations

9. Business Left Over from Previous Meeting (if adjourned)

Nil.

10. Declaration by Members who have Not Given Due Consideration to Matters Contained in the Business Paper Presented before the Meeting

11 Reports - CEO (and Delegates)

11.1 Corporate and System Services

11.1.1 Procurement Non-Compliance – Compliance Audit Return Review

Responsible Executive	Director Corporate and System Services
Author(s)	Service Manager Procurement and Contracts and Chief Financial Officer
Attachments	N/A

Recommendation
The Committee recommends Council:

(1) RECEIVES the report on procurement non-compliance for 2024 and 2025;

(2) NOTES the 2024 results were reported on a statutory and significant procurement non-compliance basis whereas the 2025 results included both statutory and policy non-compliance, and therefore results are not directly comparable;

(3) NOTES the proposed approach to strengthen procurement compliance through consistent reporting, education, monitoring, management oversight and proportionate escalation; and

(4) ENDORSES a new FTE for a two-year period, to address procurement non-compliance results, with the funding to be sourced by reallocation of current resources, so as to have a zero impact on the adopted operating budget(s).

Background

At its Ordinary Council Meeting held on 8 September 2026, Council considered the 2025 Local Government Compliance Audit Return. As part of its decision, Council requested that a report be presented to the December Audit Risk and Improvement Committee providing further detail on procurement non-compliance during 2024 and 2025.

This report responds to that decision and provides further information on the reported procurement non-compliance, the factors contributing to the results, and the actions proposed to strengthen procurement governance and compliance.

Submission

N/A

Report

The City undertakes regular reviews of procurement transactions to monitor compliance with legislative, policy, and procurement requirements.

The 2024 and 2025 Compliance Audit Returns reported the following for purchases below $50,000 in Table 1:

Table 1: Reported Results

	2024	2025
Purchases below $50,000	7,681	8,053
Non-compliant purchases reported	15	509
Reported rate	0.20%	6.32%

Reporting period is from 1 January to 31 December each calendar year.

The reported results indicate a significant increase in procurement non-compliance. However, the results are not directly comparable as different reporting methodology was applied each year. The 2024 Compliance Audit Return applied a narrower interpretation focusing primarily on statutory and significant procurement non-compliance. The City improved its reporting when preparing the 2025 Compliance Audit Return by applying a broader interpretation that also captured policy non-compliance identified. This approach is consistent with good governance practices and provides greater transparency across the procurement lifecycle.

For the purposes of this report, statutory non-compliance refers to a breach of legislation that directly impacts the procurement process, including but not limited to:

- Local Government Act 1995
- Local Government (Functions and General) Regulations 1996
- Local Government (Financial Management) Regulations 1996
- Corruption, Crime and Misconduct Act 2003
- Public Sector Management Act 1994
- Building and Construction Industry (Security of Payment) Act 2021
- State Records Act 2000
- Work Health and Safety Act 2020.

To provide a comparison the 2024 data has been reassessed using the broader methodology applied in 2025, as shown in Table 2.

Table 2: Adjusted Comparison

Item	2024	2025
Purchases below $50,000	7,681	8,053
Total non-compliant purchases	235	509
Total % Rate	3.06%	6.32%

The comparison demonstrates that the total non-compliant purchases increased from 235 (3.06%) in 2024 to 509 (6.32%) in 2025.

Introduction of Auto-release

Auto-release of requisitions below $50,000 was introduced in January 2024 to deliver efficiencies for the organisation particularly to support delivery of the City's growing capital and operational programs.

Previously requisitions were reviewed prior to release, allowing non-compliance to be identified and corrected before a purchase order was issued where possible. Following implementation, the pre-audit resource was reassigned to post-audit monitoring. The City accepted the resulting higher risk profile having assessed it against the efficiencies gained.

As Auto-Release was in place for both reporting periods it does not account for the difference between the 2024 and 2025 results. The available data doesn't establish that it caused the underlying purchasing behaviour. Given the level of non-compliance now being identified the City must reassess this risk position and reinforce internal controls.

The table below summarises the top three recurring areas of non-compliance.

Table 3: Top Three Areas of Non-Compliance

Item	2024	2025
Lack of quotations or expired quotations used	61	40
PO raised after services commenced (non-contracted)	25	93
Invoice received before PO raised	86	250
Total	**172**	**383**
% Rate of total non-compliance	73.2%	75.25%

The figures demonstrate that most non-compliance occurs at the start of the procure to pay, and source to contract, lifecycles.

Improvement requires foundational change at the beginning of these lifecycles rather than reliance on post-audit monitoring to identify issues. Early procurement planning is critical to ensure requirements are identified, appropriately sourced and approved prior to commitments being made. This must be supported by cultural and behavioural change and increased understanding of procurement requirements and capability across the City. Compliance must be recognised as a shared organisational responsibility.

Proposed Approach Moving Forward

To address this, the following three priorities have been identified:

- Cultural and behavioural change – embedding early procurement planning and building procurement understanding and capability across the City through targeted education, guidance and support
- Review of Auto-Release – options include reducing the threshold, limiting its use to the Christmas shutdown period with a single nominated approval officer, with secondary approval from a leader or removing it entirely. The preferred option is to be confirmed through an impact assessment and change management process to minimise business disruption
- Purchasing cards – aligning the management of purchasing cards with the guidance published in the report from the Office of the Auditor General's for Local Government Management of Purchasing Cards for Larger Metropolitan Entities released in May 2025.

These priorities will be supported by compliance controls, including:

- establishing consistent definitions and reporting of statutory and policy non-compliance
- continuing regular monitoring and reporting of procurement compliance
- strengthening management oversight and accountability for recurring issues
- applying proportionate escalation where significant or repeated non-compliance continues, which may, subject to appropriate governance and procedural fairness, result in restrictions on purchasing authority.

In the interim, the City is reviewing its Procurement Framework to align with the Procurement Policy adopted by Council at its Ordinary Council Meeting in July 2026, which will provide improved guidance and strengthened controls.

In addition, an external consultant has been engaged to deliver fraud, anti-bribery and anti-corruption training to the Budgeting and Accounting team and the Procurement and Contracts team in early 2027, as part of the City's ongoing approach to improving compliance.

Delivering these priorities efficiently and effectively will require additional resourcing, as outlined below.

Resourcing and Capability

Procurement compliance requirements and expectations on local government continue to grow, and external reviews across the sector have consistently identified weaknesses in procurement and purchasing controls.

In the current economic environment, with ongoing cost-of-living and cost pressures, organisations are generally more susceptible to fraud and misconduct. Procurement

non-compliance increases this exposure and may result in financial loss, adverse audit findings, regulatory consequences and reputational damage to the City.

Due to the need to increase the level of training, monitoring and controls in the procurement area, additional resources are required to reinstate a higher level of control in the short term, whilst at the same time building stronger system capability for the longer term.

As a result, a new two-year role is requested to support delivery of the actions identified in this report, develop management strategies and controls, ensuring systems are effective and system improvements are implemented to support compliance requirements. It is proposed that the funding of this position will be sourced by reallocating resources within the directorate, therefore having a zero impact on the operating budget, noting there will be a one FTE increase in the Workforce Plan for a two-year period.

Conclusion

The significant difference between the procurement non-compliance reported for 2024 and 2025 primarily reflects a change in reporting methodology. However, when the broader methodology is applied to the available 2024 data, non-compliant purchases increased from 235 in 2024 to 509 in 2025. This indicates a genuine increase in non-compliance, largely relating to purchase orders not being in place before goods or services are committed to or received.

Auto-Release, which has been in place since January 2024, has shifted the identification of some non-compliance to post-audit monitoring, reducing the opportunity to prevent issues before a commitment is made.

Procurement compliance remains an area requiring management attention. The City's priorities are cultural and behavioural change, a review of Auto-Release and improved management of purchasing cards in line with the Office of the Auditor General's better practice guidance, supported by consistent reporting, monitoring, oversight and proportionate escalation.

To deliver these priorities, an additional FTE is proposed for a two year term, funded through the reallocation of existing resources with no overall budget impact. The role will support the development of more mature procurement compliance strategies, controls and system improvements.

Strategic Plans/Policy Implications

Our Governance
Transparent leadership that listens, communicates openly and plans for a sustainable future.

- Facilitate transparent and accountable governance for today and tomorrow.

Budget/Financial Implications

There are no direct budget implications arising from this report. The position is proposed for a two-year term, funded through the reallocation of existing resources with no overall budget impact.

Legal Implications

N/A

Community Consultation

N/A

Risk Management Implications

Procurement non-compliance may expose the City to compliance, financial, governance and reputational risks, including unauthorised commitments, reduced assurance of value for money and adverse audit findings. The significance of individual instances will be assessed having regard to their circumstances, value, impact and recurrence.

The proposed priorities and supporting controls will strengthen the City's control environment. The proposed additional FTE will provide dedicated capacity to deliver these actions and mitigate the increasing compliance and fraud risk. Without this resource, the City's ability to sustain improvements in procurement compliance will be constrained.

Advice to Proponent(s)/Submitters

N/A

Implications of Section 3.18(3) Local Government Act 1995

The proposed approach supports the efficient and effective management of the City's services and facilities through strengthened procurement governance, monitoring, and accountability.

11.2 Office of the CEO

11.2.1 City of Cockburn Audit, Risk and Improvement Strategy 2027-2029

Responsible Executive	Chief Executive Officer
Author(s)	Risk and Governance Advisor
Attachments	1. City of Cockburn Audit, Risk and Improvement Strategy 2026-2029 - tracked changes ⇩ 2. City of Cockburn Risk and Improvement Strategy 2026-2029 - November 2026 ⇩

Recommendation

The Committee recommend Council APPROVES the City of Cockburn Audit, Risk and Improvement Strategy 2027-2029.

Background

At its 22 September 2026 Audit Risk and Improvement Committee (ARIC) meeting:

The Committee recommended that Council:

(1) RECEIVES the Audit, Risk and Improvement Strategy Update;
(2) ACKNOWLEDGE the work that the City has undertaken to date on the City of Cockburn Audit, Risk and Improvement Strategy 2027-2029.

Feedback from ARIC, together with a further review of the Strategy by the CEO and Executive has now been completed and the Strategy is now presented to ARIC.

Submission

N/A

Report

The City reported to the 25 November 2025 ARIC its completion of the PSC Integrity Framework Maturity Self-Assessment Tool, which allowed the City to self-assess itself against four maturity levels in 13 nominated integrity elements.

This self-assessment was supported by numerous City policies, frameworks, guidelines, processes, and systems, including but not limited to:

- The City's Risk Maturity Improvement Plan, which was informed by the Moore Australia Risk Maturity report presented to the ARC at its 25 May 2023 meeting
- The Governance Improvement Guidance Plan, which resulted from the 2024 RokSteady Governance Review of the City.

On 4 June 2026, Ethical Governance, using the City's self-assessment above as a foundation, facilitated an Integrity Framework Maturity Assessment Workshop for the City's Senior Management Leadership Team (SLT).

Following the Workshop, Ethical Governance drafted an integrity framework for the City. Subsequently, SLT was invited to review the draft framework, and the reviewed document titled City of Cockburn Audit, Risk and Improvement Strategy 2027-2029 (Strategy) was presented to this committee in September 2026 for feedback.

Further changes have been made following feedback from this Committee and Council, and subsequent Executive review (refer Attachment 1), and the final City of Cockburn Audit, Risk and Improvement Strategy 2027-2029 is now presented to the Committee and Council for endorsement (refer Attachment 2).

Whilst the draft framework provided prescriptive operational actions, the reviewed document has strengthened the focus on outcomes, development areas and key success measures for 2029. The action list supporting the strategic priorities, and the implementation roadmap, will be retained but managed and monitored as an internal City document. This aligns with the approach in the Embedding Integrity: Integrity Strategy for WA Public Authorities 2024–28 of the Public Sector Commission (PSC).

The following table illustrates the alignment of ensuring actions are clarifying what needs to be achieved rather than how that is done at an operational level. The City of Cockburn Strategy refers to Actions as Development Areas.

PSC Integrity Strategy - Action for Public Authorities	**City of Cockburn Audit, Risk and Improvement Strategy - Development Area**
Shape mindsets Use Commission resources in conjunction with authority initiatives to raise staff awareness of integrity and shape attitudes towards it.	**Integrity Capability and Awareness** Integrity expectations are documented and communicated; however ongoing education and practical decision-making support can be strengthened. Opportunities include establishing a structured program of induction, annual training, leadership development and integrity awareness activities to build confidence and capability across the organisation.

The final Strategy being presented to the ARIC aligns with the current version of the integrity strategy as adopted by the PSC. The City will conduct training sessions to ensure that the integrity strategy becomes embedded in the as part of the City of Cockburn culture. The City will also provide an annual progress report to ARIC against the Strategy.

The Chief Executive Officer will provide Council with an annual report on integrity performance, including progress against this Strategy, the results of any culture surveys, the aggregate findings of the ARIC's integrity oversight work, and any matters of significance identified through the audit program or PSC reporting.

Strategic Plans/Policy Implications

Our Economy
Attracting investment, supporting business and visitor growth and boosting local jobs through vibrant hubs.
• Attract investment to the City by promoting innovation and economic opportunity.

Our Governance
Transparent leadership that listens, communicates openly and plans for a sustainable future.
• Facilitate transparent and accountable governance for today and tomorrow.
Strive for financial sustainability and operational excellence.

Budget/Financial Implications

The engagement of Ethical Governance is being managed within existing Corporate Business Plan and Budget processes.

Legal Implications

The Strategy will guide the City to comply with its legal obligations and align it to the PSC integrity requirements.

Community Consultation

N/A

Risk Management Implications

The Strategy includes actions to better manage any identified integrity risks.

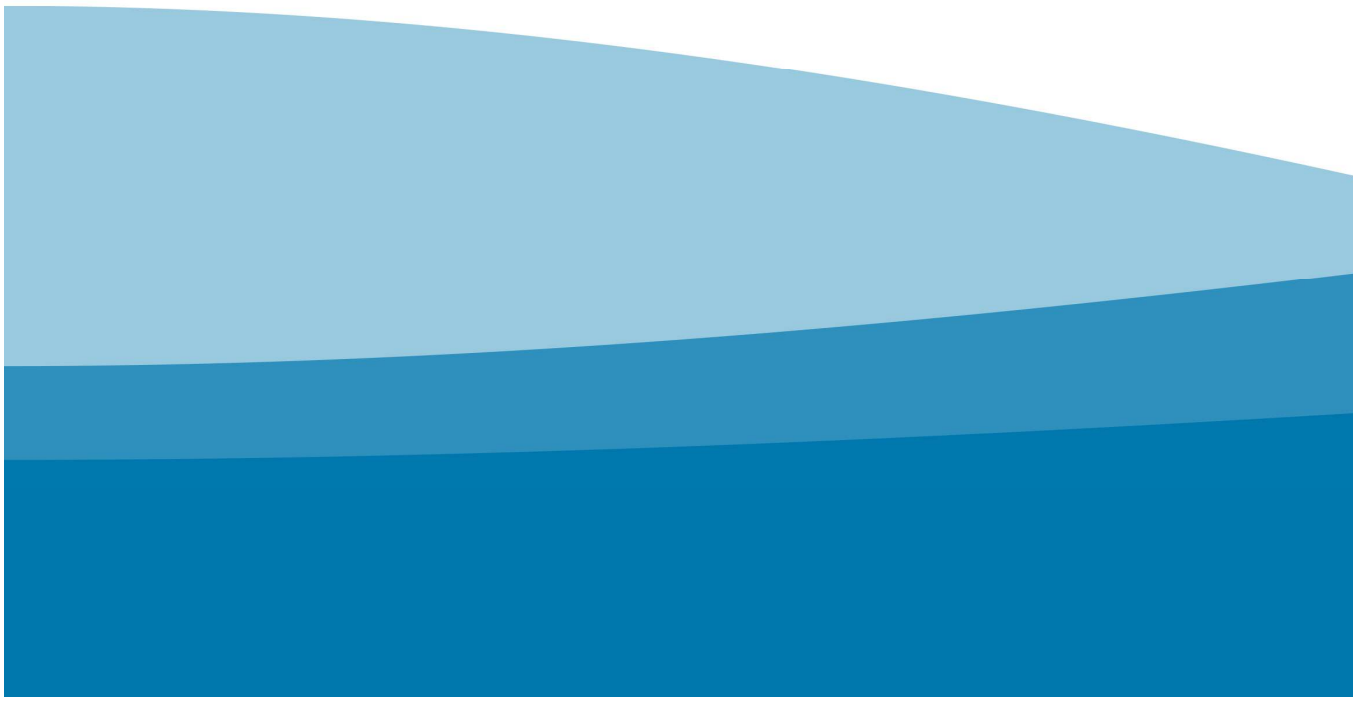
Advice to Proponent(s)/Submitters

N/A

Implications of Section 3.18(3) Local Government Act 1995

Nil.

Audit, Risk and Improvement Strategy 2027-2029



Document Control

Document Record			
Document title	Audit, Risk and Improvement Strategy		
ECM document name	City of Cockburn Audit, Risk and Improvement Strategy 2027-2029		
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Review and approval			
Maintained by	Risk & Governance Advisor		
Version number	~~1~~3	Version date	~~June~~ November 2026
Reviewed by	SLT	Date reviewed	
Approved by	Chief Executive Officer	Date approved	
Frequency of review	Annually	Next review date	June 2027
NOTE: The City of Cockburn will review this framework on ~~a biennial~~an annual basis, but will also make incremental changes, modifications, and adjustments as conditions warrant. This ~~framework~~ document goes through ~~continuous ongoing~~continual changes based on the ~~risk~~ developing integrity maturity level of the City of Cockburn.			

Record of changes / issues			
Version	Date	Comments / reasons for change	Made by
1	19/06/2026	Legal and Risk internal review	~~Council~~Governance
2	22/09/2026	Audit, Risk and Improvement Committee (ARIC) review	Council
3	24/11/2026	Audit, Risk and Improvement Committee (ARIC) review	Council

Distribution	
Name	Position
City of Cockburn	All City of Cockburn Elected Members and workers~~, organisation-wide~~

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DRAFT

1 Introduction

1.1 Public Sector Commission Integrity Strategy

The Western Australian Government has adopted an Integrity Strategy "Embedding Integrity" for WA Public Authorities 2024-2028. This strategy focuses on 4 key improvement areas with actions and controls to promote integrity and help prevent misconduct and corruption. Under each of the key improvement areas are actions for the Public Sector Commission (the PSC), public authorities, and for individuals:

1. Plan and act to improve integrity
2. Model and embody a culture of integrity
3. Learn and develop integrity knowledge and skills
4. Be accountable for integrity.

The Strategy encompasses the broad work of the City of Cockburn (the City) Audit, Risk and Compliance Committee (ARIC).

As part of the PSC Strategy, agencies are expected to conduct an Integrity Maturity Self-Assessment against a standardised tool (the Integrity Tool). This identifies 13 elements of integrity which form the building blocks of any agency's approach to integrity. The City will have many of these building blocks in place.

This is reflective of the importance placed on improvement through the ARIC and Council.

The Integrity Tool allows the City to evaluate~~its~~ progression on each element. The City can then set its target for future progress in relation to each element. This future progress can then be mapped into this document, the City's Integrity Strategy, for regular reporting to the ARIC and Council.

The Integrity Strategy applies to all City Elected Members and City of Cockburn Employees ~~workers~~ undertaking any function for or on behalf of the City.

1.2 Executive Summary

The City of Cockburn Audit, Risk and Improvement Strategy 2026–202~~8~~9 (the Strategy – this document) is the primary instrument for planning and building integrity across every level of the City. It establishes a clear framework of priorities, actions and accountabilities to advance integrity maturity across the organisation over the two-year strategy period.

The Strategy is informed by a comprehensive Integrity Framework Maturity Assessment conducted across thirteen elements and a leadership workshop. The assessment

established the City's baseline position — identifying genuine strengths the Strategy builds on, and priority development areas it directly addresses.

The City's baseline position reflects a strong foundation: governance structures are in place, delegations and compliance calendars are active, the Employee Code of Conduct has been refreshed, the Code of Conduct for Council Members, Committee Members and Candidates has been introduced, and the Executive Leadership Team reinforces values through regular briefings. The assessment also identified four priority areas requiring targeted action: Fraud and Corruption Detection, Response to Integrity Breaches, Organisational Culture, and Risk Analysis and Planning.

The assessment identified that strengthening confidence in reporting, escalation and constructive challenge will be critical to sustaining an embedded integrity culture. Integrity can only be sustained where people feel safe to raise concerns, challenge decisions and escalate issues without fear of adverse consequences.

The Strategy is organised around five strategic priorities, ~~each with specific actions, accountabilities and timeframes. It is designed to build on what already works,~~which utilise existing systems and governance structures, ~~and~~ to deliver measurable improvements in integrity maturity by ~~2028~~2029.

2 Integrity Vision

2.1 What Integrity Means for the City of Cockburn

INTEGRITY VISION

To be a trusted, integrity-led local government where ethical decision-making, accountability and continuous improvement are embedded in everyday practice, strengthening confidence among our community, elected members and employees.

Integrity at the City of Cockburn means:

- Clear governance arrangements, defined responsibilities and accountable decision-making.
- Leaders who consistently reinforce organisational values through their actions and behaviours.
- A culture where risks, concerns and opportunities for improvement are identified, discussed and addressed.
- Continuous learning and improvement informed by audits, reviews, reporting and emerging risks.

2.2 Strategic Outcomes

By ~~2028~~2029, the City of Cockburn will have an embedded integrity culture supported by capable leaders, informed employees, effective controls and transparent oversight mechanisms that enable the City to identify, prevent and respond to integrity risks with confidence.

Successful implementation of this Strategy will deliver measurable improvements across the City's integrity maturity profile. By ~~2028~~ 2029 the City aims to:

01	02	03
Build an integrity culture where ethical behaviour is visibly reinforced by leaders at all levels.	Strengthen organisational capability to identify, detect and respond to integrity risks.	~~Establish~~ Embed a mature integrity governance framework supported by robust oversight, reporting and continuous improvement.

3 Context and Purpose

3.1 Why Integrity Matters

Integrity is essential to effective local government. It enables the City to exercise delegated authority, manage public resources and deliver services in a manner that is transparent, accountable and worthy of community trust.

The *Local Government Act 1995* (as reformed) and the Public Sector Commission's integrity framework place clear expectations on elected members, the CEO and all officers. The formation of the Audit, Risk and Improvement Committee (ARIC) — requiring independent external leadership — signals a legislative expectation that integrity oversight will be strengthened, not merely maintained.

The City operates in an environment of increasing scrutiny. Reforms to the Local Government Act, the introduction of Privacy and Responsible Information Sharing (PRIS) legislation, and the ongoing work of the PSC and the Office of the Auditor General all require the City to move beyond reactive compliance toward a proactive, embedded integrity culture.

3.2 Scope

This Strategy applies to all ~~elected~~ Elected ~~members~~Members, the Chief Executive Officer, all ~~officers (permanent, fixed-term and casual) and contractors performing functions on behalf of the City~~City ~~workers~~employees. It covers the full range of integrity risk — misconduct, fraud and corruption, conflicts of interest, information management, procurement and culture — addressing both prevention and detection.

3.3 Strategic Design Principles

The Strategy is designed around the following principles:

◆ **Lead by Example** Integrity is reinforced through visible leadership behaviour. Leaders at every level are expected to model the standards they seek from others.	◆ **Embed, Don't Add** Integrity should be integrated into existing systems, processes and governance arrangements rather than managed through parallel structures.
◆ **Communicate Proactively** Integrity is strengthened through regular discussion, visible leadership messaging	◆ **Integrity by Design** Integrity should be supported by consistent expectations, processes and

and ongoing engagement across the organisation. Engagement includes training/learning opportunities.	accountability mechanisms that endure beyond individual roles or personalities.
◆ **Courageous Accountability** Leaders and employees are expected to take ownership of decisions, raise concerns, challenge constructively and address issues early.	◆ **Learn and Improve** Integrity is strengthened through reflection, learning and continuous improvement informed by audits, reviews, incidents and emerging risks.

4 Strategic Context and Baseline

4.1 Strategic Themes

Four cross-cutting themes inform all five strategic priorities ~~and the sequencing of actions~~ across the strategy period:

01 **Leadership and Accountability** Building visible integrity leadership across the organisation.	02 **Capability and Confidence** Ensuring employees understand expectations and feel confident navigating integrity issues.	03 **Risk Intelligence and Response** Strengthening the City's ability to identify, detect and respond to integrity risks.	04 **Continuous Improvement** Using audits, reviews and reporting to strengthen organisational performance.

4.2 Baseline Strengths

The Integrity Framework Maturity Assessment identified a number of strengths that provide a strong foundation for this Strategy:

- **Values and Standards** – The refreshed Employee Code of Conduct, Elected Members Code of Conduct, and regular leadership communications demonstrate a clear commitment to organisational values and expected standards of behaviour.
- **Roles and Responsibilities** – Delegations, decision-making authorities and separation of duties are clearly documented and embedded within operational processes.
- **Leadership and Culture** – The Executive Leadership Team actively reinforces organisational values and has invested in building integrity capability across leadership cohorts.
- **Governance and Compliance** – Established compliance monitoring processes, regulatory oversight mechanisms and active monitoring of legislative change support ongoing accountability.
- **Assurance and Oversight** – Internal and external audit programs, ARIC oversight and audit action tracking provide a mature foundation for assurance and continuous improvement.

4.3 Priority Development Areas

The Integrity Framework Maturity Assessment identified several priority areas where

targeted investment and sustained focus will further strengthen the City's integrity maturity over the Strategy period:

- **Fraud and Corruption Detection** – Existing controls provide a sound foundation for fraud and corruption prevention; however, detection remains largely reliant on manual processes. ~~The Strategy~~ Opportunities include prioritisinges the progressive introduction of analytics-supported detection capabilities and strengthened monitoring arrangements.
- **Response to Integrity Breaches** – Established reporting processes support compliance with Public Sector Commission requirements. ~~The Strategy~~Opportunities include strengthenings this capability through a more structured approach to breach response, lessons learnt, trend analysis and organisational reporting.
- **Organisational Culture** – The Employee Code of Conduct and Elected Members Code of Conduct ~~Cockburn Way~~ provides a strong cultural foundation and is well understood across the organisation. ~~The Strategy~~ Opportunities include seekings to further embed integrity as a visible and ongoing part of leadership practice, team discussions and organisational decision-making.
- **Integrity Capability and Awareness** – Integrity expectations are documented and communicated; however ongoing education and practical decision-making support can be strengthened. ~~The Strategy~~Opportunities include establishinges a structured program of induction, annual training, leadership development and integrity awareness activities to build confidence and capability across the organisation.
- **Risk Analysis and Planning** – The City has established a strong foundation for a more structured and intelligence-led approach to integrity risk management. ~~The Strategy~~Opportunities include prioritisinges the full operationalisation of this capability through regular integrity risk reviews, enhanced reporting, strengthened risk ownership and improved oversight across the organisation.
- **Decision-Making Consistency** – An opportunity exists to strengthen consistency in how integrity-related decisions are identified, escalated, documented and communicated across the organisation. While the City's governance arrangements provide a strong foundation, a more structured and consistent approach to integrity decision-making would support officers and managers when navigating unfamiliar, complex or high-risk situations.

5 Strategic Priorities and Actions

The Strategy is organised around five strategic priorities. Each priority translates strategic intent into specific, accountable actions. The priorities are sequenced from foundational (culture and leadership) through to systemic (detection, response and review), reflecting the logic of the PSC Integrity Framework.

STRATEGIC PRIORITY 1 | Integrity Leadership and Organisational Culture
Embedding integrity as a visible leadership responsibility and a shared organisational expectation

Integrity culture is shaped by the behaviours leaders model, the expectations they set and the actions they take when issues arise. While the City has established a strong foundation through The Employee Code of ConductCockburn Way and leadership commitment to organisational values, maintaining an effective integrity culture requires ongoing visibility, accountability and engagement at every level of the organisation.

This priority seeks to strengthen integrity as a shared organisational responsibility by embedding integrity into leadership practice, performance expectations, communication and everyday workplace conversations.

#	Strategic Action	Lead / Owner	Timeframe	Priority
1.1	Introduce an Integrity Moment as a standing item at team meetings. Leaders share a brief integrity observation, lesson learnt, ethical dilemma, case study or practical example relevant to their work area to encourage discussion and reflection. Rotate responsibility to build shared ownership across teams.	Group Managers, People Leaders	Ongoing from Q3 Q4 2026	HIGH
1.2	Incorporate integrity as a Key Performance	People & Organisational Performance	Q1 2028	HIGH

#	Strategic Action	Lead / Owner	Timeframe	Priority
	Indicator for all people leader roles and reflect it explicitly in performance review frameworks.			
1.3	Conduct an annual integrity pulse survey to establish a baseline and monitor staff confidence in reporting, leadership commitment to integrity and organisational culture. Develop and communicate action plans in response to findings. Commence base survey by requesting responses from these statements: — 'I know how to report suspected misconduct and or unethical behaviour'; — 'I am confident reports of misconduct are taken seriously' — I feel safe to raise concerns without fear	People & Organisational Performance / Service Manager Organisational Capability and Performance	Q1 2028 (baseline), annually thereafter	HIGH

#	Strategic Action	Lead / Owner	Timeframe	Priority
	~~of reprisal'~~ — ~~'I understand the City's Code of Conduct and integrity expectations'.~~			
~~1.5~~	~~Develop and implement an ongoing integrity awareness training programs to increase organisational understanding of integrity obligations, reporting pathways and expected behaviours, including aspects of conflict of interests. The program may include awareness campaigns, leadership communications, practical resources and annual activities aligned with International Anti-Corruption Day (9 December).~~ ~~Update the codes of conduct to implement clear and up to date policies and procedures that outline gifts that are acceptable to Employees workerss and Elected Members, introducing new~~	~~General Counsel, Communications & Engagement~~	~~Q1 2027 (launch), ongoing thereafter~~	**MODERATE**

#	Strategic Action	Lead / Owner	Timeframe	Priority
	clarity to help maintain effective management of gifts.			

STRATEGIC PRIORITY 2 | Integrity Capability and Clear Expectations

Building consistent understanding of integrity obligations across all roles and levels

Integrity expectations are established through policies, codes, governance frameworks and legislative obligations. Maintaining a strong integrity culture requires these expectations to be consistently understood, applied and reinforced across the organisation.

This priority focuses on building integrity capability through induction, training, practical guidance and clear expectations, ensuring employees, leaders, contractors and elected members have the knowledge and confidence to navigate integrity-related issues in their daily work.

#	Strategic Action	Lead / Owner	Timeframe	Priority
2.1	Develop and deliver a compulsory online integrity induction for all workers as part of the development of the City's improved induction approach. This to include training on elements identified throughout this Strategy.	People & Organisational Performance / External Provider	Q4 20262027	HIGH
2.2	Require all workers to complete compulsory online integrity induction every three years as part of the development of the City's improved mandatory training approach. This to include training on elements identified throughout this Strategy.	People & Organisational Performance / External Provider	Q4 2028	HIGH
2.3	Review all position descriptions to incorporate explicit integrity and ethical decision-making requirements, prioritising high-risk roles and leadership positions in the first instance.	People & Organisational Performance or External Provider	Q4 2026 2027 (high-risk roles), Q2 2028 (all roles)	MODERATE

#	Strategic Action	Lead / Owner	Timeframe	Priority
2.4	Develop and promote a simple and consistent conflict of interest disclosure process with defined decision points for leaders.	General Counsel / Governance Office or External Consultant	Q3 2026 2027 (launch), annually refreshed	HIGH
2.5	Develop a consistent guidance for integrity-related decisions, providing officers and managers with a structured guide for identifying, escalating, documenting and reporting integrity matters.	General Counsel / Governance Office or External Consultant	Q2 2028	HIGH
2.8	Develop and deliver integrity awareness sessions for people leaders, focusing on leadership responsibilities, Public Sector Commission integrity expectations and fostering a positive speak-up culture.	People & Organisational Performance or External Provider	Q2 2028	MODERATE

STRATEGIC PRIORITY 3 | Risk Intelligence and Internal Controls

Advancing from manual processes to analytics-supported risk detection and control

Risk Analysis and Planning and Fraud and Corruption Detection were identified as key development areas through the Integrity Framework Maturity Assessment. This priority strengthens the City's ability to identify, assess and respond to integrity risks through improved risk intelligence, enhanced internal controls, strengthened risk ownership and the effective use of enabling technologies.

#	Strategic Action	Lead / Owner	Timeframe	Priority
3.1	Establish an annual integrity risk review cycle including confirmation of risk ownership, control effectiveness and accountability for treatment actions as part of the City's operational risk register review.	Risk & Audit Function, Finance Services	Q2 2026 2027 (first cycle), annually thereafter	HIGH

#	Strategic Action	Lead / Owner	Timeframe	Priority
3.2	Deliver a financial accountability program incorporating budget accountability concepts into induction, team briefings and manager development.	Finance Services, People & Organisational Performance or External Facilitator	Q1 20262027	MODERATE
3.3	Implement a program of regular and random line manager audits of staff exercising delegated powers, with outcomes reported to Finance and the delegations register updated in real time.	People Leaders, Finance Services	Q1 2028 (launch), bi-annual cycle	MODERATE
3.4	Assess opportunities to enhance compliance monitoring and reporting through existing technology platforms and automation capabilities.	Finance Services, General Counsel	Q2 2028 (pilot), Q4 2028 (recommendation)	LOW

STRATEGIC PRIORITY 4 | Reporting, Breaches and Closing the Loop

Making integrity reporting visible, trusted and acted upon

Response to Integrity Breaches is a key development area. This priority ensures that every issue raised is acknowledged, tracked, acted upon and — where appropriate — communicated back to the organisation. Strengthening confidence in reporting and constructive challenge is essential to sustaining an embedded integrity culture.

#	Strategic Action	Lead / Owner	Timeframe	Priority
4.1	Operationalise the Audit Action Log as a tracked register of all audit recommendations from internal audits, external audits and ARC. Provide regular reporting to ARIC on implementation progress, action status and any emerging risks or barriers to completion.	General Counsel, Finance Services	Q3 Q4 2026	HIGH

#	Strategic Action	Lead / Owner	Timeframe	Priority
4.2	Develop and distribute clear written guidance for line managers on responding to integrity breaches — identification, initial steps, escalation pathways and documentation. Incorporate into manager induction.	General Counsel, People & Organisational Performance or External Consultant (guidance review)	Q4 2026	HIGH
4.3	Report integrity breach data — de-identified and thematic — to ARIC annually following the PSC Integrity and Conduct Annual Collection.	General Counsel, Finance Services	Annually from 2028	HIGH
4.4	Review and simplify existing reporting and escalation processes. Where processes are complex, provide decision-support tools. Ensure staff understand how to raise integrity concerns and what occurs after a matter is reported.	General Counsel, People & Organisational Performance	Q1 2028	MODERATE
4.5	Communicate integrity case outcomes to the organisation — without identifying individuals — through intranet or team briefings, to demonstrate that reporting leads to action and to build confidence in reporting pathways.	General Counsel, CEO	Ongoing from Q3 2026	MODERATE

STRATEGIC PRIORITY 5 | Oversight, Governance and Continuous Improvement
Embedding Audit, Risk and Improvement Committee (ARIC)as an effective oversight body and building a culture of continuous improvement

The transition to the Audit, Risk and Improvement Committee — with mandatory independent external leadership — represents a governance step-change. This priority ensures that the ARIC operates with the mandate, structure and information flows needed to provide effective integrity oversight, and that the City builds a culture of continuous self-improvement.

#	Strategic Action	Lead / Owner	Timeframe	Priority
5.1	Develop and adopt a rolling three-year internal audit plan — ensuring audit activities are informed by integrity risks and include consideration of internal control effectiveness where appropriate.	General Counsel, Finance Services, ARIC	Q3 2026	**HIGH**
5.2	Establish a consistent integrity reporting rhythm to ARIC: risk dashboard, audit action log, policy compliance summary, breach data (when applicable) and survey results (when available).	General Counsel	Q3 Q4 2026 (first report), regularly thereafter	**HIGH**
5.3	Conduct a biennial Integrity Framework Maturity Assessment (next assessment 2028) and present findings to ARIC with a progress report against this Strategy. Use results to update the Strategy.	General Counsel or external consultant (assessment facilitation)	Q1 2028	**MODERATE**
5.4	Establish a structured policy governance framework to ensure policies remain current, aligned with legislative requirements and reviewed in accordance with approved review cycles.	General Counsel, CEO	Q4 Q1 20262027	**MODERATE**

6 Implementation Roadmap

The following roadmap summarises the sequencing of strategic actions across the two-year Strategy period. All actions are oriented toward what the City will build and achieve from Q3 Q4 2026 onward. Phases reflect urgency, dependencies and organisational capacity.

Strategic Action	Phase 1: Q3 2026–Q2 2027	Phase 2: Q3 2027–Q2 2028	Phase 3: Q3 2028 Onwards
PRIORITY 1 — Integrity Leadership and Organisational Culture			
1.1 Integrity Moment in team meetings	Launch and establish	Sustained and reviewed	Embedded in culture
1.2 Integrity Working Group	Establish Q3 Q4 2026	Active program	Embedded in governance rhythm
1.3 Integrity KPI for people leaders	Design and implement Q4 2026	First annual review	Ongoing
1.4 Integrity pulse survey (annual)	Baseline Q1 2028	Year 2 survey + action plan	Annual — action plans communicated
1.5 Integrity leadership forums (annual)	Q1 2028 (first forum)	Annual cycle	Annual cycle
1.6 Integrity awareness program	Launch Q3 Q4 2026	Ongoing	Ongoing
PRIORITY 2 — Integrity Capability and Clear Expectations			
2.1 Compulsory integrity induction	Build and launch Q4 2026	Annual update	Annual update
2.2 Annual integrity awareness training	First cycle Q1 2028	Annual cycle + action plans	Annual cycle
2.3 Statement of Business Ethics	Q3 Q4 2026		
2.4 Position description review	High-risk roles Q4 2026	All roles Q2 2027	
2.5 Team debriefs after training	Establish Q3 Q4 2026	Sustained	Sustained
2.6 COI and PID guidance	Launch Q3 Q4 2026	Annual refresh	Annual refresh

Strategic Action	Phase 1: Q3 2026–Q2 2027	Phase 2: Q3 2027–Q2 2028	Phase 3: Q3 2028 Onwards
2.7 Integrity decision-making framework	Q4 2026	Reviewed and embedded	
2.8 Integrity awareness sessions for leaders	Q2 2028	Annual cycle	Annual cycle
PRIORITY 3 — Risk Intelligence and Internal Controls			
3.1 Risk management platform operationalisation	Q3 Q4 2026		
3.2 Annual integrity risk review cycle	First cycle Q4 2026	Annual	Annual
3.3 Information governance consolidation	Complete Q4 Q1 20262024	Sustained	Sustained
3.4 ASD Essential 8 maturity	Annual targets from Q3 Q4 2026	Progress against roadmap	Full maturity target
3.5 Financial accountability program	Q1 2028	Annual refresh	Annual
3.6 Risk awareness and management training	Q2 2028	Annual cycle	Annual cycle
3.7 Line manager delegation audits	Q1 2028 (launch)	Annual cycle	Annual cycle
3.8 Technology-enabled compliance monitoring		Pilot Q2 2027	Implement if approved
PRIORITY 4 — Reporting, Breaches and Closing the Loop			
4.1 Audit Action Log — quarterly ARIC reporting	Q3 Q4 2026	Quarterly — ongoing	Quarterly — ongoing
4.2 Breach response guidance for managers	Q4 2026		Review
4.3 Annual breach report to ARIC	First report 2028	Annual	Annual
4.4 Manager breach response training	Q2 2028	Biennial cycle	Biennial cycle
4.5 Review reporting and escalation processes	Q1 2028		
4.6 Case outcome communications	Ongoing from Q3 Q4 2026	Ongoing	Ongoing

Strategic Action	Phase 1: Q3 2026–Q2 2027	Phase 2: Q3 2027–Q2 2028	Phase 3: Q3 2028 Onwards
PRIORITY 5 — Oversight, Governance and Continuous Improvement			
5.1 Three-year internal audit plan	Q3 2026	Year 2 update	Year 3 update
5.2 Quarterly ARIC integrity reporting	Q3 2026 (first report)	Sustained	Sustained
5.3 Biennial Maturity Assessment			2028 — ARIC report
5.4 Policy governance framework	Q4 2026	Sustained	Sustained
5.5 Integrity Officer role determination	Recommendation Q4 2026	Implement if approved Q2 2027	Ongoing

~~7~~5 Governance and Accountability

~~7.1~~5.1 Oversight

The Audit, Risk and Improvement Committee (ARIC) holds primary oversight responsibility for this Strategy. The General Counsel is responsible for coordinating implementation of the Strategy and ~~monitoring progress against strategic actions~~continuous improvement in the priority development areas. General Counsel provides the ARIC with a quarterly integrity dashboard covering: ~~action status,~~ priority development areas, audit findings, policy compliance, risk register updates and any reportable breach data. The CEO is accountable for Strategy implementation and reports progress to Council.

~~7.2~~5.2 Executive Leadership Accountability

Each member of the Executive Leadership Team (ELT) is accountable for implementing this Strategy within their ~~service~~Directorate ~~area~~. Integrity performance — including participation in induction, training completion rates, risk register currency and breach response timeliness — will be a standing ELT reporting item on a quarterly basis.

~~7.3~~5.3 Integrity Working Group

~~The~~ An Integrity Working Group ~~(Action 1.2)~~ will support implementation of the Strategy by promoting integrity awareness, providing practical feedback on implementation initiatives, identifying emerging issues and sharing lessons learnt across the organisation. The Working Group will act as a conduit between operational areas, the General Counsel and the ~~Executive Leadership Team~~ELT to support continuous improvement in integrity maturity. The Working Group will report to the General Counsel quarterly.

~~7.4~~5.4 Reporting to Council

The CEO will provide Council with an annual report on integrity performance, including progress against this Strategy, the results of any culture surveys, the aggregate findings of the ARIC's integrity oversight work, and any matters of significance identified through the audit program or PSC reporting.

~~7.5~~5.5 Strategy Review

The Strategy will be reviewed annually by General Counsel in consultation with ELT and the ARIC, and comprehensively refreshed following the 2028 Integrity Framework Maturity Assessment. It is a living document — ~~actions~~priority development areas may be added, amended or reprioritised in response to emerging risks, legislative change or assessment findings. Progress against priority development areas~~strategic actions~~ will be monitored through regular implementation reporting and reviewed annually as part of the Strategy review process.

~~8~~6 ~~Expected~~Target -Outcomes by end of 2029

The following table presents the key outcome targets across priority areas.

Integrity Element (13)	Current Position	Target by 2029
Clear Expectations	Developing — expectations documented but inconsistently understood and applied	Embedded — mandatory induction, plain-language guidance and position description requirements in place
Roles & Responsibilities	Embedded — delegations documented, separation of duties active	Excelling — delegation audits operational; roles reviewed and integrity obligations explicit in all position descriptions
Legislation & Regulations	Embedded — compliance calendars and regulatory monitoring active	Excelling — PRIS obligations integrated; regulatory change monitoring sustained
Risk Analysis & Planning	Developing — manual management; no automated controls	Embedded — Risk management systems fully operational; annual integrity risk review cycle established.
Internal Controls, Audit & Governance	Embedded — external and internal audit programs active	Excelling — Audit Action Log operational; quarterly ARIC reporting; three-year audit plan in place
Fraud & Corruption Detection	Developing — reliant on manual controls; no analytics-driven detection	Embedded — analytics-supported detection capability operational; Essential 8 maturity advanced
Values & Standards	Embedded — refreshed Code of Conduct; ELT briefings active	Excelling — values embedded in induction, performance frameworks and team-level integrity practice
Leadership & Management Attitude	Embedded — ELT actively reinforces values	Excelling — integrity KPIs in place for all people leaders; integrity a sustained leadership behaviour at all levels
Organisational Culture	Developing — integrity not yet a routine leadership conversation at team level	Embedded — ~~Integrity Moment embedded in all teams; annual pulse survey with action plans~~

		~~tracking year-on-year improvement~~Staff survey show a positive perception of integrity in the organisation, Current survey question “this organisation is ethical” (results increased by 15% to 73%~~results that the organisation is ethical continue to improve year on year~~
Integrity Education & Capacity	Developing — training ad hoc; no mandatory annual requirement	Embedded — mandatory annual cycle operational; 100% completion tracking in place; induction compulsory for all new starters
Response to Integrity Breaches	Developing — inconsistent; no systematic lessons-learnt process	Embedded — structured breach response cycle; annual thematic report with action plans to ARIC
Self-Analysis & Review	Developing — audits completed; close-out inconsistent	Embedded — Audit Action Log operational; quarterly ARIC reporting; biennial maturity assessment cycle
Oversight	Developing — transitioning from ARC to ARIC	Embedded — ARIC fully operational with quarterly integrity reporting rhythm and independent external leadership

~~9~~7 Related Documents and References

This Strategy should be read in conjunction with the following documents:

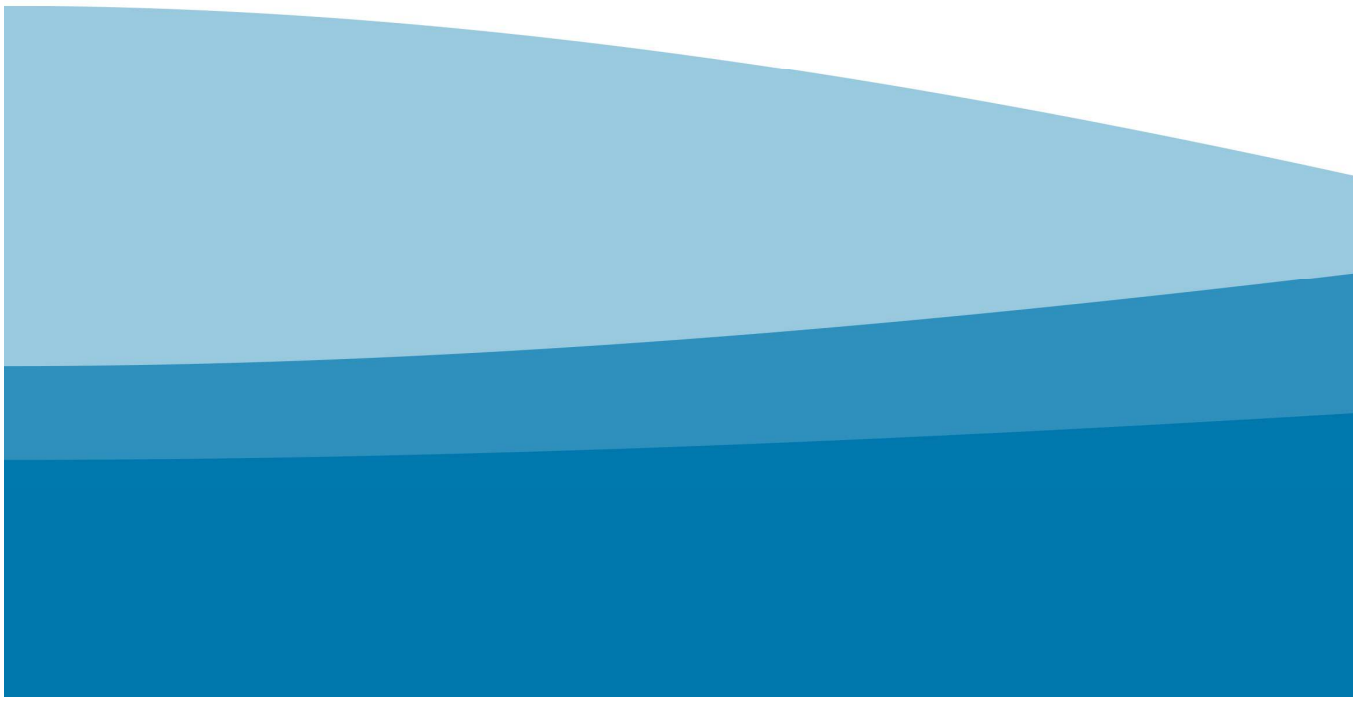
~~This Strategy should be read in conjunction with the following documents:~~

- City of Cockburn Governance Framework
- City of Cockburn Fraud and Misconduct Control and Resilience Framework
- City of Cockburn Employee Code of Conduct — The Cockburn Way
- City of Cockburn Code of Conduct for Council Members, Committee Members and Candidates
- City of Cockburn Enterprise Risk Management Framework
- Audit, Risk and Improvement Committee (ARIC) Terms of Reference
- City of Cockburn Internal Audit Program
- Public Sector Commission — Integrity ~~Promotion~~ Framework Maturity Self Assessment Tool
- Public Sector Commission — Integrity and Conduct 2026 Annual Collection
- Office of the Auditor General — Audit Reports
- Australian Signals Directorate — Essential Eight Maturity Model

City of Cockburn
9 Coleville Crescent, Spearwood WA 6193
PO Box 1215, Bibra Lake DC Western Australia 6965
Telephone: 08 9411 3444 Fax: 08 9411 3333
Email: Governance@cockburn.wa.gov.au
City of Cockburn website: cockburn.gov.wa.au



Audit, Risk and Improvement Strategy 2027-2029



Document Control

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NOTE: The City of Cockburn will review this framework on an annual basis, but will also make incremental changes, modifications, and adjustments as conditions warrant. This document goes through continual changes based on the developing integrity maturity level of the City of Cockburn.			

Record of changes / issues			
Version	Date	Comments / reasons for change	Made by
1	19/06/2026	Legal and Risk internal review	Governance
2	22/09/2026	Audit, Risk and Improvement Committee (ARIC) review	Council
3	24/11/2026	Audit, Risk and Improvement Committee (ARIC) review	Council

Distribution	
Name	Position
City of Cockburn	All City of Cockburn Elected Members and workers.

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1 Introduction

1.1 Public Sector Commission Integrity Strategy

The Western Australian Government has adopted an Integrity Strategy "Embedding Integrity" for WA Public Authorities 2024-2028. This strategy focuses on 4 key improvement areas with actions and controls to promote integrity and help prevent misconduct and corruption. Under each of the key improvement areas are actions for the Public Sector Commission (the PSC), public authorities, and for individuals:

1. Plan and act to improve integrity
2. Model and embody a culture of integrity
3. Learn and develop integrity knowledge and skills
4. Be accountable for integrity.

The Strategy encompasses the broad work of the City of Cockburn (the City) Audit, Risk and Compliance Committee (ARIC).

As part of the PSC Strategy, agencies are expected to conduct an Integrity Maturity Self-Assessment against a standardised tool (the Integrity Tool). This identifies 13 elements of integrity which form the building blocks of any agency's approach to integrity. The City will have many of these building blocks in place.

This is reflective of the importance placed on improvement through the ARIC and Council.

The Integrity Tool allows the City to evaluate progression on each element. The City can then set its target for future progress in relation to each element. This future progress can then be mapped into this document, the City's Integrity Strategy, for regular reporting to the ARIC and Council.

The Integrity Strategy applies to all City Elected Members and City of Cockburn Employees undertaking any function for or on behalf of the City.

1.2 Executive Summary

The City of Cockburn Audit, Risk and Improvement Strategy 2026–2029 (the Strategy – this document) is the primary instrument for planning and building integrity across every level of the City. It establishes a clear framework of priorities, actions and accountabilities to advance integrity maturity across the organisation over the two-year strategy period.

The Strategy is informed by a comprehensive Integrity Framework Maturity Assessment conducted across thirteen elements and a leadership workshop. The assessment

established the City's baseline position — identifying genuine strengths the Strategy builds on, and priority development areas it directly addresses.

The City's baseline position reflects a strong foundation: governance structures are in place, delegations and compliance calendars are active, the Employee Code of Conduct has been refreshed, the Code of Conduct for Council Members, Committee Members and Candidates has been introduced, and the Executive Leadership Team reinforces values through regular briefings. The assessment also identified four priority areas requiring targeted action: Fraud and Corruption Detection, Response to Integrity Breaches, Organisational Culture, and Risk Analysis and Planning.

The assessment identified that strengthening confidence in reporting, escalation and constructive challenge will be critical to sustaining an embedded integrity culture. Integrity can only be sustained where people feel safe to raise concerns, challenge decisions and escalate issues without fear of adverse consequences.

The Strategy is organised around five strategic priorities, which utilise existing systems and governance structures, to deliver measurable improvements in integrity maturity by 2029.

2 Integrity Vision

2.1 What Integrity Means for the City of Cockburn

INTEGRITY VISION

To be a trusted, integrity-led local government where ethical decision-making, accountability and continuous improvement are embedded in everyday practice, strengthening confidence among our community, elected members and employees.

Integrity at the City of Cockburn means:

- Clear governance arrangements, defined responsibilities and accountable decision-making.
- Leaders who consistently reinforce organisational values through their actions and behaviours.
- A culture where risks, concerns and opportunities for improvement are identified, discussed and addressed.
- Continuous learning and improvement informed by audits, reviews, reporting and emerging risks.

2.2 Strategic Outcomes

By 2029, the City of Cockburn will have an embedded integrity culture supported by capable leaders, informed employees, effective controls and transparent oversight mechanisms that enable the City to identify, prevent and respond to integrity risks with confidence.

Successful implementation of this Strategy will deliver measurable improvements across the City's integrity maturity profile. By 2029 the City aims to:

01	02	03
Build an integrity culture where ethical behaviour is visibly reinforced by leaders at all levels.	Strengthen organisational capability to identify, detect and respond to integrity risks.	Embed a mature integrity governance framework supported by robust oversight, reporting and continuous improvement.

3 Context and Purpose

3.1 Why Integrity Matters

Integrity is essential to effective local government. It enables the City to exercise delegated authority, manage public resources and deliver services in a manner that is transparent, accountable and worthy of community trust.

The *Local Government Act 1995* (as reformed) and the Public Sector Commission's integrity framework place clear expectations on elected members, the CEO and all officers. The formation of the Audit, Risk and Improvement Committee (ARIC) — requiring independent external leadership — signals a legislative expectation that integrity oversight will be strengthened, not merely maintained.

The City operates in an environment of increasing scrutiny. Reforms to the Local Government Act, the introduction of Privacy and Responsible Information Sharing (PRIS) legislation, and the ongoing work of the PSC and the Office of the Auditor General all require the City to move beyond reactive compliance toward a proactive, embedded integrity culture.

3.2 Scope

This Strategy applies to all Elected Members, the Chief Executive Officer, and all City employees. It covers the full range of integrity risk — misconduct, fraud and corruption, conflicts of interest, information management, procurement and culture — addressing both prevention and detection.

3.3 Strategic Design Principles

The Strategy is designed around the following principles:

◆ **Lead by Example** Integrity is reinforced through visible leadership behaviour. Leaders at every level are expected to model the standards they seek from others.	◆ **Embed, Don't Add** Integrity should be integrated into existing systems, processes and governance arrangements rather than managed through parallel structures.
◆ **Communicate Proactively** Integrity is strengthened through regular discussion, visible leadership messaging and ongoing engagement across the organisation. Engagement includes	◆ **Integrity by Design** Integrity should be supported by consistent expectations, processes and accountability mechanisms that endure beyond individual roles or personalities.

training/learning opportunities.	
◆ **Courageous Accountability** Leaders and employees are expected to take ownership of decisions, raise concerns, challenge constructively and address issues early.	◆ **Learn and Improve** Integrity is strengthened through reflection, learning and continuous improvement informed by audits, reviews, incidents and emerging risks.

4 Strategic Context and Baseline

4.1 Strategic Themes

Four cross-cutting themes inform all five strategic priorities across the strategy period:

01	02	03	04
Leadership and Accountability Building visible integrity leadership across the organisation.	**Capability and Confidence** Ensuring employees understand expectations and feel confident navigating integrity issues.	**Risk Intelligence and Response** Strengthening the City's ability to identify, detect and respond to integrity risks.	**Continuous Improvement** Using audits, reviews and reporting to strengthen organisational performance.

4.2 Baseline Strengths

The Integrity Framework Maturity Assessment identified a number of strengths that provide a strong foundation for this Strategy:

- **Values and Standards** – The refreshed Employee Code of Conduct, Elected Members Code of Conduct, and regular leadership communications demonstrate a clear commitment to organisational values and expected standards of behaviour.
- **Roles and Responsibilities** – Delegations, decision-making authorities and separation of duties are clearly documented and embedded within operational processes.
- **Leadership and Culture** – The Executive Leadership Team actively reinforces organisational values and has invested in building integrity capability across leadership cohorts.
- **Governance and Compliance** – Established compliance monitoring processes, regulatory oversight mechanisms and active monitoring of legislative change support ongoing accountability.
- **Assurance and Oversight** – Internal and external audit programs, ARIC oversight and audit action tracking provide a mature foundation for assurance and continuous improvement.

4.3 Priority Development Areas

The Integrity Framework Maturity Assessment identified several priority areas where targeted investment and sustained focus will further strengthen the City's integrity maturity

over the Strategy period:

- **Fraud and Corruption Detection** – Existing controls provide a sound foundation for fraud and corruption prevention; however, detection remains largely reliant on manual processes. Opportunities include prioritising the progressive introduction of analytics-supported detection capabilities and strengthened monitoring arrangements.
- **Response to Integrity Breaches** – Established reporting processes support compliance with Public Sector Commission requirements. Opportunities include strengthening this capability through a more structured approach to breach response, lessons learnt, trend analysis and organisational reporting.
- **Organisational Culture** – The Employee Code of Conduct and Elected Members Code of Conduct provide a strong cultural foundation and is well understood across the organisation. Opportunities include seeking to further embed integrity as a visible and ongoing part of leadership practice, team discussions and organisational decision-making.
- **Integrity Capability and Awareness** – Integrity expectations are documented and communicated; however ongoing education and practical decision-making support can be strengthened. Opportunities include establishing a structured program of induction, annual training, leadership development and integrity awareness activities to build confidence and capability across the organisation.
- **Risk Analysis and Planning** – The City has established a strong foundation for a more structured and intelligence-led approach to integrity risk management. Opportunities include prioritising the full operationalisation of this capability through regular integrity risk reviews, enhanced reporting, strengthened risk ownership and improved oversight across the organisation.
- **Decision-Making Consistency** – An opportunity exists to strengthen consistency in how integrity-related decisions are identified, escalated, documented and communicated across the organisation. While the City's governance arrangements provide a strong foundation, a more structured and consistent approach to integrity decision-making would support officers and managers when navigating unfamiliar, complex or high-risk situations.

Strategic Priorities The Strategy is organised around five strategic priorities , reflecting the logic of the PSC Integrity Framework.

STRATEGIC PRIORITY 1 | Integrity Leadership and Organisational Culture
Embedding integrity as a visible leadership responsibility and a shared organisational expectation

Integrity culture is shaped by the behaviours leaders model, the expectations they set and the actions they take when issues arise. While the City has established a strong foundation

through The Employee Code of Conduct and leadership commitment to organisational values, maintaining an effective integrity culture requires ongoing visibility, accountability and engagement at every level of the organisation.

This priority seeks to strengthen integrity as a shared organisational responsibility by embedding integrity into leadership practice, performance expectations, communication and everyday workplace conversations.

STRATEGIC PRIORITY 2 | Integrity Capability and Clear Expectations
Building consistent understanding of integrity obligations across all roles and levels

Integrity expectations are established through policies, codes, governance frameworks and legislative obligations. Maintaining a strong integrity culture requires these expectations to be consistently understood, applied and reinforced across the organisation.

This priority focuses on building integrity capability through induction, training, practical guidance and clear expectations, ensuring employees, leaders, contractors and elected members have the knowledge and confidence to navigate integrity-related issues in their daily work.

STRATEGIC PRIORITY 3 | Risk Intelligence and Internal Controls
Advancing from manual processes to analytics-supported risk detection and control

Risk Analysis and Planning and Fraud and Corruption Detection were identified as key development areas through the Integrity Framework Maturity Assessment. This priority strengthens the City's ability to identify, assess and respond to integrity risks through improved risk intelligence, enhanced internal controls, strengthened risk ownership and the effective use of enabling technologies.

STRATEGIC PRIORITY 4 | Reporting, Breaches and Closing the Loop
Making integrity reporting visible, trusted and acted upon

Response to Integrity Breaches is a key development area. This priority ensures that every issue raised is acknowledged, tracked, acted upon and — where appropriate — communicated back to the organisation. Strengthening confidence in reporting and constructive challenge is essential to sustaining an embedded integrity culture.

STRATEGIC PRIORITY 5 | Oversight, Governance and Continuous Improvement
Embedding Audit, Risk and Improvement Committee (ARIC)as an effective oversight body and building a culture of continuous improvement

The transition to the Audit, Risk and Improvement Committee — with mandatory independent external leadership — represents a governance step-change. This priority ensures that the ARIC operates with the mandate, structure and information flows needed to provide effective integrity oversight, and that the City builds a culture of continuous self-improvement.

5 Governance and Accountability

5.1 Oversight

The Audit, Risk and Improvement Committee (ARIC) holds primary oversight responsibility for this Strategy. The General Counsel is responsible for coordinating implementation of the Strategy and continuous improvement in the priority development areas. General Counsel provides the ARIC with a quarterly integrity dashboard covering: priority development areas, audit findings, policy compliance, risk register updates and any reportable breach data. The CEO is accountable for Strategy implementation and reports progress to Council.

5.2 Executive Leadership Accountability

Each member of the Executive Leadership Team (ELT) is accountable for implementing this Strategy within their Directorate. Integrity performance — including participation in induction, training completion rates, risk register currency and breach response timeliness — will be a standing ELT reporting item on a quarterly basis.

5.3 Integrity Working Group

An Integrity Working Group will support implementation of the Strategy by promoting integrity awareness, providing practical feedback on implementation initiatives, identifying emerging issues and sharing lessons learnt across the organisation. The Working Group will act as a conduit between operational areas, the General Counsel and the ELT to support continuous improvement in integrity maturity. The Working Group will report to the General Counsel quarterly.

5.4 Reporting to Council

The CEO will provide Council with an annual report on integrity performance, including progress against this Strategy, the results of any culture surveys, the aggregate findings of the ARIC's integrity oversight work, and any matters of significance identified through the audit program or PSC reporting.

5.5 Strategy Review

The Strategy will be reviewed annually by General Counsel in consultation with ELT and the ARIC, and comprehensively refreshed following the 2028 Integrity Framework Maturity Assessment. It is a living document — priority development areas may be added, amended or reprioritised in response to emerging risks, legislative change or assessment findings. Progress against priority development areas will be monitored through regular implementation reporting and reviewed annually as part of the Strategy review process.

6 Target Outcomes by end of 2029

The following table presents the key outcome targets across priority areas.

Integrity Element (13)	Current Position	Target by 2029
Clear Expectations	Developing — expectations documented but inconsistently understood and applied	Embedded — mandatory induction, plain-language guidance and position description requirements in place
Roles & Responsibilities	Embedded — delegations documented, separation of duties active	Excelling — delegation audits operational; roles reviewed and integrity obligations explicit in all position descriptions
Legislation & Regulations	Embedded — compliance calendars and regulatory monitoring active	Excelling — PRIS obligations integrated; regulatory change monitoring sustained
Risk Analysis & Planning	Developing — manual management; no automated controls	Embedded — Risk management systems fully operational; annual integrity risk review cycle established.
Internal Controls, Audit & Governance	Embedded — external and internal audit programs active	Excelling — Audit Action Log operational; quarterly ARIC reporting; three-year audit plan in place
Fraud & Corruption Detection	Developing — reliant on manual controls; no analytics-driven detection	Embedded — analytics-supported detection capability operational; Essential 8 maturity advanced
Values & Standards	Embedded — refreshed Code of Conduct; ELT briefings active	Excelling — values embedded in induction, performance frameworks and team-level integrity practice
Leadership & Management Attitude	Embedded — ELT actively reinforces values	Excelling — integrity KPIs in place for all people leaders; integrity a sustained leadership behaviour at all levels
Organisational Culture	Developing — integrity not yet a routine leadership conversation at team level	Embedded — Staff survey show a positive perception of integrity in the organisation, Current survey

		question “this organisation is ethical” (results increased by 15% to 73%
Integrity Education & Capacity	Developing — training ad hoc; no mandatory annual requirement	Embedded — mandatory annual cycle operational; 100% completion tracking in place; induction compulsory for all new starters
Response to Integrity Breaches	Developing — inconsistent; no systematic lessons-learnt process	Embedded — structured breach response cycle; annual thematic report with action plans to ARIC
Self-Analysis & Review	Developing — audits completed; close-out inconsistent	Embedded — Audit Action Log operational; quarterly ARIC reporting; biennial maturity assessment cycle
Oversight	Developing — transitioning from ARC to ARIC	Embedded — ARIC fully operational with quarterly integrity reporting rhythm and independent external leadership

7 Related Documents and References

This Strategy should be read in conjunction with the following documents:

- City of Cockburn Governance Framework
- City of Cockburn Fraud and Misconduct Control and Resilience Framework
- City of Cockburn Employee Code of Conduct — The Cockburn Way
- City of Cockburn Code of Conduct for Council Members, Committee Members and Candidates
- City of Cockburn Enterprise Risk Management Framework
- Audit, Risk and Improvement Committee (ARIC) Terms of Reference
- City of Cockburn Internal Audit Plan
- Public Sector Commission — Integrity Framework Maturity Self Assessment Tool
- Public Sector Commission — Integrity and Conduct 2026 Annual Collection
- Office of the Auditor General — Audit Reports
- Australian Signals Directorate — Essential Eight Maturity Model

City of Cockburn
9 Coleville Crescent, Spearwood WA 6193
PO Box 1215, Bibra Lake DC Western Australia 6965
Telephone: 08 9411 3444 Fax: 08 9411 3333
Email: Governance@cockburn.wa.gov.au
City of Cockburn website: cockburn.gov.wa.au



11.2.2 Financial Report and Audit Results for City of Cockburn Year Ending 30 June 2026

This item will be distributed when documents are received from the Officer of the Auditor General.

12. Motions of Which Previous Notice Has Been Given

Nil.

13. Notices Of Motion Given At The Meeting For Consideration At Next Meeting

14. New Business of an Urgent Nature Introduced by Members or Officers

15. Matters to be Noted for Investigation Without Debate

Nil.

16. Confidential Business

16.1 Office of the Auditor General Microsoft 365 Security Controls – State Entities, Report 9: 2025-26, 6 March 2026, and the City of Cockburn's Response

This report and its attachments are **CONFIDENTIAL** in accordance with Section 5.23(4) (e) of the *Local Government Act 1995*, which permits the meeting to be closed to the public for business relating to the following:

(e) information the making public of which would be likely to endanger the security (including cyber-security) of any of the local government's property or operations.

16.2 Cyber Security Report - November 2026

This report and its attachments are **CONFIDENTIAL** in accordance with Section 5.23(4) (e) of the *Local Government Act 1995*, which permits the meeting to be closed to the public for business relating to the following:

(e) information the making public of which would be likely to endanger the security (including cyber-security) of any of the local government's property or operations.

16.3 Office of the Auditor General Local Government 2025 – Information Systems Audit Results, Report 12: 2025-26, 25 March 2026, and the City of Cockburn's Response

This report and its attachments are **CONFIDENTIAL** in accordance with Section 5.23(4) (e) of the *Local Government Act 1995*, which permits the meeting to be closed to the public for business relating to the following:

(e) information the making public of which would be likely to endanger the security (including cyber-security) of any of the local government's property or operations.

17. Closure of Meeting