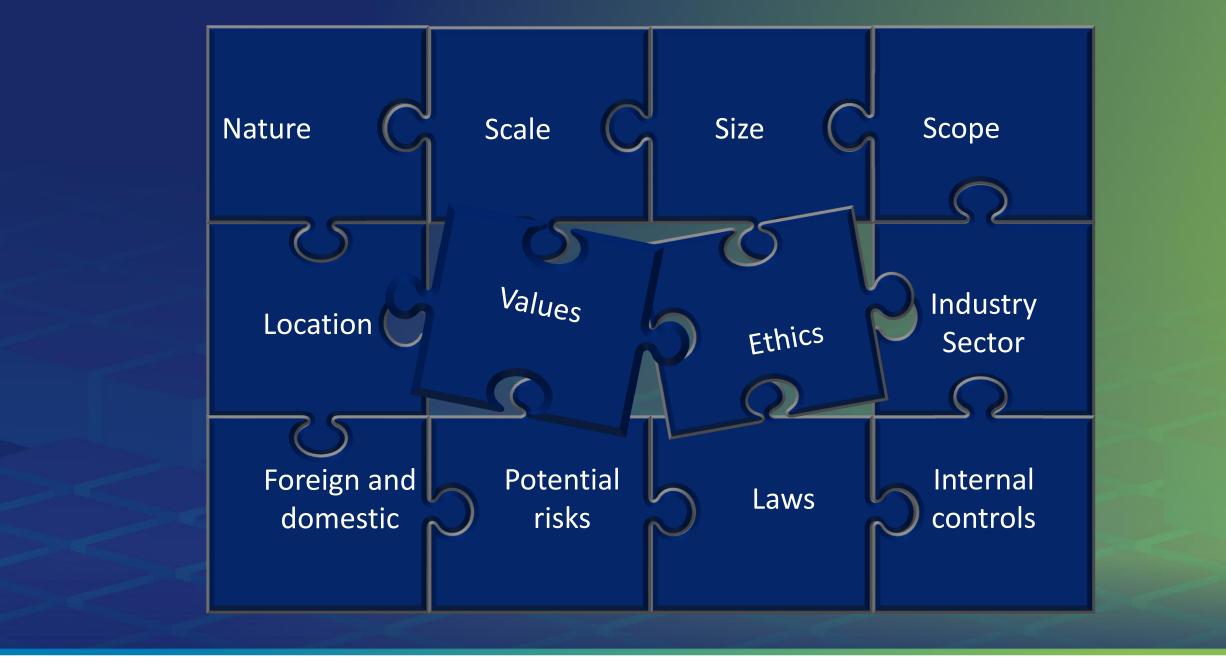




Assessing Integrity Risks: public sector organisations

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### **Control Environment**



### **Culture**



Policies and procedures



Designated compliance function and oversight



Effective training, education, communication



Internal monitoring and testing



Reporting and investigating



Enforcement and discipline



Response and prevention





### Risk assessment

- Well designed program/program elements
- Risk management process
- Risk tailored resource allocation
- Updates and revisions
- Lessons learned



### Policies and Procedures

- Design
- Comprehensiveness
- Accessibility
- Responsibility for operational integration
- Gatekeepers





### Training and communication

- Risk based training
- Form, content, effectiveness of training
- Communications about conduct
- Availability of guidance





# Confidential reporting and investigations

- Effectiveness of reporting mechanisms
- Properly scoped investigations qualified personnel
- Response
- Resources and tracking of results





### Third party management

- Risk based and integrated process
- Appropriate controls
- Management of relationships
- Real actions and consequences





#### Governance

- Conduct at the top
- Shared commitment
- Oversight
- Autonomy and resources
- Structure
- Seniority and stature
- Experience and qualifications
- Funding and resources
- Data resources and access
- Autonomy
- Outsourcing





# Continuous improvement, periodic testing and reviews

- Control testing
- Internal audit
- Evolving updates
- Culture of compliance
- Root cause analysis
- Prior weaknesses
- Prior indicators
- Remediation
- Accountability





## Detection, prevention, remediation











