

Annual Action Plan: Implementing the Integrity Framework

Our **vision of integrity** is to ensure our culture is characterised by the highest standards of ethical behaviour and accountability at every level of the organisation

Monitoring – Reporting, data and systems

- Monitor control activities to improve performance and embed a zero-tolerance approach to fraud and corruption.
- Benchmark our organisational data against other agencies.
- Consult with reporting areas to align data insights, enhance enterprise resilience and improve the key risk indicators for ER4.
- Set system priorities and articulate clear expectations to embed an ethical culture.
- Embed future-focused practice through streamlining access to data insights and evidence.

Information and Communication – Capability, awareness and culture

- Empower educators and leaders to build professional expertise by using established on-demand tools and training platforms.
- Support our employees to make ethical decisions to establish strong foundations for learning outcomes.
- Empower our educators and leaders to strengthen our organisational culture by sharing information and providing accessible resources.
- Enhance transparency and accountability through acting where conduct and behaviour are unlawful or out of step with our values.



Control Environment – External-driven reforms

- Implement government reform to create a positive environment for teaching and working.
- Strengthen our integrity systems and incorporate connected systems across agencies.
- Respond to relevant audits from Crime and Corruption Commission, Queensland Audit Office and others.

Risk Oversight – Assurance and strategic oversight

- Align the Integrity Framework to the Equity and Excellence strategy and bring all areas of our department together in order to realise every student's potential.
- Build on previous success achieved through the Long-Term Integrity Plan and empower leaders to give every student the opportunity to realise their potential.
- Oversight of enterprise risk reporting by committees including the Integrity, Fraud and Corruption Committee.

Control Activities – Governance and controls

- Reduce performance variability through current delegations, authorities and procedures.
- Regularly assess and respond to enterprise risks, control gaps and opportunities.
- Maintain key documents that support ethical practices.

Targeted awareness campaigns (Response initiatives)

T3	T4	T1	T2	T3
2024	2024	2025	2025	2025
Purchasing and Accountability	Conduct at Workplace Events			

Annual Integrity, Fraud and Corruption Action Plan 2024–25

Integrity is everybody's business. [Prevent. Detect. Respond.](#)

	Business owner	Delivery date	Prevent	Detect	Respond
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Control Environment – External-driven reforms

Define the scope of Enterprise Risk 4	New	I, GSP	Oct 2024	●		●
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Risk Oversight – Assurance and strategic oversight

Review the Integrity Framework annually and develop Annual Action Plan	BAU	I	Ongoing	●	●	●
Implementation of audit recommendations through the Infrastructure Services Division Assurance Oversight Project with a focus on the priority areas of contract management and financial management	New	IS	June 2025	●		●
Undertake QAO Grants Management Maturity Model Self-Assessment	BAU	EC	Ongoing		●	●
Annual Action Plan reporting	BAU	I	Ongoing	●	●	●

Monitoring - Reporting, data and systems

Analyse department Working for Queensland (WfQ) survey and School Opinion Survey (SOS) data	New	I	Dec 2024		●	
Develop new lead and lag indicators for ER4	New	I	June 2025	●	●	
Analyse CCC and PSC allegations data to benchmark across the sector	New	I	June 2025	●	●	
Review the online anonymous form	BAU	I	June 2025		●	
Quarterly ER4 risk report	BAU	I	Ongoing	●		●
Monitor and maintain purchasing training and compliance dashboard	BAU	P&F	Ongoing		●	●
Maintain the Procurement conflict of interest register	BAU	P&F	Ongoing	●		
Maintain the Gifts and benefits register	BAU	F	Ongoing	●		
Maintain Assistance and support animals register	New	SSS	Jan 2025	●	●	
Maintain the SES declaration of interests register	BAU	Central HRBP	Ongoing	●		
Review all system access controls in accordance with the Information Security Policy IS18:2018 Policy Requirement 1	BAU	IT	Ongoing	●	●	●
Develop an Integrated Assurance self assessment tool for use by control owners	New	GSP	Dec 2024			

Control Activities - Governance and controls

Review the Fleet management procedure	BAU	P&F	March 2025	●	●	
Review the Purchasing and procurement procedure	BAU	P&F	March 2025	●	●	
Review the Gifts and benefits procedure	BAU	F	June 2025	●	●	
Review the Appropriate and ethical use of public resources policy	BAU	F	June 2025	●	●	
Review the Assets policy	BAU	F	Dec 2025	●	●	
Review the Financial internal controls policy	BAU	F	Sept 2025	●	●	●
Review the Corporate card procedure	BAU	F	Jan 2025	●	●	
Review the Catering and hospitality procedure	BAU	F	March 2025	●	●	
Review the Expenditure policy	BAU	F	Aug 2024	●		●
Review the Parents and Citizens' Associations procedure	BAU	SSS	June 2025	●		
Review the Assistance animals and support animals at school procedure	BAU	SSS	Jan 2025	●	●	
Review the Allegations against employees in regards to student protection procedure	BAU	I	Apr 2025	●	●	
Digitise integrity-related forms	BAU	I	June 2025	●	●	
Amend the Reporting contact with lobbyists procedure in response to changes to the Conflict of interest policy and procedure	New	I	Dec 2024	●	●	
Complete Annual Statement of Assurance	BAU	F	Ongoing		●	
Review the Recruitment and selection policy and procedure	BAU	RER	Nov 2024	●		
Develop strategies and reports to identify multiple family claims	New	EC	June 2025	●	●	
Review the Leave policy and Employee leave procedure	BAU	ER	Jan 2025	●	●	●
Review the Sponsorship procedure	BAU	SCE	Jan 2025	●	●	

Control Activities - Governance and controls

Review the Hours of work, accrued time off, time off in lieu and timesheet arrangements for non-school based public servants' procedure	BAU	ER	Jan 2025	●	●	
Maintain the delegations, HR, Finance and DoE	BAU	I, F, PPII	Ongoing	●	●	
Review the Early childhood grants management policy, procedure and framework	BAU	EC	June 2025	●	●	

Information and Communication – Capability, awareness and culture

Update Mandatory All-Staff Training and Management Foundations content	BAU	EFI	Ongoing	●		
Implement the Business manager coach model	BAU	EFI	Ongoing	●		
Implement the Conflict of interest policy and procedure and associated reporting requirements	BAU	I	Jan 2025	●	●	
Implement the Positive Performance Management procedure	New	I	Nov 2024			
Develop an IFCC Sharepoint Portal	BAU	I	July 2024	●		
Review integrity web presence content	New	I	Aug 2024	●	●	●
Develop and implement the International Fraud Awareness Week campaign	BAU	I	Nov 2024	●	●	
Contribute to the review of staff induction materials	BAU	I	June 2025	●		
Coordinate the targeted awareness campaigns	BAU	I	Ongoing	●		●
Promote integrity training opportunities	BAU	I	Ongoing	●		
Integrity capability uplift	New	I	Ongoing			●
Review the presentation materials for principal orientations	BAU	I	June 2025	●		
Facilitate a workshop at SBMAQ Conference	BAU	I	June 2025	●		

Forward Planning 2026+

	Business Owner	Delivery date	Prevent	Detect	Respond
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Control Environment – External-driven reforms

Engage in the whole-of-government project related to the single clearing house for complaints (rec 6) (Coaldrake Review)	New	I	2026		●	
Oversight by PSC of complaints against senior public sector employees (rec 8) (Coaldrake Review)	New	I	2026		●	
Account for the benefits derived from engaging consultants and contractors, (rec 9) (Coaldrake Review)	New	I	2026			
Mandatory reporting of data breaches (rec 10) (Coaldrake Review)	New	I	2026		●	
Reforms public sector transparency (Crime and Corruption Commission)	New	I	2026			
Implement recommendations of the Public Interest Disclosure Act Review (Rec 11) (Coaldrake review)	New	I	2026	●		
Rejuvenation of the Public Sector (rec 5) (Coaldrake Review)	New	I	2026	●	●	●

Control Activities - Governance and controls

Review the Reporting fraud and corruption procedure	BAU	I	2026		●	●
Review the Public Interest Disclosure procedure	BAU	I	2026	●	●	
Review the Complaints involving the 'public official' Director-General procedure	BAU	I	2026	●	●	
Review the Standard of Practice	BAU	I	2026	●		
Review the Managing delegations, authorisations and administrative approvals procedure	BAU	PPII	2026	●	●	
Review the Domestic travel procedure	BAU	F	2026/2027	●	●	
Future Procurement Systems through Vendor Panel	BAU	P&F	2026			

Control Activities - Governance and controls

Roll out annual integrated assurance self-assessment tool	New	GSP	2025/2026	●	●	
Review the Information security policy and procedure	BAU	IT	2026	●		●
Review the Catering and hospitality procedure	BAU	F	2026	●	●	

Key: Central HRBP: Central Human Resources Business Partners EC: Early Childhood ER: Employee Relations EFI: Education Futures Institute F: Finance I: Integrity IS: Infrastructure Services IT: Information Technology
PPII: Policy, Performance, International and Intergovernmental P&F: Procurement & Facilities RER: Recruitment & Employment Review SCE: Strategic Communication & Engagement SSS: Schools & Student Support GSP: Governance, Strategy & Planning