



CONSOLIDATING ETHICS IN THE PUBLIC SECTOR IN TURKEY (TYEC2)

TECHNICAL PAPER

Ethics Audit Toolkit

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Table of Contents

| | |
|--|----|
| Introduction and acknowledgements | 3 |
| The Turkish Land Registry | 4 |
| What is an Ethics Audit? | 6 |
| The Integrity Management System model..... | 8 |
| The tools that make up the IMS audit..... | 10 |
| The Ethics Audit Process | 13 |
| Integrating the Ethics Audit into the organisation | 16 |
| Appendix 1: The Turkish Land Registry IMS | 17 |
| Appendix 2 Ethics Audit Start Up Meeting Agenda..... | 18 |
| Appendix 3 Ethics Audit Do's and Don'ts..... | 19 |
| Appendix 4 Person Specification for Ethics Auditor | 20 |
| Appendix 5: Benchmarks and performance indicator descriptors | 21 |
| Appendix 6: Diagnostic self-assessment survey..... | 30 |
| Appendix 7: Interview and focus group questions | 34 |
| Appendix 8: Suggested documents to be analysed..... | 44 |
| Appendix 9: Action Plan Template | 45 |

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Introduction and acknowledgements

Although this ethics audit toolkit has been designed to apply to the Turkish Land Registry, it is based on universal principles and ideas, which means that it can be adapted for any organization within the Turkish public sector.

The ethics audit tool kit adapts Maesschalck (2009) and OECD (2009) model of the Integrity Management System, and the methodology is adapted from the UK Audit Commission's ethical governance audit.

This document provides the following elements:

- a brief understanding of the Turkish land Registry;
- an explanation of the Integrity Management System model;
- an outline of the choices involved in ethics audits
- a description of the ethics audit process and timeframes for the work
- advice on conducting follow-up work from the toolkit
- the toolkit itself (including ethical performance benchmarks for the Turkish Land Registry/public sector; a self-assessment survey; detailed interview questions; and other assorted documents)

This work also follows guidelines outlined in a Technical Paper (ECU-TYEC 2-2/2013) written for the project Consolidating ethics in the public sector in Turkey (TYEC2).

In using the ethics audit toolkit, it is hoped that the Turkish Land Registry can build on the work that it has already undertaken, to become the initial organisation in the wider project to promote ethical culture in the Turkish Land Registry.

The author would like to thank a number of organisations for helping to conduct this ethics audit project. Thanks go to the Council of Europe, for instigating and arranging the work; the UK Audit Commission, for kind permission to adapt its original ethical governance toolkit; and thanks, finally, to the Turkish Land Registry for its co-operation and hospitality during the initial workshop phase of the project.

The Turkish Land Registry

1.1 This tool has been specifically designed for the Turkish Land Registry. The ethics tools were designed after an extensive series of events with the Land Registry. These included:

- 2 workshops with senior managers and leaders
- Visits to the Turkish Land Registry headquarters
- A site visit to one of the Land Registry branches in Ankara

The toolkit is, however, designed to be readily adaptable for other organisations in the Turkish public sector.

1.2 The Turkish Land Registry is the biggest government Ministry in Turkey, with over 500 offices spread throughout the country and employing more than eighteen thousand members of staff. The Registry is responsible for all transactions of land and property in Turkey.

1.3 It has always suffered from a poor reputation regarding the integrity of its conduct, especially for bribes and gifts being given to land registry officials in order for them to process applications more quickly, or to gain approval on a decision. This reputation led to a severe lack of trust in the Land Registry with a recent survey showing that 61% of those surveyed believing there are unethical conducts in the Land Registry. It is worth noting that the ratings of those who actually use the service is very high - a 2013 customer satisfaction survey shows that 97% of customers now rate the Land Registry as “very good” or “excellent”.

1.4 In 2009 a new ethics team was brought in to make radical changes to the integrity systems of the Land Registry. Anti-corruption and ethics training has been provided to over fifteen thousand members of staff in all local offices. Ethics training is also now mandatory for all job applicants. A new code of conduct has been introduced along with an ethics manual, which clearly defines the expected behaviour of officials.

1.5 The Land Registry ethics team also promote greater awareness of integrity among the public, with an “ethics week” of events that are open to all, and a new performance management mechanism through public surveys.

1.6 A Land Registry *Ethics Commission* has been established, made up of senior leaders, which oversees the integrity system. The commission produces annual reports and operates a full inspection service. Any investigations can be referred to

the *disciplinary board*, but the commission also rewards good conduct: the performance management system therefore incentivizes integrity.

1.7 The system is underpinned through continuous improvement: The Land Registry has recently achieved Total Quality Management status, which necessitates integrity measures being built into all levels of the organisation. As already mentioned, the most recent (2013) customer satisfaction survey shows that 97% of customers now rate the Land Registry as “very good” or “excellent”.

1.8 It is apparent, then, that the Land Registry already has much of the components on an ethical environment in place and already monitors its effectiveness through a variety of measures. Following discussions with the Land Registry it was agreed that what was required was a systematic way of bringing all of this information together to enable an assessment of the ethical culture and processes. In addition, there are a number of further areas that need to be considered. These include:

- internal and external audit procedures
- appointment and recruitment procedures
- policies on service delivery, access to information and complaints procedures
- policies on data protection and access to information
- policies on recordkeeping and storage time

1.9 The ethics audit will allow such policies and procedures to be analysed and mapped onto the Turkish land registry current IMS.

What is an Ethics Audit?

2.1 An ethics audit is a process by which an organisation can assess and evaluate various dimensions of ethical conduct. It is an investigation into how well (or poorly) an organisation conforms to agreed benchmarks of ethical standards; some organisations may conduct periodic ethics audits to see how closely they follow their own rules.

2.2 An organisation may want to conduct an ethics audit if they suspect that there are specific issues that need to be addressed, whether these are behavioural issues; leadership issues; system issues; etc. In these cases an ethics audit can:

- (1) Identify areas of concern;
- (2) Evaluate the extent of any perceived problems;
- (3) Suggest ways forward by which these problems can be tackled (implementation of new regulations; ethics training; etc.).

However an ethics audit may be conducted on an organisation that has no concerns whatsoever, in which case it can: (1) act as an ethical 'health check'; (2) identify existing good practice; (3) further strengthen the organisation.

2.3 The Organisation for Economic Cooperation and Development have made a distinction between compliance based approaches and integrity-based approaches to ethics (Gilman 1997). The former is very much a top down approach whereby the behaviour of individuals is directed and controlled by a set of laws and rules and sanctions are applied if those rules and laws are not followed. Ethical behaviour is enforced. The integrity based approach encourages individuals to take responsibility for their actions and decision-making by encouraging them to internalise the ethical principles. It follows that the emphasis here will be on those softer activities which are aimed at ensuring that individuals internalise the values, for example training and leadership.

2.4 This distinction is reflected in different types of ethics audits. An ethics audit looks at the overall ethical health of an organisation. There are three principal types of ethics audit:

2.5 *Compliance audits*: are the least comprehensive ethics audits and is the process whereby the auditor determines the degree to which one's ethics program meets the standards set forth in applicable law, regulation and policy, and the degree to which organizational and individual behaviour satisfies the requirements of that program. At the most basic level, performance can be measured by how well an organisation meets (or exceeds) standard compliance requirements, e.g. a code of

conduct; protocols; protection for whistle-blowers. Difficulties with using this approach are that the existence of such mechanisms does not ensure adherence to them: Enron was an American energy, commodities and services organisation which, despite significant compliance mechanisms in place (Jennings 2006), filed for bankruptcy in 2001 and became infamous for its corporate fraud and corruption with several executives sent to prison.

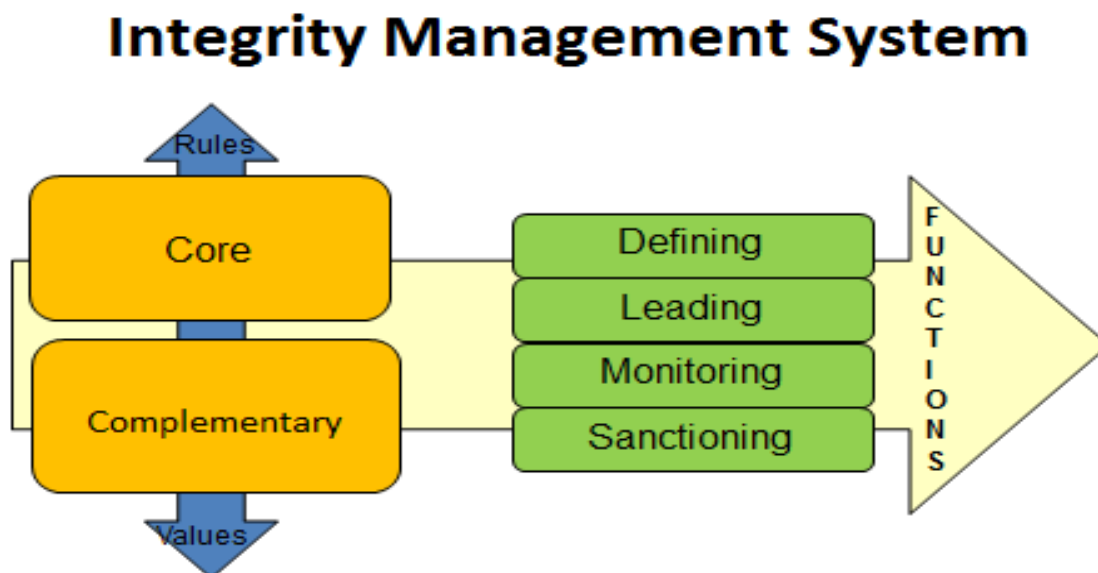
2.6 *Cultural audits* explore how employees and other stakeholders feel about the standards and behaviour of the organization. They assess perceived priorities and ethical effectiveness of individuals, groups, units or the organization as a whole. Organisational culture is frequently defined as “the way we do things around here”. The ability to read, understand and change organisational culture is an essential skill for any leader and a toxic culture plays a crucial role in unethical conduct. Ethical culture can have a substantial impact on numerous aspects of performance of an organisation.

2.7 *Systems audits* assess both compliance *and* culture as part of a bigger whole; the degree to which the ethical principles, guidelines and processes of the organization are integrated within the organizational system. A systems audit is the audit type that has been developed in the subsequent pages. This leads us to the notion of the Integrity Management System (IMS) which is discussed in the following section.

The Integrity Management System model.

3.1 The Integrity Management System is a means of conceptualising the various components and functions of an ethical environment. The IMS (see figure 1) has within its scope core and complementary mechanisms and the functions of defining, leading, monitoring and sanctioning ethics and integrity. Our slight amendment to the IMS is to expand the function 'sanctioning' to 'sanctioning and rewarding', reflecting the need for integrity mechanisms to recognise good behaviours and champion the benefits of a strong ethical environment (Bossart and Demmke 2005). These mechanisms and functions are outlined in more detail below.

Figure 1: Integrity Management System



3.2 *Core* mechanisms refer to the policies, processes and practices that directly contribute to ethics and integrity within an organisation (e.g. ethics training; code of conduct, whistle blowing procedure, etc.)

3.3 *Complementary* mechanisms refer to policies, processes and practices that are indirectly related to ethics and integrity within an organisation, but that nevertheless have an impact upon the organisation (e.g. equality and diversity policies; bullying protocol; etc.)

3.4 These mechanisms will be set against the balance of **rules** and **values** of the organisation and serve four functions:

- **Defining ethics and integrity** – what are the values of the organisation? How have these been created? Are people aware of them and do they follow them? Are they translated into policies and regulations, such as a code of conduct? How transparent are rules and values? How accessible are they?
- **Leading ethics and integrity** – who leads the ethics agenda? Is there an ethics officer? Is there an ethics commission? What is its workload? Does ethics training occur regularly? Do people within the organisation know who to turn to if they have a problem?
- **Monitoring ethics and integrity** – is there a register of gifts and hospitality? Is there a register of interest? Are complaints recorded? Who is responsible for keeping registers and logs up to date? Are investigations published or otherwise publicly available?
- **Rewarding ethics and integrity** – how are the outcomes of investigations dealt with? How have these been developed? Is there a right to appeal? How effective have these sanctions been?

3.5 Clearly the extent to which such questions will be asked will be dependent upon the level of audit that is being conducted. Broadly speaking:

- A compliance audit will evaluate the core integrity mechanisms
- A culture audit will evaluate complementary integrity mechanisms
- A systems audit will evaluate core and complementary mechanisms

Each level of audit will assess the relevant mechanisms against its balance of rules and values, and also against the four functions of the IMS.

3.6 An application of the IMS model to the work that the Turkish Land Registry has already conducted can be found in Appendix 1.

The tools that make up the IMS audit

4.1 The tools that make up the IMS audit are:

- Start up meeting agenda (appendix 2)
- Guidelines on Dos and Don'ts of an ethics audit (appendix 3)
- Person specification for ethics auditor (appendix 4)
- Benchmarks and performance indicators (appendix 5)
- Data collection methods
 - A diagnostic self-assessment survey (appendix 6)
 - Interview and focus group questions (appendix 7)
 - List of documents for analysis (appendix 8)
- Action plan template (appendix 9)

Collectively, these tools will enable an assessment of an organisation's approach to ethical governance, the code of conduct and compliance with ethical standards.

Further information on these tools is provided below.

Start up meeting agenda

4.2 Planning the ethics audit is vital. It is recommended then that prior to undertaking the audit there is a start-up meeting in which, amongst other things, a decision is made about who will undertake the audit, the scope of the audit and how the data collection methods will proceed. A suggested agenda is provided in appendix 2.

Guidelines on Dos and Don'ts of an ethics audit

4.3 The guidelines (appendix 3) provide are useful reminders of issues to consider when embarking on an ethics audit. As such they should be read and considered at the start up meeting.

Person specification for ethics auditor

4.4 It is important to stress that use of the audit tool will involve some interpretation and judgement of data. The audit tool should be viewed as a framework for collecting and assessing data and not a mechanism in which raw data is entered, and a button pushed, resulting in a single 'right' answer. It follows that the person or persons undertaking the audit should have certain competencies, skills and attributes.

Ethics audit planning checklist

4.5 Prior to collecting data for the audit adequate planning is important to ensure a standardised procedure, identify any priority areas and ensure that appropriate data is collected.

Benchmarks and performance indicators

4.6 The benchmarks and performance indicators are the criteria against which the organisation is assessed. The benchmarks cover the four functions of defining integrity, leading integrity, monitoring integrity and sanctioning and rewarding integrity and include core and complementary mechanisms. Appendix 5 provides definitions of these functions as well as the criteria that an organisation should meet in order to achieve 'adequate performance' and 'excellent performance'. Auditors may wish to add to and/or adapt these criteria.

Data collection methods

4.7 In order to audit the Turkish Land Registry we will assess each of these functions (defining, leading, monitoring and sanctioning and rewarding integrity) using a variety of methods;

- A diagnostic self-assessment survey
- Interviews and focus groups
- Documentary Analysis

4.8 Using these methods the ethics audit tool will provide diagnosis and development for the Land Registry IMS and will look to strengthen the IMS in three key ways:

- promote high standards of conduct
- assist in building a 'bond of trust' within the Land Registry and with external stakeholders
- identify best practice for sharing and dissemination

A diagnostic self-assessment survey

4.9 The diagnostic survey (appendix 6) tests knowledge and understanding of approximately 100 different items relevant to the ethical health of the Land Registry and is directed towards every member of the organisation. It builds on the benchmarks and performance indicators identified in appendix 5.

4.10 The survey can check awareness and the usefulness of the Land Registry's IMS functions, and can also test perception of processes, outcomes and more general areas such as leadership, for example.

4.11 The benefit of this self-assessment survey is that it is relatively quick and easy to implement. It gives standard data for staff and members at all levels, which can be readily analysed and comparisons can be made between different local offices.

Interviews and focus groups

4.12 The purpose of the interviews and focus groups are to follow up on issues identified in the survey and those issues identified in the planning stage. The interview and focus group questions identified in appendix 7 will gather data that will help assess how the organisation is delivering the four functions identified in the benchmarks and performance indicators in appendix 5.

Documentary analysis

4.13 Alongside the data collected via the diagnostic self-assessment survey and interviews and focus groups there needs to be an analysis of those documents that help underpin an ethical environment. Appendix 8 is a list of the documents that should be considered. NB This is not necessarily an exhaustive list and others may be added to the list.

Action plan

4.14 An action plan ensures that any issues that arise from undertaking the audit are translated into action. An action plan template is provided in appendix 9. The Land Registry may of course choose to use their own existing action plan template.

4.15 The ethics audit tool itself cannot, of course, guarantee a strong ethical environment. Furthermore, it may be that even with guarantees about anonymity many respondents may feel obliged to paint a more positive picture of the organisation's and particularly their own behaviour. Perhaps more importantly, an authority can score highly on knowledge and understanding, yet may still be susceptible to behavioural issues such as discrimination or bullying.

4.16 However, if the audit tools are used properly then it will help the organisation recognise its strengths and areas for improvement. It is then up to the organisation to act upon these findings.

The Ethics Audit Process

5.1 The tools referred to in the previous section are all used within a process. There are four stages to assessing ethical performance: planning, fieldwork, reporting, and follow-up



5.2 Planning

5.2.1 Hold an initial meeting with key stakeholders to discuss the aims and the scope of the ethics audit. Depending on local circumstances, you may decide to deliver the tool as a whole or to use individual parts. Another key decision will be whether to deliver the tool across the whole Land Registry or in specific branches where there are concerns over ethical performance.

It is at this stage that the ethics auditor will be identified using the criteria outlined in appendix 4). Planning is required to agree on performance measures and organisational benchmarks outlined in appendix 5.

5.3 Fieldwork

The fieldwork stage of the ethical audit will be directly contingent upon the scope of the performance measurement as identified in the planning stage. The fieldwork is consists of three parts:

- Diagnostic self-assessment survey
- Interviews and focus groups
- Documentary analysis

Diagnostic self-assessment survey

5.3.1 The first part of the fieldwork is a survey of staff in the organisation. It enables a self-assessment of compliance with the principles of good ethical governance among staff and of perceptions of the organisation. The findings will inform the detailed interviews and focus groups.

5.3.2 Send out an initial letter or email asking people to complete the survey. Then send reminders so you have enough returns from staff to make the survey credible.

Try to ensure that the letter is attached to a senior colleague to emphasize its importance.

Interviews and focus groups

5.3.3 The second part of the fieldwork is interviews and focus groups, which allows for a more detailed assessment of how well an organisation's ethical governance arrangements are working. Plan the interviews and focus groups. Decide whether you want both interviews and focus groups, or whether you simply want to do one of these. You will need to plan these several weeks in advance to ensure people's availability.

5.3.4 Conduct the interviews and focus groups using Appendix 5 benchmarks and performance indicators, and Appendix 7 for the detailed questions on interviews or focus groups as guidelines. The list of issues identified in the detailed questions (contained in Appendix 7) are not necessarily comprehensive and interviewers will need to exercise discretion in asking questions. The final questions should be chosen in advance and should be matched to the issues or needs of the Land Registry. Also, following the analysis of the survey questionnaire you may want to revise who is involved in the interviews and focus groups and what the questions might be.

Documentary analysis

5.3.5 The third part of the tool is the documentary analysis, which follows from the survey and interviews and focus groups. The intention here is not just to determine whether these documents exist but also to analyse them in the light of any findings from the survey and interviews and focus groups.

5.3.5 Summarising the fieldwork:

- The diagnostic self-assessment survey will identify strengths and weaknesses in the integrity management system
- Strengths and weaknesses can then be explored further in the in-depth interviews (and focus groups if necessary), which will also help identify good practice
- The documentary analysis will help the auditor to assess what mechanisms are in place to work through any issues identified in the first two phases of the audit; the auditor can also identify where some policies need to be expanded or amended; and whether or not some entirely new policies are needed

5.4 Reporting

5.4.1 Following an analysis of data collected at each stage, agree judgements, evidence, impact and recommendations. Draft a summary report with recommendations or a presentation with recommendations.

5.4.2 The audit report will address two key areas: first, it should identify key ethical risks and secondly, it should provide recommendations for minimising these risks (Lawton et al. 2010). In so doing the report will show fundamental issues that already exist as well as potential issues that may arise in the future. Prioritise the recommendations.

5.4.5 It is useful to divide the reporting process itself into a number of stages: the initial report that is presented to the organisation; an organisational response, which will include a register of priorities and an action plan; and then a final report, which will incorporate this response and provide timescales and milestones for future performance.

5.5 Approximate timings for the sequence of work is as follows:

| | | |
|----------|-----------------------------------|---|
| Part (1) | Diagnostic self-assessment survey | 3 – 5 days (contingent on the mode of delivery, i.e. paper or electronic) |
| Part (2) | Interviews and focus groups | 10 – 15 days (depending on number of interviews, inclusion of focus groups, etc.) |
| Part (3) | Documentary analysis | 3-5 days |

In total the audit should take 3-5 weeks of 5 working days.

Integrating the Ethics Audit into the organisation

6.1 Following the analysis and discussion of conclusions/recommendations among senior leaders and management, the report should be made available to all those who took part in the ethics audit. If this is not possible then as a minimum the key findings and recommendations of the report should be made available.

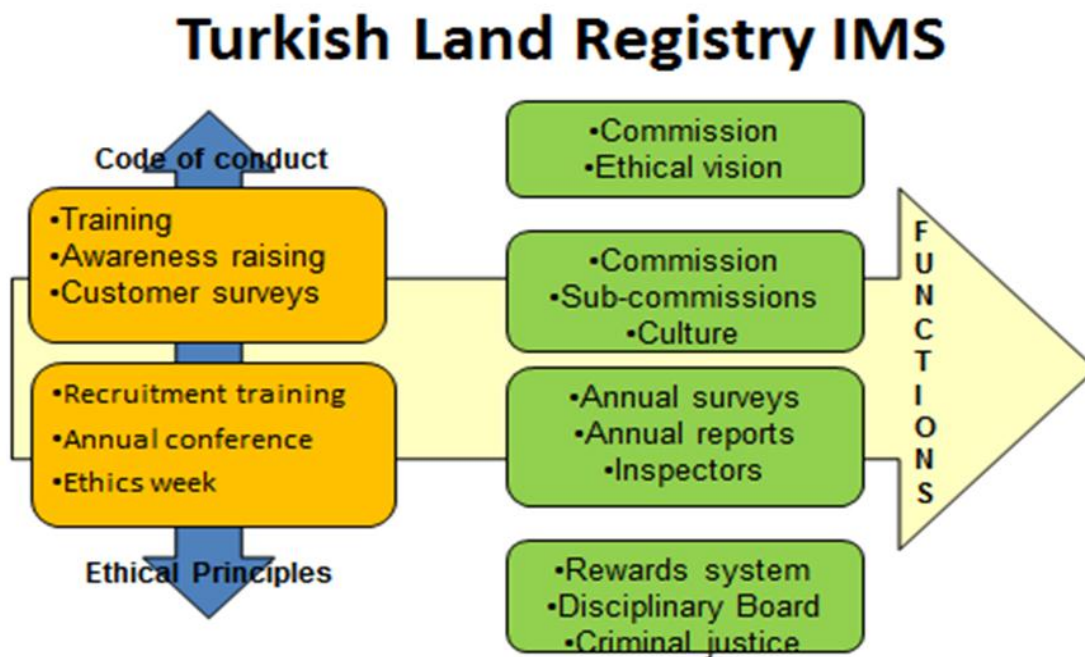
6.2 An action plan needs to be agreed upon to provide details of what follow-up work needs to be conducted, along with agreed milestones for the delivery of the work. The action plan should include:

- Immediate priorities (within 3 months)
- Medium-term priorities (3-12 months)
- Changes to long-term integrity strategy (12 months plus)
- Non-priority areas that require further monitoring
- Non-priority areas that require further assessment

6.3 The result of the ethics audit should also be included in any future discussion on continuous improvement in the organisation.

Appendix 1: The Turkish Land Registry IMS

As suggested in **section 1**, the Turkish Land Registry has already made significant progress in developing its Integrity Management System. The following diagram identifies the key features of the IMS:



This model will now serve to guide the performance benchmarks and subsequent ethics audit tools.

Appendix 2 Ethics Audit Start Up Meeting Agenda

- Introductions
- Key issues/risk assessment – identify any particular issues on which the audit should focus. Large organisations such as the Land Registry necessarily carry out an enormous array of activities. These may not all carry the same ethical risk and therefore some key areas may need to be identified (eg procurement, senior management appointments, financial administration)
- Objectives and process of the ethics audit
- Benchmarks – agree final version
- Scope of the ethics audit – how many people will be sent the diagnostic self-assessment survey?; will the whole organisation be involved or just specific regions/offices; who will be involved in interviews and/or focus groups?
- Notification – how will staff be notified about the ethics audit?
- Feeding back – how will the findings be fed back to staff?
- Other practicalities – will the questionnaire be distributed as a paper version or electronically?
- Who will undertake the audit? – use appendix 4 as a guide
- Which documents should be included in the scope of the audit? – use appendix 9 as a guide
- Timescales and completion dates

Appendix 3 Ethics Audit Do's and Don'ts

DO

- Ensure that the auditor is senior enough to be respected by colleagues
- Be confident about working with the leadership of the organisation.
- Understand the politics of the organisation
- Make sure you are able to discuss issues like feelings and behaviours without embarrassment.
- Ensure the auditor is able to write performance reports.
- Meet leaders and agree the audit specification beforehand
- Be prepared to have a number of set up meetings - there may be nervousness around the project
- Arrange for leaders and senior managers to see the survey before it is sent out in case some questions touch sensitive spots.
- Run the survey before starting the interviews if at all possible.
 - Will give useful information and pointers to the further questions that can be followed up in the interview/focus groups stage
- Consider whether interviewing people in focus groups may make them less likely to tell you the truth than interviewing them on their own.
- Target questions appropriately for the people that you are dealing with
- Remember that much of what you write in your report will be your own judgement.
- Remember that you could be closely challenged when write negative statements.
- Ensure you can explain and have documented evidence why you reached your judgements. They must be based on evidence.
- Be prepared to change the *wording* of the report but not *judgements* (unless provided with additional evidence).

DON'T

- Ask junior colleagues to undertake ethics audit
- Begin the audit without understanding and managing the risks
- Rush the project – you won't regret a slow start
- Restrict the survey to a small number of senior staff

Appendix 4 Person Specification for Ethics Auditor

This tool is not a routine piece of work with normal set up and feedback processes. Ethical governance is a sensitive issue for many organisations and from an early stage there are many potential risks and challenges which must be managed.

Close and consistent contact with the Relationship Manager, Appointed Auditor and Audit Manager is essential before and during this work. This is to help ensure a shared understanding of the context and issues in the organisation. The work will need to involve a senior specialist or equivalent Audit Manager because of the need for sensitivity and understanding of the context in which the organisation is operating.

The complexity of the tool will need auditors/inspectors/performance specialists to have the following high-level knowledge and skills:

- knowledge of ethical governance;
- knowledge of the organisation and its local issues;
- ability to work with most senior people in the organisation;
- strong interpersonal and facilitation skills;
- strong communication skills;
- a degree of independence;
- experience of analysing and interpreting questionnaire and interview/focus group data;
- strong project management skills.

Appendix 5: Benchmarks and performance indicator descriptors

IMPORTANT – these level descriptors are only a guide for the Turkish Land Registry. They are not intended as a definitive description of good ethical governance.

| DEFINING INTEGRITY | |
|--|---|
| Ensuring that the standards of conduct in the Land Registry are clearly defined, communicated and understood by all members of staff. | |
| Evidence that: | |
| <ol style="list-style-type: none"> 1. Organisational values are known and used 2. Senior managers understand the ethical framework 3. Staff understand and abide by the code of conduct 4. Active promotion of vision and principles by senior management 5. Training sessions are participatory | |
| Adequate performance | Performing well |
| Ethical principles have been officially adopted | The Ethical Principles of the Land Registry are compatible with the public sector code of conduct. |
| The public sector Code of Conduct has been communicated to members of the Land Registry | Both the ethical principles and the code of conduct are fully understood and utilised by all members of the Land Registry. The code is incorporated into the terms and conditions of service |
| Senior managers sporadically remind members of the Land Registry about the ethical principles or code of conduct | Expectations about standards of conduct are fully explained and clearly communicated throughout all levels of the Land Registry. |
| There is an ethics training strategy The strategy includes: <ol style="list-style-type: none"> a. Increasing the number of the trainers having received the ethics training from the Council of Ethics; b. Increasing the number of the staff having received the ethics training; c. Increasing the number of the managers having received training in the field of ethics; | Training is inclusive and participatory. It is developmental and not just a one-off session. Training materials are easy to access for all members of the organisation and are perceived to be helpful and useful by members. |

| DEFINING INTEGRITY | |
|---|---|
| Ensuring that the standards of conduct in the Land Registry are clearly defined, communicated and understood by all members of staff. | |
| <p>d. Providing awareness trainings in the field of ethics;</p> <p>e. Using e-learning methods during the training period;</p> | |
| <p>An easily accessible area of the Land Registry's website is devoted to ethics and standards of conduct.</p> <p>The website of the organisation includes a section on the Ethics Commission, the ethical principles, the Code of Conduct and the findings from the monitoring of the ethical health of the organisation. The names and contact details of the members of the Ethics Commission and ethics trainers will also be included on institutions' website</p> | |
| <p>Terms and conditions for service provide clear guidelines on eligibility for expenses and allowances</p> <p>A list of expenses and allowances claimed by staff is available</p> | |
| <p>Some external-facing discussions take place regarding the ethics work</p> | <p>A range of actions are undertaken to promote confidence in the Land registry, such as:</p> <ul style="list-style-type: none"> • Posters aimed at the public in offices; • Newsletters; • Work with schools. |
| <p>Ethics awareness raising events are undertaken in 'ethics week'</p> | <p>Annual ethics awareness training</p> |
| <p>The Ethics Trainers having been trained and certified by the Council of Ethics of Public Officials in the trainings, and use the training modules developed by the Council of Ethics</p> | |
| <p>An annual anti-corruption strategy is published</p> | <p>Appropriate anticorruption agencies have been consulted in the development of these</p> |

DEFINING INTEGRITY

Ensuring that the standards of conduct in the Land Registry are clearly defined, communicated and understood by all members of staff.

| | |
|---|----------|
| | policies |
| There is a policy statement on data protection and access to information available to the public There is a policy on recordkeeping and storage time available to the public | |

LEADING INTEGRITY

Ensuring that leaders and managers lead by example and set the correct ethical tone within the organisation; that they offer a positive example of ethical behaviour; that staff members trust and feel confident in the leadership of the Land Registry.

Evidence that:

1. Senior managers are recognised by staff as having high standards of conduct and leading by example
2. Willingness of people to behave as self-leaders and take action on poor standards of conduct
3. Understanding throughout Land Registry of individual and collective responsibility for maintenance of high ethical standards
4. The role of the regional sub-commissions is known and understood
5. That there is an active culture of integrity within the Turkish Land Registry

Adequate performance

All new recruited staff are provided with information about the ethical principles and the tasks of the Ethics Commissions and the Council of Ethics of Public Officials

There is a fair and appropriate selection process and all appointments follow this process
There is a HR manual outlining processes and procedures for advertising posts, criteria, for promotion, promotion procedures and appeals

Members of the Land Registry treat each other and members of the public fairly and with respect at all times

The Regional Ethics Commissioner has a formal role in ensuring that ethical behaviour is promoted.
The Land Registry's practice and

Performing well

The Land Registry proactively promotes high standards of ethical conduct among all staff, for example as well as through ethics induction and training for new workers, newsletters, briefings, briefing notes, training, codes of conduct etc.
The Ethics Commission and the regional Ethics Commissions actively promote good ethical standards.

All new appointees are provided with guidance on what to do if they are asked to undertake activities which would result in a breach of the Code

The Land Registry can demonstrate that all staff have awareness and knowledge of equalities and human rights legislation, the implications for their work, and are properly skilled to deliver to the Land Registry's diverse customer base.
The Land Registry can demonstrate that its customers value its services.

There is evidence that the Regional Ethics Commissioner is a positive role model and is proactive in promoting the implications of the ethical agenda inside and outside the Land

| | |
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| LEADING INTEGRITY | |
| Ensuring that leaders and managers lead by example and set the correct ethical tone within the organisation; that they offer a positive example of ethical behaviour; that staff members trust and feel confident in the leadership of the Land Registry. | |
| procedures allow the Ethics Commissioner to intervene verbally or in writing if ethical issues arise. | Registry. The Land Registry can demonstrate that the Regional Ethics Commissioner has good access to the branch managers on ethical issues. |
| | The Regional Ethics Commissioner works closely with the Inspectorate department to ensure proactive leadership in monitoring and investigative processes. |
| | The Land Registry can demonstrate that its culture encourages open and constructive communication and challenge with stakeholders, including senior managers and leaders |

| | |
|---|---|
| The Ethics Commission and the Regional Ethics Commission have enough resources to conduct their work | All Land Registry branches have enough resources to proactively engage in the ethics agenda |
| The Ethics Commission and Regional Commissioners are familiar to all staff of the Land Registry | External stakeholders, partners, and the public consider that the Council has a good reputation for efficiency and integrity. |
| Managers of the Land Registry act within the spirit of the ethical principles and the code of conduct. | Staff of the Land Registry are empowered to report misconduct without fear of reprisal, and to be proactive in their ethical behaviour. |
| The Land Registry's complaints and whistle blowing policies have been communicated to staff, the public and those parties contracting with the organisation. The Land Registry can demonstrate that complaints and whistle blowing cases are resolved appropriately. And in a timely manner. | The Land Registry can demonstrate that staff within contracting organisations have high levels of awareness of, and confidence in the Land Registry's complaints and whistle blowing arrangements and feel safe to make a disclosure. |
| At least one member of the Ethics Commission has received the ethics | |

| | |
|---|--|
| training from the Council of Ethics | |
| At least one member of the Ethics Commission is also a member of the Disciplinary Board | |

MONITORING INTEGRITY

Ensuring that behaviour and standards of conduct are monitored through open, fair, and transparent process that all staff are aware of and have confidence in.

Evidence that:

1. Annual reports are accessible to all members of staff
2. Strengths and weaknesses are regularly assessed and acted upon
3. Role of the regional inspectorate is known and understood
4. Staff are aware of and participate in annual surveys
5. The ethics dimension of the Land Registry's TQM process is understood

| Adequate performance | Performing well |
|---|--|
| <p>Monitoring takes place through staff surveys.</p> <p>An annual report has feedback on ethics and standards of conduct</p> | <p>Annual monitoring of all staff takes place through staff surveys with specific questions about ethics and standards of conduct.</p> <p>Follow-up sessions are conducted to alleviate any specific problems that may be identified (whether this may be an issue or a specific Land Registry local branch).</p> <p>Monitoring processes are themselves re-evaluated on a regular basis to better reflect developing issues.</p> <p>Results from annual surveys and the annual report are available to all stakeholders</p> |
| <p>All posts are advertised appropriately following HR guidelines</p> | <p>There is evidence of an open and transparent appointments process for Regional Ethics Commissioners.</p> <p>HR/ equality and diversity practices are used when selecting Regional Ethics Commissioners.</p> |
| <p>The terms of reference of the Ethics Commission and Regional Ethics Commission are transparent and available to members of the Land Registry</p> | <p>The terms of reference of the Ethics Commission and Regional Ethics Commission are transparent and available to all stakeholders including members of the public.</p> |

| | |
|---|--|
| <p>The Land Registry Inspectorate publishes its investigative processes and the results of its investigations on an annual basis</p> | <p>The Land Registry Inspectorate has clear terms of reference that are publicly available to all.</p> <p>The Inspectorate has a presence on the internet so that members of the public can contact it as well as a publicly known, dedicated phone-line.</p> <p>The Inspectorate regularly communicates updates to all Land Registry branches</p> |
| | <p>Ethics Commissions and the Inspectorate regularly reviews their own terms of reference and recommends changes that may be necessary.</p> |
| <p>Training, development and support programmes are regularly evaluated.</p> | <p>Training, development and support programmes are linked directly to results from annual reports and staff surveys. Staff development has specific reference to ethics issues.</p> <p>The Land Registry can demonstrate that it learns from and takes appropriate action as a result of cases of misconduct</p> |
| <p>The Land Registry (including Ethics Commissions and the Inspectorate) has appropriate arrangements to assess new complaints, review decisions to take no action over complaints</p> | <p>The monitoring process is structurally embedded into the Land Registry's organisational processes.</p> <p>The monitoring process has a positive impact upon staff performance and professional development.</p> |
| <p>The outcome of the ethical audit is shared with the Head of the organisation</p> | |
| <p>There is a designated official point of contact with the external audit agency who is protected from dismissal on the grounds of co-operating with the external agency or drawing the agency's attention to activity or expenditure of concern or which may breach the organisation's responsibilities</p> | |
| <p>There are internal staff appointed to an internal audit unit with responsibility for auditing processes and systems, assessing risk and reporting on mismanagement,</p> | <p>Appointments have appropriate employment protection so that they can undertake these tasks without fear or undue influence or retaliation.</p> <p>There is a finance committee to receive reports from the internal audit unit which then reports to the</p> |

service quality and fraud

appropriate committee

SANCTIONING AND REWARDING INTEGRITY

Ensuring that all staff within the Land Registry understand the consequences of misconduct or poor standards of conduct; that such mechanisms are perceived to be both fair and effective; that the rewards system for exemplary conduct is fully understood and recognised

Evidence that

1. Good standards of conduct are incentivized for all members of staff
2. Incentives and sanctions are in place to deal with misconduct
3. Incentives and sanctions are understood by all members of staff
4. That incentives and sanctions are effective in developing a high ethical culture

Adequate performance

Performing well

Sanctions are in place to mitigate against misconduct and unethical behaviour

Sanctions are clearly communicated and understood by all staff of the Land Registry. External stakeholders and members of the public are aware of the sanctions process.

Ethical conduct is incentivized and good ethical performance is rewarded accordingly

Investigations and hearings are monitored

Investigations and hearings are fully transparent and their findings are freely available to staff of the Land Registry, external stakeholders and members of the public.

Incentives and sanctions are both built into the monitoring systems and processes. Incentives and sanctions are reviewed on a regular basis and are assessed for effectiveness.

Ethical behaviour and high standards of conduct are linked directly to professional development.

There is a protocol outlining the respective roles and responsibilities of the Ethics Commission and Disciplinary Board. This includes the handling of complaints and dealing with breaches of the Code.

Staff understand the relationship between the Ethics Commission and the Disciplinary Board.

Appendix 6: Diagnostic self-assessment survey

This survey is designed to be used by all members of Land Registry staff and evaluates perceptions of each of the four key benchmarks. Questions relate directly to performance indicators.

As part of the Land Registry's commitment to improving standards of conduct and ethical behaviour in the workplace, we are currently conducting a brief survey of members of staff.

The survey will take approximately 10-15 minutes to complete and asks questions about your perceptions of the Land Registry's policies of ethics and standards.

Each question has a score between 1 and 5:

- 1 = strongly disagree
- 2 = disagree
- 3 = neither agree nor disagree
- 4 = agree
- 5 = strongly agree

Once you have completed the survey please return to..... Our sincere thanks in helping out with this research

| | | 1 | 2 | 3 | 4 | 5 |
|--------------------------------------|--|----------|----------|----------|----------|----------|
| Section 1: Defining Integrity | | 1 | 2 | 3 | 4 | 5 |
| 1 | I have an excellent knowledge of the ethical principles of the Land Registry | | | | | |
| 2 | The ethical principles inform my actions at work | | | | | |
| 3 | I would never act against the ethical principles | | | | | |
| 4 | My manager makes me aware of the ethical principles | | | | | |
| 5 | My colleagues act in accordance with the ethical principles | | | | | |
| 6 | I know what to do if I am offered a gift from a customer | | | | | |
| 7 | If I was offered a gift or money, making the right decisions would be of most importance to me | | | | | |
| 8 | I have refused a gift or money from a customer in the last 12 months | | | | | |
| 9 | My manager encourages us not to accept gifts or money from customers | | | | | |
| 10 | My colleagues do not accept gifts or money from customers | | | | | |
| 11 | I have an excellent knowledge of the public sector code of conduct | | | | | |
| 12 | The code of conduct works well in the Land Registry | | | | | |
| 13 | I would not break the rules of the code of conduct | | | | | |
| 14 | My manager reminds me about the code of conduct when I am at work | | | | | |
| 15 | My colleagues act within the rules of the code of conduct | | | | | |

| | | | | | | |
|--|---|-------------|----------|----------|----------|----------|
| 16 | I have participated in ethics training in the Land Registry | | | | | |
| 17 | The ethics training has improved my performance at work | | | | | |
| 18 | I learned new ideas as a result of ethics training | | | | | |
| 19 | My manager has participated in ethics training | | | | | |
| Sub-total | | /100 | | | | |
| <p><i>n.b. a score of 30 or less is indicative that there are serious issues with the Defining Integrity function that need to be investigated further in the interviews/focus groups and prioritised in future action plans. A score of 31-70 suggests a medium performing function in which specific issues are more problematic than others, and which need to be investigated further in interviews/focus groups. A score of 71 and above suggests a high performing function but which, nevertheless, may show have some development issues, and indeed some areas of good practice that may need investigating further in interviews/focus groups.</i></p> | | | | | | |
| Section 2: Leading Integrity | | 1 | 2 | 3 | 4 | 5 |
| 20 | My colleagues have all participated in ethics training | | | | | |
| 21 | I do not break ethical rules in order to 'get the job done' | | | | | |
| 22 | I am prepared to question the actions of those around me | | | | | |
| 23 | I am prepared to question the actions of my manager and other senior managers | | | | | |
| 24 | I treat other people with consideration and respect | | | | | |
| 25 | My colleagues treat each other with consideration and respect | | | | | |
| 26 | That I perform to a high ethical standard is of great importance to me | | | | | |
| 27 | That my organisation performs to a high ethical standard is of great importance to me | | | | | |
| 28 | That our customers recognise our high ethical standards is of great importance to me | | | | | |
| 29 | That my manager performs to a high ethical standard is of great importance to me | | | | | |
| 30 | That my colleagues perform to a high ethical standard is of great importance to me | | | | | |
| 31 | My manager's actions always mirror a high ethical standard | | | | | |
| 32 | My manager keeps his promises | | | | | |
| 33 | My manager treats other people with consideration and respect | | | | | |
| 34 | My manager is truthful when he communicates with colleagues and myself | | | | | |
| 35 | My manager does not gossip about people at work | | | | | |
| 36 | I understand the role of the Ethics Commission in the Land Registry | | | | | |
| 37 | I have read some of the Ethics Commission's work in the last 12 months | | | | | |
| 38 | I trust the Ethics Commission to do the right thing | | | | | |
| 39 | My manager understands the role of Ethics Commission | | | | | |
| 40 | My colleagues understand the role of the Ethics Commission | | | | | |
| 41 | I have been involved in public awareness work of ethics | | | | | |
| 42 | The public trust the Land Registry | | | | | |

| | | | | | | |
|--|---|-------------|----------|----------|----------|----------|
| 43 | I treat every member of the public with equal respect | | | | | |
| 44 | My manager has led public awareness events | | | | | |
| 45 | My colleagues have been involved in public awareness events | | | | | |
| 46 | I am not afraid to speak my mind and be honest | | | | | |
| 47 | Honesty is encouraged in my place of work | | | | | |
| 48 | My manager is open with me and encourages me to talk openly with him | | | | | |
| 49 | My colleagues are honest with me and with each other | | | | | |
| 50 | I trust the people I work with | | | | | |
| Sub-total | | /125 | | | | |
| <p><i>n.b. a score of 40 or less is indicative that there are serious issues with the Leading Integrity function that need to be investigated further in the interviews/focus groups and prioritised in future action plans. A score of 41-90 suggests a medium performing function in which specific issues are more problematic than others, and which need to be investigated further interviews/focus groups. A score of 91-125 and above suggests a high performing function but which, nevertheless, may show have some development issues, and indeed some areas of good practice that may need investigating further in interviews/focus groups.</i></p> | | | | | | |
| Section 3: Monitoring Integrity | | 1 | 2 | 3 | 4 | 5 |
| 51 | I am fully aware of the role of the Regional Ethics Commissioner | | | | | |
| 52 | I have filled in a staff development survey within the last 12 months | | | | | |
| 53 | The Land Registry Inspectorate regularly communicates with us | | | | | |
| 54 | My manager has given me development work on standards and ethics | | | | | |
| 55 | Standards of conduct have improved in my office in the last twelve months | | | | | |
| 56 | I have a full knowledge of the role of the Land Registry Inspectorate | | | | | |
| 57 | The staff survey asks sensible questions on standards and ethics | | | | | |
| 58 | Ethics and standards of conduct are always improving | | | | | |
| 59 | I have undertaken additional study on ethics and standards of conduct | | | | | |
| 60 | My colleagues' standards of conduct have improved in the office in the last twelve months | | | | | |
| 61 | I know more about standards and ethics now than I did twelve months ago | | | | | |
| 62 | The Regional Ethics Commissioner regularly communicates with us | | | | | |
| 63 | I have read the annual report from the Land Registry Inspectorate | | | | | |
| 64 | My manager has met with me to discuss ethics development and training | | | | | |
| 65 | My colleagues behaviour has improved in the last 12 months | | | | | |
| 66 | I have read the annual report from the Regional Ethics Commissioner | | | | | |
| 67 | | | | | | |
| 69 | I have a full knowledge of the Land Registry TQM system | | | | | |
| 70 | Everyone is reminded of ethics rules and procedures | | | | | |
| Sub-total | | /100 | | | | |
| <p><i>n.b. a score of 30 or less is indicative that there are serious issues with the Monitoring Integrity function that need to be investigated further in the</i></p> | | | | | | |

interviews/focus groups and prioritised in future action plans. A score of 31-70 suggests a medium performing function in which specific issues are more problematic than others, and which need to be investigated further in interviews/focus groups. A score of 71 and above suggests a high performing function but which, nevertheless, may show have some development issues, and indeed some areas of good practice that may need investigating further in interviews/focus groups.

| Section 4: Rewarding Integrity | | 1 | 2 | 3 | 4 | 5 |
|---|---|-------------|----------|----------|----------|----------|
| 71 | I understand the investigations procedure for misconduct | | | | | |
| 72 | The Land Registry encourages us to behave ethically | | | | | |
| 73 | My colleagues understand what the consequences of misconduct will be | | | | | |
| 74 | I can direct customers to the correct complaints procedure | | | | | |
| 75 | I know where to find information about investigations and hearings | | | | | |
| 76 | Members of the public are aware of the investigations procedure | | | | | |
| 77 | My manager makes me aware of the process for investigating misconduct | | | | | |
| 78 | Members of the public know where to find the complaints procedure | | | | | |
| 79 | Training on investigations and hearings was helpful | | | | | |
| 80 | I am rewarded for my ethical behaviour | | | | | |
| 81 | The Land Registry rewards good conduct at work | | | | | |
| 82 | I understand what the consequences of misconduct will be | | | | | |
| 83 | My colleagues feel motivated to behave ethically | | | | | |
| 84 | I feel motivated to behave ethically at work | | | | | |
| 85 | Colleagues know where to access reports on investigations | | | | | |
| 86 | My manager makes me aware of the rewards for good behaviour | | | | | |
| 87 | I trust the investigations and hearings procedure | | | | | |
| 88 | I have received training on the investigations procedure in the Land Registry | | | | | |
| 89 | The investigations procedure is fair | | | | | |
| 90 | I have read the results of investigations in the last twelve months | | | | | |
| Sub-total | | /100 | | | | |
| <p><i>n.b. a score of 30 or less is indicative that there are serious issues with the Rewarding Integrity function that need to be investigated further in the interviews/focus groups and prioritised in future action plans. A score of 31-70 suggests a medium performing function in which specific issues are more problematic than others, and which need to be investigated further in interviews/focus groups. A score of 71 and above suggests a high performing function but which, nevertheless, may show have some development issues, and indeed some areas of good practice that may need investigating further in interviews/focus groups.</i></p> | | | | | | |
| | | | | | | |

Appendix 7: Interview and focus group questions

These questions are designed to provide more detailed information on the four benchmark areas of defining; leading; monitoring and sanctioning and rewarding integrity. They should provoke a detailed response and interviewers may need to ask supplementary questions that are not here.

The questions are designed primarily for more senior members of the Land Registry: branch managers; members of the Ethics Commission (and regional Ethics Commissions); members of the inspectorate division; etc. They can, however, be offered to anybody and the answers can be used to cross reference with the initial responses from the self-assessment survey.

As such the questions can be used in face-to-face interviews or with focus groups

| | |
|---|--|
| 1 DEFINING INTEGRITY | |
| Ensuring that the standards of conduct in the Land Registry are clearly defined, communicated and understood by all members of staff. | |
| Evidence that: | |
| <ol style="list-style-type: none"> 1. Organisational values are known and used 2. Senior managers understand the ethical framework 3. Staff understand and abide by the code of conduct 4. Active promotion of vision and principles by senior management 5. Training sessions are participatory | |
| ETHICS AUDIT QUESTIONS | |
| ANSWERS | |
| 1.1 | How are the ethical principles incorporated into daily working practices? Does the workforce have a thorough understanding of the ethical principles? Do they demonstrate these principles in their behaviour? |
| 1.2 | To what extent are the ethical principles into policies on Equality, Human Rights, etc.? |
| 1.3 | Are there any serious issues with standards of conduct at work? Is there any evidence of inappropriate use of resources? |
| 1.4 | Is there any evidence that people ever |

| | |
|---|--|
| 1 DEFINING INTEGRITY | |
| Ensuring that the standards of conduct in the Land Registry are clearly defined, communicated and understood by all members of staff. | |
| Evidence that: | |
| <ol style="list-style-type: none"> 1. Organisational values are known and used 2. Senior managers understand the ethical framework 3. Staff understand and abide by the code of conduct 4. Active promotion of vision and principles by senior management 5. Training sessions are participatory | |
| ETHICS AUDIT QUESTIONS | ANSWERS |
| | do anything which compromises or is likely to compromise the reputation of the Land Registry? |
| 1.5 | <p>Is there an anti-bullying policy? How is information about this policy disseminated? Is there any evidence of bullying in the workplace?</p> |
| 1.6 | <p>Have all members of staff been involved in ethics training? Are there any specific areas that require further training or development? Is there annual 'refresher' training for staff?</p> |
| 1.7 | To what extent do leaders and managers work with staff to overcome specific issues with misconduct? |
| 1.8 | <p>How public facing is the Land Registry's ethics work? Have you been involved personally in any ethics work with the public or other external stakeholders? Is your website regularly updated to ensure broad public access and transparency? Are all relevant policies and procedures available to the public? Are the public made aware of data protection issues?</p> |
| 1.9 | <p>Is there an anti-corruption strategy? Who was involved in its development?</p> |

| | |
|---|---|
| 1 DEFINING INTEGRITY | |
| Ensuring that the standards of conduct in the Land Registry are clearly defined, communicated and understood by all members of staff. | |
| Evidence that: | |
| <ol style="list-style-type: none"> 1. Organisational values are known and used 2. Senior managers understand the ethical framework 3. Staff understand and abide by the code of conduct 4. Active promotion of vision and principles by senior management 5. Training sessions are participatory | |
| ETHICS AUDIT QUESTIONS | |
| ANSWERS | |
| 1.10 | Does the Ethics Commission have its own website? What information is provided on the website? |
| 1.11 | Are there guidelines on expenses and allowances? To what extent are these guidelines followed? |
| 1.12 | Is there a policy on recordkeeping and storage time? To what extent is this policy followed? |
| 1.13 | Are there any policies on data protection and access to information? To what extent are these policies followed? |

2 LEADING INTEGRITY

Ensuring that leaders and managers lead by example and set the correct ethical tone within the organisation; that they offer a positive example of ethical behaviour; that staff members trust and feel confident in the leadership of the Land Registry.

Evidence that:

1. Senior managers are recognised by staff as having high standards of conduct and leading by example
2. Willingness of people to behave as self-leaders and take action on poor standards of conduct
3. Understanding throughout Land Registry of individual and collective responsibility for maintenance of high ethical standards
4. The role of the regional sub-commissions is known and understood
5. That there is an active culture of integrity within the Turkish Land Registry

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|--|---------|
| 2.1 | What examples are there of leaders and managers within the Land Registry leading by example in terms of ethics and standards of conduct? | |
| 2.2 | What evidence is there that members of the Land Registry at all levels understand their respective roles? | |
| 2.3 | What training, guidance or support have members of the Land Registry received to familiarise themselves with the Ethics Commission and Regional Ethics Commission? | |
| 2.4 | What are the terms of reference of the Ethics Committee? What are the terms of reference for the Regional Ethics Committees? | |
| 2.5 | Is the leadership of the Land Registry trusted by staff? Is the leadership trusted by external stake-holders and members of the public? | |
| 2.6 | Do staff of the land registry treat each other with respect? Do they treat customers with equal respect? | |
| 2.7 | Are staff of the Land Registry aware of procedures and guidelines on | |

2 LEADING INTEGRITY

Ensuring that leaders and managers lead by example and set the correct ethical tone within the organisation; that they offer a positive example of ethical behaviour; that staff members trust and feel confident in the leadership of the Land Registry.

Evidence that:

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2. Willingness of people to behave as self-leaders and take action on poor standards of conduct
3. Understanding throughout Land Registry of individual and collective responsibility for maintenance of high ethical standards
4. The role of the regional sub-commissions is known and understood
5. That there is an active culture of integrity within the Turkish Land Registry

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|--|---------|
| | workplace bullying, or whistle blowing? Is there evidence to demonstrate that members use these procedures? | |
| 2.8 | Is there evidence to show that staff of the Land Registry understand policies on accepting gifts or money from customers? Is there evidence that some people do not follow these policies or guidelines? | |
| 2.9 | Do staff of the Land Registry work within the ethos of collective responsibility? Do they mutually support each other and offer guidance and help on an informal basis? Is there any mentoring in terms of ethics or standards of conduct? | |
| 2.10 | Do staff of the Land Registry trust the colleagues they work alongside? | |
| 2.11 | Do members of the public and other external stakeholders generally trust their dealings with the Land Registry? | |
| 2.12 | Are you a manager or leader within the Land Registry? What advice, support and information do you provide to colleagues? | |

2 LEADING INTEGRITY

Ensuring that leaders and managers lead by example and set the correct ethical tone within the organisation; that they offer a positive example of ethical behaviour; that staff members trust and feel confident in the leadership of the Land Registry.

Evidence that:

1. Senior managers are recognised by staff as having high standards of conduct and leading by example
2. Willingness of people to behave as self-leaders and take action on poor standards of conduct
3. Understanding throughout Land Registry of individual and collective responsibility for maintenance of high ethical standards
4. The role of the regional sub-commissions is known and understood
5. That there is an active culture of integrity within the Turkish Land Registry

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|--|---------|
| | How do you ensure your role is valued by colleagues? | |
| 2.13 | Do staff of the Land Registry have easy access to managers and leaders? Does the public have easy access to managers and leaders? | |
| 2.14 | How is the importance of high ethical standards communicated among staff of the Land Registry? | |
| 2.15 | Are there processes for advertising, appointing and promoting staff? To what extent are these followed? | |
| 2.16 | What activities to Ethics Commission undertake to promote ethical behaviour? | |

3 MONITORING INTEGRITY

Ensuring that behaviour and standards of conduct are monitored through open, fair, and transparent process that all staff are aware of and have confidence in.

Evidence that:

1. Annual reports are accessible to all members of staff
2. Strengths and weaknesses are regularly assessed and acted upon
3. Role of the regional inspectorate is known and understood
4. Staff are aware of and participate in annual surveys
5. The ethics dimension of the Land Registry's TQM process is understood

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|---|---------|
| 3.1 | Do the Annual Reports published by the Land Registry have an area that deals with ethics and standards of conduct? | |
| 3.2 | How accessible is the Annual Report to all members of the Land Registry? How accessible is it to external stakeholders and members of the public? | |
| 3.3 | How embedded is ethics monitoring? Is there evidence that it is built into the Land Registry's organisational policies and processes? | |
| 3.4 | Is there a specific section on ethics and standards of conduct in the annual staff survey? Are these questions linked with professional development of members of the Land Registry? Is there evidence that the Land Registry has directly acted upon the results of the Annual Survey in terms of ethics and standards of conduct? | |
| 3.5 | Are the terms of reference for the Ethics Commission (and Regional Ethics Commissions) available to all staff of the Land Registry? Are the terms of reference for the Ethics Commission (and Regional Ethics Commissions) available to external stakeholders and members | |

3 MONITORING INTEGRITY

Ensuring that behaviour and standards of conduct are monitored through open, fair, and transparent process that all staff are aware of and have confidence in.

Evidence that:

1. Annual reports are accessible to all members of staff
2. Strengths and weaknesses are regularly assessed and acted upon
3. Role of the regional inspectorate is known and understood
4. Staff are aware of and participate in annual surveys
5. The ethics dimension of the Land Registry's TQM process is understood

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|--|---------|
| | of the public? | |
| 3.6 | What monitoring procedures are carried out to evaluate the public perception of the Land Registry? Is there evidence that any actions have been taken as a direct result of these evaluations? | |
| 3.7 | Do members of the Land Registry have easy access to the Inspectorate division? Do external stakeholders and members of the public have access to the Inspectorate division? | |
| 3.8 | How many investigations have been conducted by the Inspectorate in the last 12 months? | |
| 3.9 | Are investigations and the results of investigations publicly available? | |
| 3.10 | Are arrangements for monitoring adequate at the local, regional and national levels? | |
| 3.11 | Are all aspects of the ethics process monitored? <ul style="list-style-type: none"> • Terms of reference for Ethics Commissions and Inspectorate? • Training materials, both content and delivery style? • The ethical principles? • Stakeholder and public engagement mechanisms? | |

4 SANCTIONING AND REWARDING INTEGRITY

Ensuring that all staff within the Land Registry understand the consequences of misconduct or poor standards of conduct; that such mechanisms are perceived to be both fair and effective; that the rewards system for exemplary conduct is fully understood and recognised

Evidence that

1. Good standards of conduct are incentivized for all members of staff
2. Incentives and sanctions are in place to deal with misconduct
3. Incentives and sanctions are understood by all members of staff
4. Incentives and sanctions are effective in developing a high ethical culture

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|--|---------|
| 4.1 | Is there an incentivisation scheme for good standards of conduct and ethical behaviour in the Land Registry? Is there evidence that it is effective? How is the scheme managed and monitored? | |
| 4.2 | Are members of the Land Registry aware of the investigations and hearing process? Are members of the public aware of the investigations and hearing process? | |
| 4.3 | Are the terms of reference for the Disciplinary Board accessible to all? | |
| 4.4 | How many hearings did the Disciplinary Board deal with in the last 12 months? Was this number higher or fewer than previous years? What follow-up work has been conducted to try and tackle issues of misconduct or unethical behaviour? | |
| 4.5 | Are members of the Land Registry aware of the criminal charges that could possibly be brought against them in some circumstances? How is this information communicated? | |
| 4.6 | How effective are sanctions against misconduct and unethical behaviour in the Land Registry? Is there any evidence to support this? | |
| 4.7 | How effective are incentivization | |

4 SANCTIONING AND REWARDING INTEGRITY

Ensuring that all staff within the Land Registry understand the consequences of misconduct or poor standards of conduct; that such mechanisms are perceived to be both fair and effective; that the rewards system for exemplary conduct is fully understood and recognised

Evidence that

1. Good standards of conduct are incentivized for all members of staff
2. Incentives and sanctions are in place to deal with misconduct
3. Incentives and sanctions are understood by all members of staff
4. Incentives and sanctions are effective in developing a high ethical culture

| ETHICS AUDIT QUESTIONS | | ANSWERS |
|------------------------|--|---------|
| | schemes in the Land Registry? Is there any evidence to support this? | |
| 4.8 | What informal mechanisms are used to tackle misconduct? <ul style="list-style-type: none"> • Informal hearings? • Informal warnings? • Coaching and mentoring? • Extra training and development? | |
| 4.9 | What is the relationship between the Ethics Commission and the Disciplinary Board? How well understood is this relationship by staff? | |

Appendix 8: Suggested documents to be analysed

The following list is an indicative list only and should be revised and expanded (where necessary) before the ethics audit is conducted.

1. Ethical principles
2. Code of conduct
3. Training materials
4. Annual reports
5. Ethics week materials
6. Awareness raising materials
7. Investigations process
8. Terms of reference
9. Minutes of meetings
10. Anti-corruption strategy
11. Data protection policy
12. Recruitment and appointments policies
13. Expenses and allowances policy
14. Finance committee reports
15. Internal and external audit reports

Appendix 9: Action Plan Template

| Area for improvement | Proposed actions to be taken | Resources required | Target date of implementation | Desired outcomes (Improvement measures) | Immediate, Medium or Long Term priority |
|-----------------------------|-------------------------------------|---------------------------|--------------------------------------|--|--|
| | | | | | |