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**Integrity in Government: Towards Output and Outcome Measurement**

**Expert Group on Conflict of Interest  
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*This document provides background for discussion on options for future directions.*

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## INTEGRITY IN GOVERNMENT: TOWARDS OUTPUT AND OUTCOME MEASUREMENT<sup>1</sup>

### INTRODUCTION

1. In 2005, the OECD assessed that countries have in the last decade made substantial efforts to develop institutions, systems and mechanisms for promoting integrity and preventing corruption in the public service (OECD, 2005). This resulted in a growing demand for evidence of impact of these initiatives. The development of international comparative measures of the success of integrity policies is a promising avenue for fulfilling this demand for evidence. Obviously, as with any international comparative measurement effort, the obstacles are vast. Different national practices, structures and cultures have led to differences in data registration and to definitional issues. However, there are reasons to believe that we can move ahead.

2. First of all, integrity is an issue all countries; from rich to poor. Mark Davies of the New York Integrity Bureau notes that “amazingly, the kinds of problems are remarkably similar. Now the solutions may be very different, but the problems are amazingly the same. Gifts, misuse of office, post-employment (revolving door), nepotism, moonlighting, and so forth.(Davies, 2005)” He further remarks that “conflicts of interest problems appear strikingly similar throughout the world; and thus a template, a framework, a skeleton for a conflicts of interest system that is globally uniform exists. But the solution of conflicts of interest problems within that system must be tailored to the particular nation, society, and culture(Davies, 2005)”. This is a hopeful perspective for the development of output and outcome data. There is a fundamental common understanding of the integrity issues on which we can start to build measurement practices.

3. The purpose of this paper is to explore strategies to further develop integrity measurement. Unlike some international monitoring initiatives and commercial risk assessments, we use a bottom up approach. Countries are already taking initiatives to measure the success of integrity policies. We study current national practices and then ask whether these practices can be useful for developing international comparative measurement. The benefit of this approach is that we more strongly connect with practical measurement applications, and therefore, the chances are higher that we end up with actionable and validated measures.

4. Besides being a technical paper for the development of Government at a Glance, we also hope that it can be a source of inspiration for national measurement practices. By showing what other countries are doing, and by revealing some of the challenges in measurement, we hope that countries may be triggered to further seek more advanced measurement practices to evaluate their integrity initiatives.

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<sup>1</sup> This report was written by Dr. Wouter Van Dooren, University of Antwerp, Department of Political Science.

5. The structure of the paper is as follows. First we solve some definitional issues on output and outcome measures. We discuss what they mean in general terms (chapter 2) and then apply the terms to the special case of public governance (chapter 3). Outputs are the goods and services that government provides while outcome is the impact of these goods and services in society. Outputs and outcomes of public governance processes such as HRM and budgeting are not directly felt in society. Rather, a performing public governance process is enabling others such as line departments to have an impact on society. Chapter 4 is discussing current measurement practices in a selection of OECD countries. The country files, with several concrete excerpts and examples are included in the annexes. This is the empirical foundation on which the analysis is built. We first discuss some notable observations from the country practices and then provide some points of discussion. Chapter 5, the core of the paper, is making suggestions for international comparative integrity measures. Some may be collectable in the short term, while others require more development effort. Table provides a feasibility assessment.

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## EXECUTIVE SUMMARY

6. Countries have in the last decade made *substantial efforts* to develop institutions, systems and mechanisms for promoting integrity and preventing corruption in the public service.

7. At the same time, the *demand for evidence* on the effectiveness of these arrangements is growing. Countries want to know whether the money spent on integrity policies adds value. Are integrity policies efficient and effective?

8. The *financial turmoil and the resulting economic crisis will in all probability reinforce this demand for evaluation*. The economic stimulus programmes will undoubtedly necessitate fiscal discipline when the economy picks up. Public expenditure will be critically reviewed. Public governance processes such as integrity should and will not be an exception.

9. *International benchmarking is one of the most promising avenues* for obtaining insights on the efficiency and effectiveness of integrity policy. More than other kinds of evaluation, international benchmarking challenges national practices and requires decision makers to think out of the box.

10. This paper explores the opportunities for developing international benchmarks for integrity. Some people question whether it is feasible at all to develop such measures. *We demonstrate in this text that it can be done*. It should be done cautiously, with a lot of attention for the stories behind the data, for the national contexts and for what we do not measure. Nevertheless, it can be done.

11. International benchmarks should put countries on their way to learning and change. Therefore, *measures have to be actionable*. Several existing international integrity monitoring initiatives are critiqued precisely on this point. They do not give clues on what to change in order to do better. The actionability of the measures may prove to be one of the key features of the OECD initiatives.

12. This text therefore follows a *fundamentally different approach* compared to international monitors. We analyse existing measurement practices in countries, and then ask whether we can build international benchmarks on these foundations. Table 7 on page 53 represents an overview of the feasibility assessment for the 38 indicators that are discussed in the text.

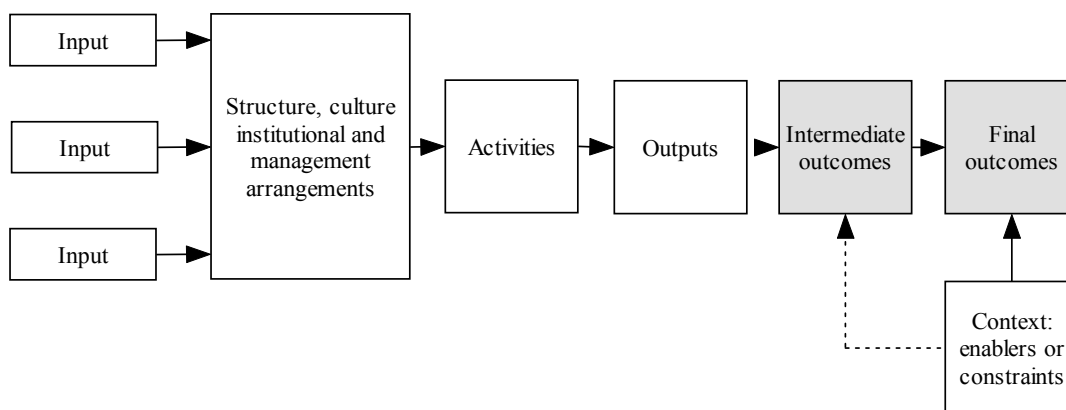
13. One of the most notable opportunities is the development of an *OECD integrity module* that can be inserted into staff surveys. Personnel are in many instances the target group of initiatives and key witnesses for assessing trends in integrity. Moreover, and very importantly, the data infrastructure is already available. Most countries are already performing staff surveys and some countries already including ethics items. International standardisation can strongly increase the value of these items, since rich benchmarking opportunities arise.

14. Finally, we also hope that this text can be a *source of inspiration for national measurement practices*. By showing what other countries are doing, and by revealing some of the challenges in measurement, we hope that countries may be triggered to further seek more advanced measurement practices to evaluate their integrity initiatives and share them with other countries.

## WHAT ARE OUTPUTS AND OUTCOMES?

15. Outcome and output are *well accepted notions*. Figure 1 situates output and outcome in a public production process. This model is the mindset of many researchers and practitioners in both public administration and policy evaluation. Although some terminological issues remain and although some analysts will primarily emphasise the importance of contextual factors, the main building blocks have become widely accepted foci of public administration theory and practice.

**Figure 1: Identifying outcomes in the public production process**



Source: Van Dooren et al. (2006).

16. *Outcomes* are the result of *activities* that convert *inputs* to *outputs*. The transformation of inputs such as financial and human resources to activities is mediated by the structure of government, the cultural predispositions and the institutional and management arrangements. Outputs are the goods and services which public organisations supply in response to a demand. Outcomes are the consumption of the goods and services (intermediate outcomes) as well as the effects this consumption entails (final outcomes).

17. The criterion for assessing outcome is *added value* (Moore, 1995). The added value of a private firm is the result of the aggregation of individual decisions to consume (to buy) a service or a good at a given price. The (sustainable) profit of a firm can be conceptualised as its outcome in society. Profit is the sum of values that individuals attach to a good or service, minus the costs of production. Free riders problems<sup>2</sup> and positive and negative externalities<sup>3</sup> of consumption however make that we cannot rely on individual consumption decisions for all goods and services (Musgrave, 1959). Here, public services step in. The criterion of added value remains intact however, but we talk of *public value* rather than *private value*. In absence of monetary profits, it is much more difficult for public organisations to assess outcomes.

18. In definitional discussions, the devil is in the detail. When we have to label an indicator as input, output or outcome, much more disagreement arises.

- Although seemingly obvious, the *distinction between input and output* is sometimes controversial. For example, a apparently simple measure such as the number of pupils is

<sup>2</sup> A free rider is someone who enjoys the benefits of a public good without bearing the cost. The image of someone who uses public transport without paying is illustrative.

<sup>3</sup> Externalities are those costs and benefits attributable to an activity that is not reflected in the price of the goods or services being produced.



classified as an input of a process by some and an output by others (Van Dooren, 2004). Those who would say pupils are inputs regard them as the intake, the raw material, of the education activities. Those who see the number of pupils as an output consider it to reflect the bundle of services a school provides including teaching, managing, support, cleaning, catering, etc.

- Even more disputed is the *distinction between output and intermediate outcome*. An example concerns the measure ‘graduated students’. In some data sets, this indicator is seen as output. In this view, the service (or output) is complete when the student is successfully educated. Others regard it as an intermediate outcome, because graduation proves the absorption of a provided service (education) by the target group (pupils). We will follow the latter view. When the outside world comes in, it is outcome. In this view, schools do not supply diplomas. They supply courses which hopefully lead to diplomas when students absorb knowledge. Table 1 reflects this clear demarcation line between output and outcome.
- The third distinction is *between intermediate and final outcomes*. Intermediate outcomes are a necessary, but insufficient condition for final outcomes. Often, the intermediate outcome will be the response/acceptance by a target group of a public service. Suppose an employment agency provides courses for reintegration into the labour market for unemployed, and suppose that only a marginal percentage of the unemployed is responding to the service, then it will be certain that the ultimate outcome of reintegration will not be attained. On the contrary, when a significant percentage of unemployed is following a course, we cannot be certain of the final outcome. Contextual factors such as the economic growth will restrain (in case of economic hardship) or enable (in case of economic growth) the final outcome. These contextual factors will have a higher impact on the final outcomes than on the intermediate outcomes. The decision of unemployed to follow job training will depend less on economic growth than the chance of them actually finding a job. In this example the final outcome will be the number of unemployed who took the course and found suitable employment afterwards.

**Table 1: The demarcation line between output and outcome**

Supply		Demand	
Input →	Output →	Intermediate outcome →	Final outcomes
Productivity/efficiency		Effectiveness	
Resources	Goods and services	Response of target group use of goods and services, satisfaction, waiting lines, ...	Desired state of society
What is needed to make it happen?	What do we have to do?	What do we want to achieve in the short term?	What do we ultimately want to achieve?

Source: van den Heuvel, 1998.

## OUTPUTS AND OUTCOMES OF PUBLIC GOVERNANCE

19. The development of output and outcome indicators for public governance requires an understanding of two defining features of the nature of public governance.

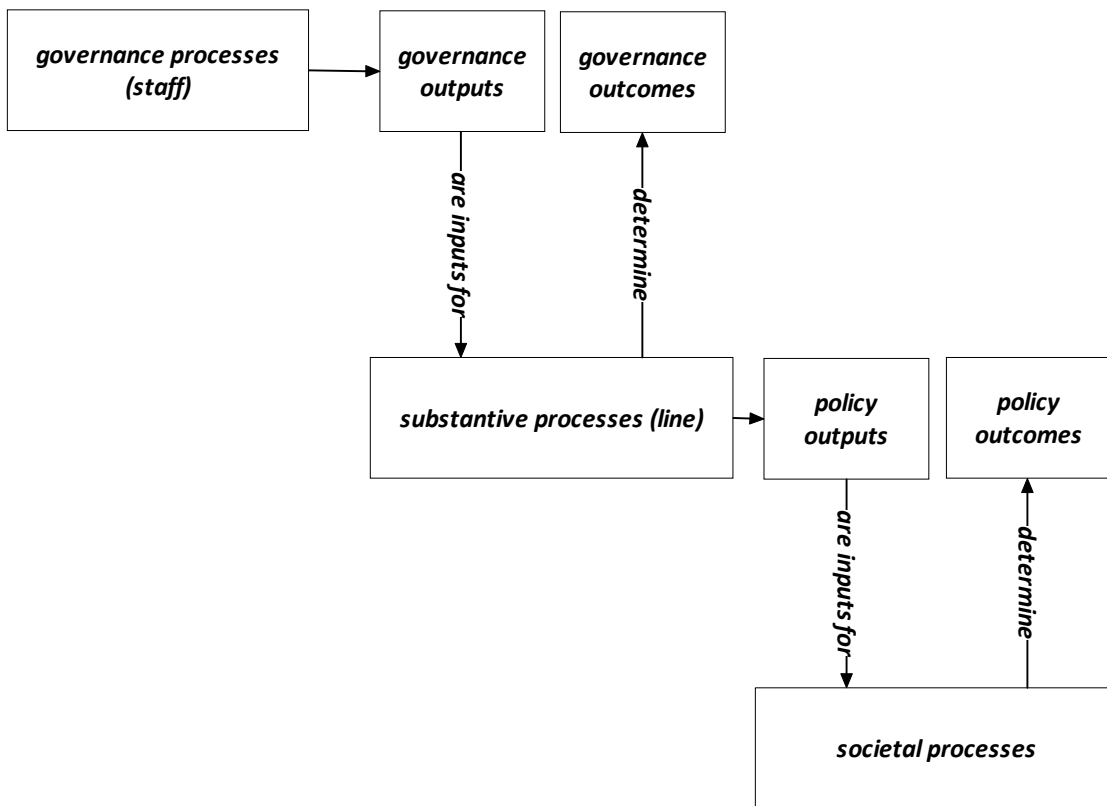
20. First, public governance is about *enabling rather than delivering*. Public governance does almost never provide final goods and services. Governance however is a precondition for the successful operation of other government departments. It is government for government, rather than government for the citizens. That takes nothing away from its importance. Public service delivery is a chain of inputs and outputs. Clearly, governance arrangements are to be found earlier in the chain. Schools need to be staffed and financed before they can provide teaching.

21. The *chain of impact* is schematically represented in Figure 2. Governance processes, including typical staff functions such as financing and HRM, are a precondition for what we call substantive processes. The latter are performed by the line departments and agencies. Governance outputs are inputs for the substantive processes. For instance, ethics training sessions are an output for an ethics division but an input for a social security department. The outcome of the training sessions is a better awareness of ethics issues within the administration of the social security. In the same way, the number of administered allowances is an output of the social security administration that is an input for societal processes. If it shows that thanks to the allowance more people are saved from poverty, than this a policy outcome.

22. The gap between a governance process such as ethics policies and a policy outcome such as poverty in society is rather *a grand canyon than a gap*. It seems a great leap to jump across the canyon from integrity training to poverty statistics. However, by taking the intermediate processes into the chain into consideration, we might be able to bridge the gap. Governance processes should in the first place improve the quality of governance, and enable others to govern society.

23. A second typical feature of the administrative policy sector is its *cross-cutting nature*. Precisely because it is an enabler, public administration impacts all other policy sectors. This is also one of the explanations why it is so difficult to implement government wide administrative policies. Often, they are perceived to run counter to the vested interests and practices of the policy sectors (for an elaborate discussion of the recent wave of New Public Management reforms, see Pollitt and Bouckaert (2004).

Figure 2: A chained approach to outcome



24. The consequence is that outputs of governance processes are the inputs for substantive processes in the line departments and agencies. If we want to identify output, we have to ask: *what products and services do governance processes deliver to line agencies?*

25. The consequence is that outcomes of public governance primarily have to reflect its ability to facilitate policy sectors. If we want to identify outcome, we have to ask: *do governance processes succeed in enabling performance of other sectors?*

## INTEGRITY INDICATORS: A REVIEW OF PRACTICES IN OECD COUNTRIES

26. We studied measurement practices in a varied selection of OECD countries; Australia, Belgium, Finland, France, Korea, the Netherlands, the United Kingdom and the United States of America. Table 2 represents, in a rather stereotypical way, the distinctive features of a country’s integrity institutions and their measurement efforts. For more detail and more nuances on the country practices, we refer to the section 0, which includes the Appendices.

**Table 2: Key features of national measurement practices**

	Key features
Australia	Rather centralised system with strong integrity actors Multi dimensional measurement (perceptions and volumes)
Belgium	Integrity is highly embedded in risk analysis and internal control Relatively few measurement efforts
Finland	Mainstreaming of integrity Some measurement on public values
France	Legal approach, driven by the ministry of justice Criminal justices statistics
Korea	Citizen focussed, sunshine model Emphasis on stakeholder surveys as part of a more comprehensive approach
The Netherlands	Decentralised system – integrity is the responsibility line managers Measurement of adoption
United Kingdom	Fragmentation of ethics oversight – emphasis on codes and politicians Measurement takes contextual factors into account in surveys
United States	Strong emphasis on disclosure (sunshine principle) Multi dimensional measurement (perceptions and volumes)

27. The analysis of the country cases triggers questions on how to move ahead. Below some difficulties and opportunities in moving from national practices towards international comparative measures are discussed.

### **What is the impact of institutional arrangements on measurement?**

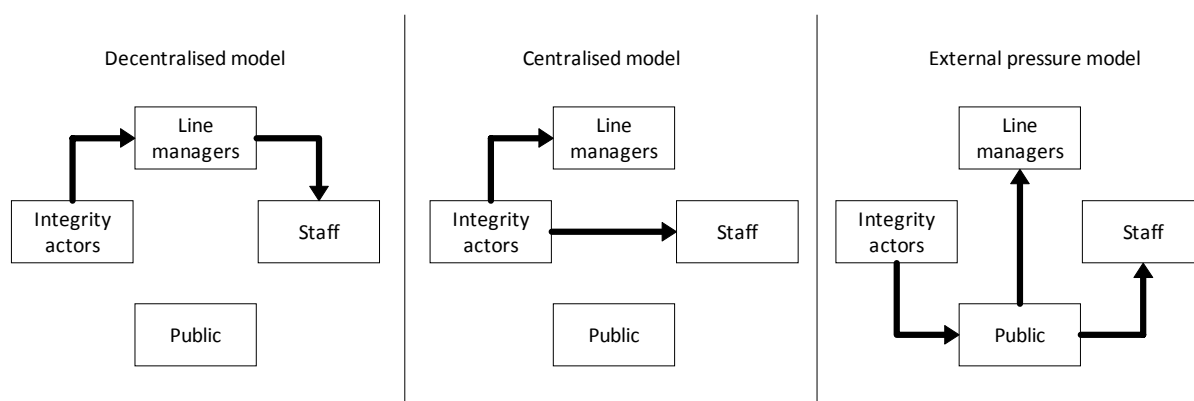
28. Variation in institutional arrangements is obviously very rich, but decentralisation stands out as a factor that may have a considerable impact on measurement. We focus here on the decentralisation of

integrity policies from central integrity actors to line managers (and not on decentralisation from central to regional and local governments). A second institutional factor is whether pressure on behaviour comes from within government or from outside. Pressure from the public will often be mediated through interest groups and media. Three ideal-typical cases can be distinguished (Figure 3). Ideal-typical is the sociological term for a pure case and includes no normative judgement. In practice, these pure cases will rarely be found. However, by describing these cases as ideal types, we may be better able to describe towards which model practices incline.

29. First, some countries mainly count on line managers to implement integrity policies. Central integrity actors in these cases mainly raise awareness and build knowledge for line managers. The latter then have to set up adequate mechanisms and influence behaviour of staff in the organisation. Finland and the Netherlands have many features of this system. Other countries opt for a more central mode where integrity actors have a stronger role in investigation and sensitising staff. The commonwealth of Australia and New South Wales seems to be an example. Integrity actors directly address managers and staff. Thirdly, some countries do more than others rely on external pressure to influence behaviour. The USA and Korea seem to follow this model.

30. Note that the models depicted in Figure 3 are ideal typical, pure arrangements. In practice, countries will have blended arrangement with characteristics of all models. Moreover, the ideal typical models do not make normative claims about the best model, since such models are contingent on the national practices and culture. However, the development of comparative measurement may provide evidence that enables countries to strategically adopt successful elements of other countries.

**Figure 3: Three ideal typical representation of integrity arrangements**



31. Different arrangements will have *an influence on the measurement of integrity*. First, it seems plausible that decentralised systems will have more problems with data collection. Unlike in centralised systems, data holdings will often be decentralised as well, which requires often difficult aggregation procedures. Secondly, in decentralised systems fewer integrity breaches may be counted since line managers may mediate between staff and integrity actors. Line managers may be more inclined to solve minor integrity issues without registering them. Central integrity actors on the contrary will probably be more inclined to register all infringements, however small they may be. For integrity actors, registration is often one of the core processes of the organisation. Thirdly, an indicator that measures the adoption of integrity policies by departments and agencies will mainly make sense in decentralised systems where it is the actual responsibility of line managers to implement integrity policies.

### **A focus on politicians, civil servants, or both?**

32. Some countries mainly focus on the integrity of civil servants (e.g. the Netherlands, Belgium, and Finland). Other countries focus on both (e.g. Australia, USA). The French SCPC focuses also on private sector corruption. It seems that all countries look at least at civil service, while some countries take either politicians or private companies into account as a surplus. In any case, a choice about the focus of its measurement efforts seems appropriate.

### **Towards a 360° assessment of stakeholders?**

33. All countries use surveys to assess integrity. However, few countries succeed in developing a 360° approach. This would imply that all stakeholders are questioned. Korea for instance has one of the largest scale surveys of the general public. Flanders (Belgium) includes some integrity questions in its staff survey, but only for middle and top management. A minimal 360° assessment would combine surveys of staff and businesses and citizens. An extended assessment might include other actors such as middle and top managers, politicians, local businesses, foreign businessman, non profits, journalists, experts, etc.

### **Can we join in with existing staff surveys with an OECD integrity section?**

34. Staff is a *privileged witness* of the state of integrity. The perception of staff of the integrity of their organisation is much more experience based than for instance businesses who have limited dealings with the public sector. Moreover, they are the main target group of most integrity initiatives. Therefore, it seems safe to assume that staff is one of the most important sources for assessing outcomes of integrity policies.

35. One of the most promising steps forward in the short term is the development of a *limited set of standardised integrity questions* that can be inserted by countries in their staff surveys. Almost all countries have staff surveys and most of these surveys live up to scientific standards in terms sampling and inference. Several countries already integrate integrity items in the staff surveys. The benefits of such an agreed upon integrity section are two-fold. For the OECD's Government at a Glance, this is an unparalleled source of information while for the participating countries; a well founded benchmark can be developed. Moreover, the integrity section can be used to compare several staff surveys within a country, e.g. for different states, for different tiers of government and for different policy sectors.

### **What is the utility of Criminal Justice statistics?**

36. Criminal justice statistics are *available in all countries* and may be an interesting source of information that is probably worth checking. France as well as the USA report criminal justice statistics on public integrity. The SCPC counted 274 convictions in France in 2006 (*Service central de le prévention de la corruption*, 2008: p 193) while the USA counted 764 cases (US Department of Justice, 2007: p45-46). The USA has 2.78 as much convictions as France, while the USA public sector is 3.75 times as big as the French public sector (in expenditure terms).

37. This rough calculation would suggest that France has somewhat more corruption than the USA. However, we believe that this conclusion would be premature. We need to be sure that the USA criminal justice statistics include exactly the same offences as the French. *Two strategies* may be used in order to assure that we do not compare apples with oranges; developing a uniform classification scheme or highlight a limited number of offences for which statistics are available.

**Towards a uniform classification scheme?**

38. OECD countries do not appear to disagree much on what they consider to be an integrity breach. Merit is an important principle in all countries. Most countries agree that gifts should not be tolerated, that bribes cannot be accepted and that private interests may influence public decision makers. However, due to terminological and definitional differences, international comparison is hindered.

39. For purposes of international data collection and comparability of systems, a uniform classification scheme is integrity breaches may be very beneficial (similar to the classification standards that are developed for accounting). Obviously, countries would have to adapt their national registration systems for the classification scheme to be fully effective. Evidently, this is a long term strategy.

**Is it possible to single out commonly understood integrity breaches?**

40. A strategy that is more feasible in the short term is to highlight specific dimensions that are quite uniformly understood. For instance, gift policies should be quite easy to compare. Probably, bribery is also a phenomenon that is uniformly understood. In developing indicators for the Government at a Glance project, we may attempt to agree on a common set of phenomena in order to focus our measurement efforts. Indicators of these phenomena may serve as blinking indicators.

**Should data on the context/work environment be included?**

41. The context of the work environment of public officials also determines the propensity of integrity breaches. Relatively few measurement practices take the context in account. Notable examples are the Finnish survey on 'public values in the daily work' and the UK public attitudes survey.

**GAP ANALYSIS: MEASURES FOR THE INTEGRITY FRAMEWORK**

42. In this section, we develop some *proposals of concrete output and outcome measures*. The aim is to provide suggestions for discussion. In the debate, it is important to clearly separate two issues; are the proposals meaningful/useful, and are the proposal feasible. By providing examples, we attempt to give an indication on the latter question. Before we develop the measures however, we first determine the main concepts; what are outputs and outcomes, and, what are outputs and outcomes in a public governance context.

43. Outputs and outcomes of governance thus are in first order showing inside government and in second order, through better performance and probity, in society. We now apply this line of thinking on one particular area of governance, i.e. integrity policy and management<sup>4</sup>. Government at a Glance has the ambition to develop output and outcome measures in a similar vein for other governance areas such as HRM, budgeting and open government.

44. We use the integrity framework developed in earlier OECD work (OECD, 2008b) as a starting point. The framework is represented in Figure 4. It represents all the components of a sound integrity system.

**Figure 4: The integrity framework**

Integrity Framework							
Integrity Management Framework					Context		
Core			Complementary			Inner context	Outer context
Instruments	Processes	Structures	Instruments	Processes	Structures		

Source: OECD, 2008b.

45. Some distinctions are important for a good understanding of the framework.
1. The distinction between integrity management and integrity. Integrity management reflects those activities that aim at improving or maintaining integrity. Integrity is the outcome we want to attain by the outputs of integrity management processes.
  2. The distinction between instruments, processes and structures. We will focus on the performance (outputs and outcomes) of instruments. The differences in performance however should be explained in terms of structures and processes. Indeed, the main aim of measuring results is to improve processes and structures.

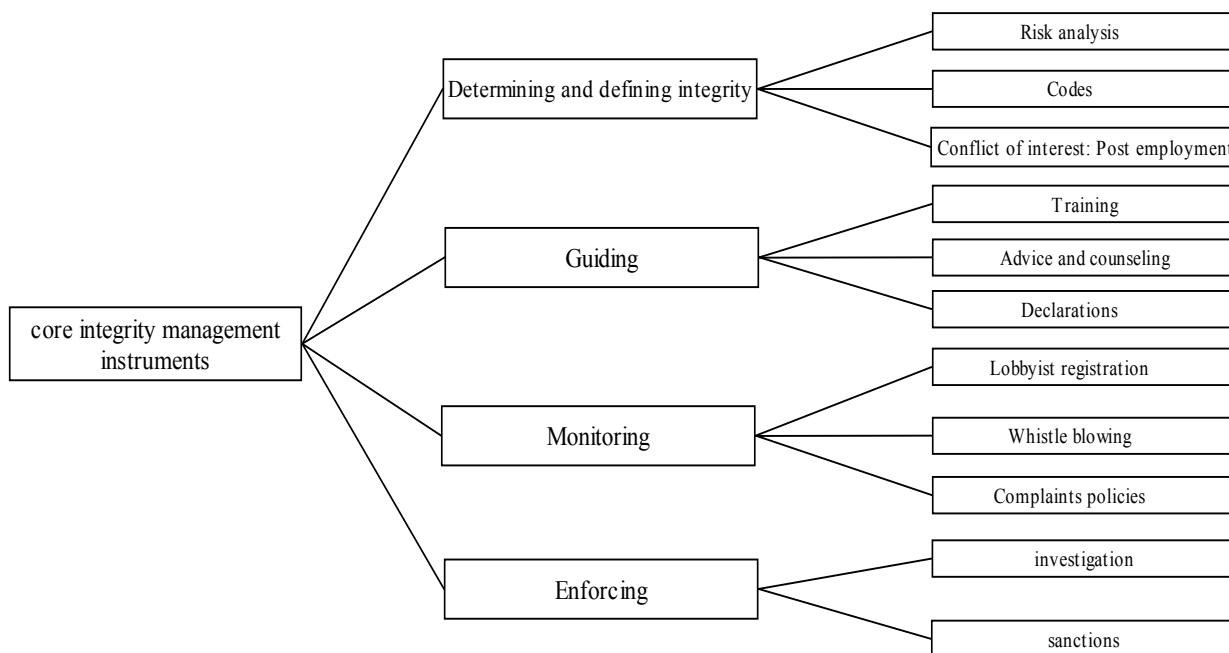
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<sup>4</sup> A terminological note. In line with previous OECD work, we use the term integrity as a synonym of ethics management. It refers to the application of generally accepted public values and norms in daily practice.



- a. Instruments are the tools for intervention that are used to shape integrity and resistance to corruption. Below, we will consider output and outcome measures for instruments in four groups, as defined by the framework. The four groups we will discuss respectively in sections 6.2, 6.3, 6.4, and 6.5 are included in Figure 5.

**Figure 5: Main integrity instruments analysed in this report**



- b. Processes: the continuous processes of putting instruments to work; planning, implementing, evaluating and adjustment.
- c. Structure: or organisation of the integrity management. How are responsibilities distributed over the different actors?

3. The distinction between core and complementary integrity management efforts. The core integrity management instruments have integrity as their main, often even single objective. Ethics codes, conflict of interest policies, whistle blowing arrangements etc are typical examples.
4. The distinction between inner and outer context. These are intra-governmental factors and management arrangements that do not have integrity as their main objective. However, they may have an impact on integrity. For instance, an office planning decision to have more tele-workers may pose new integrity risks.

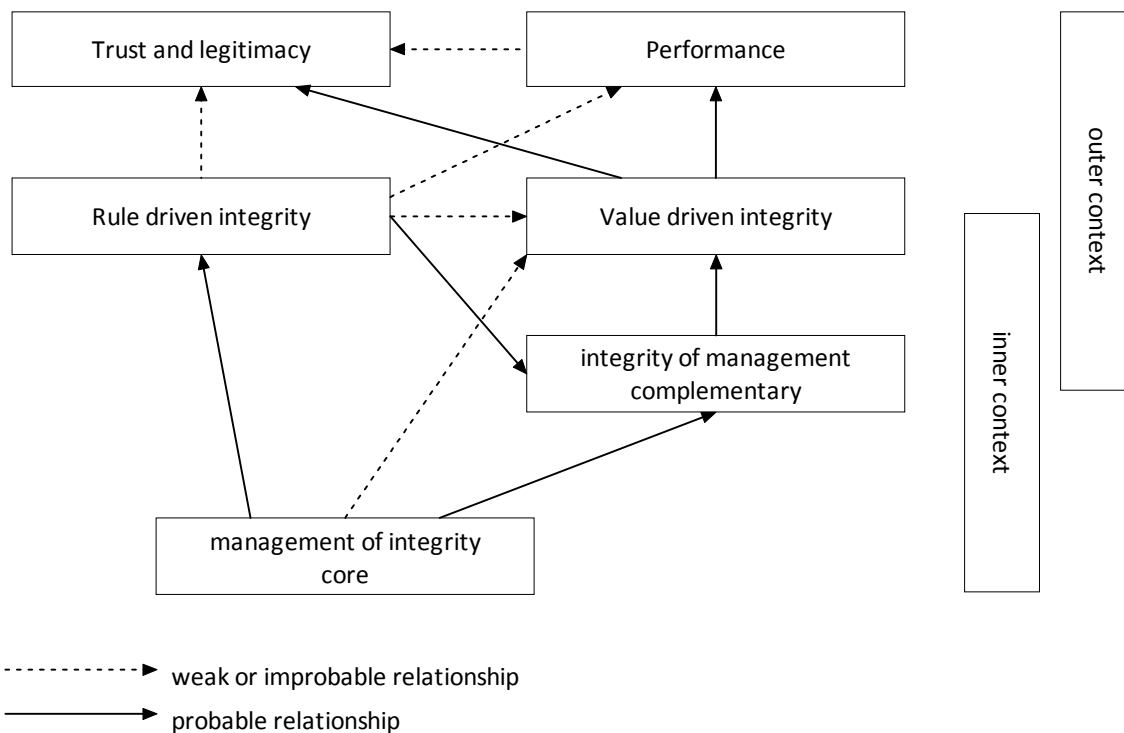
46. In addition, the integrity framework further specifies its approach along four lines:

1. A focus on organisation. The text 'towards a sound integrity framework' unambiguously opts for a focus on the organisation. This approach contrasts to some widely known approaches that consider integrity systems at government wide level. Examples are Transparency International National Integrity system model and the World Bank's government effectiveness indicators. In the analysis below, we take a middle road. We start with integrity instruments that are proposed by integrity actors, which is the organisation level. We then consider the potential for developing output and outcome indicators. Outcome measures in particular will transcend organisational boundaries.
2. A focus on implementation. Implementation is a necessary precondition for outputs and outcomes. Measures that are not implemented obviously will not have an effect. Moreover, non-implemented measures may even have a negative effect. Employees may deduce from an implementation deficit that management is not taking integrity serious.
3. A focus on the joint impact of rules based and values based. The integrity framework stresses the mutual importance of rule based and value based integrity management instruments. It has been proven that a mix of value and rule based approaches is having the highest impact. As in other fields, sustained behavioural will only occur when both the hearts and minds are convinced. (see appendix for an overview of value based and rule based instruments)
4. A systemic focus: integrity issues are interrelated and a coordinated approach is required.

### **Overall outcomes of integrity management**

47. First, we discuss overall outcomes of integrity management. Overall outcomes cannot be pinpointed to specific instruments. Rather, they reflect the impact of the *integrity management framework as a whole*. In order to identify these overall outcomes, we first need reflect on the causal relationships underlying the integrity framework (represented in Figure 4). Figure 6 provides such a causal scheme. A note of caution however is that this scheme may provide a basis for discussion, but is only to a limited extent empirically tested.

Figure 6: Causal relations in the integrity framework



48. We start at the bottom with the *core integrity instruments*. In some countries, these core instruments are to a large extent administered by integrity actors (e.g. ethics commissions). Other countries opt for a more decentralised model where the responsibility of integrity management instruments mainly resides in the hands of the departments and agencies.

49. *Management of integrity can have influence in three ways*. First, rule based instruments may have an impact on rule driven integrity. Rule driven integrity is the result of rational calculation. People comply with rules (e.g. post employment regulations) because the costs of the potential sanctions outweigh the benefits of breaching the integrity rules. Secondly, value based integrity management can lead to value driven integrity. In contrast to rule driven integrity, integrity is not the result of rational calculation but of internalised values. However, we suspect that the causal line seldom runs directly from the instruments to the behaviour in the organisation, hence the dotted line. It seems more probable that management of integrity first needs to lead to integrity of management. Only when daily management practices in an organisation are fair and when leadership is exemplary, organisational members will internalise public values.

50. This assertion is backed by research demonstrating the *importance of leadership and fairness*. “Perceived organisational fairness” is found to be a crucial variable in explaining the integrity of organisational members (Trevino & Weaver, 2003). Staff members will be more likely to behave unethically when they perceive their environment to be unfair. For instance, unfair performance appraisals or unfounded pay differences affect the perceived fairness in the organisation. Integrity of other management processes such as HRM may be a precondition for value driven integrity.

51. Next, we turn to the *causal relations between value driven and rule driven integrity*. Trevino and Weaver (2003: 191-230) conducted a survey among around 10 000 respondents in six companies from different sectors. Although the study was not conducted in the public sector, the results do provide an idea

of the impact of different integrity management approaches. In general, Trevino and Weaver observed that both the rules-based and the values-based approaches to integrity management had a positive impact upon ethical behaviour of the organisational members, but that the effect of the values-based approach was stronger.

52. This finding is somewhat paradoxical, because conceptually, value driven and rule driven integrity are mutually exclusive. One is either intrinsically convinced of the value of integrity, or rationally calculates the costs and benefits of breaching the rules. Here, we need to make a distinction between rule and value driven integrity as an outcome on the one hand, and rule and value based instruments on the other. It seems plausible that when integrity levels are generally low, a high proportion of rule based instruments are required to establish an acceptable level of integrity. Once, these acceptable levels are attained, value based instruments may be beneficial in order to internalise integrity. In other words, rational and technical rules need to be *infused with value*<sup>5</sup>.

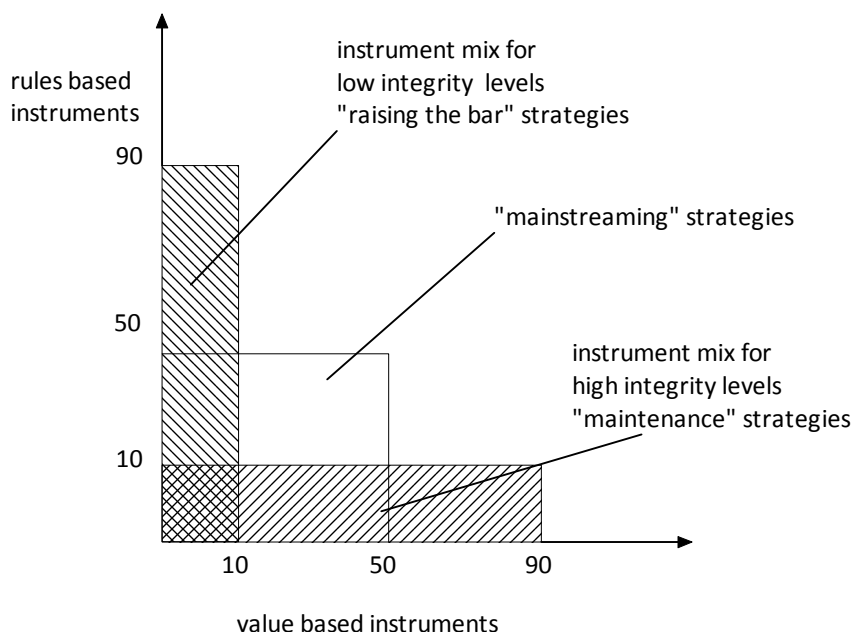
53. Here too, the exemplary role of management – and thus integrity of management - is a precondition. A direct line from rule driven integrity towards value driven integrity seems improbable (hence the dotted line). Since value driven integrity is more sustainable, we assume in the model that the impact of rule driven integrity on performance and trust will be weaker than value driven integrity.

54. The OECD (2008b) observed that there is ‘*a never-ending balancing exercise between the rules-based and the values-based approaches. The exact relative importance as well as the actual shape of both approaches will depend on the actual social, political and administrative context, as well as on the history of the organisation concerned.*(p.13)’ The discussion above adds to this argument that there should be a developmental perspective underlying the choice for value or rule based approaches. As Figure 7 suggests, the proportion of rule based instruments will decrease when countries (or organisations) from lower to more satisfactory levels of integrity. When integrity standards are low, a high proportion of rule based approaches is needed to raise the bar. When levels are high, rule based instruments retreat into the background. It seems however that rules based instruments will always be needed to some extent in order to maintain the system. The shift from rule based to value based instruments is a gradual process. Therefore, between raising the bar and maintenance lies a third strategy of mainstreaming integrity management into daily management practice. The shadow of rule enforcement may deter those who did not internalise values.

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<sup>5</sup> This process of institutionalisation is well documented in Public Administration literature. One of the seminal works was by Selznick (Selznick, 1957)

**Figure 7: Instrument mix for integrity management**



55. We expect that value driven integrity significantly contributes to trust and legitimacy of government as well as performance. A Dutch saying posits that *trust comes by foot and leaves by horse*. Cases of corruption or other breaches of integrity may have a detrimental effect on trust of citizens in government. Integrity may indeed be seen as a deficiency need for trust in and legitimacy of government. Integrity does not assure trust, but when it is deficient, we can be sure that government will not be trusted.

56. The link between *integrity and performance* seems more straightforward. Probity will lead to high quality decision making. In government, this implies decision making in the general interest and not in the private interest.

57. The causal relation between trust and performance is often not as strong as decision makers hoped for. On several occasions, an increase in performance coincided with a decline in trust levels. The missing link in the analysis may be integrity. It could be that both performance and integrity are needed to assure trust. Table 3 includes four potential relations between integrity and performance, and their impact on trust. Several authors acknowledge the importance of integrity variables for determining trust (Heintzman & Marson, 2005; Braithwaite & Levi, 1998; Kim, 2005).

**Table 3: Performance and trust: integrity as the missing link**

	High performance	Low performance
High integrity	High trust	Low trust
Low integrity	Low trust	Low trust

58. An additional explanation lies in the *definition of performance*. In essence, government is performing when it lives up to expectations. If expectations rise more rapidly than output and outcomes, performance may come under pressure.

59. Finally, we need to acknowledge in our model that *contextual factors* play a role. The inner context refers to intra-governmental factors. Integrity in public administration for instance will experience influences from the political arena. It is hard to conceive a value driven administration if politicians are

corrupt, or vice versa. The outer context refers to broader societal trends that may have an impact in integrity and integrity perceptions. For instance, the changing role of governments around the world in the current economic and financial crisis may have an impact on trust.

60. Note that we only discuss outcomes here, and not outputs. The reason is that measures of output usually are closely tied to concrete processes. It would be difficult to add up and to weigh different outputs in order to compose an overall output index. Moreover, such an index would not be actionable, since the linkage with the concrete process is lost. An overall *output* measure of integrity management therefore may not only be not feasible, but probably is not very useful either.

***Adoption rate: Take up of integrity instruments by line departments and agencies***

61. A first outcome measure reflects the adoption of integrity management instruments. Adoption refers to *having* integrity instruments and thus has to be clearly distinguished from *doing* integrity management (Beyer & Trice, 1982; van Dooren, 2005). High adoption with low use may be an indication of window dressing strategies as well as inadequate instrument design.

62. A distinction can be made between adoption at country level and adoption within a country by departments and agencies other than the integrity actor.

International players usually measure *country adoption rates*. Transparency international for instance uses a model of an ethics infrastructure in order to check whether all the instruments and institutions in a country are in place<sup>6</sup>. The GRECO reports of the Council of Europe<sup>7</sup> also focus largely on the take up of integrity instruments, although the evaluation teams attempt to dig deeper into the actual functioning of the instruments during the site visits

For several integrity actors, the adoption of integrity instruments by managers is an intermediate outcome. *Within-country adoption rates* give an indication of how broadly integrity management instruments are spread. The Dutch Integrity Bureau (BIOS) puts a lot of effort in training and sensitizing line departments. For this reason, they survey the take up of a broad list of instruments by line departments and agencies (see the appendix 0 on The Netherlands for more details). Such analyses are mainly useful in decentralised settings where integrity instruments are administered by line departments and agencies instead of central integrity actors.

Adoption rates are based on *tangible activities*, i.e. the implementation of instruments. Moreover, they are observable through documents, publications and websites. Some instruments, such as post-employment arrangements or whistleblower protection are similarly understood in different countries. Definitional issues therefore seem less pressing.

63. Adoption rates are *intermediate outcomes* because *without* incorporation of the integrity instruments proposed by the integrity actors, we can be sure that the instruments will *not* have an effect. However, adoption rates have some limitations.

First, adoption rates have the inherent limitation that they do not say anything about whether organisations actually *do* something with the integrity instruments.<sup>8</sup> This measure will therefore

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<sup>6</sup> [www.transparencyinternational.org](http://www.transparencyinternational.org)

<sup>7</sup> [www.coe.int/greco](http://www.coe.int/greco)

<sup>8</sup> It should be noted that the window dressing problem is an issue for virtually all management and policy instruments and innovations. It is by no means limited to integrity instruments. In performance instruments,

not detect the window dressing strategies. It may even be the case that organisations that take up all possible integrity instruments have less resources (time, money, support, ...) to actually put the instruments at work.

Secondly, variation in take up rates tends to erode, which makes the measure meaningless. As increasingly more countries or organisations adopt integrity instruments, the take up rate moves towards 100%. This phenomenon is also occurring with take up rates of Regulatory Impact Analysis. Virtually all OECD member states evolve towards 100%. The question what countries do with the RIA's becomes more pressing than whether they have it.

***Mainstreaming rate: Integration of integrity into management systems (integrity of management)***

64. There is a difference between the adoption of core integrity instruments by countries and/or within countries on the one hand and the mainstreaming of a focus on integrity in other management functions on the other. We envisage here the management instruments that are included in the integrity framework as complementary instruments. We use the term mainstreaming similar to the mainstreaming of other issues such as gender or ecology.

65. The complementary instruments are represented in Table 4. For each of these areas, it could be assessed whether integrity is part of the daily management practice. This could lead to the calculation of a *mainstreaming rate*. Such an analysis however is not available until now.

**Table 4: Complementary integrity management instruments**

<p>Management instruments complementary to the core integrity management instruments (OECD, 2008b).</p> <ul style="list-style-type: none"> <li>- Procurement, contract management and payment</li> <li>- Personnel management (e.g. integrity as criterion for selection, reward, evaluation and career promotion)</li> <li>- Financial management (e.g. 'double key', financial control, )</li> <li>- Information management (e.g. protecting automated databases)</li> <li>- Quality management (e.g. reviewing the quality assessment tool)</li> <li>- Internal control</li> <li>- Internal audit</li> <li>- External audit</li> </ul>
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66. The *value of a mainstreaming measure may be significant*. Similar to the discussion of value based and rule based instrument mixes, it can be argued that the more successful integrity systems are mainstreamed, and thus less visible. In a sense, mainstreaming makes integrity management to a large extent redundant. The Finnish project on public values in the daily work reflects this approach (Ministry of Finance, 2004).

67. Since the focus is on mainstreaming integrity in daily management, it seems that it can only be calculated at the *organisational level*. This is problematic when we want to calculate country scores. It is probably not feasible to do this analysis for a majority of public organisations in a country. An alternative would be to select a limited number of organisations that are relatively comparable across countries in the

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we may point to the big difference between having a management score card and doing something with it (Van Dooren & van de Walle, 2008)

nature of their tasks (e.g. the ministry of finance, ministry of foreign affairs), and calculate the integration rate for this sample.

68. The calculation of a mainstreaming rate would require a *novel methodology* and considerable new data collection. For now, only limited bits of information are available. In staff surveys, countries regularly ask whether they feel if promotion and performance appraisal are fair (e.g. Belgium/Flanders). The Dutch baseline survey of the SAI Algemene Rekenkamer has some items on whether internal and external auditors pay attention to integrity.

#### ***Exemplary role of leadership (integrity of management)***

69. Another dimension of the integrity of management is the exemplary role of leadership. It seems plausible that *integrity of leadership is a precondition for integrity of staff*. Value driven integrity in particular will not materialise if leadership is perceived as not being honest.

70. Some staff surveys measure the perception of the integrity of leadership. The Integrity of Perception survey of the Dutch Ministry of the Interior has the following items; (1) Managers react adequately to potential integrity problems (19%), and (2) Managers give a good example for what integrity is concerned (16%). The US Human Capital Survey for instance has an item: "My organization's leaders maintain high standards of honesty and integrity". This seems an adequate measure which could be inserted in an OECD integrity section for staff surveys.

#### ***Awareness of rules (rule driven integrity)***

71. Rule driven integrity is hard to measure, because these measures would have to be able to uncover the intentions of people for either infringement or compliance with integrity regulation. However, a precondition for rule driven integrity is *awareness of the rules* and the ability of people to detect ethical issues.

72. We did not find much measurement of awareness in the countries under study. Nonetheless, it should not be too difficult to survey knowledge of ethics laws. Some US states have online ethics quiz as a training module<sup>9</sup>. These tests are not useful for developing measures since there is no control on who is filling out the test. The approach however is interesting. Respondents have to answer questions on specific cases. On the one hand, these case based tests allow tailoring questions to concrete context. On the other hand, it might be difficult to compare the results on these tests since the cases and the questions may be more or less difficult depending on specificities of a case in a specific national context. Only when the number of cases is high enough, the results of such case surveys may be comparable. More and less difficult cases probably will level each other out.

#### ***Corruption incidence and perceived corruption incidence (rule driven integrity)***

73. Another way to assess rule driven integrity is to *assess the corruption cases*. The number of cases in the recorded in the criminal justice system may give an indication of the problem. All countries do keep criminal justice records. The question thus is whether these records are useful to measure corruption in the public sector. The French SCPC for instance heavily relies on criminal justice statistics in assessing the level of corruption in France (see appendix 8.4 on page 73). The public integrity unit of the Department of justice the and the Australian ICAC reports the number of prosecuted cases as well (resp. appendices 8.8, p.96 and 8.1, p.58)

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<sup>9</sup> For instance, there is an ethics quiz on the site of the Executive ethics board of Washington State, providing 38 ethics scenarios. The Texas ethics commission also has an online test.



74. Usually, quite *detailed breakouts* for the different steps in the judicial process are available. As a measure of corruption, however, only the number convictions should be counted. The discharged cases clearly are not cases of corruption<sup>10</sup>. The absolute number has to be standardised for comparison across countries. One could calculate the number of cases per inhabitant or per civil servant. The latter makes more sense, since every civil servant can be seen as a potential risk and an independent decision maker that may be confronted with ethical dilemmas.

75. Corruption incidence statistics however have *two limitations* for international comparison. First, cases need to be identified. A case of bribery of a public official for instance needs to be distinguishable from a case of bribery in the private sector. Moreover, there needs to be a general international agreement on what to count. However, in this case, it could be argued that the definitional problem is less pressing. Corruption (e.g. bribery) is defined by the country's laws and courts. The number of convictions would be a measure that is culturally relative in the sense that the national definition of corruption as enacted in law and examined by courts is the basis. Moreover, it seems plausible that in most countries, only the more severe cases are referred to court. Therefore, we could argue that the number of convictions represents what a country considers to be serious corruption.

76. A second problem is the *inherent covert nature of corruption*, which makes interpretation of the statistics more difficult. A high number of convictions may be an indication of rampant corruption as well as of effective integrity enforcement. However, if combined with professional judgement and other measures, it should be feasible to tell the story behind the numbers may. Therefore, it seems useful to supplement these data by perceptual data. Data on the perception of corruption businessmen and experts is available from several international sources such as the World Bank's governance indicators, the Swiss business school IMD, the World Economic Forum, (see (UNDP, 2004) for an overview).

#### ***Ethical Climate, Ethical Tone, Ethical culture (value driven integrity)***

77. As we argued above, value driven integrity is about *internalisation of an ethical attitude*. While rule driven integrity mainly is the result of a cost benefit assessment of following or breaking the rules, value driven integrity is intrinsic and normative. People behave ethically because they want to, not because they have to. Countries increasingly understand that value driven integrity is more robust and sustainable. Several initiatives have been taken to (a) define public values (see Table 5 for an overview and comparison of four countries and the OECD integrity survey for GaaG) and to (b) get them across to the staff. Value initiatives usually talk about developing an ethical climate or culture. The concept of the ethical tone of the organisation should also be seen in this light.

78. The initiatives that are taken to inform staff about the public values may be a first output measure. The OECD integrity survey has an item on if and how this happens in member countries. One limitation to this approach is that it does not really grasp the intensity of the efforts to get public values across.

- Core values are automatically provided when someone joins the public service.
- They are provided when someone takes up a position in a different public service organisation.
- The statement of core values is part of the employment contract/document (<sup>11</sup>).

<sup>10</sup> The number of referrals to court however becomes relevant as a measure of the enforcement function (see 0, p 43)

<sup>11</sup> If collective or individual contracts are used in the public service.

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- Core values, after revision, are distributed to all public servants.
- Core values are communicated by instruments of new technology (such as Internet, CD-ROM).

**Table 5: An overview of definitions of public values in the UK, Finland, the Netherlands, Australia and OECD**

<b>UK – Seven principles of public life</b>	<b>Finland – values in the daily job</b>	<b>Netherlands (van den Heuvel et al., 2002)</b>	<b>Australia – APS values – code of conduct</b>	<b>OECD 2008 survey on integrity for GaaG</b>
Accountability				Accountability
Honesty	Honesty	Honesty	Honesty	Honesty
Integrity	Integrity	Incorruptibility	No abuse of office	
Leadership				
Openness	Openness	Openness	Disclose COI's	Transparency
Selflessness			Use resources properly	
	Collegiality	Collegiality		
	Expertise	Professionalism	No false or misleading info	
	the service principle	Servitude		
	Effectiveness	Effectiveness		Effectiveness
	Loyalty	Obedience	Compliance	
Objectivity	Impartiality	Independence		Impartiality
	Result orientation	Profitability		Efficiency
	Legality	Lawfulness	Legality, follow regulation	Legality
	Commitment	Devotion		
	Justice	Acceptability		
			Care and diligence	
			Respect in service	
			Confidentiality	
			Uphold reputation	
				Continuous service

79. These values may be part of *staff surveys*. The Finnish survey on values in the daily job for instance asks staff to circle the five most important values, which may give an indication on changes of the values structure. These changes can be related to initiatives and events that impacted the public sector. For instance, a mediatised scandal might lead to an increased attention for incorruptibility and lawfulness. A programme to foster customer relations might lead to more attention for the service principle. The Finnish survey also has a general item asking ‘Have the values of State administration changed in the last ten years?’

80. The problem on *how to measure intrinsic motivations* however remains. In order to assess whether integrity is value driven, we would also need to know why people are finding particular values more important, or why they feel that values have changed for the better or for the worse.

81. The New South Wales ICAC did a survey on ethical culture (Independent Commission Against Corruption, 2000). The findings indicated that features most strongly associated with perceptions of the workplace being honest included the behaviour of leaders, punishment of wrongdoing, and the existence and enforcing of organisational values, rules and rewards. These factors suggest that the good perception of integrity will be fostered by both value driven factors such as the exemplary behaviour of leaders, as well as rule driven factors such as punishment of wrongdoing.

82. A sophisticated approach might consist of an *analysis of the factors that staff considers to be important* for integrity. Is there a shift from rule based factors or instruments to value driven instruments. In the ICAC example, this would imply a shift from punishment of wrongdoing and enforcement of values to for instance the exemplary role of managers. Clearly, a longitudinal research design is required. Although this seems a plausible strategy for a quasi scientific study in a single country, it might be aiming to high for international comparison.

83. Finally, we might think of two proxy measures for value driven integrity. They do not measure why people (not) support values, but they may give an indication. First, it can be fairly easily measured whether people are aware of the definition of values. For instance, does staff know about the UK standards of public life? Secondly, it can be assessed whether staff takes these initiatives seriously, whether they feel it is an important and genuine effort of government to strengthen integrity. A disbelief in the utility of the effort may be an indication of a more cynical attitude towards integrity which seems hard to reconcile with value driven integrity.

### ***Measures of trust***

84. The idea of “trust” in government is well anchored in the modern discourse about political and government performance. Trust in government is an extraordinary concept. *It is often asserted that trust is important, but we do not know what it actually is.* In the context of integrity, trust in government may well be a valid outcome measure. As we argued above, integrity may be the missing link between the often spurious relation between trust and performance. MacQuarrie (2008) recently published a balanced and thought provoking study on the issue which further explores these issues.

85. Trust data has the advantage of being available. The Eurobarometer of the European Union and the European Values Study are two examples of high quality measurement efforts that include data on trust. In addition, national trust data are often available (see (van de Walle et al., 2008) for an overview).

86. Obviously, trust data has limitations.

87. First, we do not know very well *what trust data are about*. What does it mean when a respondent says she trusts government? What does trust mean and what does government mean? Moreover, trust can take two forms – trust either in the abstract idea of the institution, as in we trust “the justice system, or the health system” or in the people who work in those institutions: in their

competence, the quality of service they provide and the extent to which they fairly apply the laws of the land to all citizens (MacQuarrie, 2008).

88. There is a lot of confusion and, as MacQuarrie argues, “this is unfortunate because there are important reasons to make distinctions between the various actors and roles in government, most particularly between the political level of government and its bureaucratic institutions (p.24)” The recommendation would be to at least make a distinction between political and administrative roles, and to national and sub-national governments when doing trust surveys.

89. Secondly, the *causal relationship* between what government does and how it does it on the one hand and trust in government on the other is fuzzy. MacQuarrie argues that “our views of government and its players are likely influenced first of all by our personal predisposition to trust others in general, and then our sense of “personal” trust in government is shaped by other societal cues or intermediates – especially the media, business or political elites who tell us whether we ought to trust government.” As a result, trust measures are not actionable. What can we do, if anything, when trust is low?

90. Thirdly, we have to ask *what the optimal level of trust* is. What is the right balance between trust and distrust? Perhaps we should not be too concerned about the low polling on trust. Hardin argues that “It may suffice that government not generally be distrusted. If some core of the populace genuinely trusts at least parts of government and not too many others actively distrusts, then it likely has done well by historical standards (Hardin, 1999)”

91. In sum, we may conclude that trust data may be *useful, but as trust data only*. Trust is felt to be important for the functioning of any relationship, and thus for the relationship of citizens with government too. High levels of trust may therefore point to a positive attitude towards government, civil servants and politicians. We should however only use trust data for measuring an attitude towards government. Trust cannot be assumed to be a proxy for public sector performance or integrity (see for instance (Afonso et al., 2006) who use trust as performance proxy). High trust can be the *outcome* of high integrity standards, amongst others. However, high trust can never be *equalled* with high integrity standards.

### ***Indicators of civil support (contextual)***

92. As a contextual variable, *civil support* for integrity management may be worth measuring. An example is found in the New South Wales ICAC has a tradition of community surveys (Independent Commission Against Corruption, 2006). The survey deals with the citizen perception on corruption in New South Wales as well as the knowledge and perception of the ICAC itself. With regard to the ICAC, the survey includes many items on the role of the ICAC as well as on its importance.

93. Another exemplary study is the ombudsman awareness study of two UK ombudsman (Parliamentary and Health Services Ombudsman & Local Government Ombudsman, 2003). Similar to ICAC, they measure knowledge of the ombudsman, perception of their performance and attitudes towards complaining.

94. The ICAC survey also has an item on citizen’s willingness to report fraud and the UK ombudsman survey has items on why people do not complain. Such measures may be useful for measuring the quality of integrity management. Integrity benefits from a trusted integrity actors. This item could be generalised to other surveys in other countries; do citizens know where to report integrity breaches and fraud, and are they willing to do it?

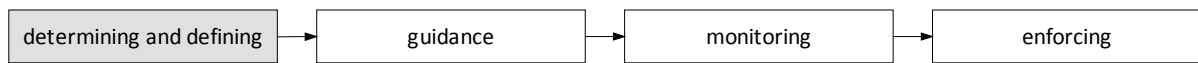
95. The *advantages* of this measure are twofold. First, the measure can be internationally comparative. Notwithstanding the structural variation of the country’s public sectors, citizens should know where to report, and ideally, should be willing to do it. This measure therefore can trigger

interesting debates on why citizens are willing to report. It can be a matter of lacking opportunities for reporting, of knowledge of the reporting channels, of attitude towards the public sector (trust), of complexity, etc. In any case, low willingness to report asks for a solution. This brings us to the second quality of the measure. Actions can follow from the results. In particular when surveys also ask for some of the aforementioned barriers to reporting, the measure becomes actionable.

96. The *disadvantage* probably lies in the costs of setting up a representative survey of the population with an adequate response rate. The ICAC survey for instance reports a response rate of 23% for a telephone survey. The UK ombudsman report was based on an omnibus survey, which is a taken from panel of respondents that regularly answers a set of questions on diverse themes for MORI, the research bureau. Therefore, it does not report response rates but a response bias can be assumed in this type of research.

## Outputs and outcomes of function 1: determining and defining integrity

97. Let us now turn to the analysis of the outputs and outcomes of some concrete instruments. The first cluster includes instruments that have determining and defining of integrity as a purpose.



### *Risk analysis*

98. Risk analysis is about identifying and assessing the factors that may jeopardise the good functioning of the organisation. In a process of risk analysis one would map sensitive processes (e.g. procurement, promotion of staff members, inspection, etc.) and sensitive functions (typically staff-members with a responsible role in the sensitive processes or in decision making in general) and identify the points where there is a significant vulnerability for integrity violations (e.g. selection of method for tendering or modification of rewarded contract).

99. The aim of risk analysis is *to better able to manage risks*. Given that the analysis focuses on risks that are embedded in the *structure* of the organisation (processes and functions) rather than the culture, the solutions are also typically of a structural nature, e.g. function rotation, conflict of interest regulations, regulations about the acceptance of gifts and gratuities, etc.

100. The first question obviously is *whether there is a system for risk analysis*. Output measures however should reflect whether the system is used. An output measure at the organisational level might be a combination of the coverage rate of the risk analysis (are all processes of all divisions covered?), and the frequency of the analysis. At the country level, this output measure would imply a calculation of the coverage rate of ministries and departments.

101. A difficulty is that it might not always be clear what the *optimal frequency* should be. This will depend amongst others on the task structure and the turnover of staff of the organisation. When tasks and processes are stable and the staff and leadership of the organisation does not change frequently, it does not make sense to reiterate risk analyses. Risk analyses would quickly become ritualistic, which undermines support for the system. When tasks and processes or staff and leadership changes are frequent, a higher frequency of risk analyses may be warranted.

102. The outcome of good risk management would be that risks are better managed. It seems that this is *hard to quantify*, unless in a survey of middle and top managers. The survey questions could ask whether managers believe that risks are sufficiently analysed and managed. These perceptual data might be related to take up rates of structural measures to reduce risks.

### *Codes of Ethics*

103. The signing of a code of ethics is an output of integrity management. At the most basic level, the *availability* of a code is an output. It might be more interesting however to add some quality dimensions to the mere yes/no availability question. For instance, are adequate consultation processes set up before signing the code? Is the code tailor made for specific sensitive processes and profiles? Is there a clear follow up procedure for breaches of the code?

104. The ultimate outcome of a code is that it *guides behaviour*. Two components are generally acknowledged as preconditions for having an influence on behaviour: knowledge and attitudes. First, there needs to be awareness and knowledge. Secondly, there needs to be a positive attitude towards the code and its contents.

105. A first outcome measure is *awareness*. The target group of the code has to know what is in it. Knowledge of the code can be tested in surveys. An exemplary study is the 2007 survey of the New Zealand State Services Commission, which was conducted by the Ethics Resource Centre among 4,642 State civil servants. 96% reported that their agency has written standards of integrity and conduct. Fifty percent reported that their agency has a specific person, telephone line, email address, or website where they can get advice about integrity and conduct issues. A more advanced way of testing knowledge and awareness is to test the application of the code in concrete ethical dilemmas.

106. A second outcome would be that there is a *positive attitude towards the code*. This is more difficult to test in survey, since the tendency to provide social desirable answers will be stronger. An additional complexity is that usually Codes of Conduct consist of a series of instruments. It would therefore be difficult to determine which instrument or aspect of the code did influence ethical behaviour.

107. There are virtually no studies on the *impact of codes on actual behaviour* (OECD, 2008b). A specific problem in measuring the impact of codes of conduct is that they usually encompass a range of instruments and/or a range of values. The Australian Commonwealth Code of Conduct for instance has 13 entries which in turn cover several behaviours such as impartiality, disclosing conflicts of interests, not accepting gifts, upholding merit principals, dealing with information, etc. It seems fair to assume that some instruments may have a stronger impact on behaviour than others. Measuring the overall impact of a code may therefore be misleading.

#### ***Conflict of Interest: Post employment arrangements***

108. Post employment can be problematic because *networks with government employees* may remain intact after people leave public services. These networks may be improperly used for private or corporate interests. Under the motto that it takes two to tango, the OECD identified four roles with a responsibility for integrity in post employment in (OECD, 2008a): (i) *officials that are still working in government* should not seek advantageous future employment prospects by giving preferential treatment (ii) *public officials that have left government* should not misuse public information or networks with former colleagues (iii), *current officials* should deal with former officials in an objective way (iv), and *organisations that employ former public officials* should be aware of the role conflicts that may arise and certainly not exploit them.

109. A familiar approach to tackle post employment issues is to determine a '*cooling off*' period which, for some time, prohibits sensitive private employment for public officials. It is assumed that after one or two years, personal networks will have eroded and sensitive information will be obsolete. Note that this measure may run counter with HRM efforts to encourage staff mobility from public to private sectors. Several authors assess that government has to operate in an increasingly networked environment, and thus increasingly has to seek partnerships with private actors (Agranoff, 2005; Castells, 2000; Koppenjan & Klijn, 2004). The banking crisis and the subsequent entry of public capital in private corporations further challenge the frontier between public and private sectors.

110. A first measure of interest might be the *staff turnover* to sensitive positions the private sector. Staff turnover statistics should be available in many HRM contexts. However, the breakout of staff turnover to sensitive positions seems more innovative. Clearly, sound definitions of sensitivity of positions are required. It might also be of interest to calculate the ratio of entering public officials that come from the private sector. This would be an interesting measure of the risk – and not the occurrence - of post employment integrity breaches. We did not find any metrics of this kind in the cases.

111. Obviously, such an indicator would require some *sophisticated calculations and registration systems*. The total exit of public officials would need to be corrected at least for those who are retiring, those who move to other governments, and those who will become unemployed (see formula). A point



of discussion might be whether those who move to non profits should be included or not. What to do for instance with non profits that are largely subsidized by public funds?

Private exit

$$\text{PRIVATE}(\text{profit}) + \text{PRIVATE}(\text{not for profit}) = \text{TOTAL} - \text{RETIRED} - \text{OTHER GOV} - \text{UNEMPL}$$

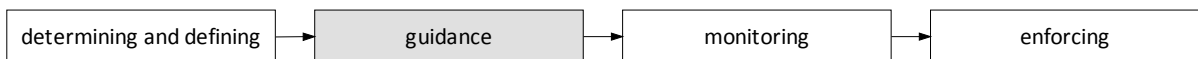
112. Not all staff is moving to sensitive private sector functions. A cleaning lady who starts to work for a private cleaning company probably does not poses an integrity risk. It may make sense however *to limit the analysis* above to those civil servants that are able to acquire the main assets that private companies might want to exploit: personal networks and information. Typically, these assets are owned by high ranking officials. Therefore, when applied to senior civil servants only (e.g. N, N-1, N-2), the formula mentioned above may be computable without losing most of its relevance.

113. A second way to assess the impact of post employment policies is to *ask privileged observers* for opinions on its effectiveness. These observers might reflect the four roles of responsibility mentioned above.

- First, current officials may be asked whether they are influenced by former colleagues. The New Zealand State Services Integrity and Conduct survey does ask staff to identify the main sources of pressure to compromise on standards of integrity. Former colleagues however are not a category<sup>12</sup>.
- Secondly, HRM surveys sometimes ask for intentions to leave the service. This measure may give an indication of the extent of the post employment integrity *risk*. It may however mainly be an indicator of well-being at work and therefore not necessarily predict actual exit behaviour.
- Thirdly, those who left the public service are often difficult to keep track of, and thus are difficult to survey. Through post-exit meetings<sup>13</sup>, a HRM instrument, some information may be gathered. However, it seems that this is not a common practice in public HRM policies.
- Fourthly, organisations that employ public officials have a responsibility in not pressuring their employees towards post employment integrity breaches. These employers could be surveyed and asked for their perception of the general practice in their industry. Since this item would envisage quasi illegal behaviour, one cannot ask for companies' own behaviour. In general, surveys of the business community usually only ask for their perception of government behaviour. Questions on practices in the respective industries may be a useful complement.

**Outputs and outcomes of function 2; guiding towards integrity**

114. The objective of the second cluster of instruments is guiding towards integrity. This and the two following functions are about making integrity part of the daily practice.



<sup>12</sup> The categories are; senior management, middle management, colleagues, sources outside of my organisation, and don't know.

<sup>13</sup> An exit meeting usually occurs when an employee is leaving the organisation. A post-exit meeting is occurring after one year or so. It is assumed that in a post-exit interview, the employee can look at his or her former employer from a distance.

### ***Training***

115. Training sessions are one of the most widespread integrity instruments and a typical activity of integrity actors. The most obvious output measures for of training count the *number of training days*. Obviously, this measure does not tell much about the contents of the training, but it may give an indication of the efforts put into training. In order to make it a comparable, a training ratio can be calculated.

$$\text{training ratio} = \frac{\text{\# training days in period X}}{\text{staff total}}$$

116. In order to calculate training ratios, one would have to decide both on the target population (staff total) and the time period in which a training session has to occur. The calculation of staff totals in the public sector at countrywide level has proven to be very difficult. For instance, there is the choice between a head count and a count in full time equivalents. Also, there may be discussion on whether agencies at arms' length, public corporations and subsidised not for profits should be included. The decision on the time period is probably less difficult but probably somewhat arbitrary. For the sake of data collection, it makes sense to take one year as a reference point, since most integrity actors make annual reports.

117. An additional measure is *the coverage rate* of staff by the training sessions. It would add up all individual public officials that have received training in period X, and relate this to the total. This measure reflects the importance of all staff members receiving integrity training<sup>14</sup>. Here too, the decision on the target population may prove to be difficult. However, there are two additional difficulties compared to a training rate. First, the period in which training has to occur, is more questionable than for a training ratio. The question is; how often does it make sense to provide ethics training for everyone? What should be the optimal frequency? A yearly rate of recurrence may be too high for staff with low risk profiles. Secondly, this measure is more demanding for the registration systems, since disaggregated individual data is required.

$$\text{COVERAGE RATE} = \frac{\text{SUM (STAFF(indiv)*TRAINING(indiv) in period X)}}{\text{STAFF (tot)}}$$

118. Let us now turn to the outcome measures. A first set of outcome measures assess *satisfaction of participants* with training. It seems a good practice not only to ask for general satisfaction levels, but also to ask whether staff feels to be better equipped to deal with integrity issues after the training. A second set of outcome measures can probe for knowledge on how to deal with integrity issues. Knowledge of two kinds may be of relevance;

1. did participants acquire a better understanding of the integrity rules (the what question)
2. did participants acquire a better understanding of how to deal with integrity issues (the how question)

### ***Advice and counselling***

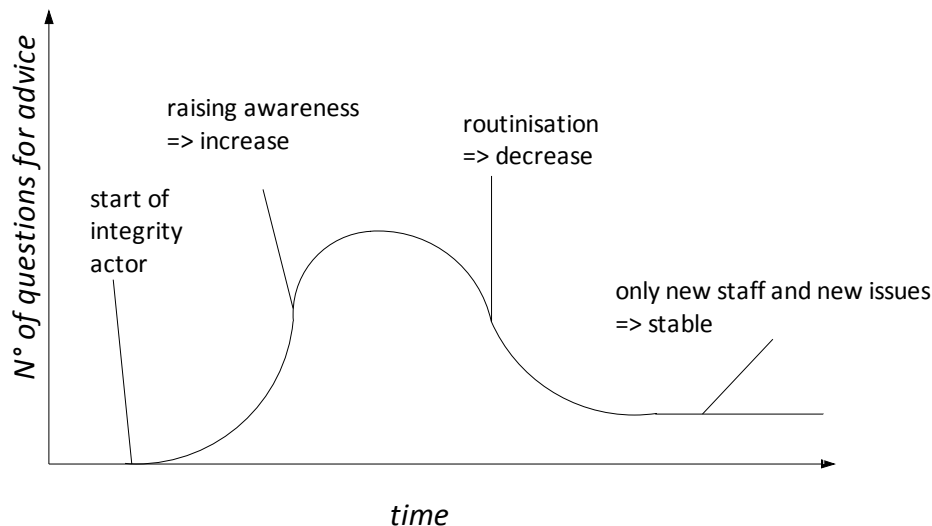
119. Advice and counselling in disputable cases is also an important responsibility of many integrity actors. Most of the time, the explanation on the disputed cases is published in order to create a shared understanding of what is permissible.

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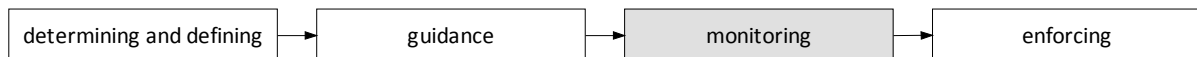
<sup>14</sup> A training ratio does not reflect the spread of ethics training in the organisation or public sector. A high ratio can be the result of intensified programmes for specific profiles.

120. For advice and counselling, the number of questions for advice may be a good measure of awareness for integrity issues. This measure only makes sense when *longitudinal data series* are available. A hypothetical course of the number of opinions asked for is represented in Figure 8. The inauguration of an integrity actor giving advice and counselling, should lead to a strong increase in the number of opinions asked for. If an integrity actor is to be successful, it first should raise awareness. After some time however, there should be a decrease, since common integrity issues will be dealt with in a routine way. People should know what to do when they get offered their fifth gift. Probably, the number will stabilise at a certain level, either driven by questions from new staff or by new issues that may arise.

**Figure 8: Hypothetical course of the number of questions for advice on integrity issues**



**Conflict of interest declarations**



121. A conflict of interest “involves a conflict between the public duty and private interests of a public official, in which the public official has private-capacity interests which could improperly influence the performance of official duties and responsibilities” (OECD, 2008b). Typical instruments are declarations of private interests such as income statements or declarations of occupations outside the main employment. As we argued above, the underlying behavioural theory is to put pressure on people through the watchful eye of public scrutiny. It is unclear however to what extent this approach leads to rule driven or value driven integrity.

122. A first outcome measure is *compliance to reporting level*. Compliance is a precondition for declarations to have an effect. Low compliance levels may be an indication of low awareness of integrity codes or a lack of commitment to the value of the instrument. Those who report in a case of low reporting levels put themselves in a vulnerable position and may not be eager to report again. The credibility of the system will quickly erode. Moreover, it can be argued that a low reporting level in itself is a warning sign for integrity problems. The question why someone would not report if there is nothing to hide, seems not entirely inappropriate.

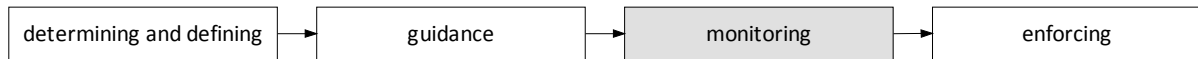
123. The calculation of compliance to reporting levels requires a *good definition of the target group* and *the object* of reporting. This should however be a feasible undertaking. The Integrity Survey of the 2008 OECD survey on integrity for government at a glance limits the potential target groups to politicians (executive, legislators). The potential objects of disclosures are (1) assets and liabilities, (2) loans, (3) sources and level of income, (4) outside positions, (5) gifts and (6) previous

employment. Although it may be relatively easy to calculate the share of the target group that did file a report, it is much more difficult to assess the completeness of these reports.

124. The crucial question however is *whether reporting leads to integrity* in potential conflict of interest. This is of course more difficult to measure. It is expected however that public officials and politicians will act in line with ethical standards pressured by public scrutiny by actors such as citizens, interest groups and media. It is thus very important that the declarations are consulted by the aforementioned players. Most declarations are published on websites. Site statistics may be a source of information.

### Outputs and outcomes of function 3; monitoring integrity

125. The third function is to monitor integrity. While guidance towards integrity is mainly about avoiding integrity problems, the instruments in the monitoring cluster should assure that integrity breaches are detected. We will discuss three important instruments; lobbyist registration, whistle blowing and complaints policies.



#### *Lobbyist registration*

126. The underlying theory of lobbyist registration is similar to the registration of income or occupations by public officials or politicians. Through registration, governments hope to trigger external public scrutiny processes that uncover unethical behaviour. Countries use the metaphors of ‘*sunshine regulation*’ and the ‘*watchful eye*’ to reflect this external pressure. Since the influence of lobbying can be better traced, lobbyist, their clients and targets are expected to act with probity.

127. Here too, the compliance to reporting levels may be a good measure. However, unlike the registration of income or occupation, the *target group is not well defined*. The absolute number of lobbyists, clients and targets may provide useful information for a single country, when compared over time. Since lobbying practices are different in OECD member states, it may not be useful to compare absolute numbers across nations. The comparison of trends for those *countries* that have lobbying registration requirements however may be feasible.

#### *Whistle blowing*

128. Whistle blowing is *defined* as those processes aiming at facilitating the reporting of misconduct. It could substantially help public institutions monitor compliance and detect integrity violations such as fraud and corruption. A whistle-blowing policy essentially consists of two components: a system for reporting wrongdoing and a system for the protection of those who make use, in good faith, of these channels (OECD, 2008b). A metaphorical association with aviation may be helpful. A plane may be able to fly people from point A to point B, but it will only be used when travellers feel safe. Safety feelings however are the result of subjective perceptions and objective risks of which the mutual impact is not well understood. It seems clear however, that incidents have a substantial impact on feelings of safety.

129. Governments often have a *love-hate affair* to whistle blowing arrangements and whistle blowers. On the one hand, there is no doubt that whistle blowers are an unparalleled source of information for detecting problems. On the other, governments fear the negative reputation effects of making integrity violations public and are concerned about the effects of whistle blowing on corporate culture (the *witch hunt* syndrome). Most countries however, do have whistle blowing arrangements.

130. In essence, the output of a whistle blowing arrangement is its *existence*. Remember that we defined output relatively strictly as the goods and services that are provided by an organisation. The integrity actors for instance provide a procedure that potential whistle blowers may or may not use. Such an output measure would have a binary character (yes/no) and probably would not differentiate between countries, since most countries have procedures in place. Therefore, it seems less useful.

131. A more sophisticated output analysis would have to include *quality dimensions of the procedure*. For instance, it may include the structural features that have to assure protection of the whistle blower. However, such a quality assessment would require considerable expert judgement

since quality of an arrangement is highly contingent on the structural and cultural features of a country. The OECD integrity survey for GaaG includes an item on how firmly the whistle blowing arrangements are rooted; legal provisions, a policy matter, or internal procedures.

132. Outcome measures are a necessary complement to output measures. A precondition for whistle blowing arrangements to work is that *staff is aware* of the procedures and knows how and whom to address. This is a knowledge item which can relatively easily be included into staff surveys.

133. A second outcome measure is the *number of occurrences*. How many whistle blowers are actually using the procedure? Clearly, this measure tells something, although it may not always be clear what. Are a high number of whistle blowers a good thing, because it proves the success and reliability of the procedure? Or is it bad, since it demonstrates that there is a significant integrity problem? And what exactly is a high number?

134. Clearly, some additional analyses are required.

- First, in order to determine whether the number of occurrences is high, a benchmark needs to be developed. Typically, countries look at trends. Is the number rising or declining? In this respect, the hypothetical trend regarding the number of questions for counselling and advice (Figure 8) may apply here too. First, there is a strong growth in the number of cases as the arrangement becomes more widely known. After that, the number of cases stabilises at a lower level since the number of reportable integrity breaches diminishes.
- Secondly, governments within countries may compare the whistle blowing levels with each other. A national department for instance may compare its results with a big city. One caveat lies in the different task structure of these governments. It is clear that some activities are more vulnerable than others. NSW data for instance demonstrate the risks in zoning departments.
- Thirdly, the breakout of the cases that after investigation prove to be founded and those that are not founded is important. The total number of whistleblowers tells something about the willingness to report. The evolution of the founded cases tells something about integrity problems – bearing in mind the trend effects discussed in the previous paragraph. The proportion founded/unfounded cases may give an indication of how well staff understands the purposes of the arrangement.

135. One of the most important outcomes for whistle blowing arrangements is a *safe environment for reporting*. As we argued above, whistle blowing arrangements in essence have two components; the procedure itself and the protection of the people that report. Several surveys ask staff whether they feel safe to report. In addition to this measure, it may be useful to probe whistleblowers for their experiences. Did they experience retaliation or not? Finally, also managers in government may have a say on the fairness of whistle blowing procedures.

### ***Complaints procedures***

136. While whistle-blowing policies concern people within organisations who report wrongdoing by their colleagues, there are also systems where *citizens* can complain about wrongdoing by public servants or politicians. These systems usually do not have integrity as their sole objective (OECD, 2008b). They usually also deal with issues of service quality and improvement. However, it goes without saying that complaints may represent integrity breaches too.

137. Since the nature of the complaints policies is similar to whistle blowing arrangements, the discussion on output measures is also alike. The output of a complaint procedure is the *existence* of the procedure in combination with some efforts to make the service known. However, unlike whistle

blowing arrangements, there is probably more variation across countries in what counts as a complaints procedure.

138. Similar to whistle blowing arrangements, *quality dimensions for complaints procedures* of the service may be taken into account. For instance, is the complaints procedure multi channelled, with online as well as physical reporting facilities?

139. The intermediate outcome is the *reaction of citizen* to the complaints procedure. Again, two questions are of relevance; are citizens *aware* of the procedure and do they *use it*? The first question can only be answered through citizen awareness surveys. Two UK Ombudsmen for instance commissioned a 2003 awareness survey for their activities (Parliamentary and Health Services Ombudsman & Local Government Ombudsman, 2003).

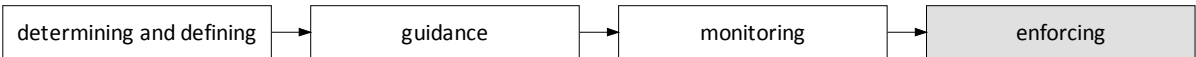
140. Like whistle blowing arrangements, another intermediate outcome is the *number of complaints made*. Are citizens actually using the complaints procedures? Again, the trend over years is important. We would expect a rise as more people are aware of the procedure. After some years, it should stabilise.

141. An additional difficulty for complaints policies is that only *part of the complaints relates to integrity breaches*. The majority of the cases probably will refer to service quality or problems in the administration of programmes. The complaints registration systems thus have to make a distinction between complaints where an integrity breach is demonstrated and other complaints.

142. If it is possible to separate integrity cases from other complaints, a potential measure is the *number of integrity cases divided by the total number of cases*. By calculating a ratio, international comparison may be facilitated since the measure controls for differences in reporting inclination. In some countries, citizens are more inclined to report than in other countries. Comparing absolute numbers or per capita numbers may therefore mainly reflect attitudes towards government instead of the incidence of integrity breaches in government.

**Outputs and outcomes of function 4; enforcing integrity**

143. Every integrity management framework will need a significant component of enforcement. If the rules are clear for the staff members and the monitoring indicates transgressions of those rules, then sanctions will be necessary if the integrity management framework wants to maintain its overall legitimacy (OECD, 2008b). In addition, a credible enforcement procedure may have a preventive effect, since they discourage wrongdoing. We will discuss two instruments; the investigation procedures<sup>15</sup> and the sanctions.



**Investigation procedures and sanctions**

144. Investigation is a *multi-faceted activity*; who is investigating what, how and whom? Table 6 is an attempt to give an indication of the complexity of the matter. We have to add to this picture the national differences in the distribution of responsibilities. For instance, in some countries (typically Anglo-Saxon) the control pyramid is well developed with a clear hierarchy of internal control, internal audit and external audit. In other countries that have a culture of rules rather than control (typically Latin countries), the control pyramid is less firmly established. Comparative international measures thus face the difficulty of defining a uniform subject.

**Table 6: The many dimensions of integrity investigation**

who	what	how	when	whom
Internal control	Code of conduct	Documents and	Recurrent	Public servants
Internal audit	Criminal justice	material evidence	Incident based	Managers
External audit		Interviews and	Risk based	Politicians
Integrity actors		assessments	At random	
Public prosecutor				
Ombudsman				
Non profit				
Media				

145. If we are searching for commonalities, the *criminal justice system* may be the best option. Of course, in this case we limit the ‘what’ question to criminal justice issues. However, developed countries seem to have comparable regulations on what is criminal behaviour in integrity breaches. Moreover, criminal justice statistics are broken out for different offences. We may be able to single out comparable offences across nations. Additional research should confirm this however.

146. The *number of cases dealt with* by the public prosecutor may give an indication of how strong a country is enforcing its regulation. This measure therefore may be combined with the number of cases that lead to a conviction in order to calculate a *conviction ratio*. A low conviction rate may

<sup>15</sup> It may be argued that investigation is rather part of uncovering and thus monitoring integrity than enforcing. On the other hand, in practice, investigative and sanctioning procedures are closely related. Moreover, an investigation is in itself often very intrusive. Therefore, many actors may experience the investigation as a sanction.



point to strong enforcement, since cases with a weaker evidence base are also brought to the criminal justice system. A high conviction rate may point to weaker enforcement since only 'sure shots' are submitted for prosecution. Obviously, we need to be very careful with conclusions like this. Other explanations for low conviction rates, besides enforcement policies, may be low quality preparatory work by integrity actors or inefficiencies in the judicial process.

147. We argued that the enforcement is important for upholding the legitimacy of the system as well as for its preventive effects. Therefore, the *perception of employees of the fairness and adequacy* of the investigation and sanctioning process is an important outcome of enforcing integrity. Staff members have to be confident that, if they are accused of a violation, this will be investigated thoroughly with respect of their rights and the sanction will be proportional and fair (OECD, 2008b). This perception could be measured through staff surveys.

**Summary table: feasibility assessment**

148. To conclude, we present a feasibility assessment for the measures. This assessment is based on the discussions above. The table provides a short description of the measure, an assessment of the feasibility on a five point Likert scale and an argumentation for the scores. The scores are based on personal professional judgement and the argumentation gives an indication on how we got to a particular score. However, they should be handled with care. It is not an exact science and it should be clear that the score on the scale is not the result of a formula based addition of the arguments. Some arguments may be more pressing than others. In sum, the feasibility assessment should be seen as the foundation for discussion rather than an ultimate result.

149. The table represents a feasibility score, and not an opportunity assessment. Feasibility does not necessarily imply that these measures are the most useful to collect. We discuss 18 avenues for further work on integrity measures. Clearly, data gathering efforts will have to be targeted. This decision should be based on a) the feasibility assessment of the effort as well as on b) the added value of the information. Throughout the text, some arguments on the latter point have been suggested. However, this is ultimately the decision of the OECD and its member countries. We hope however that this text helps to structure the debate.

**Table 7: Feasibility assessment of integrity measures (overall assessment on a five point scale**

Measure	Definition	Feasibility score	Argumentation: (+) represents an opportunity while a (-) represents a challenge
<b>Overall outcomes</b>			
1. Country adoption rate	Is a country adopting integrity management instruments?	++	(+) A common understanding of integrity instruments is developed (+) The adoption of integrity instruments is observable (+) International organisations already collect some data
2. Within country adoption rate	Are actors other than the integrity actor (e.g. agencies and departments) adopting integrity management instruments?	+	(+) A common understanding of integrity instruments is developed (-) Mainly relevant in decentralised systems where the integrity actor only taking up a facilitator role. (-) Data gathering would require a considerable effort of countries. (+) A more realistic option would be to limit the measure to two or three well-accepted and understood integrity management instruments.
3. Mainstreaming rate	Is integrity mainstreamed into traditional management instruments?	-	(-) the measurement of mainstreaming is relatively unexplored terrain (-) measurement should occur at the organisational level, which represents an additional challenge in the extrapolation to the country level (+) more realistic is to measure a sample of some departments with similar tasks (+) there are some bits of information in staff surveys
4. Exemplary role of leadership	How does staff perceive the integrity of leadership	++	(+) a general item in a staff survey would suffice to have a substantial indication
5. Awareness of Rules	Does staff know the ethics rules and can they apply it	-	(+) Some potential for case based multiple choice surveys

Measure	Definition	Feasibility score	Argumentation: (+) represents an opportunity while a (-) represents a challenge
	to concrete cases?		(-) the number of cases has to be high to level out different degrees of difficulty (-) few examples (-) a good knowledge of the respondents is required
6. Corruption incidence	What is the number of convicted corruption cases?	+	(+) criminal justice data are available in all countries (+) the definitions are culturally relative; they are defined laws and the courts. (+) it is a measure of more severe breaches, which gives some definitional stability (-) Criminal justice classification schemes have to be able to identify public corruption
7. Ethical climate	Is integrity value driven?	0	(+) Data gathering can be comprised in staff surveys (-) Need to survey intentions of support for integrity, which is difficult (+) Some possibilities in more sophisticated, longitudinal research designs (+) Knowledge of values, attitudes towards value formulation may be used as proxies
8. Trust	Trust of citizens in government	+	(+) trust data is available (+) trust reflects a positive attitude in government, which may, amongst others, be an outcome of high integrity standards (-) ill understood and often misused as a proxy for performance or integrity (not actionable)
9. Civil support	Support of citizens for integrity management	+	(+) in particular 'willingness to report' seems an key comparative item in a survey (+) the measure is actionable, in particular if the survey asks for the barriers to reporting (-) representative surveys with a good response rate are cost
<b>Outcomes of instruments</b>			
1. Risk analysis	How frequently are risks analysed (output)?	--	(-) the functional frequency of risk analyses is contingent on the specific context of individual organisations, which therefore is hard to compare across organisations, let alone organisations
	Are risks better controlled (outcome)?	0	(-) it is difficult to assess whether risks are better controlled, since this will mainly show when risk controls fail. (+) managers however may be able to make a well-founded assessment
2. Codes of Ethics	Presence of a supported code (output)	++	(+) easy to assess
	Quality of the code (output)	+	(+) code as tangible assessment object (-) somewhat more professional judgement is required
	Awareness of the code (outcome)	+	(+) item could be inserted in staff surveys (-) potential for social desirability in the answers needs to be countered. Knowledge questions may be useful for this.

Measure	Definition	Feasibility score	Argumentation: (+) represents an opportunity while a (-) represents a challenge
	Attitude towards the code (outcome)	-	(+) could be inserted in a staff survey (-) potential social desirability is strong and hard to counter (-) hard to assess, based on which subdivision is the attitude formed?
3. Post Employment	Staff turnover to and from sensitive positions (outcome/risk)	-	(-) novel work – considerable definitional issues need to be sorted out (-) assesses risks, not occurrence of problems (+) more feasible if confined to senior civil servants
	privileged observers: staff (outcome)	+	(+) staff surveys may ask to identify who they feel is pressuring them to breach integrity. Former colleagues can be category (+) entrants from the private sector may be prove to be very valuable respondents (-) social desirability is an issue
	privileged observers: former employees (outcome)	-	(+) post exit interviews may be a source of information, (-) post exit interviews are probably not systematically held (-) hard to standardise in quantitative and internationally comparable measures (-) difficult to keep track of those who left the public service
	privileged observers: businesses (outcome)	0	(+) if surveys with businesses are performed, some items on industry practices could be inserted (-) social desirability can be partly underscored, but remains an issue
4. Training, advice, counselling	Number of training days/staff total (output)	0	(+) annual reports of integrity actors often provide this information (-) it does not give information on the quality and contents of the training (-) a clear definition of staff totals is required
	Coverage rate of staff by training (output)	--	(-) the optimal frequency, and thus time interval for measurement, differs between high risk and low risk employee profiles (-) more detailed disaggregated data on participants profiles is required
	Satisfaction of participants (outcome)	-	(+) systematic follow up survey of participants is a general practice for training (-) difficulties for international standardisation due to the differences in content of the training sessions
	Knowledge of participants (outcome)	-	(+) systematic follow up survey of participants is a general practice for training programmes (-) difficulties for international standardisation due to the differences in content of the training sessions
	Questions for advice of counselling (outcome)	+	(+) most integrity actors with counselling activities record the number of advices provided (+) longitudinal data may reveal trends (-) some research into the specific mandate

Measure	Definition	Feasibility score	Argumentation: (+) represents an opportunity while a (-) represents a challenge
			of the integrity actors is required in order to internationally compare
5. Conflict of Interest declarations	Compliance to reporting obligations (outcome)	0	(+) it should be relatively easy to measure the compliance rate of a target group such as MP's, senior civil servants, etc... (-) it is much more difficult to assess the completeness of the submitted reports (+) differences in national arrangements are not highly problematic, since the target would be 100% compliance to national requirements (-) however, it would make sense to perform some additional analysis in order to compare the COI declarations
	Consultation statistics of COI declarations (outcome)	+	(+) countries that have online COI databases could produce site statistics (+) since every citizen potentially can access these sites, a per capita ratio makes sense (-) some interpretation issues; is high consultation a good sign? (cf incidence stats)
	Behavioural impact of COI declarations (outcome)	--	(-) difficult to assess the intentions for not breaching integrity (-) difficult to determine causality
6. Lobbyist registration	Compliance to reporting	-	(+) number of registered lobbyists are available (-) difficult to establish the target group (the lobbyists) (-) variation in lobbyist regulations: registration is not always compulsory
7. Whistle blowing	Presence of whistle blowing arrangements (output)	++	(+) easy to collect (-) binary character (yes/no) may lead to a failure to differentiate between countries
	Quality of whistle blowing arrangement (output)	0	(+) collection of data can be based on the regulation and policy documents (-) expert judgement is required to define and assess quality of an arrangement (-) the definition of quality may be contingent with national cultural and structural characteristics
	Awareness of arrangements?	++	(+) Some knowledge items can be easily inserted in staff surveys
	Are arrangements used?	+	(+) Data should be available with the integrity actor. (-) additional analysis is required to make sense of the data: trend analysis, benchmarking and breaking out founded and unfounded cases
	Is there a safe environment?	++	(+) Some items on this issue can be inserted in staff surveys (+) Regardless of the differences in arrangement and national cultures, a safe environment should be realised. International comparison is useful and possible. (+) integrity actors may survey whistle

Measure	Definition	Feasibility score	Argumentation: (+) represents an opportunity while a (-) represents a challenge
			blowers on their experiences and the absence of retaliation
8. Complaints procedures	Presence of complaints policies (output)	+	(+) relatively easy to collect, although there is probably more variation in what counts as a complaints procedure compared to the concept of whistle blowing (-) binary character (yes/no) may render it impossible to differentiate between countries
	Quality of whistle blowing arrangement (output)	0	(+) collection of data can be based on the regulation and policy documents (-) expert judgement is required to define and assess quality of an arrangement (-) the definition of quality may be contingent with national cultural and structural characteristics
	Are citizen's aware? (outcome)	+	(+) there are examples of awareness surveys (+) awareness levels are significant, regardless of national contexts; (+) moreover, they are actionable – corrective actions can be taken (-) representative, high quality surveying is a costly matter
	Do citizens use the complaints procedures? (outcome)	-	(+) counts of the number of complaints are usually available (-) integrity complaints need to be distinguished from other complaints, which is not evident since service complaints may conceal integrity issues (-) additional analysis is required to make sense of the data: trend analysis and comparison (+) potentially interesting ration of integrity complaints/total complaints, since it controls for differences in inclination to report.
9. Investigation and sanctions	Publicly prosecuted cases and the conviction rate	+	(+) criminal justice statistics are available in all countries (+) possibility to single out a number of well understood integrity breaches (-) some additional research on the criminal justice statistics is required (-) careful interpretation of conviction rates is required
	Staff perception of fairness and adequacy of investigation	++	(+) could be an item in staff surveys

## CONCLUSION

150. The objective of the paper was to explore strategies to further develop integrity measures. For this purpose, we use a bottom up approach. Countries are already taking initiatives to measure the success of integrity policies and management. We studied those national practices. In the first place; the analysis was oriented at developing measures for government at a glance. However, some strategies that may not be feasible in the short term in an internationally comparative context, may well be of relevance for national evaluation practices.

151. Clearly, the country cases provide hopeful perspectives for the development of international comparative measures. There are some good opportunities for obtaining original and high quality data on outcomes of integrity initiatives building on current national measurement practices.

152. One of the most notable opportunities is the development of an *OECD integrity module* that can be inserted into staff surveys. Often staff is the target group of initiatives. In addition to that, they are key witnesses for assessing trends in integrity. In this sense, we might argue that staff assessments are leaning towards experience rather than perception. Finally, and very importantly, the data infrastructure is already available. Most countries are already performing staff surveys and some countries already including ethics items. International standardisation can strongly increase the value of these items, since benchmarking opportunities arise. Table 15 suggests some measures that could be part of the integrity module.

153. We discussed 18 avenues for further development of integrity measures, and discussed 38 measures. This is already a significant number, but undoubtedly, after some discussion, the number could easily be doubled. An motivated choice of a selection of blinking indicators therefore is needed. The idea of a blinking indicator reflects the idea that an indicator is an incomplete representation of a reality, and therefore always requires interpretation. They reflect *that* something may be going on, but they usually do not sufficiently specify *what, where, when* and *why*.

154. Indicator sets, once they become relevant, have the tendency to mushroom. Experts in a field always see hiatuses in the coverage of the indicator set and the common reaction is to add more indicators. However, complete coverage is not realistic, and maybe even inconceivable. Measurement possesses the dialectic nature of knowledge creation; the more we know, the more we become aware of what we do not know. Every indicator will generate new questions, and thus new fields of inquiry.

155. In this respect, the difference between a blinking indicator and a key indicator is not merely semantic. The definition of key indicators suggests that there are indicators for all dimensions of the field, in our case integrity, and that it is mainly a matter of selecting those that measure the most important aspects. This assumption should be challenged.

156. First of all, it is not possible to develop indicators for all dimensions of integrity. Some important dimensions, such as the behavioural impact of conflict of interest declarations or the use of risk assessments, are for a variety of reasons very hard to measure. In Einstein's words, *not everything that counts can be counted and not everything that can be counted, counts*.

157. Secondly, even if it were possible to measure all the dimensions, it would be hard to tell which the most important 'key' areas are. As we showed in Figure 7, the importance of dimensions will depend on the specific integrity context of a country.

158. Blinking indicators do not make these claims. It is acknowledged that some important dimensions cannot be measured and it does not assume an intricate hierarchy in the importance of integrity dimensions. It only claims that we may be able to select some indicators that trigger analysis and learning. Indicators are conceived as tin openers that help us to open the can and to see what is inside (Carter et al., 1992). In a complex setting such as integrity, this seems a more valid approach.

159. If indicators are tin openers, follow up mechanisms become more important. Best and good practices should be shared in order to trigger learning effects. Countries should moreover seek forums to discuss and to interpret the data. International organisations on public governance, such as OECD, EIPA, EUPAN, and others offer opportunities for these purposes. In addition, countries could initiate bi- or multilateral initiatives. Finally, the findings would need to feed back into national reform practices. A strategic vision on this learning cycle may help countries to get the most out of this benchmarking project.



## APPENDICES

160. In the appendix, we review some well developed integrity management practices on OECD countries. We do this with a particular focus on measurement. This appendix is the empirical evidence that measurement of ethics. For each country, we will present (a) a fact sheet, with some key features of the case, and (c) the measurement practices.

### (a) Fact sheet

- What are the main players?
- What are the institutional features? (internal or external, national and/or sub-national)
- What are the main integrity management instruments?

### (b) The assessment framework

161. The relation between the assessment framework for integrity and integrity measurement is crucial. Integrity is the subject we want to understand. Therefore, several sources of evidence are collected for making a judgement. Typically, judgement will be based on three types of information - quantitative, qualitative and tacit information. Integrity measurement refers to the process of obtaining *quantitative* information while integrity appraisal refers to *qualitative* information (for instance focus groups with citizens, getting expert advice, privileged witnesses ...). Both measurement and appraisal are deliberate activities performed to obtain a better view on performance. Besides this explicit information, people usually also have *tacit* knowledge of government integrity built up through personal experience. An understanding of integrity develops from these different types of information.

162. From statistical theory however we learn that this understanding will never be 100% correct. Since the true value is most of the time unobservable, there will always be a difference between a computed, estimated, or measured value and the true, specified, or theoretically correct value. The best way to deal with this issue is to take different shots, which in our case implies the use of different sources of evidence and a careful interpretation.

163. A clear subject (here; integrity) and different sources of information are not enough to make a judgement. We need to be able to select the *right* information and to make sense of it. Public managers often complain at the same time about both information overload *and* information gaps. Although there is ample information, they often are bewildered and uncertain about the decisions to make. Here, the assessment framework comes into play. It mediates between subject and judgement. Assessment frameworks are the lenses by which we look at integrity. As such, they will guide information searches and ultimately, judgement.

### (c) Measurement practices

164. We thirdly will focus on the indicators that are used to measure performance. We also address whether there are time series or benchmarks. Notable methodologies will also be pointed at.

We do however not assess the gaming issue in performance data. It is a well documented phenomenon that indicators can and will be manipulated when they inform decisions that heavily impact people's lives, careers, or pay check. The gaming issue should be taken into account when concrete indicators are further developed. In this paper however, we did not want to limit our scope based on a pragmatic argument of potential gaming.

**Australia**

*Fact sheet*

Main players	<ul style="list-style-type: none"> <li>- Federal; the Australian Public Service Commission, Ombudsman, Auditor General, department of the prime minister and cabinet</li> <li>- State level<sup>16</sup>; NSW Independent Commission against Corruption (ICAC), NSW ombudsman, NSW department for local government, Audit offices (except at the local level, where audit is a missing link)</li> </ul>
Institutional features	<ul style="list-style-type: none"> <li>- At the commonwealth level, no single agency takes overall responsibility for corruption. According to (Roberts, 2005) there is no integrity leadership.</li> <li>- Integrity policies are determined by commonwealth and the states</li> <li>- Local councils are relatively weak (e.g. 38 councils cover Greater Sydney), which leads to an absence of ‘truly local’ integrity systems. Local integrity policies are determined by the state</li> <li>- Integrity policies focuses on both elected and non elected staff, incl. the judiciary</li> <li>- Rather centralised model – moderate responsibility for line managers (the ICAC however wants agencies to take a greater responsibility)</li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- Strong emphasis on ethics code (Australian Public Values) and code of conduct (NSW has also a model code for local councils)             <ul style="list-style-type: none"> <li>o The APS code of conduct includes many instruments, such as conflict of interest, whistle blowing, gifts policies, post employment</li> <li>o Integrity is broadly defined and includes relationships with politicians,</li> <li>o The code strongly appeals on the individual civil servant.</li> </ul> </li> <li>- Investigations and enforcement, (i.e. by ICAC with publication of findings, or by the attorney general)</li> <li>- Lobbyist register at the federal level and a lobbying code of conduct</li> <li>- NSW’s ICAC has politicians as a target group, the federal level is also moving in this direction (i.e. Standards of Ministerial Ethics (December 2007))</li> </ul>

*Assessment Framework*

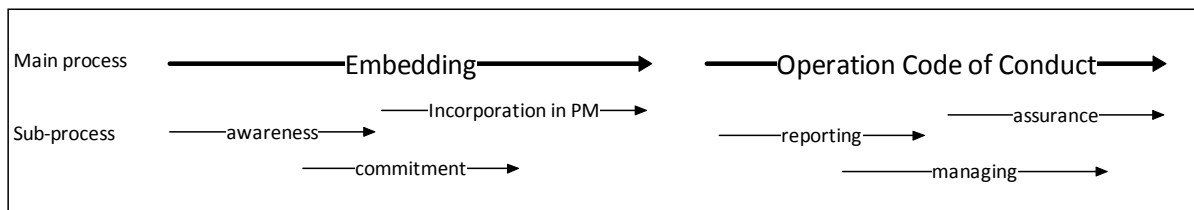
165. The annual State of the Service report issued by the Australian Public Services Committee (Australian Public Service Committee, 2008) provides a detailed assessment of ethics and integrity in the Australian Commonwealth. The framework underlying this assessment assumes two main stages of development; embedding and operation. Obviously, a code of conduct that is not embedded in the organisation will not be able to operate. Each stage has some sub-processes. Embedding goes through the stages of awareness, commitment and incorporation. Operation is a sequence of reporting

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<sup>16</sup> We focus on the commonwealth (federal level), New South Wales (state level) and Sydney (local level)

breaches, managing them (amongst others through investigation) and assurance of the integrity of the processes for handling misconduct itself (Figure 9).

**Figure 9: Assessment framework of the APSC report ‘the state of the service’ (2008)**



166. The APSC attempts to go beyond the adoption of instruments. They do so by asking whether the APS values are incorporated into the performance management and whether and how many new employees receive induction training. The ambition to assess impact also shows in the section on the operation of the code of conduct. For instance, it is not only assess what efforts agencies undertake to raise awareness of reporting channels, they also include an assessment of who is initiating reports which may give an indication on whether awareness initiatives reach their target groups.

167. The ICAC has in essence also has the two components of embedding and operation. Their assessment framework, as reported in the annual report 2007-2008, makes a distinction between exposure (~ operation) and prevention (~embedding anti corruption policies). They do however follow a different path. They first look for breaches of integrity and then suggest preventive measures.

168. In conclusion, the assessment framework focuses on the diptych of prevention and enforcement, with a slight prevalence of the latter. Investigation and enforcement get substantial attention. Both perceptions and facts are included.

*Measurement practices*

169. Advanced **volume measures** are available. The APSC ‘state of the service’ report includes the number of investigations against breaches of the code by agencies, broken out for agency, elements of the Code of Conduct suspected of being breached, and types of misconduct (see Figure 10 and Figure 11) (Australian Public Service Committee, 2008). Interestingly, there is high variation in both investigative activity and sanctioning between agencies. The report attributes these differences both the nature of the work as to the rigorousness of the management of the agencies.

Figure 10: Exemplary volume measures of the APSC (1)

TABLE 7.4: Elements of the Code suspected of being breached in investigations finalised during 2007–08

Element of the Code	No. of employees investigated for a suspected breach of this element (Number)	Percentage of cases where a breach was found (%)	No. of agencies with finalised investigations (Number)
<b>An employee must:</b>			
at all times behave in a way that upholds the APS Values and the integrity and good reputation of the APS (s.13(11))	639	67	33
behave honestly and with integrity in the course of APS employment (s.13(1))	536	52	33
use Commonwealth resources in a proper manner (s.13(8))	417	74	29
comply with any lawful and reasonable direction given by someone in the employee’s agency who has authority to give the direction (s.13(5))	359	62	19
when acting in the course of APS employment, treat everyone with respect and courtesy, and without harassment (s.13(3))	231	59	39
when acting in the course of APS employment, comply with all applicable Australian laws (s.13(4))	229	64	14
act with care and diligence in the course of APS employment (s.13(2))	205	65	24
disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with APS employment (s.13(7))	139	53	15
not make improper use of: inside information, or the employee’s duties, status, power or authority; in order to gain, or seek to gain, a benefit or advantage for the employee or for any other person (s.13(10))	104	47	18
not provide false or misleading information in response to a request for information that is made for official purposes in connection with the employee’s APS employment (s.13(9))	39	64	11
while on duty overseas, at all times behave in a way that upholds the good reputation of Australia (s.13(12))	7	29	2
comply with any other conduct requirement that is prescribed by the regulations (s.13(13))	6	67	5
maintain appropriate confidentiality about dealings that the employee has with any Minister or Minister’s member of staff (s.13(6))	0	0	0

Note: Agencies were asked for data on employees who were the subject of formal investigations, and were specifically asked not to include data on initial investigations that did not proceed to formal misconduct procedures. However, it is possible that some agencies may have provided information on elements of the Code that were suspected of being breached in both formal and informal investigations.

Source: Agency survey

Source: Australian Public Service Committee, 2008.

Figure 11: Exemplary volume measures of the APSC (2)

**TABLE 7.5: Number of employees by types of misconduct in investigations finalised during 2007–08**

Type of misconduct	No. of employees <sup>(a)</sup> investigated for this type of misconduct (Number)	Percentage of cases where a breach was found (%)	No. of agencies with finalised investigations (Number)
Improper use of internet/email	350	84	20
Inappropriate behaviour of employees (other than harassment or bullying) during working hours (e.g. treating clients or stakeholders disrespectfully)	163	61	28
Improper access to personal information (e.g. browsing)	150	70	9
Harassment and/or bullying	118	47	28
Fraud other than theft (e.g. identity fraud)	86	44	10
Improper use of position status (e.g. abuse of power, exceeding delegations)	74	20	11
Improper use of resources other than internet/email (e.g. vehicles)	60	60	17
Conflict of interest	41	46	13
Private behaviour of employees (e.g. at social functions outside working hours)	30	53	15
Unauthorised disclosure of information (e.g. leaks)	25	40	8
Theft	16	31	6
Misuse of drugs or alcohol	1	100	1

<sup>(a)</sup> An individual employee may be counted against more than one type of misconduct.

Note: Agencies were asked for data on employees who were the subject of formal investigations, and were specifically asked not to include data on initial investigations that did not proceed to formal misconduct procedures. However, it is possible that some agencies may have provided information on elements of the Code that were suspected of being breached in both formal and informal investigations.

Source: Agency survey

Source: Australian Public Service Committee, 2008.

170. The ICAC as well reports several volume indicators (Independent Commission Against Corruption, 2008; Cripps, 2008). In Figure 12 and Figure 13, the results for preventing and exposing corruption are included. The indicators follow the sequence of processes in exposing corruption; from matters received over assessment to inquiry. The data of the complaints received is broken out by workplace activity, government sector and conduct alleged. This is important for interpreting change in the statistics. There are also some indicators on the processing times of complaints and inquiries. The indicators on prevention of corruption are volume measures such as the number of training days, number of advices, site visits. In the report, some client satisfaction measures on the training that is provided by ICAC are included.

**Figure 12: ICAC exemplary volume indicators from ICAC (1)****Table 1: Key quantitative results for corruption exposure activities**

Measure	Target 2008–09*	2007–08	2006–07	2005–06
Matters received	n/a	2,702	2,149	2,191
Average time taken to deal with matters (days)	80	87	97	45
Preliminary investigations commenced	n/a	78	66	48
Investigations commenced	n/a	12	12	15
Investigations finalised in six months	n/a	38	53	24
Percentage of investigations completed within 12 months	>90%	90%	92%	82%
Number of public inquiries	n/a	11	4	4
Number of public inquiry days	n/a	51	24	27
Number of compulsory examinations	n/a	70	49	32
Number of persons subject to corrupt conduct findings	n/a	51	17	61
Number of investigation reports to Parliament	n/a	7	5	7
Percentage of investigation reports completed within three months of completion of public inquiry	80%	71%	25%	30%
Number of persons subject to prosecution arising from investigations	n/a	6	7	15
Number of persons subject to disciplinary actions commenced arising from investigations	n/a	2	3	0

\* For measures which reflect incoming work or activity beyond the control of the ICAC targets are not set, and not applicable (n/a) appears in the target column.

Source: Independent Commission Against Corruption, 2008.

**Figure 13: ICAC exemplary volume indicators from ICAC (2)****Table 2: Key quantitative results for corruption prevention and education activities**

Measure	Target 2008–09*	2007–08	2006–07	2005–06
Telephone/email requests for corruption prevention advice	n/a	211	244	246
Written requests for corruption prevention advice	n/a	25	32	28
Corruption prevention advice relating to complaints and reports of corrupt conduct	n/a	44	49	50
Rural and Regional Outreach visits	2	2	2	2
Training sessions delivered	40	58	39	61
Corruption prevention recommendations in investigation reports published in the period	n/a	57	113	78
Percentage of corruption prevention recommendations addressed by agencies, as at 30 June 2008	80%	76%	91%	85%
Percentage of public inquiries that resulted in the making of corruption prevention recommendations	90%	80%	85%	-
Number of website visitors	n/a	135,449	97,430	77,706
Number of external visitor sessions to the ICAC website	n/a	568,170	478,821	404,013
Number of editions of <i>Corruption Matters</i> newspaper published	2	2	2	2
Number of advice tip sheets	n/a	4	4	1
Number of prevention or research reports published	3	2	6	7

\* For measures which reflect incoming work or activity beyond the control of the ICAC targets are not set, and not applicable (n/a) appears in the target column.

Source: Independent Commission Against Corruption, 2008.

171. The Australian bureaus also report on what they call outcomes. These outcomes should not be seen as the effect of integrity policy and management in society – i.e. lower corruption level and higher integrity standards. They mainly refer to the next step in a process of investigation. For instance, the outcome of the assessment of matters by ICAC is broken out into twenty potential actions, of which ‘no further action by ICAC’ is the most important. Other actions range from referral to the public prosecutor to referral to the agency for information of investigative activities.

Figure 14: Measures of sanctions imposed

TABLE 7.6: Outcomes of finalised investigations into suspected breaches of the Code, 2007–08

Outcome	No. of employees affected <sup>(a)</sup>	No. of agencies that reported the outcome
Deduction from salary by way of a fine	218	17
Reprimand	212	32
No breach found	184	25
Investigation discontinued because of resignation of employee under investigation	162	17
Employee counselled	111	18
Reduction in salary	93	14
Termination of employment	79	22
Reduction in classification	32	12
Breach found but no sanction imposed	28	12
Reassignment of duties	26	13
Other	22	11

<sup>(a)</sup> An employee may be counted against more than one outcome.

Note: Agencies were asked for data on employees who were the subject of formal investigations, and were specifically asked not to include data on initial investigations that did not proceed to formal misconduct procedures. However, it is possible that some agencies may have provided information on elements of the Code that were suspected of being breached in both formal and informal investigations.

Source: Agency survey

Source: Australian Public Service Committee, 2008.

172. Besides volume measurement, the Australian bureaus for integrity (ICAC and APSC) have performed **perception of integrity measurement** (Rodney, 2008). ICAC did a study of the general public (Independent Commission Against Corruption, 2006). The so called *ICAC community attitude survey* results were published in 1994, 1996, 1997, 1999, 2003 and 2006, which allows for comparison throughout time.

173. The ICAC survey asks people amongst others the general question whether they see corruption as a problem in NSW public sector (see appendix for some results). Although the levels remain high, there is a significant decline in recent years from 96% in 1996 to 72% in 2006. Other questions of interest ask for personal experience; i.e. whether people experienced or heard about corrupt behaviour. Other issues include attitude towards reporting and citizen's perception of the ICAC.



Figure 15: Exemplary perception measures from the ICAC (1)

**Table 4: Per cent of participants indicating the extent to which they perceived corruption to be a problem in NSW, 1993–2006**

	Major problem	Minor problem	Not a problem	Don't know	N
1993	55%	37%	4%	4%	502
1994	44%	47%	4%	5%	402
1995	58%	38%	1%	3%	515
1996	49%	43%	4%	4%	511
1999	55%	37%	3%	5%	514
2003	31%	51%	9%	9%	500
2006	26%	46%	18%	11%	502

Source: Independent Commission Against Corruption, 2006.

Figure 16: Exemplary perception measures from the ICAC (2)

**Table 9: Number (and per cent) of participants who indicated they have experienced or heard about something that they felt was corrupt in the NSW public sector**

	Yes	No	Unsure
Ever experienced somebody in NSW public sector doing something you thought was corrupt?	97 (19%)	404 (80%)	1 (0%)
Ever heard from other people you know about somebody in NSW public sector doing something you thought was corrupt?	198 (39%)	297 (59%)	7 (1%)

Source: Independent Commission Against Corruption, 2006.

174. The APSC inserted two ethics issues in the annual employee survey. The state of the services report states ‘that ‘employee perceptions of ethics and integrity remained high in 2007–08. Seventy-seven per cent of employees agreed that their manager demonstrates honesty and integrity. Eighty per cent of employees agreed that people in their work group treat each other with respect and 74% of employees agreed that people in their work group are honest, open and transparent in their dealings. Seventy-one per cent of employees agreed that their agency operates with a high level of integrity.’

175. In conclusion, Australia seems to have fairly advanced measurement practices regarding integrity. They seek a combination of volume measures and perceptual indicators. The sophistication of the volume measures lies in the ability to break indicators out to relevant categories (such as sector, type of complaint, workplace activity). Box represents some findings from a survey of measurement practice in police oversight bodies. Here too, the combination between volume measures and perceptual data is sought.

**Box 1. Performance indicators for police oversight agencies**

(Prenzler & Lewis, 2005) reviewed the availability of performance indicators for police oversight bodies in Australian states. They found that the majority of oversight bodies adopt fairly basic and largely quantitative measures on matters processed. While making an analogy with measures for performance of actual police, they argue that '**complaints numbers and the disposition of complaints**' are inevitably linked to questions of agency performance, and are partly analogous to reported crime as a measure of police performance (p.77). They also argue that the indicator '**matters solved**', either formally or informally, resembles clearance rates in police agencies. Furthermore, they found **surveys of police perceptions** of the work of oversight bodies, **complainant satisfaction surveys** and **general opinion surveys** of knowledge of and confidence in the agencies' work to be useful instruments.

## Belgium

### Fact sheet

Main players	<p>Federal level</p> <ul style="list-style-type: none"> <li>- Bureau for administrative ethics and deontology</li> <li>- Court of Audit</li> </ul> <p>State level</p> <ul style="list-style-type: none"> <li>- <a href="mailto:Integriteit@Vlaanderen.be">Integriteit@Vlaanderen.be</a>, which is a network organisation hosted by the department of administrative affairs, and supported by internal audit, the ombudsman, and the agency for personnel</li> <li>- Internal Audit of the Flemish government</li> <li>- Ombudsman</li> </ul> <p>Local level</p> <ul style="list-style-type: none"> <li>- Integrity bureau Antwerp</li> </ul>
Institutional features	<ul style="list-style-type: none"> <li>- Internal actors (within government)</li> <li>- The municipal administration developed a code for local politicians, the Flemish parliament voted a code of conduct for MP's regarding</li> <li>- Both the Antwerp, Flemish and federal initiatives follow a decentralised model; they target the line managers for the latter to develop an integrity policy within their organisation.</li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- Whistle blowing arrangements, in particular in Flanders</li> <li>- Ethics and Codes of conduct (known as Deontological code)</li> <li>- Risk analysis (within a broader auditing framework (Flanders))</li> <li>- Training and advice</li> <li>- Conflict of Interest policies: registration by politicians at the Court of Audit of occupations and (in a closed envelope) their (moveable and immoveable) property.</li> </ul>

### Assessment Framework

176. There are very few explicit assessments of the performance of integrity policies. One framework worth mentioning is the model for internal control developed by the internal audit of the Flemish government. Integrity is seen as one of the four objectives of internal control besides ensuring effectiveness, efficiency, and quality. Integrity is thus fully integrated into the model for internal control. Some integrity examples from the guide to internal control include (Interne Audit van de Vlaamse Administratie, 2007);

- “Risk assessment should include the assessment of integrity risks. The vulnerable functions in the organisation have to be inventoried (p.26).” “The organisation has a clear code (potentially being part of the deontological code) that determines how to interact with stakeholders and that describes the limits of dialogue and behaviour (p.30)” (in the section on stakeholders management)

- “For the operation of advisory and administrative bodies, conflicts of interests are assessed and communicated to the parties involved (p.30). The necessary control mechanisms are in place (p.31)” (in the section on stakeholders management)
- “HRM policies pay attention to the description of values and the development of integrity in behaviour (dealing with dilemma’s) (p.48), “There is an introduction in integrity issues for new employees and integrity is part of the evaluation (p.50) ” “integrity breaches have consequences, which are clear in advance (p.52)” (in the section on HRM).
- “the organisation has a vision on integrity policy (p.57)” “The organisation has a deontological code, which is specified for vulnerable functions (p.58)” “The organisation has a concrete gifts policy and conflict of interest arrangements (p.58)” “management has an exemplary function and the organisation has trusted persons for reports by staff (p.59)” (in the section on organisational culture)
- “there is a separation of functions in financial matters between content management, accounting and payment” (p.72) (in the section on financial management).

### *Measurement practices*

177. Measurement practices are rather few. The Antwerp integrity bureau reports some **volume measures** in its annual report. It reports the number of requests for advice, for information and complaints. These measures are broken out for themes (e.g. gifts, invitations, outside activities, conflicts of interest, sponsoring, ...). Since integrity policy in the Flemish and federal administration is the responsibility of the line manager, it may be more difficult to produce volume measures. Nonetheless, the use of whistle blowing arrangement should be easy to report. Internal Audit is the second line (after the management), and the Ombudsman is the third line. The ombudsman reports 2 cases in 2007.

178. We argued that integrity policy in Flanders is largely embedded in the model for internal control. IAVA (internal audit of the Flemish administration) does measure progress in implementing a system for internal control – the so called maturity assessments. These reviews can be seen as adoption measurement, since it is assessed whether instruments are in place. The scoring uses six levels of maturity.

1. Inexistent (code red); there is no internal control, there are no initiatives, and awareness is low.
2. Ad hoc (code orange); internal control is based on concrete issues and often driven by individuals
3. Structured initiative (code yellow); internal control measures are in development, but not yet applied
4. Defined (code light green); Internal control measures are present, standardised, documented, communicated and applied
5. Controlled system (code green); internal control measures are evaluated and adjusted.
6. Optimised (code dark green); internal control measures are optimised through benchmarking and external evaluation

179. Finally, there is some **perceptual data** in the annual employee survey of the Flemish government. Unfortunately, the integrity related questions are only directed to middle and top

managers (for the results, see annex). In the survey for operational staff, no integrity items were included. The three items are (Agentschap Overheidspersoneel, 2008);

(1) “De Vlaamse overheid functioneert op een betrouwbare en integere wijze” - “The Flemish government functions in a reliable and sound way.” The score is 3,9 on a five points Likert scale. One issue with this question is that it includes two affect to which respondents may react, i.e. reliable and integer.

(2) "Bij de Vlaamse overheid verlopen de externe aanwervingen van personeel op een integere manier." “The Flemish administration performs external recruitment of staff in a sound way.” The score is 4,1.

(3) “Bij de Vlaamse overheid verlopen de interne selecties van personeel op een integere manier.” “The Flemish administration performs internal recruitment of staff in a sound way.” The score is 4,0.

**Finland**

*Fact sheet*

Main players	<ul style="list-style-type: none"> <li>- The State Employers Office, Ministry of Finance is monitoring the implementation of values, amongst others with the ‘values in the daily job’ project</li> </ul>
Institutional features	<ul style="list-style-type: none"> <li>- The GRECO found in 2004 that there is no specific integrity policy (GRECO, 2004a).</li> <li>- However, since corruption levels are very low, it can be argued that integrity policies are integrated into the legal and HRM systems (OECD, 2005).</li> <li>- Ethics and integrity are integrated in legislation; in the Constitution, in the State Civil Servants' Act, the Act on Municipal Officeholders and the Administration Act</li> <li>- According to this Act, the fundamental principles of administration shall be guided by formal principles concerning equality, legality, impartiality, proportionality and foresee ability.</li> <li>- It is a decentralised model, with a central responsibility for the state employer to monitor, to build knowledge and to stimulate agencies to develop value based management.</li> <li>- One major restriction on the decentralised model is the definition of nine common values: effectiveness, quality and expertise, service principle, transparency, trust, equality, neutrality, independence and responsibility.</li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- Post employment</li> <li>- The State Civil Servants' Act serves as a code of conduct for state officials and the Act on Municipal Officeholders for local officials.</li> <li>- Similarly, the both acts include gifts policies and conflict of interest arrangements</li> <li>- Strong freedom of information arrangements; with active and passive information policies.</li> <li>- Guidance initiatives, handbooks and training, on ethical standards, in particular in vulnerable sectors.</li> <li>- Risk analysis is less prominent</li> </ul>

### *Assessment Framework*

180. The Finnish approach is to integrate values and integrity into the daily practice, as the ‘values in the daily job’ project suggests. In the first place, this implies the integration into HRM and personnel policies. A next step is the integration of values in overall public management. As a result, integrity policy as a distinct, observable practice largely disappears. In this case, it becomes vital that assessments ask questions on whether management is paying attention to values, and to whether integrity breaches indeed are ruled out (i.e. outcome measures).

181. The values in the daily job project suggests that the following steps are followed in how values based approaches have an influence (Ministry of Finance, 2004) . This framework explicitly acknowledges the gap between awareness and behaviour. It becomes clear that integrity policies have several hurdles to take before it can have an impact. There needs to be an awareness of the values, they need to be understood, they need to be internalised and only then we can expect that integrity policies have an impact on civil servants acting according to the role model defined in the integrity policies.

**Figure 17: Assessment framework for integrity policies impact**

*Awareness of values → Understanding → Internalisation of values → Acting as a role model*

### *Measurement practices*

182. The Finnish mainly resort to survey measurement. In 1998, they send out a survey on ethics to top managers and personnel representatives of the organisations (which included some questions of an earlier survey) (Ministry of Finance, 2000). In 2004, they repeated the survey under the banner of ‘values in the daily job’ (the complete survey is included as an annex to the country report on Finland in the OECD publication ‘Public sector integrity: a framework for assessment (OECD, 2005).

183. The “values in the daily job is a balanced measurement tool (with 52 items) that combines measures on.

1) **Adoption**<sup>17</sup> of integrity policies by organisations (in particular the integration in management practices)

#### *Exemplary items from the survey*

- Has your agency had a discussion about values?
- Have values or other issues relating to civil service ethics been taken into account in the action strategy, personnel strategy or other personnel development programme of your agency?
- Are civil service ethics included in personnel management in your agency?
- Does your agency use methods to disclose abuse or other unethical behaviour (e.g. a suggestion box)?

2) **Knowledge** (awareness and understanding)

#### *Exemplary items from the survey*

- Are the central principles of civil service ethics clear, i.e., do civil servants know everything that the handling of public tasks requires of them (administration in general)?
- How uniform do you think the values of the civil service are in official acts? The values of civil servants are:

<sup>17</sup> The Finnish survey talks of adoption. The questions in the survey however would relate to both adoption rate and mainstreaming rate as we defined these concepts in the discussion of the indicators.

3) **Attitude** (Internalisation)

*Exemplary items from the survey*

- Have the values of State administration changed in the last ten years?
- Which of the values in the table are the most important for State administration on a general level? Circle a maximum of five numbers below indicating the most important values. (similar questions for own agency and private sector)

4) (reported) **Behaviour**

*Exemplary items from the survey*

- Have you yourself had to refuse or forbid your subordinates to accept trips, presents, luncheons or part-time jobs for ethical reasons?

5) **Perception of integrity**

*Exemplary items from the survey*

- Are the civil servants of your agency offered trips, presents or luncheons etc. paid by third parties and to be considered gift-like?
- In your opinion how does civil service ethics compare to the situation ten years ago?

6) **Perception of Integrity Policy**

*Exemplary items from the survey*

- Do you consider it necessary that the highest civil servants declare their economic and other interests? Should this practice also be extended to managers on a lower level?
- How could the level of civil service ethics be maintained and improved in the future?

7) **Contextual indicators** (identifying the specific task environment of the agency)

*Exemplary items from the survey*

- How actively do the media follow the activities of your agency?
- We would like to hear your opinion on what recent developments in the last ten years have influenced the operations of your agency and how?



## France

### Fact sheet

Main players	<ul style="list-style-type: none"> <li>- Service Central de la Prévention de la Corruption (SCPC).</li> <li>- Civil service Ethics commission,</li> </ul>
Institutionnel features	<ul style="list-style-type: none"> <li>- The SCPC focuses on both public and private corruption, and is located in the Ministry of Justice.</li> <li>- The French system is legally well developed,</li> <li>- The capacity to detect fraud is insufficient and fragmented<sup>18</sup></li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- Risk analysis</li> <li>- Training of internal and external controllers, and inspection services</li> <li>- SCPC also provides services to sub-national governments and large companies such as the SNCF</li> <li>- Investigative powers lie in the hands of the judiciary</li> <li>- Integrity codes exist within some departments (GRECO, 2004b)</li> </ul>

### Assessment Framework

184. Assessments of integrity policies seem not well developed in France. The annual report of the SCPC is mainly highlighting different integrity themes, without further inquiry into their effectiveness. These in depth reports do not provide quantitative data. The report also has a statistical annex of 21pages. The statistics are provided however with little analysis or interpretation. The annual report of the Mission interministérielle d'enquêtes sur les marchés (MIEM) (procurement) for instance is also strongly case based.

185. Of interest in the SCPC statistics is the division in integrity breaches they use to break out statistics,; *corruption* (corruption), *concession* (misappropriation), *traffice d'influence* (influence peddling), *ingérence* (abuse of office), and *favoritisme* (favouritism). Each of these categories is further detailed for more concrete breaches. A distinction is made between persons with a public duty, persons who hold public authority and elected persons. This classification (*nomenclatures judiciaires*) is developed by ministry of justice. A shared classification of instances of corruption may be a good instrument for developing a common understanding of the phenomenon, as well as a practical tool for data exchange.

### Measurement practices

186. The SCPC does report volume indicators on the activities of the courts - not on their own activities. They publish two kinds of data. First, the convictions pronounced by the courts are included for they provide a complete typology of integrity breaches. Figure 18 is an example of the statistics on a particular integrity issue (accepting or soliciting of favours by of public authority holders). The statistics include the sanctions (imprisonment in months and average fines). However, this data source suffers from two flaws. There is a time lag of on average 6 years between the infraction and the

<sup>18</sup> À quoi servirait à la France d'être parmi les États disposant de la législation parmi les plus complètes (cf. en dernier lieu la loi du 13 novembre 2007), de services de police et de justice hautement spécialisés si elle ne parvenait pas à mettre en ordre de marche ses services dans la détection concertée de la fraude? (Service central de le prévention de la corruption, 2008)

conviction and there are several indictments that underwent multiple legislative modifications (Service central de le prévention de la corruption, 2008).

**Figure 18: An example of French conviction statistics - Accepting or soliciting of favours by of public authority holders**

### Acceptation, sollicitation d'avantage par dépositaire de l'autorité publique

11707 – Peines principales prononcées, calculées sur les condamnations à infraction unique

Année	Infractions ayant donné lieu à condamnation	Condamnations – Infraction principale	Condamnations – Infraction unique	Dispense de peine	Réclusion	Quantum moyen réclusion en mois	Emprisonnement	Dont ferme (tout ou partie)	Dont emp. sursis total	Amendes	Dont amende ferme	Dont amende sursis total	Quantum emprisonnement ferme en mois	montant moyen amende ferme	Mesures de substitution	Mesures éducatives
1997	24	19	18	5	0	0	12	6	6	1	1	0	10,8	8 000 F	0	0
1998	31	23	2	0	0	0	1	0	1	1	1	0	0,0	5 000 F	0	0
1999	29	22	16	2	0	0	7	2	5	7	5	2	15,0	10900 F	0	0
2000	11	5	3	0	0	0	3	2	1	0	0	0	38,0		0	0
2001	11	7	5	0	0	0	2	0	2	3	2	1	0,0	2 500 F	0	0
2002	23	15	11	0	0	0	11	4	7	0	0	0	12,3		0	0
2003	23	12	1	0	0	0	0	0	0	1	1	0	0,0	2 000 €	0	0
2004	18	9	5	0	0	0	5	2	3	0	0	0	18,0		0	0
2005	26	12	6	0	0	0	5	2	3	1	1	0	7,0	2000 E	0	0
2006	19	13	6	0	0	0	5	0	5	1	1	0	0,0	1000 €	0	0

Source: Service central de la prévention de la corruption, 2008

187. More useful, according to (Service central de le prévention de la corruption, 2008) is the analysis of the incoming dossiers and their treatment by the courts. Figure 19 provides the referrals to the court for corruption cases. The progress of the process for the cases is set out quite detailed; the number of referred cases, the treated cases, the pursuable and non pursuable cases, with for the latter a distinction between dismissed cases, cases with alternative procedures, and prosecutions.

Figure 19: An example of French Criminal justice statistics

**Saisines des tribunaux de Bobigny,  
Évry, Paris, Créteil, Nanterre, Pontoise,  
Versailles au cours de l'année 2007**  
(Tribunaux reliés à la nouvelle chaîne pénale)

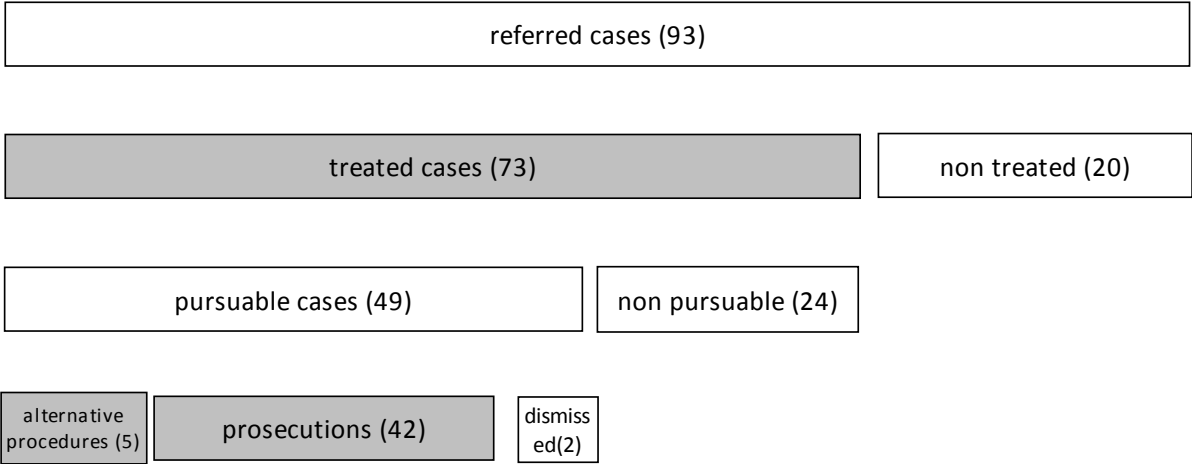
**DU CHEF DE CORRUPTION**

	Nombre d'affaires		
<b>Procès-verbaux reçus</b>	<b>93</b>	<b>100%</b>	
Dont auteur inconnu	16	17,2%	
Dont dessaisies	6	6,5%	
<b>Affaires traitées</b> (y compris les dessaisissements en provenance d'autres juridictions)	<b>73</b>	<b>100%</b>	
<b>Affaires non poursuivables</b>	<b>24</b>	<b>32,9%</b>	
<b>Infractions mal caractérisées, motif juridique</b>	<b>21</b>	<b>28,8%</b>	
Absence d'infraction	7	9,6%	
Infraction insuffisamment caractérisée	14	19,2%	
<b>Défaut d'élucidation</b>	<b>3</b>	<b>4,1%</b>	
Auteur inconnu	3	4,1%	
<b>Affaires poursuivables (a+ b+ c)</b>	<b>49</b>	<b>67,1%</b>	<b>100%</b>
<b>Classement sans suite (a)</b>	<b>2</b>	<b>2,7%</b>	<b>4,1%</b>
Carence plaignant	1	1,4%	2,0%
Recherches infructueuses	1	1,4%	2,0%
<b>Procédures alternatives aux poursuites (b)</b>	<b>5</b>	<b>6,8%</b>	<b>10,2%</b>
Médiation	1	1,4%	2,0%
Rappel à la loi/avertissement	4	5,5%	8,2%
<b>Poursuites (c)</b>	<b>42</b>	<b>57,5%</b>	<b>85,7%</b>
<b>devant le tribunal correctionnel</b>	<b>18</b>	<b>24,7%</b>	<b>36,7%</b>
Citation directe devant le TC	3	4,1%	6,1%
Comparution immédiate	5	6,8%	10,2%
Convocation devant le TC par PV du PR	3	4,1%	6,1%
COPJ devant le TC	7	9,6%	14,3%
<b>Devant le juge d'instruction</b>	<b>14</b>	<b>19,2%</b>	<b>28,6%</b>
Réquisitoire introductif	14	19,2%	28,6%
<b>Devant le juge des enfants</b>	<b>1</b>	<b>1,4%</b>	<b>2,0%</b>
Requête JE	1	1,4%	2,0%
<b>Structure de poursuite inconnue</b>	<b>9</b>	<b>12,3%</b>	<b>18,4%</b>
Non référencé	9	12,3%	18,4%
<b>TAUX DE RÉPONSE PÉNALE (b + C)</b>	<b>47</b>	<b>64,4%</b>	<b>95,9%</b>

Source: Service central de la prévention de la corruption, 2008.

188. Based on these data, the SCPC calculates a penal response rate (Figure 20). It is the number of cases that are actually pursued or that have led to alternative procedures such as mediations or warnings. This may be a measure of how well prepared the cases have been before they were brought to court.

**Figure 20: Measurement of penal response rate by courts to referrals for integrity breaches<sup>19</sup>**



Penal response rate = (prosecutions (42) + alternative procedures (5)) / treated cases (73)

189. In addition, based on the nomenclature of criminal offences mentioned above, the SCPC calculates ratio of the number of cases related to integrity breaches of officials to the total number of cases submitted to the criminal courts. They found that integrity breaches formed 0,023% of the pursuable cases.

190. The SCPC has two suggestions for improving the collection of these statistics in the future. First, investigative services should keep integrity breaches as a separate entry in their statistical accounts instead of adding them in more general entries. The SCPC also insists that the judiciary further pursues their efforts to collect reusable information.

191. Aside from the SCPC, the Ethics Commissions, established in 1993, monitors post employment arrangement and acts to avoid “*pantouflage*”. Once the Civil Service Ethics Commission had been set up, it developed comprehensive and detailed volume measures that give a good snapshot of the areas and social groups at risk from undue advantage and “*pantouflage*” (OECD, 2005). Data are available on:

**Referrals to the courts**

Status (leave of absence, resignation, retirement, unpaid leave, termination of contract, dismissal).

Origins of referrals: by administration, sector, category, corps, gender.

**Opinions**

Type of opinion (lack of jurisdiction, inadmissible, justifiable, justifiable subject to conditions, unjustifiable, unjustifiable in the present state of the file).

Breakdown of opinions by administration, category and corps.

<sup>19</sup> \*numbers are for corruption (see appendix for more detail)) \*\* The size of the boxes does not accurately reflect the relative weights of the numbers.

**Follow-up**

List of administrations that have failed to provide information on follow-up.

List of administrations that have contravened opinions, and analysis of cases in which there has been divergence.

192. Finally, at a lower level in the administrative hierarchy, much more data may be available. As the GRECO notices, “certain departments have precise statistics on disciplinary proceedings and sanctions against their staff. From 1995 to June 2004, for example, 48 disciplinary sanctions were imposed in the national police force for corruption offences. Since 2001 there have been 16 cases of corruption in the customs. However, it has emerged that there is no clear overview of the number of and reasons for disciplinary sanctions in some branches of government. (GRECO, 2004b)’

**Korea**

*Fact sheet*

Main players	<ul style="list-style-type: none"> <li>- The Anti- Corruption and Civil Rights Commission (ACRC) was launched on February 29, 2008 through the integration of the Korea Independent Commission Against Corruption, the Ombudsman of Korea, and the Administrative Appeals Commission.</li> <li>- Seoul Metropolitan government (the OPEN system)</li> </ul>
Institutional features	<ul style="list-style-type: none"> <li>- Combination of three organisations with integrity competences; KICAC, ombudsman and Administrative Appeals Commission</li> <li>- Decentralised: Integrity policy agency is mainly a facilitator of agency practices</li> <li>- Compared to other agencies, ACRC is more externally focussed on the citizen</li> <li>- A ‘watchful eye’ or ‘sunshine’ model, with active naming and blaming strategies</li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- Evaluation of prevention initiatives (common initiatives include                             <ul style="list-style-type: none"> <li>o codes of conduct,</li> <li>o whistle blowing,</li> <li>o transparency of contracting</li> </ul> </li> </ul>

*Assessment Framework*

193. The Korean assessment frameworks are based on the distinction between perceived and potential corruption. The perceived integrity as well as the potential for integrity/corruption is mainly assessed by public service users. Table 8 includes the measurement scales that are used for the Integrity Perception Index (IPI). Perception of corruption and experience of corruption are included in the same scale.

**Table 8: Measurement scales for the perception of integrity and the potential for integrity**

10 points	0 points
Respondents have not experienced any corruption and perceive that no corruption is taking place in the process of civic and community services. Altogether it indicates the perception of zero corruption.	All respondents have actually experienced a significant degree of corruption in the process of civic and community services, and perception that corruption is widespread. Altogether it indicates the perception of pervasive corruption.
There exists no condition at all that could cause corruption in the process of civic and community services of the organisation. There is no likelihood of incidence of corruption.	There is a persistent condition that could cause corruption in the process of civic and community services. There is a very high likelihood of incidence of corruption

*Measurement practices*

194. Korea has some interesting measurement practices. We discuss the approaches as developed by the central ACRC. The Seoul Metropolitan area develops similar approaches.

195. First, the *Integrity Perception Index* (IPI) studies for each agency the **perceived level of corruption** and the potential level of corruption (Figure 21). They do so by ‘asking citizens who raise complaints against public organisations to give a score to IPI. In 2002, 30 639 citizens gave an average of 6.43 (to 10) to 71 central government organisations. In 2003, the number of citizens participated in the survey increased to 36 458 and 78 public organisations were involved. The IPI average reached 7.71 point in 2003 which is 1.28 point rise compared to the previous year. The 2004 survey doubled the number of participating citizens (asking 75 317 persons who directly experienced services of 313 public organisations, including – for the first time – 234 local government organisations) and resulted a further 0.75 increase of IPI (OECD, 2005)’. The size of the sample of Korean citizens is very large - 75 317 citizens or 0.16% of the Korean population.

**Figure 21: The Korean Integrity Perception Index calculation**

Field	Sub-Field	Question
Perceived Integrity (0.494)	Experienced Corruption (0.483)	Frequency of gratuities/entertainment (0.544)
		Amount of gratuities/entertainment offered (0.456)
	Perceived Corruption (0.517)	The perceived level of seriousness of gratuities/entertainment (1.000)
Potential Integrity (0.506)	Working Environment (0.241)	Offer and receipt of gratuities/entertainment as common practices (0.667)
		Need for additional counseling (0.333)
	Administrative Systems (0.237)	Practicality of standards and procedures (0.569)
		Level of information disclosure (0.431)
	Personal Attitude (0.294)	Fairness in duty performance (0.599)
		Expectation for gratuities/entertainment (0.401)
	Corruption Control Measures (0.228)	Level of corruption prevention efforts (0.585)
		Easiness in raising objections (0.415)

Source: Kim, 2007.

196. The respondents of the surveys are citizens who either file complaints or have made use of the services. Those surveyed are ordinary citizens who have had firsthand experience with target public services for the preceding 12 months or so. To obtain survey samples, KICAC asks the public institution to submit a list of public service users in accordance with the Anti-Corruption Act, and

commissions research institutes to conduct a phone survey. Samples for the 2006 assessment are limited to the persons who experienced public service during the period from July 2005 to June 2006. The results of the study are represented in

**Figure 22: the Korean Integrity Perception Survey - results**

	2002	2003	2004	2005	2006
<b>Composite Integrity</b>	<b>6.43</b>	<b>7.71</b>	<b>8.38</b>	<b>8.68</b>	<b>8.77</b>
Perceived Integrity	6.52	7.79	8.63	9.05	9.14
Perceived Corruption	6.65	8.42	8.70	9.24	9.33
Perception bribery/gift/entertainment	6.65	8.42	8.70	9.24	9.33
Experienced Corruption	6.39	7.11	8.56	8.86	8.93
Incidence of bribery/ entertainment offer	6.31	7.09	8.53	8.96	9.06
Amount of bribe or gift of entertainment	6.48	7.14	8.59	8.73	8.78
Potential Integrity	6.33	7.64	8.13	8.31	8.42
Working Environment	7.33	8.44	8.86	9.06	9.15
Common practices of bribery or offer of entertainment	7.78	8.68	8.83	9.09	9.19
Need for additional counselling	6.42	7.97	8.92	8.99	9.07
Administrative System	5.74	6.79	7.38	7.81	7.95
Practicality of standards and procedures	5.95	6.71	7.17	7.66	7.80
Public disclosure	5.47	6.89	7.65	8.01	8.15
Personal Attitude	6.54	8.38	8.74	8.96	9.03
Fairness in the performance of duties	6.69	7.98	8.45	8.70	8.77
Expectation for bribe or gift of entertainment	6.31	8.99	9.17	9.35	9.41
Corruption Control	5.62	6.71	7.33	7.22	7.35
Level of counter-corruption efforts	6.10	7.49	8.01	8.23	8.34
Easiness of raising objections	4.93	5.61	6.37	5.79	5.95

*Source:* Kim, 2007.

197. In addition to these integrity perception indices, yearly integrity surveys are carried out with respondents from four groups<sup>20</sup>; citizens (n=1400), civil servants (n=700), foreign executives in foreign firms (n=200), and executives of domestic private enterprises (n=600). Surveys on citizens and civil servants were conducted via telephone. Due to the small sample size, surveys on foreigners and business persons were conducted via fax and e-mail as well as via telephone.

198. The Korean ACRC (formerly KICAC) also reports **volume measures** of the disciplinary sanctions and the prosecutions by the justice department. This leads to the following conclusions. 'For administrative punishment, the number of reprimanded public officials has significantly increased by more than 40% between 1998 and 1999. Since 2001, the number has slightly decreased to 3898 public

<sup>20</sup> Numbers are for the 2004 version of the survey ([http://www.acrc.go.kr/eng\\_index.jsp](http://www.acrc.go.kr/eng_index.jsp))



officials in 2003 and to 3641 in 2002 (OECD, 2005). ‘Concerning the more serious cases, the criminal punishment of corruption by the justice system, both the number of reported and prosecuted criminal cases committed by public officials are on the decrease since 1999.(OECD, 2005)’. There is a distinction between more serious criminal offences and less severe administrative sanctions.

199. The ACRC (KICAC) acknowledges the value of these volume measures, but sees a caveat if we too swiftly jump to conclusions. ‘Evaluations using traditional statistical methods, such as the justice statistics, could also provide more historical data (over a five-year period). (...) Although, the information provided by traditional statistical methods could be an evident source, it should be carefully analysed and crosschecked with data from complementary sources (for example since the causes for the decrease of cases may also be less effective investigation than less actual corruption cases) (OECD, 2005).’

## The Netherlands

### Fact sheet

Main players	<ul style="list-style-type: none"> <li>- BIOS (Bureau for integrity in the Public Sector)</li> <li>- Algemene Rekenkamer (Supreme Audit Institution)</li> <li>- Bureau for Integrity – City of Amsterdam</li> <li>- VNG (association of Dutch municipalities) / BING (Bureau for integrity in Dutch municipalities)</li> <li>- (PIANOo: centre of knowledge for procurement (ministry of economic affairs))</li> </ul>
Institutional features	<ul style="list-style-type: none"> <li>- Internal actors (within government)</li> <li>- Central government and larger cities (in particular Amsterdam) are the drivers</li> <li>- It is a decentralised system with strong responsibilities for line managers to develop an integrity system.</li> <li>- As a result, there is a strong need for coordination, even within the city of Amsterdam (van Delden et al., 2008).</li> <li>- Central players mainly take up a meta-role of guiding and monitoring</li> <li>- Note that there is a relatively limited and well-connected integrity community, including universities (in particular the VU Amsterdam)</li> <li>- More oriented towards civil servants than politicians<sup>21</sup></li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- Integrity bureaus are mainly knowledge centres, with decentralised implementation (i.e. in the target organisations). <b>Guidance</b> is the major concern for these bureaus. They provide advice, counselling and training on integrity instruments.</li> <li>- The instruments catalogue of the integrity bureau BIOS covers most instruments of the classification scheme. This reinforces the need for coordination of the system.</li> <li>- Lobbyist registration are not included and post employment arrangements seem to receive less attention</li> <li>- A substantial responsibility for monitoring lies in the hands of the Supreme Audit Institution (SAI) – the Algemene Rekenkamer. Its role is mainly confined to meta-monitoring (i.e. reviewing whether integrity instruments are in effect in government organisations). This is in line with their role as external auditor.</li> </ul>

### Assessment Framework

200. In this section we discuss how the Dutch consider integrity. A first source of evidence is the SAI Algemene Rekenkamer’s monitor of integrity policies. The SAI formulated principles and

<sup>21</sup> Initially, integrity policy was oriented towards civil servants but increasingly, politicians are a target group too. Huberts et al. (Huberts et al., 2008b)) however conclude based on a review of the Amsterdam system that “as the integrity system for civil servants becomes more tough and effective, the discrepancy with the system for politicians becomes more manifest.” They argue that the system for politicians lacks sanctioning instruments, which leaves this responsibility in the hands of political parties.

standards for their baseline survey (Algemene Rekenkamer, 2005). The assessment framework stresses the importance of sound risk analysis and staff involvement (point 1 in Table 9), and monitoring (registration, evaluation and audit) (points 2, 3 and 4).

**Table 9: What is good integrity management according to the Dutch SAI?**

<ul style="list-style-type: none"> <li>- Organisations should have integrity policies and codes of conduct based at least in part on specific risk analyses. The policies and codes should contain the compulsory elements arising from primary and secondary legislation (Central and Local Government Personnel Act, ARAR, etc.). Management and personnel should be actively involved in the formulation of policy and the conduct of risk analyses, in part because of their ability to identify risks and dilemmas. The code of conduct should act as a standard: its rules should be formulated so as to make clear what behaviour is required and explain what sanctions will be imposed.</li> <li>- The integrity policy should be periodically evaluated. Where necessary, the organisation should adapt the policy in response to the evaluation results. • Internal controls should be in place specifically for compliance with the integrity policy and the code of conduct. The effect of these internal controls should be monitored and reported to management.</li> <li>- The organisation’s external auditor or internal audit department (AD) should audit compliance with the integrity policy. The audits should lead to conclusions and recommendations and the organisation should learn from the audit findings.</li> <li>- The organisation should keep an orderly and up-to-date central record of reports of possible or actual unethical conduct. The reports should be investigated and assessed. Possible or actual violations should also be analysed as to their scope, prevalence, size and causes. The organisation should learn from the incidents.</li> <li>- If there is a concrete suspicion of an offence, the organisation’s management should report it to the Public Prosecution Service. Sanctions (disciplinary action) should be applied in accordance with the applicable criteria (based on the integrity policy or code of conduct).</li> </ul>
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201. The Integrity Bureau of the Ministry of the Interior (BIOS) monitors integrity policies in government (*Ministerie van Binnenlandse Zaken en Koninkrijksrelaties*, 2008). Their assessment framework consists of a nearly inclusive list of instruments for integrity policy (see Table 10). They surveyed departments and the largest agencies, provinces, municipalities, police, district water boards, and the administration of parliament in 2004 and 2008. Such an assessment framework can be used to calculate the adoption rate of instruments. Attempts have been made to also measure the depth of adoption. Questions that relate to the involvement of staff and management in developing the integrity instruments may be useful to distinguish between shallow ‘window dressing’ adoption and genuine adoption.

**Table 10: List of integrity instruments**

<b>INTEGRITY INSTRUMENTS – ADOPTION of INTEGRITY POLICY</b>
<b>Integrity policy/codes of conduct</b>
Has an integrity policy been formulated?
Is there a code of conduct?
Have measurable objectives been set for integrity policy?
Was management involved in formulating integrity policy?
Were the personnel involved in formulating integrity policy?
Has the policy been communicated to the personnel?
Are the policy and code of conduct based on risk analysis?

<b>INTEGRITY INSTRUMENTS – ADOPTION of INTEGRITY POLICY</b>
Are sanctions included in the policy or code of conduct?
<b>Risk analysis</b>
Have risks been analysed?
Was management involved in the risk analysis?
Were the personnel involved in the risk analysis?
<b>Internal control of compliance with integrity policy</b>
Are internal controls in place specifically for integrity policy?
Do the internal controls have an effect?
<b>Audit</b>
Does the auditor pay specific attention to compliance with integrity policy?
Do the audits lead to conclusions or recommendations?
Are lessons learned from the audit findings?
Is there a follow-up report?
<b>Record of reports</b>
Are reports of possible or actual unethical conduct recorded?
Is a record of violations or infringements present?
Are there standard recording procedures?
<b>Investigation of possible violations</b>
Is every report of possible unethical conduct investigated?
Are there standard investigation procedures?
Are investigation reports available?
Are the scope, size and causes analysed?
Are lessons learned from the incidents?
Is there a follow-up report?
<b>Reports to the Public Prosecution Service</b>
Are suspected offences reported to the Public Prosecution Service?
<b>Disciplinary action</b>
Is a record kept of disciplinary action?
<b>Policy evaluation</b>
Is the policy or code of conduct evaluated?
Does the evaluation lead to conclusions or recommendations?
Is there a follow-up report?
<b>Criminal law/public office offences</b>
forgery
breach of confidentiality
theft

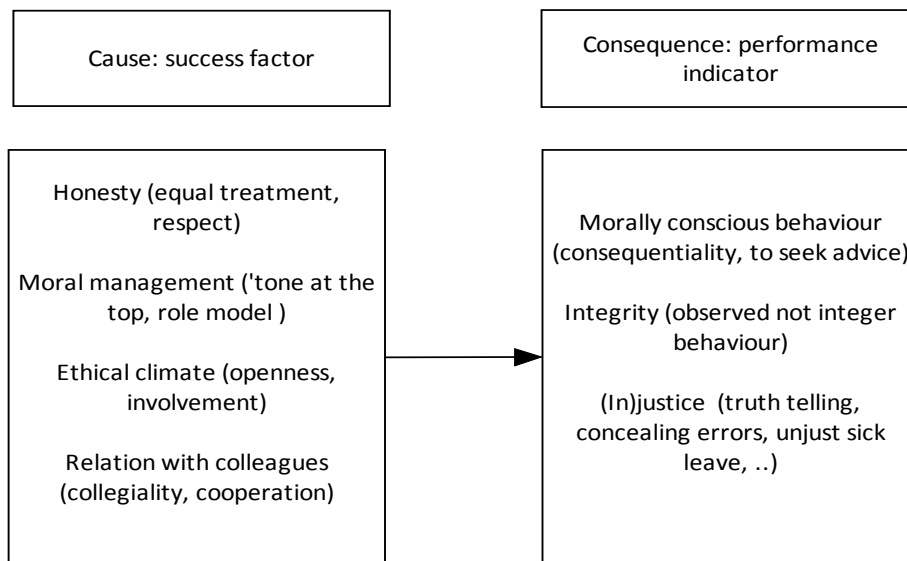
<b>INTEGRITY INSTRUMENTS – ADOPTION of INTEGRITY POLICY</b>
extortion and blackmail
fraud
economic offences (insider trading, etc.)
abuse of authority or power
corruption and bribery (active or passive)
<b>Central and Local Government Personnel Act, ARAR, ministerial orders,</b>
circulars
whistle-blowers' order
outside work/conflict of interests
regulations on the acceptance of gifts
revolving door arrangements
taking an oath of office
regulations on expense claims
information security (electronic or otherwise)
appointment of integrity advisers:
- integrity
- whistle-blowers
- sexual harassment and discrimination
<b>Miscellaneous</b>
vulnerable positions/screening
rules on the use of the internet and ministry property
rules on undesirable conduct
rules on the giving of gifts

Source: Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 2008.

202. In the list of instrument, BIOS makes a distinction between legally obligatory instruments and what they call '*basisnormen*' (basic norms). Some instruments are enacted in law, while others are not. Interestingly, it does not seem to be the case that legal instruments have a higher implementation rate. Probably, the perceived utility and feasibility are more important for the full-fledged implementation of integrity instruments than the codification in law. Nonetheless, legislative pressure may be necessary to force laggards to implement integrity policies. The results point to the complex relationship between coercive and voluntary approaches to integrity policy and management. An emerging issue in the Dutch case is what to do about the unwilling organisations. Are stronger sanctioning mandates necessary to get them aboard?

203. A third assessment initiative is *InternetSpiegel* (Internet Mirror), which is mainly an online application for employee satisfaction measurement. It does have, however, a module that measures integrity. The assessment framework is depicted in Figure 23. The advantage of the approach is that it goes beyond implementation. Some performance indicators are suggested. The downside seems to be that the independent variables (causes) are general characteristics of leadership and culture in the organisation, which are only loosely coupled with integrity management.

**Figure 23: Assessment Framework of the *InternetSpiegel***



Source: (Hogendoorn, 2006).

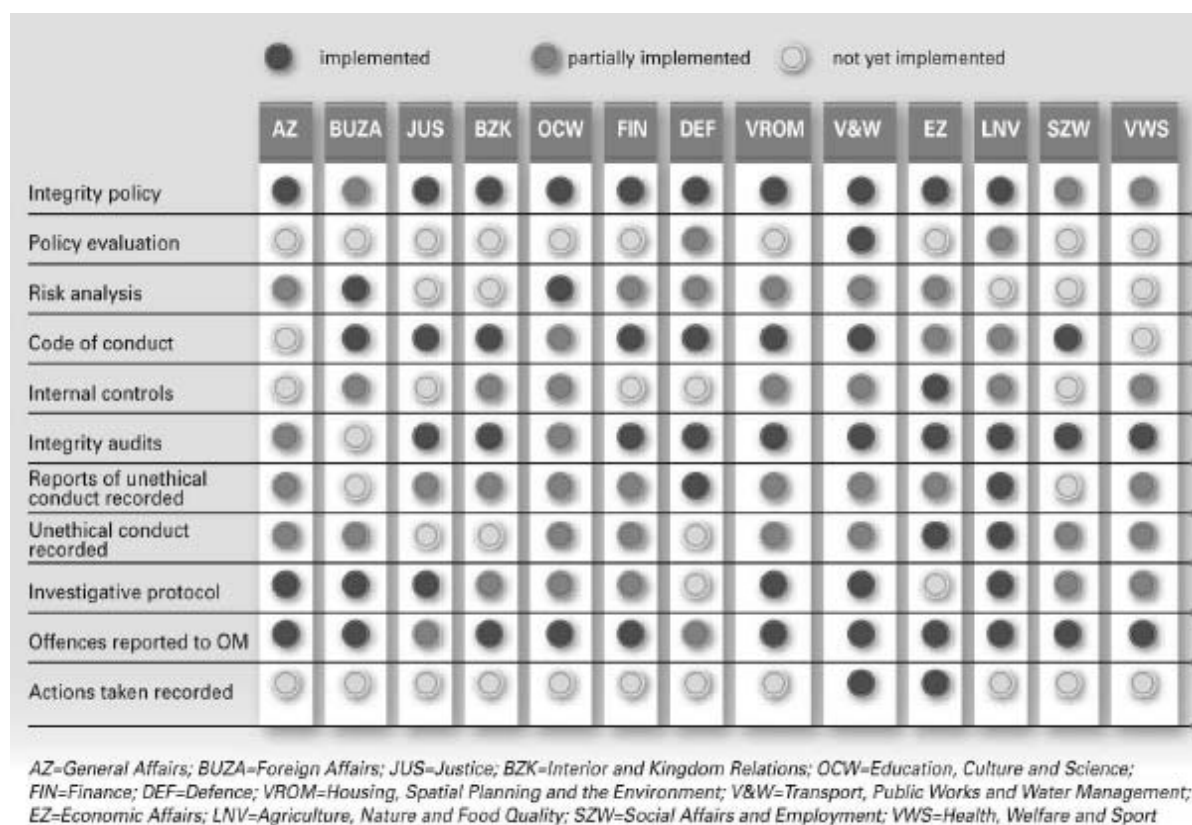
204. A similar initiative by the Ministry of the Interior included seven integrity variables in a staff survey that was filled out by 30 000 civil servants. This survey was followed by a second study (n=1250) with considerably more integrity items. In this case, no attempt has been made to link causes and consequences. The main value of these approaches thus lies in the attempt to measure the integrity levels in the organisation by means of subjective staff assessments. It remains unclear however, to what extent high or low integrity is the result of integrity policy management.

*Measurement practices*

205. We can distinguish between three measurement practices that yield quantitative information, which are discussed in order of importance; adoption measurement, integrity perception measurement and volume measurement.

206. First, until now, the main measurement efforts have focussed on the **adoption of instruments**. The monitors of the SAI and BIOS almost exclusively measure take-up rates of instruments from the catalogue. As an example, the results of the SAI survey are included in the annex. The table reflects in scorecard style whether organisations have ‘not’, ‘partially’ or ‘fully’ implemented the integrity management instruments. The measurement of BIOS takes roughly the same approach.

Figure 24: Results from the baseline survey on integrity of the Dutch SAI



Source: Algemene Rekenkamer, 2005.

207. There is an ambition to repeat adoption measurement at regular intervals. The BIOS inventory already took place in 2004 and 2007 while the SAI did not yet repeat the baseline survey. A trend towards the full adoption of the catalogue is reported. The water boards and municipalities are the main laggards. The situation for the municipalities is probably worse than reported, since the response rate is approximately 50% and we may suspect a response bias in favour of the more advanced municipalities.

208. The SAI stress that the baseline survey is not a normative frameworks, since not all organisations will need all integrity instruments. Depending on the findings from a risk analysis, different strategies can be developed. This is the core of the decentralised approach which is typical for the Dutch system. Unfortunately, usually not all stakeholders (including the media) interpret the scorecards in a non-normative way. Therefore, adoption measurement may result in a pressure to adopt the whole catalogue of instruments as window dressing rather than an integrity strategy. The BIOS inventory explicitly speaks of progress towards the legal and basic norms, and thus assumes a normative approach.

209. Secondly, there is some experience with *integrity perception measurement*, mainly as an element of employee surveys. The integrity perception survey of the Ministry of Interior included the following statements, with the percentage disagree or rather disagree between parentheses. Clearly, these survey data show that the adoption of instruments is not yet fully affect integrity perception.

1. Managers react adequately to potential integrity problems (19%)
2. Managers give a good example for what integrity is concerned (16%)
3. I can report without any problem an integrity problem with my superior or colleagues (19,5%)

4. My organisation has an open communication culture that welcomes critique and honest advice (25%)
5. My organisation pays regularly attention to integrity (27%)
6. In my organisation, rules for integrity are established (12%)
7. I can trust the integrity of my organisation (14%)

210. Interestingly, substantially different scores were reported for different policy sectors. For instance on item 7, 'I can trust the integrity of my organisation', a positive perception was noted in the department of Justice (5% strongly disagree or disagree) while a much more negative perception was recorded in vocational training (20%). Figure 25 includes the scores for all 7 items (in the columns). The sectors are included in the rows; respectively; total government, the central administration, municipalities, provinces, judiciary, water boards, defence, police, primary education, advanced education, vocational education and adult education, higher professional education, universities, research institutions and university hospitals.

**Figure 25. Sectoral differences in perception of integrity**

**Tabel 1. Aandeel ambtenaren dat het (volstrekt of grotendeels) oneens is met de stelling**

	Vertrouwen op integriteit organisatie <sup>a)</sup>	Regels over integriteit <sup>b)</sup>	Aandacht voor integriteit <sup>c)</sup>	Open organisatiecultuur <sup>d)</sup>	Melden zonder nadelige gevolgen <sup>e)</sup>	Leiding-gevende geeft voorbeeld <sup>f)</sup>	Management reageert adequaat <sup>g)</sup>
<b>Totaal overheid</b>	14%	12%	27%	25%	20%	16%	19%
<b>Openbaar Bestuur</b>							
Rijk	15%	4%	18%	27%	19%	15%	19%
Gemeenten	15%	7%	26%	26%	22%	16%	22%
Provincies	12%	2%	15%	23%	15%	10%	16%
Rechterlijke Macht	5%	5%	15%	20%	7%	6%	9%
Waterschappen	13%	5%	21%	25%	20%	12%	16%
<b>Veiligheid</b>							
Defensie	18%	6%	21%	24%	20%	14%	19%
Politie	16%	3%	11%	26%	22%	14%	14%
<b>Onderwijs en Wetenschappen</b>							
Primair Onderwijs	9%	21%	25%	18%	16%	16%	15%
Voortgezet Onderwijs	16%	29%	39%	29%	21%	19%	23%
Beroepsonderwijs en Volw. educatie	20%	20%	42%	31%	23%	21%	26%
Hoger Beroepsonderwijs	19%	22%	50%	33%	24%	20%	27%
Universiteiten	13%	14%	47%	24%	17%	15%	21%
Onderzoekinstellingen	13%	18%	52%	23%	20%	17%	23%
Universitair Medische Centra	12%	10%	30%	24%	20%	20%	19%

Source: Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 2007<sup>22</sup>

211. A Dutch research team performed a survey on integrity values of the Dutch civil servants and politicians (van den Heuvel et al., 2002). The differences between politicians and civil servant's perceptions were, according to the researchers, less outspoken than expected. The main deviations are on professionalism (a 40 percentage points difference) and honesty (a 25 percentage points

<sup>22</sup>

The table represents the share of public servants that disagrees or strongly disagrees with a list of statements. In the columns, respectively the following statements are included; (1) trust the organisational integrity, (2) there are rules on integrity, (3) there is attention for integrity, (4) there is an open organisational culture, (5) It is safe to report, (6) Leadership sets the example (7) adequacy of management. In the rows are the different sectors from national government, municipalities, provinces, courts, water boards, defence, police, and the subsectors in education and science.



difference). These and other deviations in the table mainly reflect the Weberian role perception of civil servants as loyal executors of policies determined by politicians. One caveat of the study are the relatively low response rates, in particular for MP's (13%, compared to 41% for civil servants).

**Table 11. Integrity values in the Dutch public sector**

	% three most important values for politicians	% three most important for civil servants
Honesty	<b>60</b>	<b>35</b>
Openness	39	21
Incorruptibility	39	20
Independence	32	18
Professionalism	<b>26</b>	<b>66</b>
Devotion	24	26
Lawfulness	22	31
Acceptability	<b>20</b>	<b>4</b>
Servitude	17	29
Effectiveness	14	31
Collegiality	<b>5</b>	<b>18</b>
Profitability	1	2
Obedience	0	1

*Source:* Based on van den Heuvel et al., 2002.

212. Thirdly, there are *volume measures*. The Amsterdam integrity bureau registers the number of reports for integrity breaches, the number of investigations, the number of advices and legal advices (and appeals), the number of risk analyses and the number of workshops and training sessions (van Delden et al., 2008). The authors notice however that these numbers are not complete.

**UK**

*Fact sheet*

<p>Main players</p>	<ul style="list-style-type: none"> <li>- Committee on Standards in Public Life (CSPL)</li> <li>- National Audit Office and the Audit Commission</li> <li>- Cabinet Office – Propriety and Ethics team</li> <li>- Civil service commissioners</li> <li>- Commissioner for Public Appointments</li> <li>- House of Commons Select Committee on Public Administration</li> <li>- Parliamentary Commissioner for Standards</li> <li>- Standards Board for Local Government,</li> <li>- Independent Electoral Commission</li> <li>- Advisory Committee on Business Appointments</li> <li>- Parliamentary Ombudsman, Ombudsmen covering central government, local government, and health service bodies</li> </ul>
<p>Institutional features</p>	<ul style="list-style-type: none"> <li>- Codes play a very important role in fostering a ethics culture</li> <li>- There is relatively much attention to politicians</li> <li>- Ethics oversight is dispersed over several actors</li> </ul>
<p>Instruments</p>	<ul style="list-style-type: none"> <li>- Civil Service Code and the Civil Service Management Code</li> <li>- Ministerial Code</li> <li>- Codes of conduct for MPs, Peers and Special Advisers</li> <li>- Civil Service Commissioners' Recruitment Code</li> <li>- Whistle blowing through civil service commissioner</li> <li>- Register of Members of Parliament’s interests</li> <li>- Lobbyist registration is proposed in a recent report of the public administration select committee (2009).</li> </ul>

*Assessment Framework*

213. The civil service code contains four standards of behaviour. *Integrity* is putting the obligations of public service above own personal interests. *Honesty* is being truthful and open. *Objectivity* is basing advice and decisions on rigorous analysis of the evidence. *Impartiality* is acting solely according to the merits of the case and serving equally well Governments of different political persuasions. These behaviours are derived from a set of values - the so-called principles of public life (see Table 12). These values are the framework for assessing integrity.

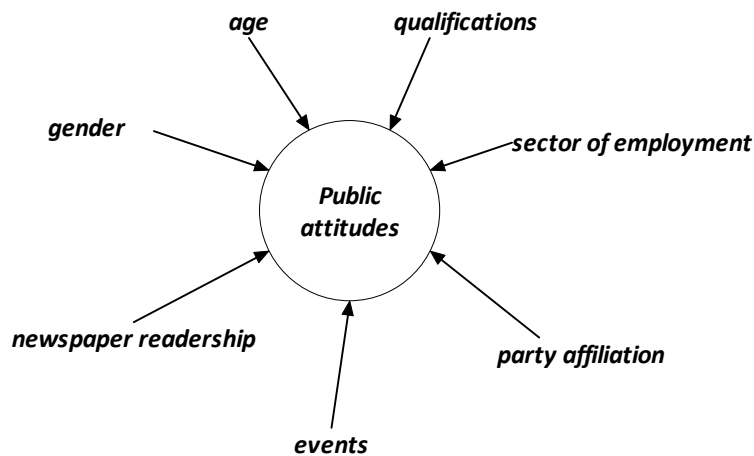
214.

**Table 12: Seven Principles of Public Life**

<p><b>Selflessness</b></p> <p>Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.</p> <p><b>Integrity</b></p> <p>Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.</p> <p><b>Objectivity</b></p> <p>In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.</p> <p><b>Accountability</b></p> <p>Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.</p> <p><b>Openness</b></p> <p>Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.</p> <p><b>Honesty</b></p> <p>Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.</p> <p><b>Leadership</b></p> <p>Holders of public office should promote and support these principles by leadership and example.</p>
--

215. The public attitudes survey of the Committee of Standards in Public Life includes some analyses of factors that may affect attitudes of citizens towards public sector ethics (Committee on standards in public life, 2008). The assessment framework in this case has explanatory ambitions. Multivariate analysis is used to test the impact of a multitude of variables on attitudes. The report pays for instance significant attention to the impact of media coverage. They find that tabloid readers are more likely than broadsheet readers to emphasise financial prudence and honesty, whereas broadsheet readers give far greater prominence to not taking bribes.

**Figure 26: Explanatory variables in the analysis of public attitudes towards public sector ethics**

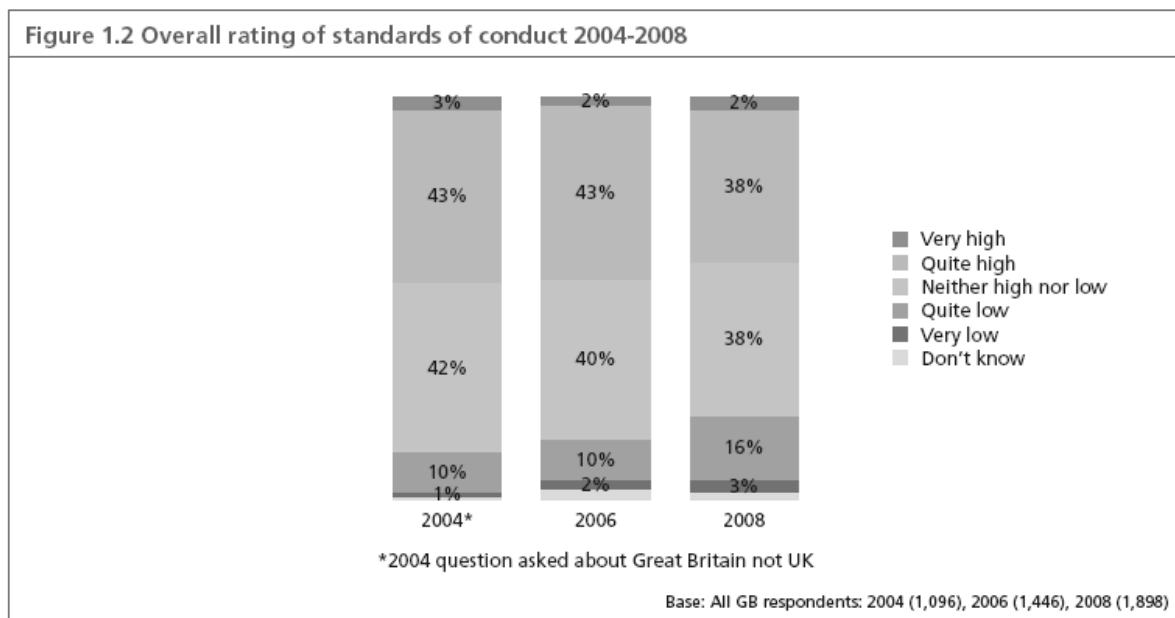


*Measurement practices*

216. Volume measures are not commonly reported on a government wide level. There is however perception measurement on ethics issues.

217. The bi-annual national survey into public attitudes towards conduct is probably one of the main sources of information. The 2008 survey was the third edition. The survey demonstrated that the overall rating of standards of conduct declined when compared to 2004 and 2006 (results in Figure 27).

**Figure 27: Overall rating of standards of conduct in the UK**

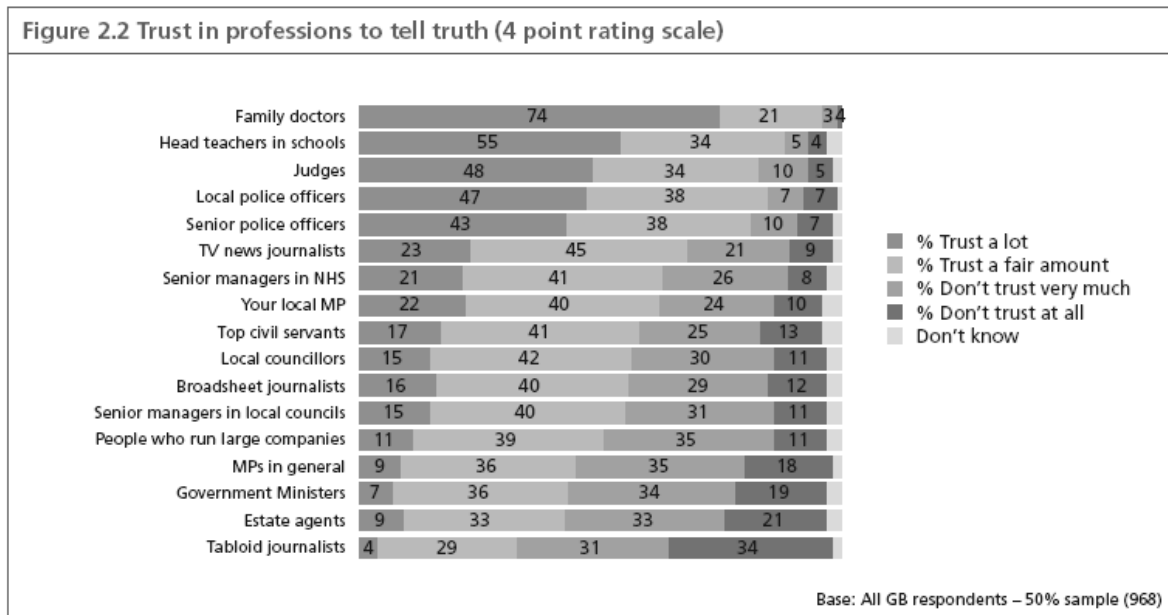


Source: Committee on standards in public life, 2008.

218. The survey has two original features worth mentioning. First, it compares the position of public officeholders vis-à-vis other professionals. It shows that the family doctor is trusted ('a lot' or 'a fair amount') to tell the truth by 95% while this is only 33% for the tabloid journalist. Typically,

frontline workers (teachers, judges, police officers) score high, politicians score low, and public managers score average (results in Figure 28).

**Figure 28: Trust in professionals**



Source: Committee on standards in public life, 2008

219. A second original feature is that it also surveys the events that respondents had in mind while answering the questions. The question was phrased as follows: “People’s opinions are influenced by many different factors. When you were answering the questions in this survey, what specific events that you might have heard or read about did you have in mind?”. The results are included in the appendix.

**Figure 29: Respondent’s frame of reference in answering ethics questions**

Events that respondents had in mind when answering the survey questions					
	GB %	England %	Scotland %	Wales %	NI %
MPs paying family members	14	14	14	13	13
General events/General media stories	11	11	6	11	7
Lack of transparency concerning MPs’ expenses	8	8	7	10	4
The war on Iraq	6	6	4	5	1
Labour deputy leadership campaign donations	4	3	5	11	3
The Government’s immigration policies	3	4	1	1	-
Local issue	3	4	2	1	2
The Government’s running of the NHS	3	3	2	2	2
Cash for honours	3	3	2	4	2
General knowledge/instincts/opinion	3	3	*	3	1
Politicians taking bribes (general mention)	3	3	4	2	4
The Wendy Alexander case	1	-	6	1	-
The Tommy Sheridan case	*	-	6	-	-
The Ian Paisley Junior case	-	-	-	-	16
Don't know/No answer	24	22	33	31	36

Base: All respondents: GB (1,898), England (913), Scotland (538), Wales (447), NI (414)

*Source:* Committee on standards in public life, 2008

220. This question is useful because it is a quite common concern that citizen’s perceptions are mostly driven by incidents. By asking for the events, results can be put into perspective. In the UK case, 14% of the respondents referred to MP’s paying family members and 8% to a lack of transparency for MP’s expenses. Also some general policy issues such as the war in Iraq (6%) or the Government’s immigration policies (3%) were mentioned.

221. In staff surveys, there is some relevant information as well. However, the responsibility to conduct staff surveys lies with the departments, which leads to considerable variation<sup>23</sup>. Some examples;

222. The *Home office 2008 survey* has items on its values and leadership: “senior managers where I work demonstrate the Home Office values” “Senior managers where I work are open and honest”. (Home Office, 2008)

223. The *Foreign and Commonwealth office 2007 survey* has an item ‘My senior managers show integrity’. (Foreign and Commonwealth Office, 2007)

224. The *Healthcare commission* includes an item on whether staff would know how to report any concerns they had about negligence or wrongdoing by staff in their organisation and whether they know if there was a system to report such concerns confidentially (Healthcare Commission, 2007).

225. Other surveys however do not include integrity items

## USA

### *Fact sheet*

Main players	<ul style="list-style-type: none"> <li>- Office of Government Ethics (federal)</li> <li>- Inspectors General and Department of Justice (for repression)</li> <li>- Merit System Protection Board and Office of the Special Counsel</li> <li>- State Ethics Commissions</li> <li>- Local ethics Commissions (New York City is one of the best known – Department of Investigations - Conflict of Interest Board and Procurement Policy Board)</li> </ul>
Institutional features	<ul style="list-style-type: none"> <li>- Efforts are made to integrate integrity in performance management. Agency ethics officials have to implement policies in the agencies, OGE oversees the agencies’ efforts</li> <li>- Integrity instruments are well developed at all levels of government.</li> <li>- Federal, state and local governments seem to approach the integrity issue in roughly the same way.</li> <li>- The integrity system has both an internal (civil servants, politicians) and external (mainly lobbyist) focus;</li> </ul>

<sup>23</sup> “Staff Surveys vary considerably between Departments because each is commissioned in the context of their individual change programmes to track progress on priority areas and help identify further areas for action. They vary in the research organisations used to conduct and analyse the survey; they vary in their frequency and timing: the reports here range from surveys conducted back in 2004 to those conducted in 2007; and they vary in presentation of results, with different degrees of analysis and breakdown of the results.” [www.civilservice.gov.uk](http://www.civilservice.gov.uk).

	<ul style="list-style-type: none"> <li>- For lobbyists and politicians, integrity is expected to follow from disclosure (i.e. by media and citizen scrutiny); for civil servants, disclosure is complemented by training and regulation.</li> <li>- Integrity policies are mostly enacted in law.</li> </ul>
Instruments	<ul style="list-style-type: none"> <li>- .Training; all federal agencies have to provide training. Most state and local governments follow this guideline as well.</li> <li>- Codes; Standards of Conduct with following topics; gifts, conflicting financial interests, impartiality, seeking other employment, misuse of position, and outside activities. The standards of conduct cover behaviour that is deemed inappropriate, but not so serious as to subject an employee to criminal or civil sanctions.</li> <li>- Whistle-blowing arrangements</li> <li>- Post employment arrangements (revolving door)</li> <li>- Conflicts of Interest; in the federal executive, there are 20000 public financial disclosures / 250 000 confidential financial disclosures / 1000 top positions have ethics agreements (on how to avoid Col) reviewed by OGE</li> <li>- Lobbyist registration</li> <li>- Political integrity is monitored by the Senate and House; financial disclosure, campaign funding, travel and gifts</li> </ul>

*Assessment Framework*

226. The US agencies do report on the performance of integrity policies. In many instances, reporting of information is obligatory. For instance, under the Government Performance and Results Act (GPRA), agencies are obliged to submit an annual performance accountability report.

227. The underlying assessment framework takes the form of a classical tree of objectives. Starting from a mission, strategic goals are developed, which then are translated into more concrete operational objectives. The indicators are considered to measure achievement of the agency on these concrete objectives. Figure 30 represents the three of objectives in OGE’s. Starting from the mission, it sets out three strategic and 10 operational objectives for the agency. For each of the latter, a number of indicators are defined of which an example is included in the figure.

228. Clearly, these trees of objectives should be seen as assessment frameworks for indicators since they contextualise the individual indicator. Consider for instance the indicator “Percent of required confidential filers who filed by end of reporting year”<sup>24</sup>. This indicator could tell different stories. It could be an indicator of how well confidential filers are living up to the regulation. If that would be the case, the filers would be held responsible for a low percentage. In this context however, it is a performance measure of OGE’s efforts to administer an effective financial disclosure system, and thus lies a great deal of the responsibility with OGE.

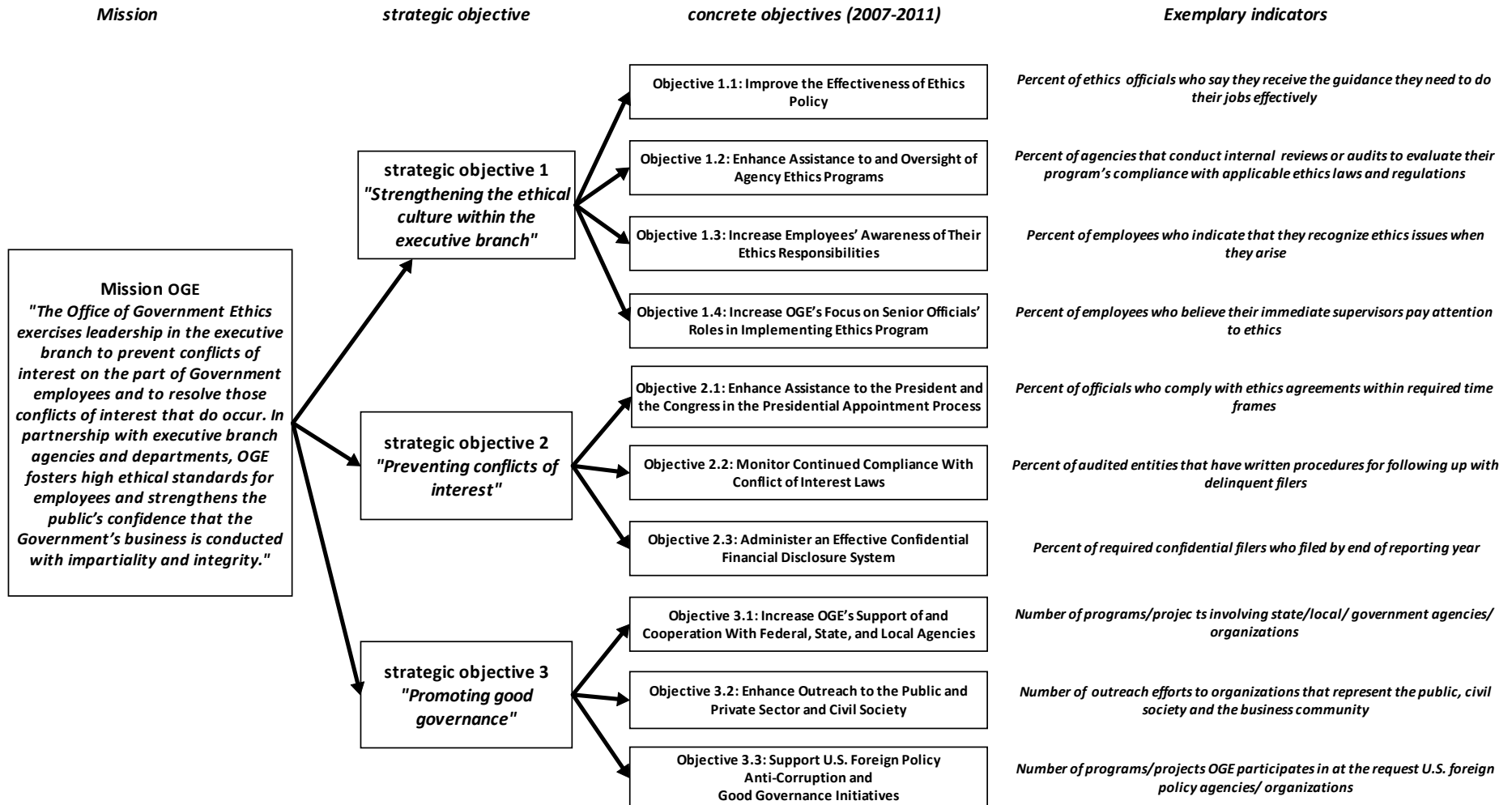
229. The quality of these trees of objectives is determined by the quality of each of the steps; from mission to strategic objectives, from strategic objectives to operational objectives and from operational objectives to indicators. Each stage adds noise and the chain is as strong as the weakest link.

<sup>24</sup> There are 250 000 confidential financial filers in the federal government.

230. In the US cases under study, there is relatively little reference to risk management as an assessment framework.



Figure 30: Assessment framework underlying the OGE's performance accountability report (tree of objectives)



*Measurement practices*

231. OGE has **volume measures** on the number of disciplinary actions taken based wholly or in part upon via lotions of the Standards of Conduct for the 126 agencies in subject to OGE’s oversight. Moreover, OGE annually requests information from the 94 offices of US attorneys and the Department of Justice with regard to the number of prosecutions or actions taken based on the conflict of interest laws and the civil ethics statutes. Figure 31 represents the numbers as they were included in the GRECO review. These data are broken out for the type of offence; amongst others gifts, conflict of interest, impartiality, seeking other employment, misuse of position and conflicting outside activities (see annex).

**Figure 31: Disciplinary actions in the US government**

**Number of Disciplinary actions taken based wholly or in part upon violations of the Standards of Conduct**

	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>
Gifts from outside sources	42	27	63	117
Gifts between employees	2	7	6	11
Conflicting financial interests	21	39	71	44
Impartiality in performance of official duties	83	72	89	52
Seeking other employment	47	22	11	26
Misuse of position, Government resources, information	1,880	1,785	2,513	2,050
Conflicting outside activities	31	101	49	99
Compensation for teaching, speaking, and writing	0	4	3	5
Compensation from non-federal sources	21	101	30	4
Indebtedness	441	304	1,168	724
General principles	653	1,208	417	253
Provision(s) in agency supplemental regulation	46	149	30	79
Other	677	692	606	842
<b>Total disciplinary actions taken</b>	<b>3,944</b>	<b>4,511</b>	<b>5,056</b>	<b>4,306</b>

In 2004 and 2005, data was collected in a different manner but the total disciplinary actions were 3,225 for 2004 and 3,454 for 2005.

*Source:* GRECO, 2005.

232. The office of Special Counsel<sup>25</sup> reports volume data on whistle blowing, as well as on cases where whistleblowers were not sufficiently protected (see annex). These data are available throughout time. It shows amongst others that the number of whistle blowing cases remains relatively stable over the last 5 years (around 500). It is also reported how many cases lead to investigations, were referred to the inspectors general, led to disciplinary actions, etc. (Figure 32 and Figure 33).

<sup>25</sup> The U.S. Office of Special Counsel (OSC) is an independent federal investigative and prosecutorial agency. Its primary mission is to safeguard the merit system in federal employment, by protecting employees and applicants from prohibited personnel practices, especially reprisal for whistleblowing.

**Figure 32: Whistle blowing statistics from the US Office of the Special Counsel (1)**

<b>TABLE 4 Summary of Prohibited Personnel Practice Matters Activity – Favorable Actions</b>		<b>FY 2003</b>	<b>FY 2004</b>	<b>FY 2005</b>	<b>FY 2006</b>	<b>FY 2007</b>
Total favorable actions obtained (all prohibited personnel practices)	# of actions	115	80	45	52	29
	# of matters	83	65	45	48	29
Favorable actions obtained (reprisal for whistleblowing)	# of actions	75	57	37	40	21
	# of matters	75	49	37	37	21
Stays negotiated with agencies		6	11	3	8	4
Stays obtained from Merit Systems Protection Board		1	1	1	1	3
Disciplinary actions negotiated with agencies		12	11	3	4	5
Corrective action complaints filed with the Board		0	1	1	1	1
Disciplinary actions obtained from the Board		1	0	1	0	0

Source: (US Office of Special Counsel, 2008)<sup>26</sup>

**Figure 33: Whistle blowing statistics from the US Office of the Special Counsel (2)**

<b>TABLE 6 Summary of Whistleblower Disclosure Activity – Receipts and Dispositions<sup>a</sup></b>		<b>FY 2003</b>	<b>FY 2004</b>	<b>FY 2005</b>	<b>FY 2006</b>	<b>FY 2007</b>
Pending disclosures carried over from previous fiscal year		556	269	98	110	69
New disclosures received		535	572	485	435	482
<i>Total disclosures</i>		1,091	1,262	583	545	599
Disclosures referred to agency heads for investigation and report		11	18	19	24	42
Referrals to Agency IGs		3	8	14	10	11
Agency head reports sent to President and Congress		23	8	16	24	20
Results of agency investigations and reports	<i>Disclosures substantiated in whole or in part</i>	13	8	16	21	19
	<i>Disclosures unsubstantiated</i>	10	0	0	3	1
Disclosures processed	<i>In more than 15 days</i>	290	1,019	237	275	182
	<i>In less than 15 days</i>	111	135	236	203	285
Percentage of disclosures processed in less than 15 days		28%	12%	50%	42%	61%
Disclosure matters processed and closed		401	1,154 <sup>c</sup>	473	478	467

Source: (US Office of Special Counsel, 2008)

233. The NY department of investigation adds a quality dimension to their volume reporting (note that unlike OGE, they have a strong investigative task). First, they measure the financial returns to the city of their work. Probably, these data will depend strongly on the nature of the cases under scrutiny and thus create a lot of volatility. However, when the mean (or better, the median return of a case)

<sup>26</sup> It should be noted that many disclosures contain more than one type of allegation. This table, however, records each whistleblower disclosure as a single matter, even if there are multiple allegations in it.

drops, then this may be an indication of a significant change. Secondly, they also report average time to close a case, with a 3 scale breakout for the nature of the case – i.e. major cases, significant cases, and routine cases. These data are included in the major’s management report card (Figure 34) (see also (Huberts et al., 2008a) for an assessment of the NYC system).

**Figure 34: Excerpt from the NY city major’s management report card**

**Performance Report**

✓ **Maintain the integrity of City agencies, employees, contract vendors and recipients of City funds.**

Performance Statistics	Actual			Target Updated		4-Month Actual	4-Month Actual
	FY06	FY07	FY08	FY09	FY10	FY08	FY09
<b>Complaints</b>	12,668	12,882	13,839	*	*	4,339	5,209
★ <b>Caseload</b>	1,908	2,045	2,481	*	*	1,503	1,552
<i>Cases closed</i>	961	995	1,418	*	*	366	507
<i>Cases closed with significant impact (%)</i>	NA	70%	70%	*	*	70%	78%
<i>Referrals for criminal prosecution</i>	624	668	454	*	*	133	179
<i>Arrests resulting from DOI investigations</i>	345	368	676	*	*	108	275
<i>Referrals for civil and administrative action</i>	1,166	1,263	1,503	*	*	365	468
<i>Written Policy and Procedure Recommendations to City agencies</i>	180	317	467	*	*	166	148
★ <i>Financial recoveries to the City ordered/agreed (\$)</i>	NA	NA	\$18,315,332	*	*	\$3,441,913	\$8,001,743
★ <i>Financial recoveries to the City collected (\$)</i>	NA	NA	\$10,576,694	*	*	\$1,359,869	\$2,521,733
<i>Financial recoveries to individuals and non-City entities ordered/agreed (\$)</i>	NA	NA	\$688,110,574	*	*	\$8,121,037	\$1,144,976
★ <i>Average Time to Complete a Case (days)</i>	341	330	329	*	*	319	304
★ <i>- Major investigations</i>	618	892	1,269	*	*	784	1,316
★ <i>- Significant investigations</i>	604	739	554	*	*	525	451
★ <i>- Routine investigations</i>	330	315	310	*	*	311	288
★ <i>Average time to complete a background investigation (days)</i>	266	278	342	*	*	283	266
<i>Background investigations closed within six months (%)</i>	56%	60%	53%	60%	60%	59%	62%
<i>Time to notify agencies of childcare workers with criminal records after receipt from the State Division of Criminal Justice Services (days)</i>	2	5	4	6	6	6	5
<i>Arrest notifications received for current childcare workers</i>	1,314	2,053	2,085	*	*	659	803
<i>Corruption Prevention and Whistleblower lectures conducted</i>	308	551	670	300	300	203	220
<i>Individuals attending lectures</i>	8,529	14,532	18,973	*	*	4,756	6,754
★ <i>Average time to complete a Vendex check (days)</i>	7	8	15	*	*	13	14
★ <i>VENDEX name checks completed within 30 days (%)</i>	99%	100%	98%	90%	90%	99%	99%
<i>Companies monitored by IPSIG program</i>	7	11	9	*	*	11	9

★ Critical Indicator 311 related \*Numeric Target "NA" - means Not Available in this report

Source: City of New York, 2009

234. The Office of Personnel Management administers the bi-annual Federal Human Capital Survey. It is a tool that measures employees' **perceptions** of whether, and to what extent, conditions characterizing successful organizations are present in their agencies. Unlike for instance the English case, all departments are surveyed in a uniform way under the central responsibility of OPM.

235. The Federal Human Capital Survey has the following items that are of relevance for measuring integrity, which respondents have to score on a 5 points likert scale (strongly agree to strongly disagree).

- (item 39) My organization's leaders maintain high standards of honesty and integrity.
- (item 45) Arbitrary action, personal favouritism and coercion for partisan political purposes are not tolerated.
- (item 46) Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated.
- (item 47) I can disclose a suspected violation of any law, rule or regulation without fear of reprisal.

236. The OPM also provides the item ranks, ordered by positive responses (i.e. agree or strongly agree) (see appendix). The ethics items mentioned above are found in the lower end of the ranking. The four ethics items have ranking 35, 53, 55, 57 out of 71 items. Compared to other dimensions of Human Resources Management, ethic items score relatively low.

**Table 13: The rank of ethics items the OPM human capital survey**

<i>Items Rank Ordered by Position Response (% agree or strongly agree)</i>	
(20) The work I do is important.	90.8%
(69) How satisfied are you with paid vacation time?	87.7%
(54) Employees use information technology (for example, intranet, shared networks) to perform work.	87.3%
(70) How satisfied are you with paid leave for illness (for example, personal), including family care situations (for example, childbirth/adoption or elder care)?	84.3%
(19) I know how my work relates to the agency's goals and priorities.	83.9%
(1) The people I work with cooperate to get the job done.	83.9%
(6) I like the kind of work I do.	83.8%
(10) How would you rate the overall quality of work done by your work group?	83.4%
(33) I am held accountable for achieving results.	81.8%
(50) Employees have electronic access to learning and training programs readily available at their desk.	78.6%

<b>Items Rank Ordered by Position Response (% agree or strongly agree)</b>	
(42) Employees are protected from health and safety hazards on the job.	76.2%
(53) Employees in my work unit share job knowledge with each other.	75.4%
(12) My supervisor supports my need to balance work and other life issues.	75.3%
(43) My organization has prepared employees for potential security threats.	74.1%
(11) The workforce has the job-relevant knowledge and skills necessary to accomplish organizational goals.	73.8%
(5) My work gives me a feeling of personal accomplishment.	73.4%
(3) I have enough information to do my job well.	73.4%
(61) Considering everything, how satisfied are you with your job?	68.5%
(21) Physical conditions (for example, noise level, temperature, lighting, cleanliness in the workplace) allow employees to perform their jobs well.	67.2%
(9) Overall, how good a job do you feel is being done by your immediate supervisor/team leader?	66.2%
(8) I recommend my organization as a good place to work.	65.5%
(36) Managers/supervisors/team leaders work well with employees of different backgrounds.	65.2%
(49) Supervisors/team leaders in my work unit support employee development.	64.5%
(32) In my most recent performance appraisal, I understood what I had to do to be rated at different performance levels (for example, Fully Successful, Outstanding).	64.3%
(7) I have trust and confidence in my supervisor.	64.2%
(2) I am given a real opportunity to improve my skills in my organization.	64.0%
(30) My performance appraisal is a fair reflection of my performance.	63.2%
(18) My talents are used well in the workplace.	62.3%
(65) How satisfied are you with health insurance benefits?	62.0%
(64) How satisfied are you with retirement benefits?	60.9%
(4) I feel encouraged to come up with new and better ways of doing things.	60.7%

<b>Items Rank Ordered by Position Response (% agree or strongly agree)</b>	
(13) Supervisors/team leaders in my work unit provide employees with the opportunities to demonstrate their leadership skills.	60.6%
(62) Considering everything, how satisfied are you with your pay?	60.4%
(66) How satisfied are you with life insurance benefits?	60.2%
(46) Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated.	60.1%
(17) My workload is reasonable.	60.0%
(35) Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring).	59.7%
(40) Managers communicate the goals and priorities of the organization.	59.7%
(48) Supervisors/team leaders provide employees with constructive suggestions to improve their job performance.	58.3%
(41) Managers review and evaluate the organization's progress toward meeting its goals and objectives.	57.5%
(63) Considering everything, how satisfied are you with your organization?	57.5%
(34) Supervisors/team leaders in my work unit are committed to a workforce representative of all segments of society.	56.8%
(31) Discussions with my supervisor/team leader about my performance are worthwhile.	56.2%
(60) How satisfied are you with the training you receive for your present job?	55.3%
(52) Managers promote communication among different work units (for example, about projects, goals, needed resources).	54.5%
(51) My training needs are assessed.	53.4%
(55) How satisfied are you with your involvement in decisions that affect your work?	53.4%
(15) The skill level in my work unit has improved in the past year.	52.7%
(37) I have a high level of respect for my organization's senior leaders.	51.8%
(16) I have sufficient resources (for example, people, materials, budget) to get my job done.	51.2%
(47) I can disclose a suspected violation of any law, rule or regulation without fear of reprisal.	50.5%

<b>Items Rank Ordered by Position Response (% agree or strongly agree)</b>	
(57) How satisfied are you with the recognition you receive for doing a good job?	50.3%
(39) My organization's leaders maintain high standards of honesty and integrity.	49.5%
(56) How satisfied are you with the information you receive from management on what's going on in your organization?	48.1%
(45) Arbitrary action, personal favouritism and coercion for partisan political purposes are not tolerated.	47.7%
(74) How satisfied are you with alternative work schedules?	46.9%
(25) Employees are rewarded for providing high quality products and services to customers.	46.1%
(14) My work unit is able to recruit people with the right skills.	44.9%
(24) Employees have a feeling of personal empowerment with respect to work processes.	43.8%
(58) How satisfied are you with the policies and practices of your senior leaders?	42.3%
(28) Awards in my work unit depend on how well employees perform their jobs.	41.4%
(26) Creativity and innovation are rewarded.	40.0%
(38) In my organization, leaders generate high levels of motivation and commitment in the workforce.	39.9%
(44) Complaints, disputes or grievances are resolved fairly in my work unit.	39.4%
(59) How satisfied are you with your opportunity to get a better job in your organization?	39.0%
(22) Promotions in my work unit are based on merit.	35.2%
(68) How satisfied are you with the flexible spending account (FSA) program?	34.8%
(67) How satisfied are you with long term care insurance benefits?	32.0%
(29) In my work unit, differences in performance are recognized in a meaningful way.	31.4%
(23) In my work unit, steps are taken to deal with a poor performer who cannot or will not improve.	29.6%
(72) How satisfied are you with work/life programs (for example, health and wellness, employee assistance, elder care, and support groups)?	28.5%

Source: Retrieval from [www.fhcs.opm.gov/](http://www.fhcs.opm.gov/) (last accessed 23/03/2009)



237. Since the Federal Human Capital Survey is a bi-annual, time series can be developed. OPM identifies the significant changes. Table 14 represents the significant changes for the four ethics items. Note that relatively small changes in absolute terms will quickly be statistically significant because of the large sample size of approximately 220000 federal employees. However, statistically significant does not necessarily imply substantial significance. For items 45 and 46, the 2 percent decline followed by a 2 percent rise probably does not point to a meaningful underlying trend in the federal workforce in general. The three percent increase on item 47 may be the result of a stronger protection of whistleblowers. Presumably, the trends will be more volatile and maybe also more meaningful at agency level.

**Table 14: Significant changes on ethics items in the Federal Human Capital Survey**

<b>Question</b>	<b>FHCS 2004</b>	<b>FHCS 2006</b>	<b>FHCS 2008</b>	<b>2004/2 006</b>	<b>2006/2 008</b>
(39) My organization's leaders maintain high standards of honesty and integrity.	48.7%	48.7%	49.5%		
(45) Arbitrary action, personal favouritism and coercion for partisan political purposes are not tolerated.	47.3%	45.2%	47.7%	Yes- Down	Yes-Up
(46) Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated.	60.4%	58.9%	60.1%	Yes- Down	Yes-Up
(47) I can disclose a suspected violation of any law, rule or regulation without fear of reprisal.	47.7%	48.0%	50.5%		Yes-Up

238. The Merit Systems Protection Board<sup>27</sup> administers Merit Principles Survey with the purpose of collecting information on how well the Federal Government is managing its workforce in adherence to the merit system principles. It includes an item on retaliation for amongst others whistle blowing (see Figure 35) .”

<sup>27</sup> The Merit Systems Protection Board is an independent, quasi-judicial agency in the Executive branch that serves as the guardian of Federal merit systems. MSPB carries out its statutory responsibilities and authorities primarily by adjudicating individual employee appeals and by conducting merit systems studies. In addition, MSPB reviews the significant actions of the Office of Personnel Management (OPM) to assess the degree to which those actions may affect merit. ([www.mspb.gov](http://www.mspb.gov))

Figure 35: Retaliation for whistleblowing in the MSPB survey

**G4. In the past 2 years, do you feel you have been retaliated against or threatened with retaliation for taking any of the following actions? *Mark all that apply.***

	Not Applicable			
	Yes, Threatened with Retaliation			↓
	Yes, Experienced Retaliation			
	No	↓	↓	↓
a. Disclosing health and safety dangers, unlawful behavior, and/or fraud, waste, and abuse.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exercising any formal appeal, complaint, or grievance right .....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Testifying for or otherwise assisting any individual in the exercise of whistleblowing, equal opportunity, or appeal rights.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Refusing to obey an unlawful order.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Reporting unwanted sexual attention or sexual harassment .....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Disagreeing with management decisions .....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

239. The Department of Justice publishes criminal justice data on public integrity breaches by federal, state and local officials. These data are disaggregated for the different states and both the number of charged and convicted cases is included (see Figure 36 and Figure 37).

Figure 36: Criminal Justice data on integrity from the Department of Justice, Public Integrity Unit (1)

**PROGRESS OVER THE LAST TWO DECADES:  
NATIONWIDE FEDERAL PROSECUTIONS OF CORRUPT PUBLIC OFFICIALS**

	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996
<b>FEDERAL OFFICIALS</b>										
Charged	651	629	695	615	803	624	627	571	527	456
Convicted	545	529	610	583	665	532	595	488	438	459
Awaiting Trial as of 12/31	118	86	126	103	149	139	133	124	120	64
<b>STATE OFFICIALS</b>										
Charged	102	66	71	96	115	81	113	99	61	109
Convicted	76	69	54	79	77	92	133	97	61	83
Awaiting Trial as of 12/31	26	14	18	28	42	24	39	17	23	40
<b>LOCAL OFFICIALS</b>										
Charged	246	276	269	257	242	232	309	248	236	219
Convicted	204	229	201	225	180	211	272	202	191	190
Awaiting Trial as of 12/31	89	79	122	98	88	91	132	96	89	60
<b>PRIVATE CITIZENS INVOLVED IN PUBLIC CORRUPTION OFFENSES</b>										
Charged	277	303	313	208	292	252	322	247	227	200
Convicted	256	240	284	197	272	246	362	182	188	170
Awaiting Trial as of 12/31	135	109	109	71	67	126	99	95	91	80
<b>TOTALS</b>										
Charged	1,276	1,274	1,348	1,176	1,452	1,189	1,371	1,165	1,051	984
Convicted	1,081	1,067	1,149	1,084	1,194	1,081	1,362	969	878	902
Awaiting Trial as of 12/31	368	288	375	300	346	380	403	332	323	244

Source: US Department of Justice, 2007.

Figure 37: Criminal Justice data on integrity from the Department of Justice, Public Integrity Unit (2)

TABLE II (continued)

	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	Totals
<b>FEDERAL OFFICIALS</b>											
Charged	459	442	480	441	502	478	479	424	445	463	10,811
Convicted	392	414	460	422	414	429	421	381	390	407	9,574
Awaiting Trial as of 12/31	83	85	101	92	131	119	129	98	118	112	2,230
<b>STATE OFFICIALS</b>											
Charged	51	91	115	92	95	110	94	111	96	101	1,869
Convicted	49	58	80	91	61	132	87	81	94	116	1,670
Awaiting Trial as of 12/31	20	37	44	37	75	50	38	48	51	38	709
<b>LOCAL OFFICIALS</b>											
Charged	255	277	237	211	224	299	259	268	309	291	5,164
Convicted	169	264	219	183	184	262	119	252	232	241	4,230
Awaiting Trial as of 12/31	118	90	95	89	110	118	106	105	148	141	2,064
<b>PRIVATE CITIZENS INVOLVED IN PUBLIC CORRUPTION OFFENSES</b>											
Charged	292	364	302	256	266	249	318	410	313	295	5,706
Convicted	243	278	306	242	261	188	241	306	311	266	5,039
Awaiting Trial as of 12/31	106	128	89	109	121	126	139	168	136	148	2,252
<b>TOTALS</b>											
Charged	1,057	1,174	1,134	1,000	1,087	1,136	1,150	1,213	1,163	1,150	23,550
Convicted	853	1,014	1,065	938	920	1,011	868	1,020	1,027	1,030	20,513
Awaiting Trial as of 12/31	327	340	329	327	437	413	412	419	453	439	7,255

Source: US Department of Justice, 2007.

240. Finally, the Ethics Resource Centre is worth mentioning for their methodologies. Although they conduct surveys in the private sector, their approach may be insightful for the public sector as well (Ethics Resource Centre, 2007). They for instance encourage companies to donate data of staff and other surveys to the organisation for comparison and learning. This is a model we would also strongly recommend for developing internationally comparative datasets.

### International monitoring initiatives

241. Finally, we include a short discussion on international monitoring initiatives. We deliberately did not take these initiatives as the main focus of the paper for several reasons. First, the potential as well as the drawbacks of this work has already been discussed in other studies. provides a good overview of the most important initiatives (Johnsten, 2008; UNDP, 2004). Secondly, by looking at national measurement systems we explore the possibility of tapping into a new and relatively unexplored source of comparative data that is grounded in practice. Thirdly, most of these indicators focus on development. Therefore, they have a broad (often global) coverage. For benchmarking across OECD countries, these indicators may however be too coarse.

**Table 15: An overview of international comparative corruption data**

Some examples of providers of corruption data (and related phenomena)	
<b>Firms providing risk assessments.</b>	
Political and Economic Risk Consultancy	Political Risk Services
The Institute for Management Development	The Economist Intelligence Unit
<b>Advocacy groups such as</b>	
World Economic Forum	Freedom House
Transparency international	Global Integrity
<b>International organisations</b>	
UNDP Oslo Governance Centre	World Bank Governance Indicators
Bertelsman Transformation Index	World Bank Doing business survey
United Nations (UNODC) Corruption Business Surveys	World Bank Public Expenditure Tracking System

242. Some critical studies have been published on the use and non use of these international comparative data sources. Arndt and Oman (2006) for instance critique amongst others the World Bank Governance Indicators on methodological as well as conceptual grounds. Johnsten (2008) argues that indices such as TI transparency index face validity problems as well as reliability problems, and that results are not precise.

243. An important drawback for our purposes is that these indicator sets are not actionable. This is mainly because indicators are overly aggregated in an often technical way that is difficult to understand for those who have to use the data. A second reason is that many indicators are based on perceptions from outside government – businesses and citizens – and the causal relationship between these perceptions and what government does is not well understood (cf infra 0 p. 16).

244. A recent study by UNDP and Global Integrity clearly sets out the limits of these governance indicators (UNDP & Global Integrity, 2008). They conclude from a interviews with 30 researchers and users of governance indicators amongst others that practitioners want actionable data to guide decisions, and existing metrics are not getting the job done and that disaggregated indicators are more likely to lead to actionable insights. They argue that practitioners find the data contained in currently available metrics are only loosely relevant to the daily work of putting together specific reforms. Practitioners deeply value narrative to go along with the numbers. If these observations are shared by OECD public officials, it seems that GaaG is on the right track.

245. We should however not discard these efforts as irrelevant. The relevance for Government at a Glance may be twofold. First, the conceptual development may be relevant. For instance, the work of Transparency International in defining the pillars of integrity may help in refining our thinking about the Integrity Framework. Secondly, some methodologies may be borrowed for application within OECD countries. For instance, business surveys may be adapted to better fit with the demands of developed countries. It will also be interesting to see the developments of the World Bank' Public Expenditure Tracking System.

**A classification of integrity management instruments**

		Determining & defining integrity	Guiding towards integrity	Monitoring integrity	Enforcing integrity
Core	Rules-based	<ul style="list-style-type: none"> <li>- Risk analysis</li> <li>- Code of conduct</li> <li>- Conflict of interest policy</li> <li>- Gifts and gratuities policy</li> <li>- Post employment arrangements</li> <li>- Structural measures (e.g. function rotation)</li> </ul>	<ul style="list-style-type: none"> <li>- Rules-based integrity training</li> <li>- Oath, signing an "integrity declaration"</li> <li>- Advice, counselling</li> </ul>	<ul style="list-style-type: none"> <li>- Whistle-blowing policies</li> <li>- complaints policies</li> <li>- Inspections</li> <li>- Integrity testing</li> <li>- Early warning systems</li> <li>- Systematic registration of complaints, investigations, etc.</li> <li>- Survey-measurement of integrity violations and organisational climate</li> </ul>	<ul style="list-style-type: none"> <li>- Formal sanctions</li> <li>- Procedure for handling integrity violations</li> </ul>
	Values-based	<ul style="list-style-type: none"> <li>- Analysis of ethical dilemmas</li> <li>- Consultation of staff and stakeholders</li> <li>- Code of ethics</li> <li>- Non-written standard setting</li> </ul>	<ul style="list-style-type: none"> <li>- Values-based integrity training</li> <li>- Integrating integrity in the regular discourse (e.g. announcing the integrity policy through channels of internal and external communication)</li> <li>- Exemplary behaviour by management</li> <li>- Coaching and counselling for integrity</li> </ul>	<ul style="list-style-type: none"> <li>- Survey measures of integrity dilemmas</li> <li>- Informal probing for ethical dilemmas and issues among staff</li> </ul>	<ul style="list-style-type: none"> <li>- Informal sanctions</li> </ul>
Complementary		<ul style="list-style-type: none"> <li>- Assessing the fairness of reward and promotion systems</li> <li>- Appropriate procedures for procurement, contract management and payment</li> <li>- Measures in personnel management (e.g. integrity as criterion for selection, evaluation and career promotion)</li> <li>-- Measures in financial management (e.g. 'double key', financial control, )</li> <li>- Measures in information management (e.g. protecting automated databases)</li> <li>- Measures in quality management (e.g. reviewing the quality assessment tool)</li> </ul>		<ul style="list-style-type: none"> <li>Internal control and audit,</li> <li>External control and audit</li> </ul>	

Source: (OECD, 2008b).

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