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**MEASURES FOR PROMOTING INTEGRITY AND PREVENTING CORRUPTION:
HOW TO ASSESS?**

**30th Session of the Public Governance Committee
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The report includes a generic Assessment Framework that provides policy makers and managers with a roadmap to design and organise assessment initiatives, and highlights concrete options for solutions based on good practices. The report also maps out an inventory of methods and solutions used in member countries for assessing integrity and corruption prevention measures. A series of related country case studies highlights experiences of recent assessment initiatives in Korea, France, Australia and Finland.

The report was discussed at the OECD Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption in the Public Service on 9-10 September 2004. Country experts also had the opportunity to provide their comments in written procedure.

The Public Governance Committee is invited to make comments on the revised report in written procedure by 10 November 2004.

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**MEASURES FOR PROMOTING INTEGRITY AND PREVENTING CORRUPTION:
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EXECUTIVE SUMMARY

ASSESSMENT: PROVIDING EVIDENCE FOR ACHIEVING BETTER GOVERNANCE

Countries shift their efforts from policy design and implementation to assessment

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. Growing demand for evidence on impact requires public institutions to shift their focus towards verifying the effectiveness of these efforts.

Advocacy assessments put growing pressure on governments

Advocacy groups have used perception indices in order to raise awareness of the issue of corruption at the political level and in society at large. For instance, indices such as the Corruption Perceptions Index and the Bribe Payers Index developed by Transparency International have been extensively cited in the media worldwide. Yet their credibility has been contested by government organisations and academic think tanks.

Assessment is the answer to verify the effectiveness of integrity and corruption prevention policies

Good governance requires proper assessment, and policies promoting integrity and preventing corruption are no exception. Assessment is a crucial way to provide evidence-based information on the actual performance of policy measures. Governments increasingly need to verify whether integrity policies are achieving their objectives in order to foster public trust through a favourable economic, political and social environment.

COUNTRIES ARE AT DIFFERENT STAGES IN THE ASSESSMENT JOURNEY

A variety of approaches to assess building blocks of the "Ethics Infrastructure"

The assessment journey starts with identifying what building blocks of an "Ethics Infrastructure" – the institutions, systems and mechanisms for promoting integrity and preventing corruption in the public service – need to be assessed. Depending on the overall approach of the assessment initiative and the stage at which public organisations are in the assessment journey, an assessment initiative may focus on separate specific measures and their interaction, in particular:

- Risks – analysing risks and reviewing vulnerable areas susceptible to corruption.
- Specific policy instruments – assessing separate integrity and corruption prevention measures.
- Complex programmes – examining the interaction of policy instruments.
- Elements of an organisational culture – reviewing values, behaviours and specific actions.

From assessing the implementation of policy measures to assessing their impact

If traditional assessment initiatives have mainly focused on verifying the existence of selected tools such as laws, codes of conduct, or administrative procedures, some countries have developed a more

holistic approach to assess the implementation of programmes and their impact on organisational culture, values and behaviour.

Integrating policy assessment into a broader performance framework

The assessment of integrity and corruption prevention policies provides decision-makers with feedback on functioning of mechanisms and support for systemic adjustment. Performance assessment rather focuses on performance appraisal of public officials, in particular the individual behaviour. If policy assessment and performance appraisal have different focuses, the approaches are complementary to foster a more comprehensive accountability system in the public service.

Emerging efforts can be seen in a few OECD countries to integrate the assessment of integrity and corruption prevention measures into a broader performance assessment framework.

ADDRESSING CHALLENGES

There is no “one-size-fits-all” solution...

Recognising that there is no “one-size-fits-all” solution, the report provides an inventory of methods and solutions used in member countries for assessing integrity and corruption prevention measures. A series of related country case studies highlights experiences of recent assessment initiatives and how these fit in the specific country context of Australia, Finland, France and Korea.

...But countries face similar questions and challenges at different steps in the assessment journey

The report also includes a draft Assessment Framework which addresses in a systematic way the issues and challenges faced at different steps of the assessment journey, namely:

- Step # 1: Defining the purpose: Why assess.
- Step # 2: Selecting the subject: What to assess.
- Step # 3: Planning the assessment: Who will assess.
- Step # 4: Agreeing on methodology: How to assess.
- Step # 5: Ensuring impact: How to integrate assessment results into the policy cycle.

The Assessment Framework provides policy makers and managers with a roadmap to help them design and organise assessments and also includes checklists and concrete options for solutions.

Three main challenges need to be addressed

When assessing integrity and corruption prevention measures, public organisations face a variety of challenges that need to be addressed, in particular:

- Defining what is measurable.
- Ensuring credible and reliable assessment results.
- Integrating assessment results in policy-making to ensure effective impact.

CHALLENGE # 1: WHAT IS MEASURABLE?

Looking beyond the "tip of the iceberg"

Assessment of integrity and corruption prevention policies poses special challenges for policy makers and managers, in particular to determine what is measurable. Corruption can be seen as the symptom of systemic failure. As corruption is a hidden phenomenon, it is difficult to measure in a precise scientific way. Available data may only reveal the "tip of the iceberg", which is the visible failure of the system.

Assessing the institutional pillars that support integrity

The approach taken in the report is rather to assess "the opposite" of corruption – i.e. integrity. Even if an assessment cannot fully encapsulate the level of integrity in an organisation, it can help identify the strengths and weaknesses of specific policy instruments constructing a consistent "Ethics Infrastructure" - the institutions, systems and mechanisms for promoting ethics and countering corruption in the public service.

Defining the focus of the assessment

The Assessment Framework provides a set of criteria to help decision-makers and managers design an assessment that captures relevant information for decision-making. Assessment initiatives may focus on:

- Formal existence of measures - are integrity policy instruments (e.g. legal provisions, code of conduct, institutions, procedures) in place?
- Feasibility - are integrity policy instruments capable of functioning?
- Effectiveness - did the integrity policy instrument achieve its specific initial objectives?
- Relevance - how significantly have policy instruments contributed to meeting stakeholders' overall expectations (e.g. overall impact on daily behaviour)?
- Coherence - do the various elements of the procedure coherently interact and enforce each other, and support the overall aims of integrity policy?

CHALLENGE #2: HOW TO ENSURE RELIABLE AND CREDIBLE ASSESSMENT RESULTS?

Defining procedures for developing a reliable methodology

The reliability and credibility of the assessment will depend on both the procedures for conducting an assessment and the methodology developed.

Identifying the right assessor

Weighing the advantages of internal and external assessment will help determine who will actually conduct the assessment. In order to ensure the credibility and reliability of the findings, several factors need to be considered, such as impartiality of the assessor, its competence, the need for directly using findings in the decision-making process, as well as the time, resources and internal capacities available to conduct the assessment.

Weighing advantages and drawbacks of involving stakeholders

The decision will reflect the balance between the importance of involving external stakeholders, and the constraints around the project, the most common being the need for confidentiality, timelines and

budget. The great benefit of participatory evaluation is that it raises the likelihood that the outcome of the evaluation will be accepted as relevant and will actually be used as a basis for future actions.

Identifying a set of relevant observable measures

Once procedures for conducting the assessment have been agreed on, a key challenge is to identify relevant credible observable measures. These observable measures need to reflect not only the outputs – i.e. the immediate results of a policy – but also its outcomes – i.e. benefits in participants' knowledge, attitudes and behaviours as a result of the policy. The question is how to deal with the potential trade-off between the need for meaningful information and the cost and complexity of collecting data. It is much easier to measure the number of training sessions provided on a code of conduct than to assess whether public officials are aware of the standards and values outlined in the code, as well as being able to identify ethical dilemmas and being committed to solve them according to stated standards.

Combining objective and subjective data

Considering the lack of relevant observable measures, most assessment initiatives tend to use perception as the primary source for assessment. But perceptions are not precise measures of reality. In a highly politicised environment they might be significantly distorted, and consequently inaccurate. Objective and subjective data need to be combined in order to maximise the reliability of assessment findings. For instance, when assessing the effectiveness of a public interest disclosure (also known as “whistle blowing”), public organisations should consider both objective data (e.g. institutional guarantees, number of complaints and cases investigated etc.) and subjective data. A survey could examine whether employees are aware of the procedure, whether they feel confident using it (whether it provides sufficient protection for whistle blowers) and are committed to use it in the future (whether former cases have been handled in an appropriate manner).

CHALLENGE #3: HOW TO ENSURE IMPACT?

Integrating results into the policy cycle

An assessment report relegated to gather dust on a shelf will not lead to improved policy design and management. If reaching credible and useful conclusions may seem like an end in itself, it is similarly important to ensure that assessment results are communicated to policy makers in charge of formulating and implementing a policy and actually used in the policy cycle. Deliberate effort is needed to ensure that assessment results help to make informed decisions.

Ensuring an active follow-up

An active follow-up reminds intended users of the planned use of assessment results. Follow-up mechanisms could even be institutionalised through mandatory responses from public officials within a limited time frame or follow-up reviews to verify and ensure implementation (e.g. in the form of a verification audit). Institutionalising follow-up mechanisms supports the integration of assessment findings in policy-making and keeps public officials accountable for their actions.

Using assessment results in a broader performance framework

Furthermore, some OECD governments have been integrating assessment results into a broader assessment framework to foster accountability. For instance, public organisations have defined standards of integrity for public officials with stakeholders and hold them accountable against these standards in their performance reviews. Introducing performance-related pay provides an incentive to link the progress towards and achievement of these standards with a financial reward.

Communicating findings to a wider audience

Assessment findings are primarily targeted at policy makers and managers but will also need to be communicated to a wider audience such as stakeholder and society at large. Assessment findings should therefore be placed in the public domain in order to raise awareness, contribute to the public debate and foster accountability. Assessment represents one of the few checks on the power wielded by government and keeps public officials accountable for their actions.

WHAT NEXT?*A roadmap for developing benchmarks*

The report, in particular the Assessment Framework, provides a roadmap that could support the development of methodologies in OECD countries and could also facilitate comparisons over time and between different sectors, and countries.

Reviewing the implementation of the 2003 OECD Recommendation

The Assessment Framework will support the review of the implementation of the 2003 OECD Recommendation on Guidelines for Managing Conflict of Interest in the Public Service and the preparation of the progress report requested by the Council for 2006.

Enriching policy dialogue with non-member countries

Sharing experience with non-member countries is an equally crucial component in preventing corruption and promoting integrity as corruption is a global phenomenon. The development of the Assessment Framework brings in a new aspect into the policy dialogue, particularly in Latin America and Central and Eastern Europe. It responds to the emerging need for helping policy-makers and practitioners review the implementation of integrity and corruption prevention measures in the public service.

INTEGRITY AND CORRUPTION PREVENTION MEASURES IN THE PUBLIC SERVICE:

TOWARDS AN ASSESSMENT FRAMEWORK

Introduction

Good governance requires proper assessment¹, and measures promoting integrity and countering corruption are no exception. While OECD countries have put growing emphasis on improving their legal, institutional and procedural frameworks, only a few countries have actually assessed the implementation of the measures already in place and their impact. Governments need to verify whether integrity measures are achieving their objectives in order to foster a favourable economic, political and social environment for public trust.

Given the inherent complexity and substantially political nature of measures promoting integrity, values and high standards of conduct in the public service, assessment of integrity and corruption prevention policies presents particular challenges. A key challenge is how to identify the initial specific objectives of a policy beyond the political rhetoric. Another difficulty arises from the fact that corruption as a hidden phenomenon can be hard to measure or assess in a precise scientific way. Yet what could be assessed is rather “the opposite” of corruption – i.e. integrity. Even if an assessment cannot fully encapsulate the level of integrity in an organisation, it can provide reasonable understanding of results and identify the strengths and weaknesses of specific policy instruments constructing a consistent “ethics infrastructure”² - the institutions, systems and mechanisms for promoting ethics and countering corruption in the public service.

Although OECD countries are at different stages in the “assessment journey”, developing relevant methodologies and practical tools for assessing the impact of integrity measures is a growing concern in all countries. The approach taken is to **provide policy makers and managers with a roadmap to design and organise an assessment that will capture and analyse relevant information for decision-making**. The generic assessment framework addresses in a systematic way the issues faced at different steps of the assessment journey, and provides checklists and options for solutions highlighted with country examples.

What is an assessment framework?

Assessment initiatives of integrity and corruption prevention policies often emphasise discrete elements of a policy, rather than having a comprehensive approach that takes into account all elements of an integrity policy, and how they fit together. An assessment framework can help public institutions

¹. Assessment can be defined as an effort to collect and analyse information about essential aspects of policy measures, with the purpose of measuring whether the policy achieved its intended goals (see also annex IV for glossary).

². The short description of the elements and functions of the “Ethics Infrastructure” can be found in Annex I.

capture relevant information for decision-making and verify assumptions about the relationship between actions and results in a systematic way.

Informal assessment may be adequate for ongoing daily assessment of routine management procedures. However, defining assessment procedures that are explicit, formal, and justifiable through an assessment framework for policy makers becomes important in the following cases:

- Before making an important decision such as a change in policy direction;
- When dealing with a sensitive issue (e.g. introducing public interest disclosure procedures) ;
- If the assessment aims to impact significantly on organisational culture (e.g. redefinition of values, reform of a code of conduct).

Another type of formal assessment is performance assessment which is often achieved through strategic management, result oriented budgeting, and performance reporting and auditing. Performance assessments are often built-in the daily management of an agency or a department in order to assess the performance of public officials. If the policy assessment and performance assessment have different focuses, the approaches are complementary to foster accountability in the public service.

The draft Assessment Framework includes both **procedural steps** and **criteria** for effective assessment of integrity and corruption prevention measures. If procedural steps can be easily identified, the difficulty often lies with the definition of explicit criteria to assess integrity and corruption prevention measures. The draft Assessment Framework identifies the challenges policy makers and managers face at each step of the assessment process and provides them with a set of criteria to help assess integrity and corruption prevention measures.

Identifying key procedural steps

The preparation stage of an assessment involves five main procedural steps:

- | | |
|-----------|--|
| Step # 1: | Defining the purpose
Why assess. |
| Step # 2: | Selecting the subject
What to assess. |
| Step # 3: | Planning the assessment
Who will assess. |
| Step # 4: | Agreeing on methodology
How to assess. |
| Step # 5: | Ensuring impact
How to integrate assessment results into the policy cycle. |

This indicative sequencing provides a logical framework for the assessment process, although these steps are not necessarily followed and/or could be carried out at the same time in practice.

Determining criteria for assessment

A clear set of criteria allows decision-makers to develop a consistent and comprehensive approach to assessment. Using explicit criteria distinguishes assessment from other approaches to strategic management in which priorities are set without reference to exact decisive factors. A rigorous assessment considers several aspects of policy measures, such as:

Table 1. Checklist

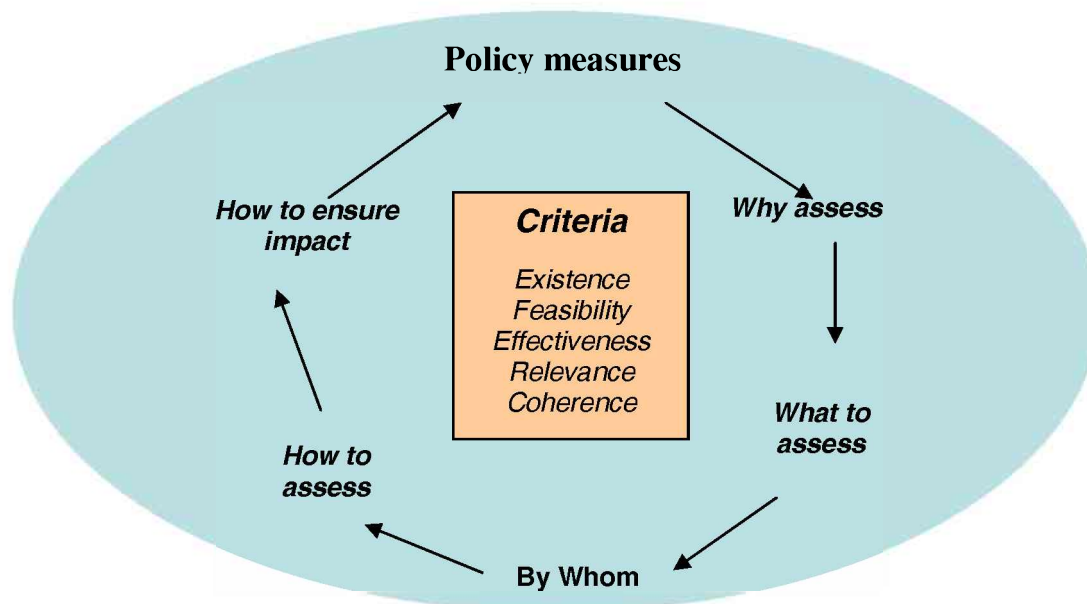
QUESTIONS	CRITERIA
Are integrity policy instruments (e.g. legal provisions, code of conduct, institutions, procedures) in place?	Formal existence of components of policy instruments.
Are integrity policy instruments capable of complete functioning (realistic expectations, resources and conditions)?	Feasibility of specific policy instruments.
Did the integrity policy instrument achieve its specific initial objective(s)?	Effectiveness of specific policy instruments.
How significantly have policy instruments contributed to meeting stakeholders' overall expectations (e.g. actual impact on daily behaviour)?	Relevance , the contribution of specific policy instruments and actions to meet stakeholders' overall expectations.
Do the various elements of integrity policy coherently interact and enforce each other, and collectively support the overall aims of integrity policy?	Coherence of measures, relationship with other elements of the policy.

Source: OECD

Designing an assessment framework

The following graph illustrates how the generic Assessment Framework combines procedural steps and criteria.

Figure 1. Procedural steps and criteria for assessing integrity and corruption prevention measures:



Source: OECD

If assessment is to be fully supportive and integrated in the decision-making process, policy makers and managers need to ensure that the generic Assessment Framework is properly applied to take into account the particular context of the assessment. An applied assessment framework responds to specific needs through tailored assessment criteria. Criteria can be defined both in relation to the context and the assessment process, so that they are:

- **Sufficiently specific** – reflecting the specific purpose and the context of the assessment.
- **Transparently constructed** – involving stakeholders in the assessment process, consulting them on the procedural steps and the development of specific criteria; ensuring that the assessment process reflect the views of stakeholders and could properly encapsulate their feedback to provide a multifaceted source for forming balanced judgments on policy implementation and its impact.

Setting criteria plays a central role in the entire assessment process, particularly in:

- **Selecting the subject of assessment** – by determining the type of observable data to be collected for analysis. For instance, is the assessment trying to assess the formal existence or implementation of instruments (such as laws and code of conduct) or their coherence with other elements of the integrity policy?
- **Measuring the gap between the initial objectives of a policy and its results** – by determining the baseline as a basis for comparison to track changes by using concrete observable measures/indicators for assessing the impact of integrity and corruption prevention policies.

The graph in Annex II summarises these two main roles of standards in the generic assessment framework.

STEP ONE: DEFINING THE PURPOSE

WHY ASSESS INTEGRITY AND CORRUPTION PREVENTION POLICIES?

An effective assessment initiative has a clear defined purpose that reflects both its overall aims and specific objectives³.

Taking the context into account

While OECD countries have put growing emphasis on improving their legal, institutional, procedural and management frameworks, less attention has been paid to assessing the implementation of the measures already in place and their impact. As a consequence, the main focus of the draft Assessment Framework is on ex-post assessments⁴, which are carried out when the policy has been completed to study its effectiveness and judge its overall value.

The context of the assessment, especially the political circumstances, is essential in determining the purpose of the assessment. Although it is preferable that assessments are pro-active and forward-looking, in practice they are so often reactive to specific political circumstances (e.g. to identify the underlying reasons for a recent scandal). Assessments might also be used for justifying resources, financial or political decisions already made by an agency. Taking into account the political circumstances of the assessment is essential in order to build an assessment framework that captures all relevant information for decision-making and ensures that results are used for the purposes that were agreed on.

Integrity and corruption prevention is a highly sensitive field that draws a lot of media attention, which has a significant impact on public perception. For instance, a well-publicised scandal could drive up perception indexes even while serious efforts are being made to adjust measures in place, which would in turn make it very difficult to assess the actual overall results of integrity policy measures. The planning phase of the assessment should therefore take into account all relevant contextual factors.

Defining overall aims of assessment

Assessing measures for promoting integrity and preventing corruption is a technical exercise but the reason for doing it is profoundly political. Assessment makes it possible for public officials and governments to demonstrate whether they achieve agreed policy objectives and contribute to outcomes that matter to their managers and to citizens.

3. Statements that describe what specific policy instruments should have accomplished (with reference to initial objectives).

4. An important distinction can be made between ex-post assessment and ex-ante appraisal. Ex post assessments are carried out when the policy has been completed to study its effectiveness and judge its overall value in order to support decision making – policy, managerial – or enhance accountability. Ex-ante appraisals are undertaken at the planning stage to examine possible options and weigh up their costs and benefits before a policy is decided upon. Ex-ante appraisal can be followed by in-process assessment that takes place during the implementation of the policy - intermediate assessment - to contribute to a learning process by gaining insights for adjustment.

The following overall aims for assessing integrity and corruption prevention measures can be identified:

1. Organisational learning

Assessment is a key feedback mechanism on the outcomes and consequences of government actions that enables learning and sharing experiences through knowledge management within an organisation and across the whole administration. It aims to understand the outcomes and consequences of government actions, and draw lessons to support systemic adjustment.

Assessment gives a better **understanding** of:

- a) Why targets and outcomes are, or are not, being achieved.
- b) What the unexpected outcomes of government actions are.
- c) Underlying assumptions of integrity policies: it verifies whether certain variables have an impact on the level of corruption.

Assessment supports systemic **adjustment** (e.g. identify strengths and weaknesses of policies, loopholes, vulnerable areas) through a feedback loop on specific policy measures and even individual actions in order to improve performance, management and operations.

Assessment can provide a key **forward-looking instrument** for organisational learning by documenting experiences, making the most of specific isolated experiences through sharing and creating an accumulated knowledge as well as supporting future decision-making with comprehensive understanding of assumptions and baselines.

2. Control and accountability

In addition, assessment aims to verify whether objectives were reached and to enhance the legitimacy of decisions as perceived within the government and among society at large.

Internal control

- a) Measure the implementation of integrity policy instruments and verify their results.
- b) Justify decisions made.

External accountability

- a) Demonstrate the impacts of government actions.
- b) Enhance legitimacy of decisions in order to build trust.

Box 1. Overall aims of assessment: Country experiences

Recent assessment initiatives illustrate how assessments seek to achieve different overall aims:

- Building and sustaining trust in public institutions.

The Integrity Perception Index developed by the Korean Independent Commission Against Corruption (KICAC) serves as a barometer based on the actual experiences of service users.

In the same way, the “Values in Agencies Project” overarching aim was to help maintain public trust and confidence in a professional Australian Public Service (APS). Its specific objectives were to evaluate the extent to which the Australian Public Service Values and Code of Conduct were being embedded into agencies, and to share good practice by producing a guide for APS-wide use. It was the first targeted, issues-based evaluation project conducted by the APS Commission as part of an increased focus on evaluation and quality assurance.

- Demonstrating that the State acts as a model employer. A recent survey in Finland produced evidence on how stated values and principles of the State’s personnel policy were integrated in the daily practice.

- Understanding the corruption phenomenon.

In order to understand the mechanisms for facilitating corruption, the Supreme Chamber of Control in Poland has been assessing the potential vulnerabilities of integrity and corruption prevention mechanisms since 2000. In 2003, the Czech Republic has also conducted a risk assessment of its civic application system for Land Registry in order to identify risk factors and adjust its preventative system accordingly,

Source: Country fact sheets prepared by participating countries for the OECD Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption Measures in the Public Service, 9-10 September 2004

Defining specific objectives of policy measures

Once the overall aim and context of the assessment has been clarified, policy makers and managers clarify the specific objectives of the policy measures, and what they were trying to accomplish. If policy makers and managers want to ensure that assessment is relevant for policy making, the assessment should measure the results of policy measures against their **original purposes and targets**.

Considering that policies in the field of governance often have **multiple objectives**, there might be room for ambiguity about what constitutes “the specific objectives” of a given policy measure. They might also be in competition or even in conflict with each another, which makes it difficult to determine which objectives are dominant.

Furthermore, the difficulty in the field of integrity and corruption prevention could be to identify the actual specific objectives of the policy to be assessed **beyond the political rhetoric**. There could be a “hidden agenda” beyond the objectives stated publicly. Political rhetoric is quite common in the field considering the prominent role of the media in highlighting corruption scandals and their impact on public trust.

STEP TWO: SELECTING THE SUBJECT

WHAT DO DECISION-MAKERS WANT TO ASSESS?

Assessment can be defined as an effort to collect and analyse information about important aspects of a policy, with the purpose of measuring whether policy measures have achieved their intended goals. It is about assessing programmes, policy instruments as well as specific actions⁵.

Selecting the subject of assessment: Challenges and approaches

Assessment of integrity and corruption prevention policies in the public sector poses special challenges for policy makers and managers. Corruption is often a **hidden phenomenon** and therefore it is hard to measure or assess in a precise scientific way. Objective assessment data might only reveal the “**tip of the iceberg**”, the visible failure of systems.

It is possible to assess rather the “opposite of corruption”, i.e. integrity. Even if an assessment cannot fully encapsulate the level of integrity in an organisation, it can help identify the **strengths and weaknesses of specific policy instruments** constructing the institutional and procedural mechanisms for promoting integrity and preventing corruption.

Depending on the overall approach of the assessment initiative and the stage at which the public organisation is in the assessment journey, the assessment may focus on separate specific measures, their interaction and contribution to the overall aim of the policy:

- Risks – analysing risks and reviewing vulnerable areas susceptible to corruption.
- Specific policy instruments – assessing separate integrity measures.
- Complex programmes – examining the interaction of policy measures.
- Elements of the organisational culture – reviewing values, behaviours and specific actions of public officials.

While traditional assessment initiatives have mainly focused on verifying the existence of selected tools such as laws, codes of conduct, or administrative procedures, and assessing risk areas, some countries have developed a more holistic approach to assess the implementation of programmes and their actual impacts:

⁵ Policy is used in the paper in a general way to refer to various elements of policy measures, including:

- Specific actions: discrete event or decision to promote integrity and prevent corruption.
- Policy instrument: a single tool to promote integrity and prevent corruption.
- Programme: a collection of integrated tools to promote integrity and prevent corruption.

- **Assessing existence of policy measures**

This first step in assessment considers whether key instruments, such as laws, institutions and procedures are in place to form an “Ethics Infrastructure”.

This type of assessment has been used initially in the assessment of Central and Eastern European countries in the accession process to the European Union⁶. It has also been used to monitor the implementation of the 1997 OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions during its Phase one evaluation⁷.

- **Assessing feasibility**

Another assessment approach is to determine whether a policy instrument is capable of functioning.

One of the ways to assess the capacity of a tool is to assess risk factors or areas that might inhibit the law, institution or procedure from being effective. For instance, the Service Central de Prévention de la Corruption, an inter-ministerial service reporting to the Minister of Justice in France, draws the attention of those working to combat corruption to high-risk areas.

- **Assessing effectiveness**

The central question would be: did the policy measures achieve their specific initial objectives?

For example, Japan’s recent assessment initiative has examined how the Ethics Code was applied in central ministries, and how they have affected daily practices. Similarly, the Australian Public Service Commission assessment in 2002-03 identified the extent to which six APS agencies had integrated the APS Values and Code of Conduct into their culture, systems and procedures and their effectiveness in ensuring that APS employees understood and applied the APS Values and the Code.

- **Assessing relevance**

The relevance of a policy measure seeks to verify to what extent it has been contributing to meeting stakeholders’ overall expectations.

In New Zealand, recognised expectations and standards are systematically reviewed as part of the broader assessment of ministry performance conducted by the State Services Commission.

- **Assessing coherence**

This type of assessment focuses on reviewing the relationship of a policy measure with other elements of the policy in order to examine whether they coherently interact and enforce each other, and support together the overall aims of the policy.

⁶ Further information on this initiative (Support for Improvement in Governance and Management in Central and Eastern European Countries) can be obtained on the following website at <http://europa.eu.int/comm/enlargement/pas/phare/programmes/multi-bene/sigma.htm>.

⁷ For further information on this initiative, please refer to the following website: http://www.oecd.org/document/21/0,2340,en_2649_34855_2022613_1_1_1_1,00.html.

STEP THREE: PLANNING THE ASSESSMENT

WHO WILL ASSESS?

Weighing the advantages of internal and external assessment will help determine who will conduct the assessment. The assessor will then decide on the forms and extent of involving stakeholders in the assessment process and define a budget accordingly.

Assessment: Internal or external?

A fundamental issue is to clarify who takes institutional responsibility for assessing integrity and corruption prevention measures. The planning of the assessment could be driven by a central institution in charge of the overall policy, or shared and agreed by organisations with responsibilities for designing and implementing measures for promoting integrity and preventing corruption. This is all the more difficult considering that only half of the OECD countries reported in 2000 having a co-ordinating institution for integrity and corruption prevention policies at a national level.

There are good reasons to undertake an assessment – building on internal resources. If the main overall aim of the assessment is to maximise learning, it might be preferable to use internal assessment. It is a way to build a culture of assessment internally that fully integrates assessment as an integral step in the policy cycle in order to give feedback on actions taken.

On the contrary, if the main overall aim of the assessment is to control and/or be accountable to society at large, an independent – external – assessment might have more weight and improve the legitimacy of the assessment findings. An increasing number of assessment initiatives have been undertaken in recent years by independent institutions, such as the Auditor General of Canada.

Box. 2. Assessment by supreme audit institutions: Canada

The Auditor General of Canada regularly reviews values and ethics issues in the federal public sector. Her recent report includes a chapter on "Accountability and Ethics in Government" (Chapter 2 of the November 2003 report that can be accessed at <http://www.oag-bvg.gc.ca/domino/reports.nsf/html/20031102ce.html#ch2hd3a>), while previous reports also examined ethics in public institutions at the federal level (for example Chapter 12 of the 2000 report on Values and Ethics in the Federal Public Sector).

In addition, state auditor-generals review ethics at the sub-national level administrations. For example the 2001 Report of the Auditor General of Quebec reviews ethics in public institutions in Quebec (report can be consulted on the Internet at http://www.vgq.gouv.qc.ca/publications/rapp_2001_1/Faits/Index.html).

Source: Office of the Auditor General of Canada, <http://www.oag-bvg.gc.ca>; and Auditor General of Quebec, <http://www.vgq.gouv.qc.ca>

It could be less costly and time-consuming to use an external assessor if the organisation does not have the necessary internal capacities. Involving independent experts and civil society representatives in programme reviews is an emerging trend in OECD countries as the Australian and Korean experiences show in the following box.

Box 3. Involving academic institutions in assessment: Australia and Korea

Academic research institutions and think-tanks can play a crucial role in developing new creative methodologies for assessment. The Seoul Institute of Transparency has developed complex indicators both for central government organisations and the Seoul Metropolitan Government. In Australia, the National Integrity System Assessment was developed in co-operation with the Key Centre for Ethics, Law, Justice and Governance at the Griffith University, Brisbane, to evaluate the capacity and coherence of the integrity system as well as their impacts or consequences.

Source: OECD, details on the survey methodologies can be found in the following chapters on the experience of Australia and Korea.

Assessment of integrity measures is an evolving field, so an investment in assessment capacity also entails substantial follow-up costs in human resource development to keep up to date with methodological and conceptual advances. The advantages and drawbacks of the two approaches are summarised in the table below.

Table 2. External assessment versus internal assessment

	Internal assessment	External assessment
Advantages	Maximises learning Findings can be put to use immediately Benefits stay in project Can be adjusted according to new needs and new findings	Usually has assessment competence Creates legitimacy Usually faster Can be subject to competitive bidding (may be less costly) Brings new perspectives
Disadvantages	Can hide unpleasant findings Often low competence on methods Takes more time Necessitates commitment	Can be irrelevant Mostly evaluator who learns Less ownership by stakeholders Gap to decision-makers Difficult to change the process

Source: Kim Forss, Evaluation framework for information, consultation and participation in policy making, January 2003
 .(forthcoming OECD report)

Combining both approaches

In many organisations, assessments are traditionally done by external experts. There is a resistance to let those engaged in projects – not to mention those who benefit from the projects - also evaluate. Nevertheless, combining both internal and external assessment could be another option. For instance, an internal staff member conducts the assessment, and an external consultant assists with the technical aspects of the assessment and helps gather relevant information. With this combination, the assessment can provide an external viewpoint and quality check without losing the benefit of the internal evaluator's first-hand knowledge of the project.

Box 4. Combining internal and external assessment: The examples of Australia and Finland

An increasing number of assessment initiatives involve independent experts and civil society representatives in programme reviews. For instance, private sector consultancy firms and research firms have been involved in conducting surveys during the Commonwealth's employee survey in Australia that provided evidence on the application of values for the 2002-2003 State of the Service Report of the Australian Public Service Commissioner.

In the same way, the assessment in Finland of the 2001 Government Decision in Principle on State Personnel Policy Line was designed in 2004 by external consultant who was assisted in his work by a group of public servants.

Source: Further details on the experiences of Australia and Finland can be found in the following chapters.

Choosing a suitable approach

The choice between internal and external assessment is largely influenced by the political administrative contexts but might also be determined by legal requirements. Policy makers and managers could consider the following set of questions when deciding whether or not to resort to an external assessor:

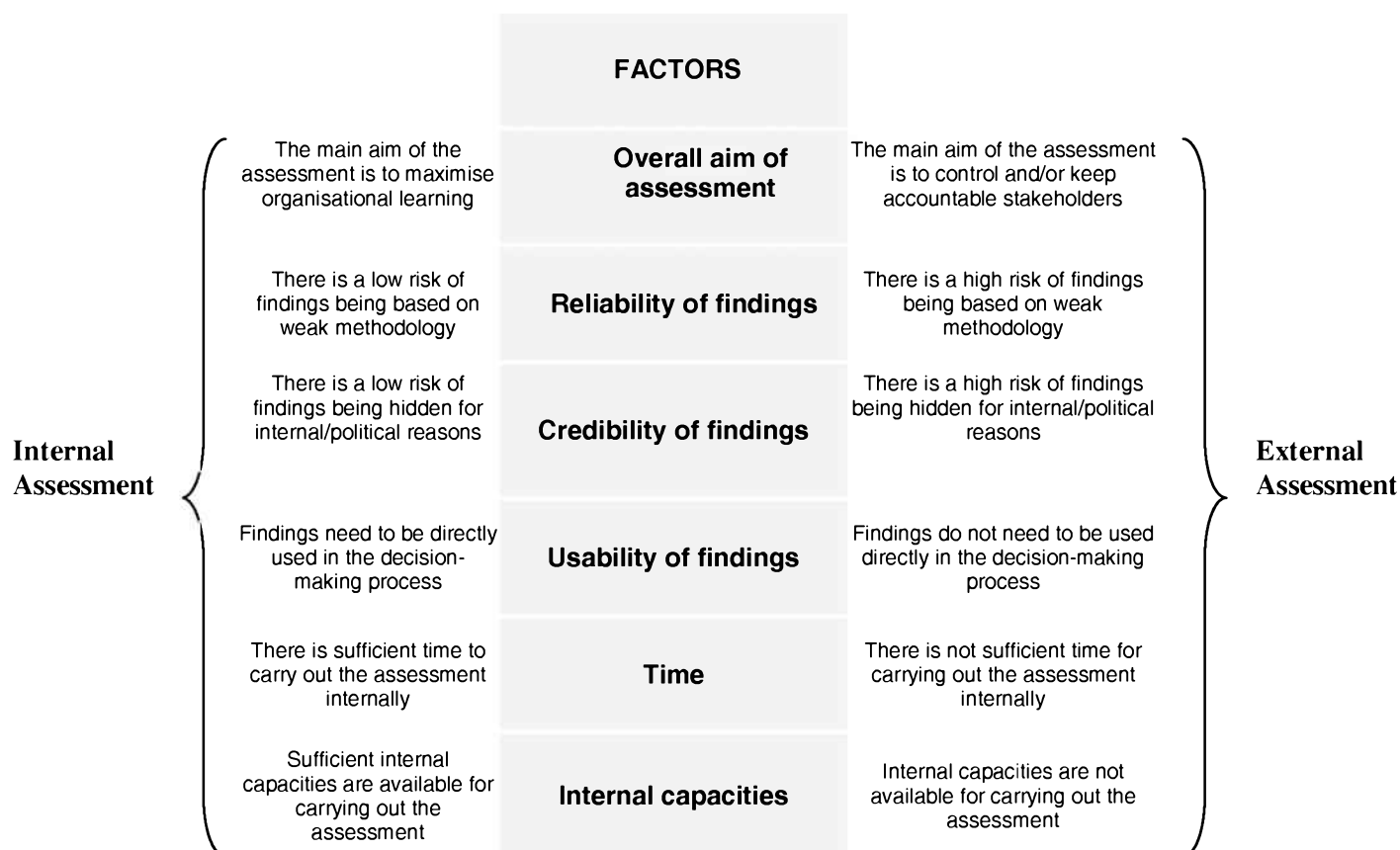
Box 5. Checklist for internal assessment

- What is the overall aim of the assessment?
- Is there enough competence internally to ensure the reliability of findings?
- Will findings be credible if the assessment is carried out internally?
- Is there a need for directly using findings in the decision-making process?
- Is there sufficient time to carry out the assessment internally?
- Are internal capacities and resources available (e.g. people, cost of training) for carrying out the assessment?

Source: OECD

The following graph helps policy makers weigh up the options to choose between internal and external assessment considering the following key factors.

Figure 2. Decision-making tool: Key factors to consider when choosing between internal and external assessment



Source: OECD

Involving stakeholders in the process

Consultations, networking and co-operation are time and resource intensive, so it is important to find out the benefits of involving external stakeholders and determine to what extent they can be involved.

Weighing advantages and drawbacks

The decision will reflect the balance between the importance of involving external stakeholders, and the constraints around the project, the most common being confidentiality, timelines and budget. The great advantage of participatory evaluation is that it raises the likelihood that the outcome of the evaluation will be accepted as relevant and will therefore be used as a basis for future actions.

Figure 3. Decision-making tool: Involving external stakeholders or not



Source: Developed on the basis of a similar tool in Connecting Government, Whole of Government's responses to Australia's Priority Challenges, 2004

Consulting the political level

The involvement of external stakeholders in the assessment might be of high interest to the political level, and arrangements for such an involvement need to be managed with the knowledge and confidence of politicians. This will avoid any suggestion of manipulating outcomes or of running inappropriate political risks, and it also recognises that governments are increasingly seeking advice directly from outside the bureaucracy.

Selecting the issues to be addressed with stakeholders

The involvement of external stakeholders is complex and involves balancing a range of interests. It is essential to understand that not all issues are quickly resolved — it depends on the imperative and importance of the issue to the government. Balancing **complexity** with the **imperative to act** can be used as a guide to assess the likelihood of moving particular issues forward, as shown in the table in Annex IV.

Finding the right form of involvement

Involvement of external stakeholders might take different forms depending on the subject matter and interests, the approaches and organisation represented. The actual involvement of stakeholders might include a combination of the following possible forms:

- Provision of information.
- Undertaking market research.
- Client satisfaction surveys.
- Formal consultations.
- Use of advisory groups.
- Engaging with key stakeholders on taskforces.

Planning the timing

The usability of the assessment will also depend on its proper **timing**. An assessment that is conducted too early may find that there is no audience for the message. On the other hand, assessment results might come in too late if the important decisions have been taken and the policy can hardly be changed. It is therefore essential that the actual commission of the assessment is closely co-ordinated with decision-makers, and it is ensured in the preparation that assessments are planned to properly feed into the policy cycle.

Budgeting for an assessment

Conducting an assessment requires an organisation to invest valuable resources, including time and money. The benefits of a well-planned, carefully conducted assessment outweigh its costs. Generally, an assessment costs around 5 percent of the budget of an activity being evaluated. Although specific pieces of the assessment budget might be revised in the course of the assessment process, the assessment budget is preferably defined in the initial planning phase.

Box 6. Checklist: Developing an assessment budget

Worthen and Sanders⁸ provide a useful framework for developing an assessment budget. The categories of their framework include:

1. **Staff salary and benefits** - The amount of time staff members must spend on assessment and the level of expertise needed to perform particular assessment tasks will affect costs.
2. **Consultants** - Consultants can provide special expertise and/or different perspectives throughout the process of assessment to assist the staff in conducting the assessment.
3. **Travel** - Projects located far from their evaluators or projects with multiple sites in different parts of the country may need a large travel budget.
4. **Communications** - This includes costs for IT connections, postage, telephone calls, etc.
5. **Printing and duplication** - These costs cover preparation of data-collection instruments, reports, and any other documents.
6. **Printed materials** - This category includes the costs of acquiring data collection instruments and library materials.
7. **Supplies and equipment** - This category covers the costs of specific supplies and equipment (e.g. computers, packaged software) that must be purchased or rented for the assessment.

Source: Evaluation Handbook, W.K. Kellogg Foundation, 1998, <http://www.WKKF.org/>

⁸. Worthen, B. & Sanders, J. (1987). Educational Evaluation. London; Longman.

STEP FOUR: AGREEING ON METHODOLOGY

HOW TO ASSESS

Developing a reliable methodology: Challenges and possible solutions

Public organisations face difficulties with identifying relevant observable measures that contribute to building a credible and reliable assessment. For instance, most assessment methods today use perception as a primary source for assessment. But perceptions are not precise, accurate measures of reality and in a highly politicised environment, they might be particularly distorted.

Reaching agreement on a reliable methodology is probably the most challenging part of any assessment of integrity and corruption prevention measures. One of the ways to address this issue could be to use the following approach:

- Designing a logical model with a set of intermediate steps that make the link between outputs and ultimate outcome.
- Deriving, if possible, a set of measurable measures/indicators to analyse outputs and intermediate outcomes of the policy.
- Identifying what information is needed and defining a method to collect data according to the needs and context.

Designing a logical model

Drafting an assessment plan requires close co-ordination within the assessment team and co-operation with stakeholders. A central concern at this stage is to determine **what questions are to be answered**. An effective way to narrow the possible field of assessment questions is through the development of a logical model. A logical model describes how the policy works and helps evaluators to focus on key aspects of the policy. Frequently, a professional evaluator is charged with developing a logical model, although a logical model that is developed with the involvement of several stakeholders – such as staff, participants and evaluators – might produce more opportunities for organisational learning.

The logical model describes **what the policy intends to achieve and the steps through which the policy is supposed to achieve its objectives**. The foundation of sound assessment is a comprehensive understanding of the essentials of an integrity and corruption prevention policy. A difficult step is to break it up, conceptually, into its constituent parts in order to validate progress towards the ultimate outcome of the policy.

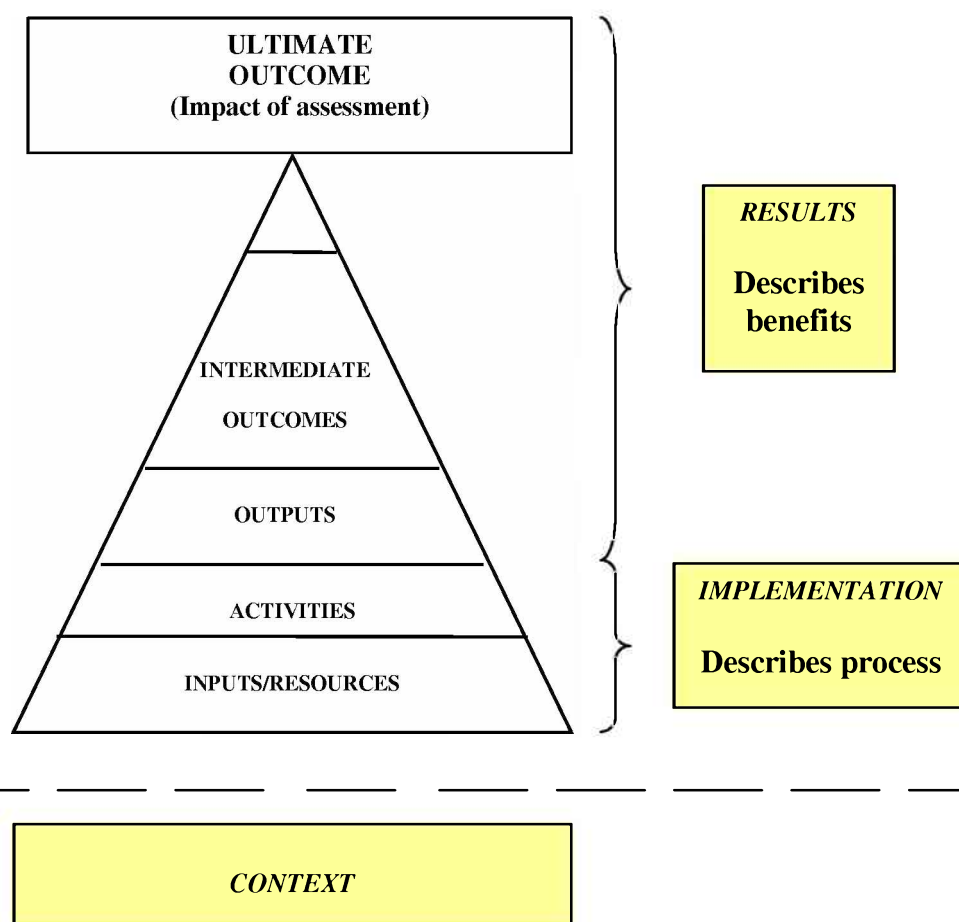
The logical model ties together, in a logical chain, the relevant inputs, activities, outputs and outcomes from the perspective of a particular policy:

- **Inputs** are typically resources -- both human capacities and financial resources -- that are required to formulate and implement the policy.

- **Activities** are the processes, tools, events, technology and actions that are an intentional part of the policy development and implementation.
- **Outputs** are tangible, immediate, and intended product or consequences of an activity that the policy makes available to a target group (such as personnel trained, institution established or procedure introduced, etc).
- **Intermediate outcomes** are usually benefits or changes in participants' knowledge, attitudes, values, skills, behaviour, condition or status as a result of the policy.
- **The ultimate outcome** is an organisational or system level change as the overall impact produced by the policy.

A clear logical model illustrates the **purpose** and **subject** of the policy assessed and makes it easier to develop meaningful assessment questions from a variety of vantage points: **context, implementation and results** (which include outputs, intermediate and ultimate outcomes).

Figure 4. Logical model



Source: OECD

Determining outcomes and causality: a key challenge

When defining the ultimate outcome of the policy, the following question could be asked: how the policy was supposed to **make a difference**, e.g. whether it aimed at changing the behaviour of public officials or at reinforcing public trust. A key challenge in the assessment process is to determine the actual outcomes produced by the policy and establish an accurate correlation between inputs, outputs and outcomes. Based on data collected, an assessment identifies how evidence contributes to explaining the success or failure of policy measures.

Taking into consideration all factors that could have a potential impact on the ultimate outcome is similarly important. In the case of the reform of a code of conduct, for example, one of the ultimate outcomes is to foster people's trust in the public service. But how to weigh up the contribution of the code of conduct if increased trust in public service were observed one year after the reform: would it be accurate to attribute this positive change purely to the reform? Conversely, if trust had decreased, would this lead to the conclusion that the reform was ineffective? Many other critical factors might have also influenced the level of public trust during the observed period of time. For instance, a widely publicised scandal could have greater impact on the level of trust (ultimate outcome) although the reform of the code had already shown good intermediary results.

The decision to select the ultimate outcome requires a **balance** between two needs:

- **Sufficient timeframe** – The long-term outcome must be far enough out on the chain to **capture noteworthy change** for participants and reflect the full extent of the policy's benefits for them. This raises the question of the timing of the assessment. An assessment that is conducted too early may find that the policy has not led yet to visible results.
- **Proved correlation** – On the other hand, the ultimate outcome should not be too far out on the chain that the policy's influence is washed out by other factors. It must be reasonable to believe that **the policy can influence the ultimate outcome in a significant way**, even though it cannot control it.

The following set of criteria support a consistent and comprehensive approach to address key aspects of ultimate outcomes:

- **Effectiveness** of policy measures: over the assessed period of time, what have been the changes/improvements towards the ultimate outcome?
- **Relevance** of policy measures: to what extent did they meet stakeholders' expectations?
- **Coherence** of policy: how do various measures interact and enforce each other to consistently achieve the ultimate outcome?

Breaking down the elements of a policy

The logical model indicates baseline assumptions on which policies are founded. Developing a logical model provides a systematic way to break down the various elements of a policy in order to facilitate their assessment. The following questions guide assessors to design a logical model.

Box 7. Designing a logical model: A checklist

- What were the ultimate outcomes that the measures were aiming at (such as increasing public trust, improving organisational learning, decreasing number of actual conflict-of-interest cases)?
- What were the key intermediate outcomes that the reform intended to achieve (e.g. key changes such as raise civil servants' awareness, improve monitoring, enhance communication)?
- What were the main outputs (immediate results such as personnel trained, information provided)?
- What were the main activities that were conducted to address the problem (actions taken such as number of training courses, promotional activities)?
- What were the inputs (human and financial resources etc.)?

Context: how did the policy function within the economic, social and political environment (e.g. budgetary constraints, modified legal framework, recent scandal etc.)?

Source: OECD

Deriving a set of possible observable measures to analyse outputs and intermediate outcomes of the policy

Clarifying the policy goals and baseline assumptions in the “logical model” provides a basis for developing a set of assessment measures or even indicators. **For each outcome, the assessor specifies what observable measures, or indicators, demonstrate that the key outcome has been achieved.** If this step is often enlightening, it can be difficult to move from a rather intangible concept to specific activities.

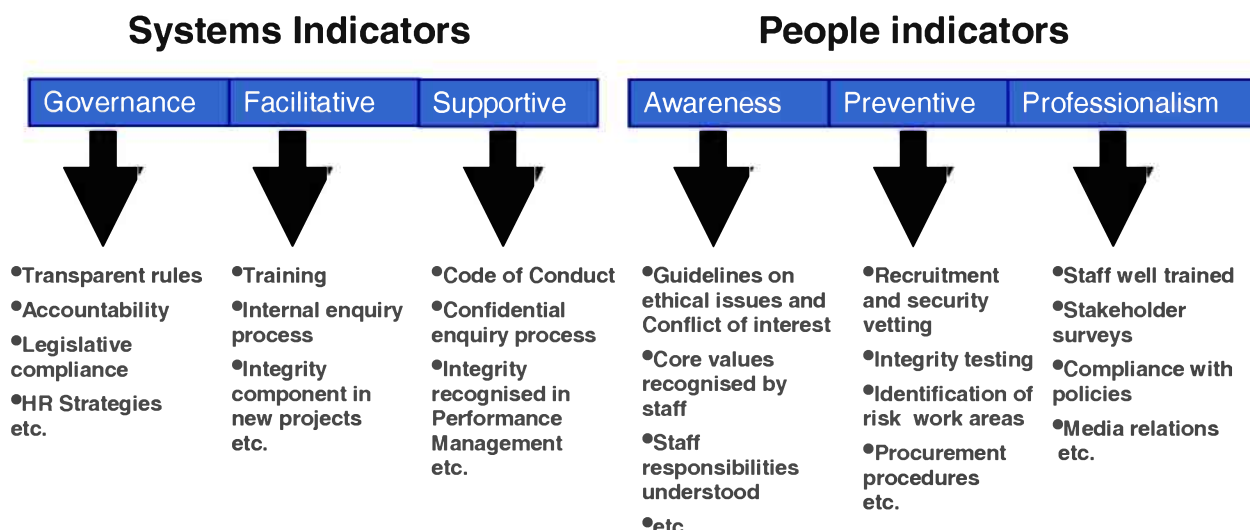
Taking stock of available information – both quantitative and qualitative – is the first step before developing credible and well-analysed observable measures that substantively capture and document changes. In the course of designing indicators, assessors frequently face the hard reality that the effectiveness of most public policies cannot be directly measured. This discrepancy between what is expected to be measured and what can be measured imposes severe limits on the methodology and often leads to trade-offs.

Revealing the link between cause and effect

Most assessment initiatives in OECD countries have focused on observable measures related to activities and outputs (e.g. number and frequency of training course and counselling, promotional activities etc.) instead of revealing the **link between cause** (outputs such as trainings) **and effects** (outcomes such as increased awareness, understanding and ability to recognise problems as well as capacity and commitment to solve them). For instance, it is easier to measure the number of persons participating in training courses than the impact of training on public servants' behaviour. Observable measures or indicators are suitable if they provide information not only about inputs and outputs, but also provide credible evidence that the policy is contributing to intermediate and ultimate outcomes by showing meaningful changes over time as suggested by the experience of New Zealand.

Box 8. Deriving a set of indicators: The experience of New Zealand

A variety of stakeholders have been involved in the New Zealand "Integrity Project" for the Customs Service in 2000 in order to identify expectations of behaviour and standards. As a result of this consultation, standards have been classified under two groups of indicators: systems indicators and people indicators.



For instance, one of the identified indicators is the ongoing security vetting checks for staff. The first evaluation in 2002 assessed whether:

- All managers and team leaders are provided with training in identifying possible indicators of corruption and staff members are made aware of what these indicators are (Systems – supportive indicator).
- Vigorous and practical security vetting procedures are applied for recruits, to identify those who would be undesirable staff members. This process includes the use of standardised prerequisite questions on values/integrity measures for all initial job interviews (People – preventive indicator).

The 2002 evaluation showed that only 25% of Customs employees had been checked. Two years later, the same evaluation was conducted and the system was in place and operating effectively

Source: OECD Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption Measures in the Public Service, 9-10 September 2004

Criteria for selecting observable measures

In the case of integrity and corruption prevention measures, a set of observable measures (or indicators) could equally reflect:

- Inputs (*existence, feasibility*) and outputs (*effectiveness*).
- Intermediate outcomes, especially benefits for stakeholders (*relevance*).
- The coherence of the policy measures assessed with other elements of integrity policies to ensure their consistent contribution to the ultimate outcome (*coherence*).

Box 9. Developing observable measures: The example of the Office of Government Ethics in the United States

OGE is conducting its Employee Ethics Survey as one of several methods of assessing the effectiveness of executive branch agency ethics programmes. The Employee Ethics Survey uses a number of key measurement dimensions to assess executive branch agency ethics programmes including programme awareness, employee perception of programme effectiveness, and ethical culture indicators. Survey results are being used to provide OGE's programme review teams with pre-review (i.e. pre-audit) information which may be used to adjust the scope of individual agency ethics programme reviews.

Programme Awareness is an important measure because one of the primary ethics programme objectives is to promote awareness of ethics issues and to encourage employees to seek advice when faced with ethics questions. This measure assesses:

- Familiarity with the rules of ethical conduct; and
- Awareness of ethics officials in the agency.

The **Programme Effectiveness** measure provides an overall assessment of the value perceived by employees with respect to the executive branch ethics programme at their agency. This measure assesses:

- The usefulness of the rules of ethical conduct in guiding decisions and conduct.
- The helpfulness of resources consulted when ethics issues arise.
- Reasons for not seeking advice and, if advice was sought, for not seeking advice from ethics officials.
- The helpfulness of resources consulted when financial disclosure reporting questions arise.
- Reasons for not seeking help in completing a financial disclosure report, if help was needed.
- The frequency of employee ethics education and training.
- The usefulness of education and training in making employees aware of ethics issues and in guiding decisions and conduct in connection with their work.
- Familiarity with specific ethics rules; and
- The effectiveness of ethics education and training methods and materials.

The **Ethical Climate** measure examines the effect of the agency's ethics programme, in part, by assessing employee perceptions of several desirable ethical culture factors and behaviour outcomes. The culture factors are characteristics of an organisation that guide employee thought and action. Each of the outcomes is a desired result of an ethics programme and evidence of a strong ethical culture. The Ethical Climate questions are not linked to specific ethics programme elements (e.g. ethics training, advice and counselling, etc.). The Ethical Climate questions assess employees' perceptions that within their agency:

- Supervisors pay attention to ethics (culture).
- Leadership pays attention to ethics (culture).
- There is consistency between ethics rules and agency practices (culture).
- There is open discussion by supervisors about ethics issues (culture).
- There is follow-up on reports of ethics concerns (culture).
- Unethical behaviour is punished (culture).
- Employees are treated fairly (culture).
- Employees are aware of ethical issues when they arise (outcome).
- Employees seek ethics advice when needed (outcome).
- Ethics violations are reported when they occur (outcome).

The Ethical Climate measure was based on an existing assessment tool, developed by a private sector consulting firm and a team of academic researchers in the field of business ethics and organisational behaviour to measure ethical culture in private sector corporations. The assessment tool examines the impact of an organisation's ethics programme, in part, by assessing employee perceptions of several desirable ethical culture factors and behaviour outcomes. In 2000, the consulting firm customised the assessment tool for use by OGE in its executive branch employee ethics survey. OGE used an abbreviated version of this assessment tool for the recent survey.

Source: OGE <http://www.usoge.gov/home.html>

Combining quantitative and qualitative data

A rigorous examination of the information collected is a precondition to develop appropriate methods for capturing relevant evidence for assessment. Public organisations may also use surveys to provide a starting point for developing a baseline for assessment. For instance, the Austrian Federal Administration has been planning in late 2004 a survey on the perception and awareness of the corruption problem for

civil servants in all areas of the public administration. Building on the results, the government will initiate a more systematic approach to fighting corruption at all levels of public services.

A critical factor in the selection of methods is to ensure the balancing of objective data and subjective opinions (perception of managers, personnel and citizens) that may over or under emphasise actual effects in order to ensure the credibility of the findings. Qualitative approaches provide depth and detail as well as enrich and explain quantitative findings. Combining the two types of dataset is difficult, as the following example from Korea shows, but it has the potential to contribute to a comprehensive approach that confirms and reinforces trends and maximises the reliability of the overall findings.

Box 10. The example of the Assessment of Anti-Corruption Index (ACI) in Korea

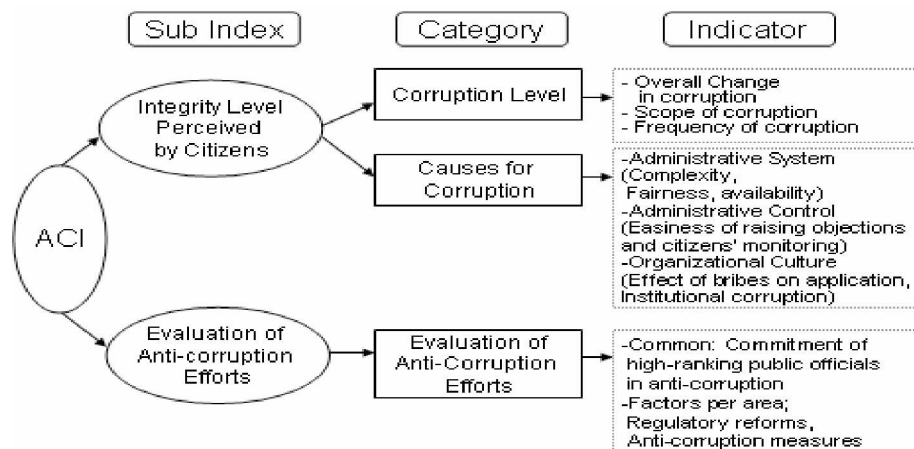
ACI is intended to promote competition and voluntary efforts among district offices in Seoul. The Seoul Metropolitan Government has been conducting studies on the ACI since 1999 and has announced results for each administrative area to encourage efforts for eradicating corrupt practices in the local-government administration. The assessment principally looked at whether:

- Administrative procedures were conducted in a fair manner.
- The information disclosure and administrative regulation was appropriate.
- Channels to report cases of corruption were open.
- Offering bribes ever paid off.

The Anti-Corruption Index introduced a formula in 1999 that takes into consideration the weighted values of the integrity level perceived by citizens and the evaluation of anti-corruption efforts in the following way:

$$ACI (100\%) = \text{Integrity Level Perceived by Citizens (58.8\%)} + \text{Evaluation of Anti-Corruption Efforts (41.2\%)}$$

This formula provides a balanced basis blending the **results of opinion polls of first hand experience** of citizens who actually applied for permits and approvals in the previous year, and **tangible statistics on anti-corruption measures taken by each district office**.



Under the assumption that categories and indicators are not equal in significance weighted values have been applied to each category and indicator. Reputable specialists were involved in the design of the model. Thirty-nine specialists from various government and non-government organisations filled in questionnaires to determine the weight of values in each category and indicator.

After the first application of this formula in the 1999 ACI survey, a number of institutes concerned and some experts challenged the validity of the 'Evaluation of Anti-corruption Efforts' in the model. As a consequence, this factor has been excluded from ACI since the second round of assessment in 2000. Instead, the Seoul Metropolitan Government gives 'Anti-Corruption Effort Award' to selected district offices that have been evaluated as excellent in making efforts against corruption by the external evaluation organ composed of civil experts and scholars.

Source: further details on the Anti-Corruption Index can be found in the following chapter on Korea.

Complexity of collecting data: Balancing cost and need for relevant data

One of the difficulties in identifying relevant data is to balance the need for meaningful information with the costs of collecting data. Measures and indicators have a mix of more and less relevant attributes. While collecting information about inputs, activities and outputs is usually easier and requires lower cost, these observable measures often have a weak relationship with the ultimate outcome and are therefore less meaningful. On the contrary, intermediate outcomes have a strong **cause and effect relationship** to the ultimate outcome, but require more efforts and costs to obtain such data.

The complexity of data collection, its cost and tight timeliness may inhibit gathering directly measured data. In this case, **proxy indicators** may replace them to capture relevant information. For instance, in the case of a whistle blowing procedure, an expert review of sample cases might be time-consuming or costly in order to assess whether the procedure had been appropriately applied. A lower-cost proxy indicator could measure "percentage change in the number of whistle blowing cases filed" or "level of confidence in the process and readiness to use it in the future". The use of this proxy would assume that government employees are more willing to file cases if they think the law will be predictably and fairly applied. The proper selection and careful verification of proxy indicators is a precondition for a successful assessment, if they are based on an unfounded assumption they might simply mislead the results of the assessment.

Specifying what information is needed and defining data collection methods

Identifying the information needed

Taking stock of what information needs to be collected in order to support the consideration of alternative options in the policy design and adjustment, the following questions could help in the decision:

- What information would support future decisions about the policy? Clarify what information is needed to analyse implementation and its impact, provide options for future adjustment.
- What information is already available? Identify the available objective (statistical data) and subjective data (e.g. employee surveys, stakeholder surveys on experienced or perceived corruption level).
- What datasets are to be collected? Identify missing information that is significant for the assessment.

Defining a method to collect data according to the context

The overall goal in selecting assessment method(s) is to get the most valuable information to key decision makers in the most cost-effective and realistic fashion. The choice of a specific methodology will depend mostly on:

- Stakeholders' need for information.
- Complexity of collecting information.
- Political sensitivity on collecting data.
- Costs of collecting information (e.g. money, timeframe etc.).
- Uses of information.

To support a right approach in selecting the most accurate methods for data collection the following table provides an overview of major methods, listing their overall purposes, possible advantages and foreseeable challenges.

Table 3. An overview of methods for collecting data

Methods	Overall Purpose	Advantages	Challenges
Surveys (e.g. public perception, public service users, employees)	To obtain a lot of information quickly and easily in a neutral way	<ul style="list-style-type: none"> - can be completed anonymously - inexpensive to administer - easy to compare and analyse - can reflect a significant sample - gather different perspectives: public perception, public service users, employees 	<ul style="list-style-type: none"> - might not get careful feedback - wording can bias responses - are impersonal - in surveys, may need sampling expert - does not tell full story
Interviews	To fully understand someone's impressions or experiences, or learn more about their answers to questionnaires	<ul style="list-style-type: none"> - get full range and depth of information - develops relationship with client - can be flexible with client 	<ul style="list-style-type: none"> - can take much time - can be hard to analyse and compare - can be costly - responses can be biased
Documentation review	To illustrate how a policy operates without interrupting the policy	<ul style="list-style-type: none"> - get comprehensive and historical information - does not interrupt policy - information already exists - few biases about information 	<ul style="list-style-type: none"> - often takes much time - information may be incomplete - need to be quite clear about what is being looked for - not flexible means to obtain data; data restricted to what already exists
Observation	To gather accurate information about how a policy actually operates, particularly about processes	<ul style="list-style-type: none"> - view operations of a policy as they are actually occurring - can adapt to events as they occur 	<ul style="list-style-type: none"> - can be difficult to interpret observed behaviours - can be complex to categorise observations - can influence behaviours of participants - can be expensive
Focus groups (e.g. management, client)	To explore a topic in depth through group discussion	<ul style="list-style-type: none"> - quickly and reliably get common impressions - can be efficient way to get much range and depth of information in short time - can convey key information about potential problems or risks 	<ul style="list-style-type: none"> - can be hard to analyse responses - difficult to generalise scientifically - need of a good facilitator for safety and closure - responses can be biased
Stakeholder analysis	To identify and assess the importance of key actors that may affect the policy in question, especially expectations, perceptions and constraints of stakeholders	<ul style="list-style-type: none"> - can illuminate observed outputs of a process - understand how participants in a process are shaping its outcome - useful when other quantitative analysis is not possible (ex: confidential cases) 	<ul style="list-style-type: none"> - often takes much time - difficult to identify key stakeholders and weigh the importance of their responses - can be expensive
Tests	To assess the level of knowledge of individuals regarding specific subjects (e.g. after a training, counselling)	<ul style="list-style-type: none"> - easy way to assess the understanding of a subject by civil servants - can be especially useful to assess the knowledge gained after an on-line training course 	<ul style="list-style-type: none"> - timing of the assessment is important
Case studies	To fully understand client's experiences in a policy, and conduct comprehensive examination through cross comparison of cases	<ul style="list-style-type: none"> - fully depicts client's experience in policy input, process and results - powerful means to portray policy to outsiders 	<ul style="list-style-type: none"> - usually quite time consuming to collect, organise and describe - represents depth of information, rather than breadth

Source: Developed on the basis of Basic Guide to Program Evaluation, Carter McNamara, 1999
http://www.mapnp.org/library/evaluatn/fnl_eval.htm#anchor1578833

Box 11. Checklist: How to select a methodology

In selecting methodologies, the following questions can be considered:

- How can the information required be efficiently and realistically gathered?
- Of this information, how much can be collected and analysed in a low-cost and practical manner, e.g. using questionnaires, surveys and checklists?
- How accurate will the information be?
- Will the methods collect all the relevant information?
- What additional methods could be used if supplementary information is needed?
- Will the information collected be credible to decision makers?

Source: OECD

The assessment initiative “Values in Agencies Project” that was conducted in 2002-03 in Australia highlights these different steps to collect information and the methodologies used in the process.

Box 12. Procedures and methodologies for conducting an assessment: the Australian experience

The team started with a review of the literature on Australian and international values-based management, including evaluating the embedding of values. The team also reviewed a range of core documents provided by the six agencies, such as corporate plans, annual reports, industrial agreements, and certain policies.

Agencies were then asked a series of structured questions (through interviews with senior staff) about the APS Values and the Code of Conduct to identify the approach taken by each agency to embedding the Values and the Code and to make an assessment of possible strengths and weaknesses. The project team also interviewed the Agency Heads of five of the six agencies. Depending on the responses to the structured questions additional policies, instructions or documents such as client and staff surveys were examined.

Following analysis of this information from agencies, qualitative research was conducted in the form of focus groups with a sample of staff to test the effectiveness of the six agencies’ strategies, policies, systems and guidance. In addition, a sample of senior executive staff from each agency was personally interviewed. Where an agency had a significant regional presence, interviews and focus groups were conducted in a sample of regional offices.

To assist the qualitative phase, the fifteen APS Values were grouped into four broad headings based on the key relationships and behaviours they affect.

Source: www.apsc.gov.au/values/executivesummary.htm

Combining subjective and objective datasets

The experience of OECD countries shows an increasing intention in the public sector to balance objective and subjective methods by combining:

- Traditional administrative control methods, document and process reviews as well as targeted opinion surveys of stakeholders.
- Surveys, collecting opinions from various fields and using focus groups.
- Informal and public hearings.

Box 13. Balancing objective and subjective methods: Country experiences

The Integrity Perception Index developed by the Korea Independent Commission Against Corruption (KICAC) also includes direct feedback from public service users and partners of public administration instead of a general survey of perceptions in business and the public at large.

In addition to the survey of employees on the implementation of the Ethics Law and Code of Conduct in Japan, the Ethics Board also gathered opinions from various fields including private sector managers, representatives of local governments, media and academia, etc.

Besides publishing 'consultation papers' and inviting submissions, over the last decade the UK Committee on Standards in Public Life has conducted a series of informal meetings with stakeholders and formal public hearings on issues of principal concern. The Committee's Tenth Inquiry "Getting the Balance Right: Implementing Standards of Conduct in Public Life" began in May 2004.

Source: further details on the development of the Integrity Perception Index can be found in the following chapter on Korea. The website of the Committee on Standards in Public Life can be accessed at: <http://www.public-standards.gov.uk/>.

STEP FIVE: ENSURING IMPACT

HOW ARE ASSESSMENT RESULTS INTEGRATED INTO THE POLICY CYCLE?

An assessment report relegated to gather dust on a shelf will not lead to improved policy design and management. If reaching credible and useful conclusions may seem like an end in itself, it is equally important to ensure that assessment results are actually used in the policy cycle; it is not an afterthought but an integral part of the assessment.

Assessment processes and results can inform decisions by providing information on key aspects of the policy, identifying strengths and weaknesses and clarifying options for adjustment. Therefore, deliberate effort will ensure that findings are appropriately **disseminated** and **utilised** in policy making through pro-active follow-up actions.

Communicating findings to a wider audience

Defining the targeted audience

Assessment findings are primarily targeted at **policy makers** and **managers** who are in charge of formulating and implementing a policy, but will also need to be communicated to, and confirmed by, a range of **stakeholders**. Communicating findings is a particularly delicate and important task.

Communication of assessment results is particularly critical in the case of integrity and corruption prevention policies. Assessment represents one of the few controls on the power wielded by government and keeps civil servants and elected officials accountable for their actions and behaviours. In particular, a growing demand from the civil society pushes governments to report on how they have been managing public resources to create a favourable climate for investment and growth. The New Zealand Customs Service experience illustrates the key components of an effective communication strategy.

Box. 14 Communicating findings and lessons: the experience of New Zealand

The New Zealand Customs Service has assessed its Integrity Programme every year since 2000. The communication strategy has been led by the Chief Executive of the department in order to demonstrate the commitment of the department to promote integrity and to highlight progress over the years. Direct stakeholders have been consulted in order to validate the findings, which ensured that managers would agree on the findings and therefore facilitate their implementation. Results have also been communicated to other departments of the administration through a network of Chief Executives who are responsible for ethical standards of departments under the responsibility of the State Services Commissioner. In addition, key messages have been conveyed to the media in order to reach a wider audience.

Source: Based on the discussions of the OECD Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption Measures in the Public Service, 9-10 September 2004.

Selecting an effective communication strategy in order to convey messages

Although documentation throughout the whole assessment process is indispensable, a formal complex assessment report is not always the best product to convey clear messages. Similar to other steps of the assessment process, the communication strategy is to be discussed in advance with stakeholders. Such prior consultation ensures that relevant information will be targeted at different audiences. Planning effective communication also requires considering the timing, style, tone, message source, medium, and format of information products. Possible **communication instruments** often include reports providing comprehensive information on the results and process of assessment. However, other tailored ways – using presentations, websites, newsletters and pamphlets, interviews in media – could by far reach out to the targeted stakeholders and the society at large.

Box. 15 Publicising results: The example of Korea

The 'naming and shaming' strategy has generally been used to make the results of evaluations public and to mobilise public opinion in recent assessment initiatives in Korea. Both the Korea Independent Commission Against Corruption and the Seoul Metropolitan Government have publicised the evaluation outcomes through mass media that put pressure on low-ranked organisations to take urgent follow-up actions.

The National Assembly also receives information on evaluation under request and regularly calls for organisations under its jurisdiction to improve their anti-corruption programmes specifically taking into account the evaluation results.

As a result of this naming and shaming strategy, organisations ranked low by evaluation have generally made proactive efforts and initiated specific measures to avoid their low-ranking evaluation results in the future.

Source: Details on the communication strategy can be found in the following chapter on the Korean experience.

Ensuring active follow-up

Because of the effort required, reaching justified conclusions in an assessment can seem like a closing stage in itself. However, active follow-up that **reminds intended users of the initial use of findings** is better implemented when the procedures are institutionalised beforehand.

Follow-up might be required to prevent lessons learned from becoming lost or ignored in the process of making complex or politically sensitive decisions. Central agencies in charge of integrity and corruption prevention policies could play a particularly significant role in effective knowledge management, collecting and sharing results of assessments across the whole public service as outlined in the following experiences of Australia.

Box. 16 Knowledge management: The example of Australia

As a result of the findings of the Values in Agencies project in Australia, the Australian Public Service Commission has designed a learning and development kit to guide employees in workplace discussion of values and ethics. The kit will be released in the first half of 2005. In addition, the Commission has developed a program of targeted specific-issues evaluations. For example, a good practice guide will be released in 2005 resulting from an evaluation of agency management of suspected breaches of the Code of Conduct.

Source: Country fact sheets prepared by participating countries for the OECD Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption Measures in the Public Service, 9-10 September 2004 .

Facilitating use of assessment findings also carries with it the responsibility for **preventing misuse**. Assessment results are always bound by the context in which the assessment was conducted. However, certain stakeholders might be tempted to take results out of context or to use them for purposes other than those agreed on. Previously agreed active follow-up mechanisms might help prevent these and other forms

of misuse by ensuring that evidence is not misinterpreted and is not applied to questions other than those that were the central focus of the assessment.

Follow-up mechanisms could even be institutionalised so that they support the integration of assessment findings in policy making such as mandatory responses from public officials within a limited timeframe or follow-up reviews to verify and/or ensure implementation (e.g. in the form of a verification audit).

Box. 17 Follow-up reviews: The example of the Office of Government Ethics in the United States

The Office of Government Ethics (OGE), a dedicated central agency within the executive branch has general responsibility for the overall direction of executive branch policies related to ethics. In order to monitor the implementation and evaluate the programme, OGE has been carrying out reviews regularly since 2001. The overall purpose of these reviews was not to rank or compare agencies but rather to inform the entire executive branch regarding the overall awareness and perceived effectiveness of the programme.

After review, OGE sends a report to agencies with recommendations for improving the programme. Then, the agencies must respond to OGE recommendations within 60 days as to the actions taken or plans for action.

Even though OGE does not automatically send the reports to the Congress, when a Congressional committee requests a report by an agency under its jurisdiction, OGE sends the relevant reports. In addition, periodically OGE releases reports to the media.

A follow-up review is conducted after six months from the date of the report in order to determine whether the agency has taken adequate and effective action on each of the recommendations. By doing this, OGE ensures that the plan for action has actually been implemented.

Source: OGE, <http://www.usoge.gov/home.html>

Integrating assessment results in a broader performance framework

Furthermore, some OECD governments have been integrating assessment results into a broader assessment framework to foster accountability. For instance, public organisations have defined standards of integrity for public officials with stakeholders and hold them accountable against these standards in their performance reviews. Introducing performance-related pay also provides an incentive to link the progress towards and achievement of these standards with a financial reward.

Box. 18 Integrating assessment results into a performance cycle: The example of Canada

The Human Resources Management Agency of Canada has been developing a Values and Accountability Framework in 2004 which aims to assess not only the different components of the "Ethics infrastructure" but also to measure the improvement of individual performance, i.e. assess the understanding of values and changes in individual behaviours of employees. This system aims to cover people management, leadership, controls, risk assessment, rewards, disclosure, enforcement etc. The Canadian Framework is an innovative approach that seeks to combine performance and policy assessment.

Source: Based on the discussions of the OECD Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption Measures in the Public Service, 9-10 September 2004

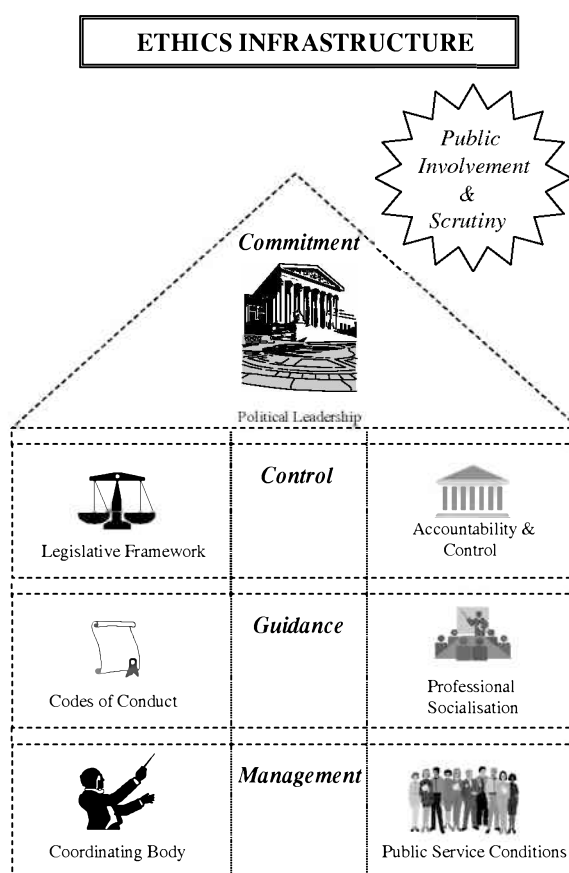
ANNEX I: ETHICS INFRASTRUCTURE

A well-functioning Ethics Infrastructure supports a public sector environment which encourages high standards of behaviour. Each function and element is a separate, important building block, but the individual elements should be complementary and mutually reinforcing. The elements interact to achieve the necessary synergy to become a coherent and integrated infrastructure. The elements can be categorised according to the main functions they serve -- guidance, management and control -- noting that different elements may serve more than one function:

- **Guidance** is provided by strong commitment from leadership; statements of values such as codes of conduct; and professional socialisation activities such as education and training.
- **Management** can be realised through co-ordination by a special body or an existing central management agency, and through public service conditions, management policies and practices.
- **Control** is assured primarily through a legal framework enabling independent investigation and prosecution; effective accountability and control mechanisms; transparency, public involvement and scrutiny.

The ideal mix and degree of these functions will depend on the cultural and political-administrative milieu of each country. The following chart shows the relationship between the functions and the elements of the Ethics Infrastructure. Further explanation on these elements is provided on the next page.

Figure 5. Ethics infrastructure



Source: OECD (1996), Public Management Occasional Papers no 14, Ethics in the Public Service: Current Issues and Practices, page 26.

Political commitment and ethical leadership

In the absence of sustained political commitment to ethical behaviour in the administration, efforts to encourage such behaviour will be in vain. Attempts to improve public sector ethics in OECD countries have been sponsored at the highest political levels, such as the approval by the Government of a comprehensive anti-corruption strategy and programme requested by the Korean President, or the Government Programme to Promote Transparency and Fight Against Corruption adopted by the Government of Hungary in 2003. Other actions, such as the integrity measures sponsored by the Minister of the Interior in the Netherlands in 1995 or the inquiries of the Committee on Standards in Public Life set up in 1994 by the Prime Minister in the United Kingdom, have demonstrated strong political support. Furthermore, political leaders also serve as important role models. This is also true for senior public officials who should set a positive example for other employees.

Workable Codes of Conduct

Codes of conduct play a vital role in stating the expected standards of behaviour, particularly in OECD countries that have reduced the rules applying to public servants and have adopted more “managerial” styles of public management. Some countries (e.g. Australia, New Zealand) chose a broad public service code of conduct from which individual agencies design a purpose-built code to reflect their particular objectives and mission. In other countries (e.g. Netherlands, Norway), codes are all agency-based. The ethical issues confronting an employee of a defense ministry might vary significantly from those facing social security officials. Criticisms of codes include being too specific or too general, unworkable, unused, unknown or simply that simplistic statements of rules are not the ideal medium for answering complicated ethical dilemmas faced by public servants.

Professional Socialisation Mechanisms

However, the content of the codes of conduct or even legal provisions remains simply words on paper, if it is not adequately communicated and inculcated. Socialisation mechanisms are the processes by which public servants learn and adopt ethical norms, standards of conduct, and public service values. Training (induction and ongoing) is an essential element to raise ethics awareness and develop skills capable of solving ethical dilemmas; for example, ethics now constitutes an integral part of the initial training of future managers in Belgium, while all senior private sector entrants to the civil service in the United Kingdom focus on ethics issues in their mandatory induction training. In the same way, training on vulnerable areas can help public servants solve ethical dilemmas by defining practices for managing organisational and strategic risks proactively.

Ethics Co-ordinating Body

These take various forms -- parliamentary committees, central agencies, or specially created bodies -- and assume various functions: “watchdog” including investigation, such as France’s permanent anti-corruption investigation commission, Korea Independent Commission against Corruption (KICAC), or the New South Wales Independent Commission Against Corruption in Australia; “general promoter” of public sector ethics, a role performed by Norway’s Department of Public Administration and New Zealand’s State Services Commission; “counsellor and advisor”, such as the United States Office of Government Ethics and the Canadian Ethics Commissioner that also plays the role of “watchdog”; or “permanent ethics workshop” like the Committee on Standards in Public Life in the United Kingdom. The existence of a co-ordinating body should not, however, be construed as absolving departments and managers of the responsibility for ensuring ethical conduct within their jurisdictions.

Supportive Public Service Conditions

The high standards of ethical conduct expected of public officials are one side of the coin. The other side is a “package” which provides decent working and living conditions for the “servants of the public”. This “package” consists of such basic elements as sufficient job security, prospect of possible promotion and career, fair remuneration or social appreciation. Fair and impartial human resources management policies could ensure that the selection and promotion processes in the public sector would be based on general professional requirements, and that other factors such as, for example direct political interventions, would be minimised. If public servants are feeling underpaid, overworked and insecure, then they are less likely to embrace initiatives to improve performance including in the ethical domain.

Effective Legal Framework

The legal framework is the “teeth” of the overall ethics infrastructure. Laws and regulations define the basic standards of behaviour for public servants and enforce them through systems of investigation and prosecution. In reviewing its legal framework, a country must check that existing criminal codes and civil service laws, conflict-of-interest statutes and other regulations which apply to public servants are clear and consistent. A prominent effort is the implementation of the National Public Service Ethics Law, the country's first such legislation (passed in August 1999 and taking effect in April 2000). This law basically bans public servants from receiving gifts and/or entertainment from private companies under their jurisdiction. Furthermore, senior officials in the central government will be required to report gifts or entertainment worth more than 5,000 yen, with some in higher positions required to report their stock and income transactions as well. Poland also adopted a law recently requiring all public officials to declare their financial assets, property and business capital.

Efficient Accountability Mechanisms

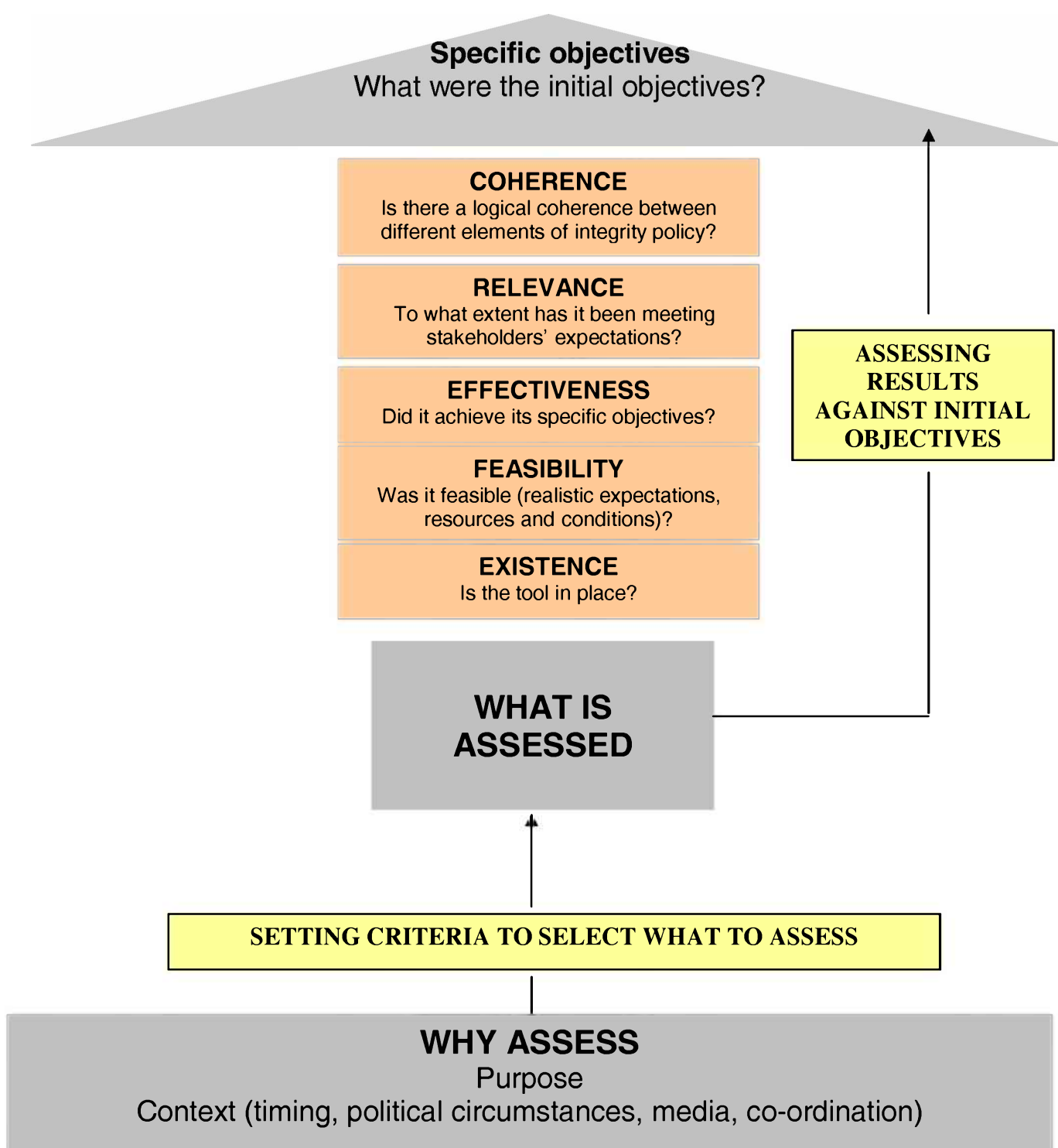
Accountability mechanisms encourage ethical behaviour by making unethical activities hard to commit and easy to detect. Accountability mechanisms set guidelines for government activities, for checking that results have been achieved, and for checking that due process has been observed. They include internal administrative procedures (requirements that activities or requests be recorded in writing), comprehensive processes such as audits and evaluations of an agency's performance, or new forms of procedures such as whistle-blowing (which can encourage public servants to expose wrongdoing committed by others or to say no when asked to do something inappropriate). They might also be external to the public service: for example, oversight mechanisms such as legislative or parliamentary committees.

Active Civic Society

Ethics is everybody's responsibility, including that of an assertive media, which through its probing reporting helps citizens to act as watchdog over the actions of public officials. Freedom of information laws, such as the one adopted by Ireland in 1997, Japan in 1999, Czech Republic in 1999, the United Kingdom in 2000 and Mexico in 2002 can institutionalise and support public awareness and responsiveness.

ANNEX II: SETTING CRITERIA FOR ASSESSING INTEGRITY AND CORRUPTION PREVENTION POLICIES

Figure 6. Assessment criteria

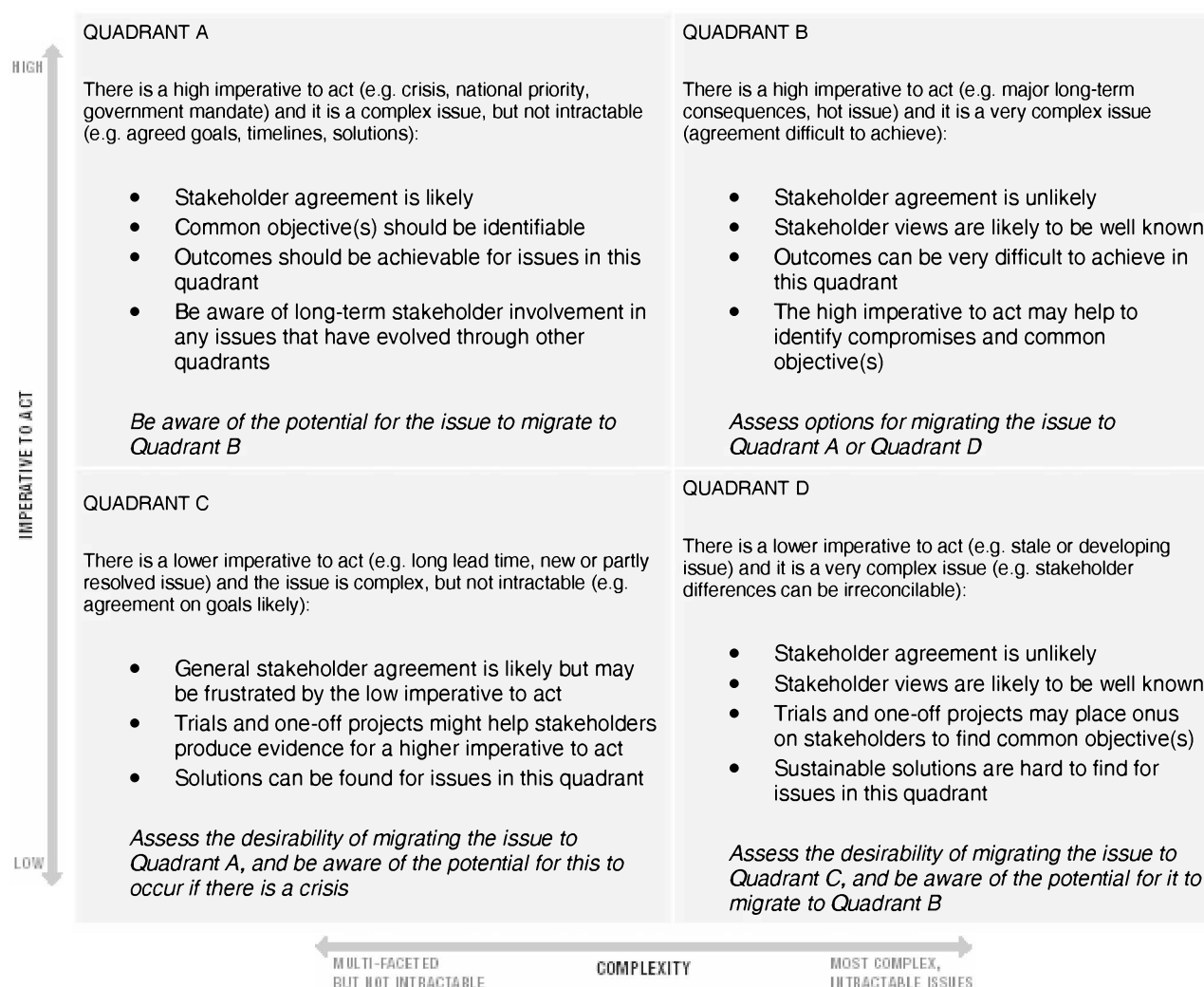


ANNEX III: BALANCING COMPLEXITY WITH THE IMPERATIVE TO ACT

Balancing complexity with the imperative to act can be used as a guide to assess the likelihood of moving particular issues forward. The following table is particularly useful for cases where government issues are complex and therefore might require the involvement of external stakeholders.

- Quadrant A issues have a high probability of being resolved successfully. They can be very complex but are not intractable.
- Quadrant B covers those whole of government issues which have high commitment levels and have proved difficult to address.
- Quadrant C issues have relatively little imperative for action, but fortunately are not intractable, increasing the chance of a successful resolution.
- Results are hardest to achieve in whole of government issues in Quadrant D. They are complex to the point of intractability, and there is relatively little imperative to do something about them.

Figure 7. : Balancing complexity with the imperative to act



Source: Connecting Government, Whole of Government's responses to Australia's Priority Challenges, 2004

ANNEX IV: GLOSSARY

- **Assessment:** An effort to collect and analyse information about important aspects of a policy, with the purpose of measuring whether the policy achieved its intended goals.
- **Assessment framework:** It comprises both procedural steps in assessment practice and standards for effectively and consistently assessing policies.
- **Evaluation:** It is a systematic, analytical assessment addressing important aspects of an object (be it policies, regulations, organisations, functions, programmes, laws, projects, etc.) and its value, with the purpose of seeking reliability and usability of its findings.
- **Logical model:** It is a systematic way of mapping out what the policy is trying to achieve and the steps by which the policy is supposed to achieve its objectives. The logical model ties together, in a logical chain, the inputs, activities, outputs and outcomes relevant from the perspective of a particular policy.
- **Overall aim:** A general statement of a desired condition to which the assessment is directed.
- **Specific objectives:** More specific statements that describe what the policy should have accomplished - the initial objectives of the policy assessed.

ASSESSMENT STRATEGIES AND PRACTICES FOR INTEGRITY AND ANTI-CORRUPTION MEASURES: A COMPARATIVE OVERVIEW

by

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Abstract

Corruption prevention systems are some of the least understood and infrequently evaluated programmes in contemporary government. This comparative chapter is a preliminary overview of how governments assess the effectiveness of their pro-integrity and anti-corruption programmes. It is not meant to be an exhaustive analysis, but rather to raise issues and identify measures that work well and vulnerabilities of existing prevention programmes resulting from assessment. The assumption is that effective assessment is critical to the future of integrity programmes.

Introduction

Integrity is essential to modern government. It not only provides a foundation for effective governance, but also assures citizens that their government is working on their behalf. Corruption of political processes and institutions both undermines the capacity of government to carry out its critical missions and distorts economic, social and political relationships that democratic government erect. Eventually, unfettered corruption gives rise to demagogues and authoritarians who then blame democracy for corruption. In truth, democracy provides the vehicle to make corruption public, whereas in most authoritarian regimes it remains hidden through intimidation and secrecy. For this reason, stable democracies require robust pro-integrity systems and anti-corruption regimes.

Modern anti-corruption regimes tend to limit their focus to investigation and punishment. Although such reactive measures are important components of the integrity framework, punishment as deterrence has limited impact. Even if individuals are punished for corruption, the resultant headlines lead many citizens to believe that the case is indicative of massive undetected corruption. Public officials must be aware of the penalties for doing the wrong thing, but it is more effective and less expensive to motivate officials to do the right thing in the first place. Therefore, a critical element of any effective integrity system is corruption prevention and effective evaluative measures for such systems. Preventative elements typically exist as ethics or compliance programmes, taking on various forms as detailed below.

The organisation of this study is fairly straightforward. After describing the nature of ethics or integrity systems, there will be a brief discussion about the concept of assessment. Organising the rest of the study around each potential element of an integrity system, the paper will address the type of assessment, with recent examples where available, the strengths and weaknesses of the approach, and the criteria for success.

9. This paper was prepared by Stuart Gilman with the assistance of Jeffrey Stout in Spring 2004. Authors would like to acknowledge Allison Pendell Jones and Katie Sutliff for their assistance in the preparation of this paper.

What is an Integrity System?

Integrity systems¹⁰ are designed to prevent corruption before it occurs. With this as a strategic mission, there are a variety of laws, institutions and systems that are used to anticipate potential corruption. It is not suggested that determined, corrupt officials will be absolutely deterred from committing crimes or violating the public's confidence, but that a number of acts that either appear to be, or are actually corrupt, often begin as relatively benign actions by individuals who are blindly focused on policy ends. This is critical because in government, the means are as important as the ends. Well-constructed prevention systems can both help individuals and protect the integrity of government. Furthermore, some "bad actors" will be deterred if they believe that everyone in their agency will recognise unethical behaviour and have an ability to report it.

Integrity systems use a variety of institutions to accomplish their goals. They may be part of a larger agency (e.g. in Ministries of Justice, Comptrollers), a separate agency, or in some rare cases they are truly independent. Their authorities also vary widely. Some prevention systems are only responsible for civil servants. Other agencies have responsibility for political officials (both appointed and elected), and still others have oversight of legislative and judicial officials. There is no one dominant pattern. In some cases agencies exist with an appointed head and civil servants to carry out its functions. In some such cases, heads are appointed to serve at the request of the appointing authority, while others have lengthy fixed term appointments to assure independence. Other forms of prevention systems include commissions. Some commissions are comprised solely of individuals who are part of the government, some are comprised of external stakeholders (citizens, NGOs, economic interests) and still others have a mixed makeup.

Integrity systems also vary in terms of level of government. Some regimes cover all government employees within a nation state. Other programmes focus only on the national level, with the national government requiring each constitutional sub-national level (province, state) to have an integrity system. Other countries, such as the United States, have different integrity systems for each branch of the federal government, but do not mandate programmes at the state or local level. Nonetheless, the prolific growth of state and local ethics systems in the United States over the past twenty years suggests that national government mandates are not necessarily required.

Assessment: The Focus of this Study

The purpose of this study is to understand the assessment strategies currently employed by government integrity programmes. Within the term "assessment" is included any effort, quantitative or qualitative, to evaluate programme effectiveness. This study does not examine the actual methodology used nor the validity or reliability of the measures utilised. Instead it provides an overview of approaches governments or and public organisation have taken to evaluate ethics programmes. Interestingly, despite all of the emphasis on performance measures over the past decade, no prevention programme has attempted to evaluate overall performance. Rather, most programmes look only at pieces of the programme, and often use indirect measures to evaluate those elements.

While the findings of this analysis could also serve as lessons for enforcement activities, this study focuses only on prevention. Thus, the purposeful omission of assessment tools for prosecution, investigation, audit, adjudication, penal institutions, or legislative oversight.

^{10.} For purposes of this paper the terms integrity system, prevention system or ethics system are used synonymously.

In the past, many programmes claimed that, because their focus was on the prevention of unethical or corrupt actions, they could not measure something that *did not happen*. Unfortunately, this perspective takes a very narrow view of evaluation. The effectiveness of most government programmes cannot be directly measured. Nonetheless, a number of indirect measures of programme and programme effect can provide reasonable understanding of programmatic outcomes. Importantly, if assessment is done regularly there can be both a contemporary assessment as well as comparative assessments over time.

The study, rather than using a random sample, contacted a number of individuals and agencies that specialise in preventative programmes. These contacts were used to not only provide assessment examples, but also to recommend other programmes with which they were familiar. In addition researchers utilised the internet and printed materials to gain a better understanding of assessment approaches. Despite the limitations, it cannot be considered as either exhaustive or wholly representative, this study does present a reasonable picture of the assessment landscape, pointing to some potentially exciting approaches and critical vulnerabilities.

Types of Assessment

Typically, there have been three types of assessments used to evaluate integrity programmes:

1. The first type is a *baseline perception survey*. Perception surveys focus on how a system is viewed by stakeholders -- citizens, business leaders, or foreigners doing business within the country. The best known in the anti-corruption area is Transparency International's annual Corruption Perception Index. This index ranks countries throughout the world in terms of the perceptions about corruption within the country. While this type of measure is an indirect way of evaluating integrity programmes, it could be argued that perception surveys and the effectiveness of ethics programmes are independent of each other.¹¹
2. A second approach to assessment looks at the *general state of affairs*. For example the state of Queensland in Australia has sponsored this kind of assessment focused on singular measures, such as prosecutions for corruption, estimated economic losses due to corruption and some perception measures. Although there is no attempt to correlate these elements, or identify how they explain the success or failure of prevention systems, this type of assessment does provide potential comparative data that could be used to view changes across time.
3. Finally, there are *agency evaluations*. These are usually comportment evaluations rather than performance evaluations. They focus on whether ministries or agencies are comporting with legal or structural requirements. For example, they do not try to assess the effectiveness of ethics training programmes, but rather focus on the number of training classes, the percentage of employees took training, and what was the focus. One can be critical of the lack of impact assessment, but comportment is a critical element in understanding the efficacy of ethics programmes.

^{11.} A hypothetical might explain how this could occur. The TI Corruption Perception Index is completed annually. Country X was ranked at number 55 because of the perception that it has a poor record of prosecuting corruption. For the next two years, it completely revamps its prosecution system, firing and trying corrupt prosecutors, and finds that in 1999 it is rank 68th in the TI rankings. Why? Because broad media coverage leads to the perception that corruption is actually more rampant rather than less. Secondly, other countries might also be getting "better." And, despite X's improvements, its progress is overshadowed.

Integrity Framework

Overview

In designing integrity systems government officials must take into account a variety of concerns. Culture and type of government both have an impact, not only in terms of what are to be considered legitimate areas of privacy and personal issues, but also the influence of the media and NGOs. And, obviously the commitment of leadership will have a profound impact.

While acknowledging the differences between programmes, it is important to recognise that there are identifiable, general elements that can be found within integrity programmes. The following is a model framework that will be used to understand what is meant by a prevention system, as well as help for organising the analysis presented in this paper:

- a) Codes of Conduct
- b) Transparency systems
 - 4. Simplification of administrative procedures
 - 5. Elimination of secrecy
 - 6. Financial or interest disclosure / asset declaration
- c) Training Systems
- d) Communication Strategies
- e) Counselling
- f) Whistleblower hotlines and Help lines
- g) Control and Enforcement
 - 7. Criminal code
 - 8. Conflict of interest code
 - 9. Post-employment code
 - 10. Ombudsmen
 - 11. Audit agencies
 - 12. NGOs
 - 13. Media
- h) Independence

Each of these is a discrete element that can be found in an integrity system. However, it would be overstating to conclude that ethics programmes that do not include all of the elements are insufficient. Many governments put elements of these programmes in other agencies, and in some societies, issues such as post-employment, are not terribly relevant.

The obvious problem with such a framework is that as it organises it can also limit it. The intention here is not to exclude other elements, but to organise the most common programmatic themes. The overall purpose of this paper is to raise issues and is not exhaustive in order to provide a starting point to understand the dynamics of evaluating an ethics programme. Future work building on the framework will rethink, modify and go beyond the framework presented here.

The Content of the Framework

Code of Conduct

Integrity systems often begin with a code of conduct, code of behaviour or code of ethics. No matter which term is used, they usually begin with either a series of principles or a delineation of behaviours that public servants are expected to avoid or observe. These codes are generally in addition to anti-corruption laws, and they attempt to refine behaviours in a broader and encompassing fashion. They are often helpful because they provide the basis for other ethics elements. For example, a counselling system needs to have guidelines -- usually law or code -- upon which to base advice.

Some governments supplement the code with a complex series of regulations and interpretations to ensure uniform application of the code. For example, the U.S. Office of Government Ethics (OGE) uses more than seventy pages of text to explain fourteen principles of public service. These regulations are in turn supplemented with Informal Advisory Opinions that are used to give guidance to both ethics counsellors and employees.¹² Programmes stand on the simplicity of principles (e.g. fairness, objectivity) and rely on employees to behave in a way that reflects those principles and use them to both advise and, if necessary, punish civil servants. Some criticise the lack of specificity of such programmes as entrapping government employees by the whims of superiors. Others defend it on the grounds that simplicity offers far more clarity of expectations for the individual civil servant.

Transparency Systems

Perhaps the most misunderstood elements in integrity programmes are transparency systems. Often, transparency systems are considered only in terms of financial disclosure. Well-designed disclosure systems can work to maintain the confidence of citizens in governmental institutions. Having effective review of disclosures, and elimination of subsequent potential conflicts of interest or other ethics problems, can have a positive impact both within government as well as on public perception. Some programmes use disclosures for prosecution rather than counselling. This focuses on the issue of "illicit enrichment", which in most cases can be better detected in other ways. While disclosure is the most common transparency programme, the openness of procurement and contracting procedures should also be included. Even simplifying and clarifying administrative processes can be excellent ways of increasing transparency.

Training

Training is also a common element included in most integrity systems. Training on ethical principles and their application is diverse. Some governments require only new employees to undergo training, while others require regular training. Additionally, some ethics regimes focus on certain levels of employees -- senior political officials -- or positions that are considered particularly vulnerable, such as tax collectors or contracting officials. Types of training also vary. For some programmes all training is in person, while

¹². The Informal Advisory Opinions of the United States Office of Government Ethics, available on the USOGE website: http://www.usoge.gov/pages/advisory_opinions/advisory_opins.html. These documents were originally published in three volumes by the U.S. Government Printing Office covering the period 1979-1998.

others use computer training. Some training is focuses solely on the “rules”, while other types of training use vignettes or actually have employees play ethics games.

Communication Strategy

Most effective ethics programmes have communication strategies. Often, the communication strategy is not planned, which leads to the accusation that it is “the best kept secret in government.” A dynamic communication strategy can range from broad media coverage to posters and/or speeches encouraging citizens to provide input on new regulations. Admittedly, many ethics programme officials are reticent to engage in broad communication for fear that it will unfairly draw the attention of the media to their limitations, rather than their successes.

Counselling

Most ethics programmes have counselling mechanisms through which they give employees advice in response to ethics questions. Such systems vary considerably from centralised to highly decentralised. The advice can be agency specific or government-wide. The counselling can be done verbally, or in writing. And finally, investigative authorities may question the advice, or it can bind employees to respect the advice given. The logic behind the latter reasons that if an employee has gone to an objective third-party for advice (appointed by the government for that purpose), it is unfair to punish said employee for following that advice.

Whistleblower Hotlines and Help Lines

Whistleblower programmes, or hotlines, are probably the most well-known prevention systems. In some cases, hotlines to report misconduct are supplemented with “help lines” that allow employees to ask ethics questions. Both require effective staffing and follow up. Often hotlines become vehicles for disgruntled employees, so hotline staff must be trained to separate the “wheat from the chaff.” Assessing the feedback provided through hotlines and “help lines” has become an essential tool in anticipating corruption and dealing with it before it becomes debilitating.

Control/Enforcement

It is important to recognize that an effective enforcement programme is an essential compliment to any prevention system. Effective enforcement deters those who would be corrupt and assures honest employees that they will not have to work in a corrupt environment. “Effective” should not be confused with “severe” enforcement. One can threaten someone with lengthy prison terms, but if no one ever goes to jail the penalty soon becomes ridiculed. Sureness of punishment for violators is a far greater deterrent than severity. As one official suggested, “rather than a ten year jail sentence that has never been imposed, I would get greater impact with a \$100 fine.”¹³

Independence

Finally, effective ethics programmes require independence. Independence can mean many different things. The key to understanding independence is not necessarily in terms of a separate agency or ministry, separate budget or limited reporting responsibilities. Rather, the foundation of independence is whether the prevention system can act as an objective, third party in judging a particular question, and whether those seeking the advice can ignore, or worse, change the advice to suit their own interests. Independence is probably one of the most critical features in assuring the effectiveness of integrity

13. Interview with an ethics official in one of the U.S. states, February 2002.

programmes. Although legitimate evaluation of independence is difficult, it is essential that it be addressed.

At this point we turn to assessment and evaluation instruments used by ethics programmes, focusing on the most effective techniques and interesting approaches. There is no single right way to design an integrity system. Many of the variations are designed to make programmes more effective. However, one would be naïve to think that some integrity programmes are not created to camouflage corruption, rather than prevent it. Some governments have created an ethics office, but then denied it the basic resources to make it successful.¹⁴ Ultimately, integrity systems are one of the most innovative and anti-corruption programmes developed by governments in the last one hundred years.

Measuring the Impact of Preventative Systems

This section describes methods of assessment for each component of an integrity system listed above, detailing strengths and weaknesses and listing criteria for success. The following overview in no way intends to be comprehensive. The examples presented below originate from many sources and include the efforts of international organisations such as Transparency International, the World Bank, Organisation of American States and the OECD.¹⁵ Other examples include programmes of a national or provincial co-ordinating ethics body, and still others are the work of an individual department within the national or provincial government. Examples are cited that refer to individual questions within a management assessment survey designed not to measure ethics specifically, but rather to assess the performance of department management practices. An attempt is made to select examples of assessment methods from a diverse range of sources and to focus on those that enable future assessment efforts.

The efforts of international organisations on this front are to be complemented. While most, to date, have concentrated specifically on baseline assessments and on anti-corruption systems, as opposed to ethics systems, the efforts that lead the way in demonstrating the importance of evaluation and assessment of anti-corruption systems are also to be commended.

Assessments by International Organisations

Transparency International¹⁶, for example, is engaged in a range of important efforts aimed at gauging the state of corruption in countries. Transparency International's Corruption Perception Index measures the extent to which corruption is perceived to exist in government. It is a composite index derived from seven separate surveys. This index measures perceived corruption rather than actual corruption. It aims to minimize possible biases, including differences in the notions of corruption and culture specific ethical standards across countries by pooling surveys from various sources. For example, the Bribe Payer's Index ranks countries based on the degree to which international companies pay bribes to foreign officials. TI's index provides an external assessment based primarily on perception and a useful check for official government analysis on the health of their integrity systems.

The National Integrity Systems Country Studies outline the state of integrity systems and the political context for 18 countries. These reports focus on the presence and effectiveness of the institutions and laws

^{14.} See Fredrick Hermann, "Bricks Without Straw: The Plight of Government Agencies in the United States," *Public Integrity Annual 1997*, The Council of State Governments, Lexington Kentucky, 1997, pp.13-21.

^{15.} For a more complete explanation of multilateral involvement see: Terry L. Cooper and Diane E. Yoder, "Public Management Ethics Standards in a Transnational World," *Public Integrity*, Fall 2002, Vol. IV, no. iv. pp. 333-352.

^{16.} TI emerged as the leading international NGO over the past decade. They have developed general tools for assessing perceptions related to corruption and bribery, such as the Corruption Perception Index (CPI).

that comprise an integrity system. They are unique in their comprehensive approach and provide a useful baseline description of how the government's integrity system is organized. They describe efforts to identify potential weaknesses in the system, as opposed to specifically assessing integrity system components.

A more recent, and sophisticated approach, has been *the Public Integrity Index*¹⁷ issued by the Center for Public Integrity in Washington, DC. Utilising both perception data and aggregate data the index assesses 21 different dimensions of integrity in 25 different countries. The analysis utilised both in country experts as well as panels of experts to evaluate the meaning of the data and assure its objectivity. Certainly, the index and ranking of countries will catch the eye of the media and politicians, but arguably the most valuable contribution of the index are the qualitative evaluations of each country. These provide a model for qualitative assessment that can be used in many other contexts.

The World Bank has developed an Anti-Corruption Toolkit, including a series of questionnaires designed for institutional assessment of policy-making institutions and the civil service, as well as surveys focused on corruption in civil service delivery and a country's commitment to reform¹⁸. The Organisation of American States has also engaged in efforts to help members assess the existence and adequacy of the legal framework and enforcement mechanisms related to corruption. It has developed a questionnaire as a follow-up instrument to determine the extent to which its member nations are working to improve their anti-corruption systems¹⁹.

The United Nations Global Programme Against Corruption, introduced in 1999, provides a framework for standardised assessment to document corruption in public administration and business. The four-part framework includes surveys of business, public administration, and media; focus groups including labour, parliament, media and prosecutors; an analysis of the legal and institutional framework; and finally an analysis of the societal context. A good example of such a study is the Country Corruption Assessment of South Africa.

The Organisation for Economic Co-operation and Development (OECD) has developed monitoring process to ensure the effective implementation of the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The monitoring process, based on the OECD peer-review principles, is divided in two main phases, namely:

Phase 1 evaluates whether relevant legal texts meet the standard set by the Convention.

Phase 2 reviews, started in 2000, studies the structures put in place to enforce the laws and rules implementing the Convention and to assess their application in practice. This includes reviewing national investigations and prosecutions and conducting "on site" interviews with government and regulatory authorities and other persons concerned with application of the Convention.

In the public governance area, a series of groundbreaking studies²⁰ from general approaches to ethics to a detailed analysis of conflicts of interest have been published in the last decade. Although these studies

17. <http://www.publicintegrity.org/ga/ii.aspx>

18. <http://www.worldbank.org/wbi/governance/pubs/govmatters3.html>

19. www.oas.org/juridico/english/followup.htm# Results listed by country with reports for 2002, 2003 and February of 2004.

20. Managing Conflict of Interest in the Public Service: OECD Guidelines and Country Experiences (2003)
Public Sector Transparency and Accountability: Making it Happen (2002)
Trust in Government: Ethics Measures in OECD Countries (2000)
Public Sector Corruption: An International Survey of Prevention Measures (1999)

did not explicitly assess ethics programmes in OECD countries, rather that provide a detailed description of the ethics regimes within a country. For example, the OECD²¹ reviewed the application of the 1998 Recommendation on Improving Ethics in the Public Service. The resulting report “Trust in Government” provides standards against which ethics programmes can be evaluated.

The intention is to supplement the reports listed above by focusing on assessment of ethics systems, as opposed to corruption or enforcement systems. More specifically, focus is on methods used to assess the effectiveness of integrity system components on a more granular level than institutional analysis. While it is important for a country to take honest stock of its institutions, how they interact and where potential exists for inappropriate actions, it is essential to be armed with tools to assess specific integrity system measures.

Instead of describing criteria for success of a system component focus is on how one can assess the success of that component. Methods that a governing entity can use to discover whether or not a policy is accomplishing the desired results are addressed, rather than what specific considerations make a successful policy. It is also worth noting that a finite number of programme assessment methods exist. The discussion of the strengths and weaknesses of surveys to measure a code of conduct may well overlap with the strengths and weaknesses of surveying training systems. In the case of overlap those advantages or disadvantages unique to the relevant assessment method will be highlighted.

Performance Assessment

Before discussing measures that assess specific integrity system components, using the framework articulated earlier, it is important to note that no country was found to have all of these measures fully implemented and that the integrity systems of many countries are in the very early stages of programme development. As governments work to implement integrity systems, a parallel effort to improve performance and managerial assessment, in general, will help create work environments that encourage ethical behaviour. The management sciences literature and innovative efforts by organisations to improve their workplace environment on many levels is very much related to our discussion, as ethics exists within the context of a living workplace with human beings who happen to be managers and workers.

An exceptional model for widening the framework of performance assessments beyond managerial results to include leadership, people management and organisational environment is provided by the Treasury Board of Canada Secretariat (TBS) Management Accountability Framework (MAF).²² It is an encouraging trend that management can now address broader goals including ethics, but it is also important to note that in practice, the disruption caused by the ebb and flow of management approaches in the public sector has often adversely affected existing ethics programmes.²³

Ethics in the Public Service: Current Issues and Practice. OECD Public Management Occasional Paper No.14 (1996)

21. Through its Public Management Service (PUMA) which was transferred to Public Governance and Territorial Directorate in 2002.

22. http://www.tbs-sct.gc.ca/maf-crg/maf-crg_e.asp#Introduction

23. See Stuart C. Gilman, “Effective Management of Ethics Systems: Some New Frontiers,” in Vusi Mavuso and Daryl Balia, *Fighting Corruption: Invitation to Ethics Management*, Unisa Press, Pretoria, South Africa, 1999.

Codes of Conduct

Measuring the success of a code of conduct is inherently difficult. However, a wide variety of assessment tools can shed light on the efficacy of this important integrity tool. By far the most common is the survey, which has the advantage of being relatively inexpensive and replicable. Of course, it matters who is surveyed and how, and it is helpful to compare survey results between organisational levels (i.e. management and employee level responses).

Code Assessment Method One: Surveys

Surveys come in several forms including:

1. Ones that measure the “ethical climate” of the organisation;
2. Direct questions about the presence of misconduct, pressure to commit, reporting of and pressure not to report; and
3. Performance reviews with some ethics relevant questions.

Additionally, there is a range of variations and combinations of each form, as detailed below, can be helpful.

Management Surveys

Some management level surveys have been designed specifically to assess ethics programmes, but far more common are performance review surveys that happen to include a question or questions regarding ethics, and codes of conduct in particular.

Example: The U.S. Office of Government Ethics Reports (1992-1998)

Executive Order 12674 requires the Office of Government Ethics to do annual surveys on ethics in the executive branch of the federal government. For approximately a six-year period the results of these surveys were publicly reported. These reports focused on aggregate data reported by ethics officials in more than one hundred ethics offices. The types of data included items such as the number of full and part-time officials working on ethics, the number of advisory opinions issued, the number of financial disclosure form filed (and their timeliness), the number of administrative and criminal actions taken against employees. Aggregate data is often not seen as relevant to assessment, yet it can be reasonably claimed that this kind of data – collected over time – can provide some strong indirect indicators of effectiveness.

Example: Survey of Top Management in Finland

This survey of management and personnel from 170 agencies focuses on changes in values of governance, principles of civil service ethics, unethical practices and factors affecting civil service ethics. The objective of the survey is to paint a general picture of ethics in civil service, specifically in public administration. Transparency of political decision-making and the operations of government enterprises are not included. Finland serves as an example for surveying both the employee and management level, allowing for a useful comparison of factors affecting civil service ethics. The Finnish survey also stands out in that the impetus for its undertaking was not the perception of high levels of unethical behaviour in government but rather the perception of risk for increasing levels of unethical behaviour.

Example: State of the Service Report in Australia

The Australian Public Service Commission uses an agency questionnaire as one source for its annual “State of the Service Report.” The survey intends to assess ways in which the code of conduct is communicated and implemented, internal issues (such as employee behaviour) and matters of external communication with Parliament and the public.

Example: Learning Advisory Panel Survey of Middle Managers in Canada

While not designed specifically for integrity system assessment, this survey targeted middle managers and its ethics related results could be compared to a survey of public servants undertaken by Canada’s Treasury Board. For example, while managers recognised a need for accountability measures and assessment of those measures, they raised concerns that their departments do not have the “capacity to lead and sustain the dialogue.” In such an environment, the results of the public servant survey which indicated perceptions of unfairness in promotions are not surprising.²⁴

Employee Surveys

Employee surveys are an effective way to determine if management has effectively implemented a code of conduct. Below, several examples are presented.

Example: Public Servant Survey in Puerto Rico

In 2003 the Ethics Resource Center worked with the Office of Government Ethics of Puerto Rico (OGE-PR) to survey all public sector employees²⁵. Teams were created by both organisations to assure that the data would reflect the culture and institutions of Puerto Rico, while assuring the validity and reliability of the survey questions. The focus of the survey was on how employees “viewed” ethics in their own organisations, capturing ethics values as well as pressure to commit misconduct. The OGE-PR also recognised the necessity of a broad communications strategy to encourage a large response to the survey and as a result, 65,000 employees responded to the questionnaire.

Example: Survey of Public Servants by the Treasury Board of Canada

While not designed specifically to assess ethics practices, this survey of public servants was able to point out gaps in the Canadian integrity strategy. For example, in the 1999 survey, a significant number of employees claimed that they do not have a “fair chance of being promoted ... that they cannot disagree with their supervisor without reprisal ... and that senior management will not try to resolve concerns raised in the survey.”

Example: KPMG “Integrity Thermometer” in South Africa

Agencies in South Africa have used a survey, initially developed by KPMG for use in businesses, to gauge the existing ethical climate within an organisation. The goal is to identify gaps between official policy and company culture in a way that facilitates comparison between offices. The initial attempt to survey employees failed because of reliance on the Internet and employees simply did not have enough access to computers. Further, the question of whether business ethics surveys are directly translatable to the public sector is debatable.

Strengths of Employee Surveys

²⁴. <http://www.oag-bvg.gc.ca/domino/reports.nsf/html/0012ce.html#0.2.0AKH9E.78C5D1.D0582G.4F>

²⁵. Report to the Office of Government Ethics, Commonwealth of Puerto Rico: 2003 Employee Ethics Survey.

The importance of employee surveys in assessing the effectiveness of a code of conduct cannot be overestimated. Whether a code of conduct is just a document in the employee handbook or whether it has become part of the agency culture can be determined by understanding the “view from the trenches”. Employee surveys are an important strategy. The Ethics Resource Center’s (ERC) 2003 National Business Ethics Survey (NBES) is a good example of a study designed to understand how employees viewed ethics in their own organisations.

Example: ERC’s 2003 National Business Ethics Survey

Although entitled a “business” survey, the data represents public and non-profit employees as well. Additionally, the data set was able to take advantage of the validity and reliability of other ERC surveys of specific organisations, as well as the two previous NBES surveys in 1993 and 2000. The NBES provides measures to understand the impact of codes of conduct, as well as their relationship to organisational culture, leadership and ethics systems, thus identifying strong relationships among these variables. For example, a robust ethics programme (defined by specific elements) is linked to both a reduction in perceived misconduct and an increase in the willingness to report that misconduct. In the review of assessment of employees there have been very few surveys that look for explanatory relationships between variables. Many organisations resist such studies for fear that some might view these as causal relationships. Although often lost on layman, this distinction is critical. It also demonstrated the greater vulnerability of young managers in organisations as well as a strong correlation between robust ethics systems and a decline in ethical misconduct.

Client Surveys

An alternate angle, most appropriate for agencies that directly serve the public and/or another agency in the government, can be provided through client surveys. While primarily designed to measure performance, surveys of the clientele of civil service agencies can shed light on integrity issues as well. The potential for politicisation of the process is very high, but intra-agency scorecards can be a useful check on activity that takes place at the depths of bureaucracy with little public exposure. No examples were found of interagency scorecards, although the Queensland NISA²⁶ included an interagency questionnaire aimed at determining the level of co-ordination between ethics related bodies. More common are report cards or scorecards for agencies that directly serve the public.

Example: Civil Service Report Cards in Bangalore, India

The 1999 Civil Service Report Card survey in Bangalore, India is an example of a client survey aimed at assessing integrity. An important result of this survey was an indication of an increase in perceived corruption, as evidenced by the growth in both the numbers of respondents who paid bribes and the amounts they paid.²⁷

Example: South Africa Country Assessment

The Public Service Commission of South Africa commissioned three surveys:

1. One measuring public perceptions of government corruption;
2. One of businesses; and

²⁶. http://www.transparency.org.au/documents/ONISA_report.pdf (p. 146)

²⁷. <http://www.worldbank.org/participation/web/webfiles/cepemcase9.htm>

3. One regarding public administration.

A selection of four agencies participated in the Public Administration Survey that collected data from service users, managers and public officials. Where most surveys focus on public perception or of government corruption, this survey offered interesting insight into public corruption. It was shown that public officials perceive that clients often sought “back door” solutions to their issues²⁸, suggesting that it is important to also measure public expectations and tolerance for corruption in addition to their perception of its existence.

Strengths and Weaknesses of Client Surveys

The public sector can learn from extensive work in private sector customer surveying. The strengths of client surveys in assessing the effectiveness of a code of conduct include:

1. Avoiding the conflation of output and outcome that often takes place in internal reviews;
2. Capturing public perception regardless of actual practice; and
3. Creating a benchmark against which change can be measured.

The primary weakness of client surveys is that their relevance is limited to service agencies. This limitation can be relaxed slightly by expanding the use of this tool to inter-agency assessment, but even then they are only relevant to agencies serving others. After that, a careful distinction must be made between the perception of code of conduct violations and actual violations. While an understanding of public perceptions of misconduct is fundamental to programme design considerations, the end goal is to eliminate actual violations of the code of conduct.

Media Surveys

Media plays an important role as agencies assess the effectiveness of a code of conduct. Negative attention can provide a powerful disincentive for transparency and co-operation with the media. At the same time, media provides an outlet for whistleblowers and momentum for investigations, reprimand and stronger ethics practices. The mantra “do nothing that you wouldn’t want on the front page of the Post” for some agency offices in Washington, DC, can be viewed as a positive.

Example: 2002 Country Assessment of South Africa

An example of the use of media coverage to characterise the success of a code of conduct are two complementary studies that formed part of the 2002 Country Assessment of South Africa. The studies measure the types of corruption reported by the media, who is responsible for bringing the corruption to light and which agencies are responsible for responding to the charges and following up.

Strengths and Weaknesses of Media Surveys

The weakness of using media surveys to measure the effectiveness of a code of conduct is that most violations of a code of conduct do not find their way to the media. Nevertheless, such studies provide a useful third party verification of the effectiveness of certain ethics programme instruments. Media participation may be more useful on expert panels and focus groups than surveys as discussed in a later section of this paper.

²⁸. PSC News December 2003 / January 2004 “Turning the Tide on Corruption”

Institutional Framework Studies

Further discussion of what are referred to as “institutional framework studies”, such as the National Integrity System Assessment, is warranted as these comprehensive studies form the groundwork for ethics programme assessment. Collaboration between the Key Center for Ethics, Law, Justice, and Governance at Griffith University in Australia and Transparency International Australia is an important example of such a study. The two groups undertook an ambitious investigation of integrity system components in Queensland, Australia.

Their objective was to provide an in-depth understanding of the laws and institutions comprising the state’s integrity systems, to point out the strengths and weaknesses of these components and to identify gaps and areas of overlap.²⁹

The undertaking included documenting the political context and history of the state as related to ethics, as well as a description of the specific laws and institutions. The main study was comprised of three bodies of information:

1. Interviews with senior executives of agencies;
2. Focus groups to discuss best practices; and
3. A survey aimed at establishing the effectiveness of interaction between agencies within the integrity system.

A parallel study of the private sector, assessments of other states and jurisdictions, attitude surveys among the public and business community and an international comparison of integrity systems were added to the initial study.

Mapping the integrity system landscape by using a framework study such as the NISA Queensland is a vital first step in establishing an effective integrity system. Framework assessments strive to “identify, analyse, and record institutions, laws, procedures, practices and attitudes”³⁰ They primarily focus on questions such as, “Does a code of conduct exist?” But due to their comprehensive nature, such an assessment can only go so far in answering, “Has the code of conduct been effective?” The Queensland NISA questionnaire does distinguish between the two, asking respondents to document formal provisions related to each integrity system component and also “what actually happens?”³¹ The intention of this paper is to focus on the latter question by comparing assessment measures used internationally.

Strengths and Weaknesses in Using Surveys in Assessing the Effectiveness of a Code of Conduct

Surveys are a familiar tool that managers and personnel already use in many cases. Retooling human resource/performance related surveys to include ethical considerations is a feasible way to gather data. The strengths of surveys, in general, are that they can be replicated -- baseline can be established and comparisons can be made over time.

The principal challenge facing surveys is self-reporting. Collaboration is often required in cases of misconduct, thus almost guaranteeing underreporting. This limitation was noted in the documentation of South Africa’s National Victims of Crime Survey conducted by the Department of Safety and Security and

^{29.} http://www.transparency.org.au/documents/ONISA_report.pdf

^{30.} http://www.transparency.org.au/documents/ONISA_report.pdf (Section 2)

^{31.} Queensland NISA p. 139

it is applicable to surveys. Employees and managers may also be unlikely to indicate violations exist for fear of reprisal. Effective survey design can avoid the obstacle of self-reporting.

Other challenges surveys face are that they often reflect perception of misconduct as opposed to actual misconduct and cultural differences among organisations or jurisdictions may make comparisons difficult. The code of conduct is intended to standardise notions of acceptable and unacceptable behaviour, but answers to survey questions regarding the effectiveness of a code of conduct, just as actual compliance, may vary from place to place and agency to agency.

Finally, a weakness of surveys in general is a lack of an effort to correlate the perceptions described in surveys with empirical data such “complaints filed”, or the lack of aggregate data for overall reference. Presumably, progress made integrating a code of conduct should be reflected in frequency or output data.

Criteria for Success

Designing a survey that can adequately measure the effect of a code of conduct is extremely difficult, but some criteria will improve its validity:

- Ease of use.
- Anonymity.
- A mechanism in place to analyse results and feedback.
- Comparison -- Comparing management vs. employee or provider vs. client.
- A benchmark is set and surveys are replicated. An example of a survey created with this in mind is the Canadian Department of Defense survey of military and civilian employees that provide a baseline assessment of values, used by employees, values respondents supported, respondent expectations of the ethics programme and an assessment of ethical concerns.³²
- Good technique. E.g. ensuring the validity and reliability of the survey and that it is distributed in a way that encourages a high response rate.
- Revealing questions, ensuring that they provide insights into the effectiveness of the program, rather than program outputs. E.g. how many financial disclosures were filed.

Code Assessment Method Two: Focus Groups, Expert Panels and Interviews

Focus groups, expert panels and interviews provide an alternative to surveys and have the advantages of fomenting discussion and a more nuanced insight. For the purpose of this paper, all three situations are referred to as focus groups. Whereas surveys are extremely focused and limited to the research question and the imagination of the surveyor, focus groups leverage group dynamics to widen the discussion to include any consideration deemed relevant by participants. However, focus group conclusions are purely qualitative and, therefore, difficult to compare over groups or over time. Additionally, the selection of participants and moderator play an important role. Both a potential advantage and limitation is the group dynamic. Hearing other participants voice similar concerns could encourage others to voice their own or make others wary of openly discussing certain issues.

³². http://www.dnd.ca/ethics/pages/home_e.htm

Employee focus groups

The Australian Public Service Commission's report "Embedding APS Values" documents the strategies of six case study agencies' efforts to embed the commission's code of conduct and then correlates them to views of employees that were collected in focus groups. As an example of findings from such a focus group, the following shows its importance and utility. Employee focus groups yielded the following conclusions, among others³³:

- Leadership is crucial to ensuring that the Values and Code of Conduct are taken seriously.
- Unethical behaviour by leaders and managers would cause employees to consider the Values and Code of Conduct as rhetoric and to lose confidence in them.
- Leaders perceived to be modelling the Values are strongly supported.
- The Values and Code of Conduct as presented in some corporate documents are not made meaningful by corporate practice.
- The relevance of the Values and Code of Conduct to everyday duties is not widely understood.
- Some managers and leaders do not seem to be upholding the Values.
- The 15 Values are quite long. Some embody more than one concept, are difficult to remember and to put into context.
- Grouping the Values is a useful tool in helping to gain an understanding of the Values and making them relevant -- makes the Values come alive.

Strengths and Weaknesses of Employee Focus Groups

Focus groups have many benefits, however organisations must be cautioned not to over analyse the results. Focus group research is best used as groundwork for a scientific survey. It is very seldom the case that a focus group represents a scientific sample, and therefore it is wrong to conclude that the summary of the focus groups is representative of a population. Further, focus groups responses – no matter how well organised -- have a subjective element within them. There are judgments and interpretations of not only responses, but also body language, and the dynamics of interchange. This is not to suggest that these are necessarily bad, but rather that one must take into consideration the subjective nature of focus groups when reviewing summaries.

Management Focus Groups and Interviews

Management interviews represent one subset of focus group methodology. Usually, the management group in any organisation is relatively small and, as a result, the interview process is relatively uncomplicated. The key to doing this successfully is a fairly detailed research framework that clearly articulates issues, question sets, and links between questions. When these interviews are done well it allows the organisation to get a picture of how the managerial level views each other's ethical perspective as well as the ethical culture of the organisation.

³³ . <http://www.apsc.gov.au/values/values6.htm>

Example: From the Private Sector -- One Company's Experience

In order to identify integrity issues among top management, the Ethics Resource Center conducted a series of interviews with over eighty executives at a multi-national corporation as a part of a 360-degree executive leadership review. Corporate officers and their direct reports were asked to describe their perceptions of the ethical leadership and overall ethical climate of the organisation. The exercise provides the information necessary to assess the integrity programme as viewed "at the top" and assisted in the development of reports for each member of the leadership team, as well as an overall organisational report. The information also provides foundation and direction for future surveys and assessments. This example from the private sector can serve as a model for government agencies, particularly at the executive level.

Example: Badaracco and Webb

Another example from the private sector, involving focus groups rather than interviews, is "A View from the Trenches" by Joseph Badaracco and Allen Webb. The work is based on in-depth interviews with Harvard MBAs in their first position out of business school. Emerging from the interviews is that intense focus on job and career goals allows pressure to exist. Getting ahead requires making your numbers no matter what; being a team player, and having a name clean of whistle blowing. The interviewees also stress that examples are more important than words when it comes to an ethics programme.

Strengths and Weaknesses of Management Focus Groups and Interviews

Management focus group methodology can help to gauge the impact of ethics programmes. However, conclusions from focus groups and interviews must be viewed in light of the limits of the methodology. In the review of public service ethics programmes no system was found that took advantage of this relatively inexpensive approach to understanding the ethical dynamics of organisations. There are several likely reasons why public agencies avoid their use:

1. First, they appear "too subjective". However, all methodologies -- including scientific surveys -- have an element of subjectivity.
2. Second, public agencies are sensitive to the politics of the results. Surveys can generally couch conclusions more generally; focus groups are far more personal.
3. Finally, most ethics programmes are too new to deal with new methodologies.

Client Focus Groups

Client focus groups are a common method used to collect public opinion, especially with regard to the provision of public services and ethics is only one among many considerations, including quality of service and efficiency. Northern Ireland's Review of Public Administration³⁴ uses focus groups to collect feedback on public service provision. As with survey's, public focus groups are limited in their reach to integrity issues involving service provision to the public.

Strengths and Weaknesses in Using Focus Groups, Interviews in Assessing Codes of Conduct

Focus groups provide a quick way to generate a qualitative comparison of stakeholder viewpoints. For example, in South Africa, under the UN GPAC framework, focus groups were conducted as part of its Country Assessment Report. Five focus groups were convened consisting of parliamentarians,

³⁴. <http://www.rpani.gov.uk/>

prosecutors, magistrates the media and trade unions.³⁵ A discussion guide was used to focus the conversation on certain issues and elicit responses from the various representatives. While this particular set of focus groups was focused on corruption, it serves as an example for future investigations into a wider array of ethics related issues. Particularly useful were the immediate comparisons of the priorities of various stakeholders. Generating candid feedback from all relevant stakeholders helps minimise the chance that important issues are swept under the rug. Focus groups are a way to elicit candid responses from experienced professionals and the interplay between colleagues may spur ideas that would not surface in a paper survey.

On the other hand, focus groups are not meant to be a wholly representative sample and therefore, one must use caution in drawing valid generalisations from their results. The data gathered is qualitative and depends very much on who is involved in the focus group, who is conducting the focus group and what the goals of the discussion guide are. Focus groups rely heavily on the opinions of a few people and to that extent they work best as a means to point out problems or potential risks rather than to scientifically measure the effectiveness of integrity system components

Criteria for Success

In order to be successful, focus groups should be as representative as feasibly possible and steps should be taken to use an independent group leader. To assure independence, one can use an outside evaluator, as shown through the ERC Corporate Leadership review example presented above. As in all measurements discussed, the proper resources must be allocated to collect, interpret, and publish the results. Follow up focus groups are encouraged, to get a sense for what changes have taken place.

Code Assessment Method Three: Audits and Performance Reviews

Performance audits and reviews are another way to assess the level of compliance with codes of conduct. Two types of audits are distinguished:

1. An audit focused specifically on ethics related requirements; and
2. A more general performance audit that may indicate ethics related performance issues.

Output methods, in this case, provide the source for assessment. For example, the Disclosure of Wrongdoing and the Harassment Policy (including the numbers of complaints, types of cases, etc.) used in Canada creates a baseline for understanding the state of affairs in this area. There are inherent problems with relying on output statistics as they do not illuminate the actual outcome of policies and therefore may be more misleading than helpful.³⁶

Another example of an ethics related audit is the Operations Review Committee (ORC) of the Independent Commission Against Corruption in New South Wales, Australia which performs both internal and external management audits focusing on key elements of the ethics regime.³⁷

Additionally, the United States Office of Government Ethics Management Audits primarily focus on the regulatory compliance of federal agencies under its responsibility. Within the regulatory regime every department or agency is required to have a Designated Agency Ethics Official (DAEO) who is responsible

^{35.} <http://www.gov.za/reports/2003/corruption.pdf>

^{36.} http://www.tbs-sct.gc.ca/pshrmac-agrhfp/rep-rap/wgdw-gtdaf2_e.asp

^{37.} [http://www.icac.nsw.gov.au/go/the-icac/what-is-the-icac/independence/-accountability/the-operations-review-committee-\(orc\)](http://www.icac.nsw.gov.au/go/the-icac/what-is-the-icac/independence/-accountability/the-operations-review-committee-(orc))

for the management of the agency's ethics programme. As examples, these audits review whether the DAEO complied with financial disclosure requirements (number, review and timeliness), training requirements, and even the accuracy of advice given to employees.

The State Services Commission (SSC) in New Zealand has one of the most advanced integrated performance system in use at this time. Originating through the *Integrity Project* the SSC has carefully created a risk matrix for both "people integrity" and "organisational integrity." This risk matrix was initially used in the New Zealand Customs Service and produced a series of critical indicators for integrity. These indicators were then used to evaluate managerial and organisational practices leading to informed policy adjustments.³⁸

Strengths and Weaknesses of Using Audit and Performance Reviews in Assessing Codes of Conduct

The weakness of relying on output statistics to measure compliance with the code of conduct is that extreme detail allows one to "lose the forest for the trees." The importance of context makes the analysis of output statistics extremely tenuous. On the other hand, audits designed specifically to account for the integrity system components and procedures can be useful in measuring the success of a code of conduct. Perhaps more importantly, such audits can encourage compliance. Because regular audits of compliance will only promote the generation of audited paperwork and not actual ethical conduct, it is important that audits are not the only assessment of integrity system components. Another shortcoming of this method is the high cost associated with a detailed audit.

The risk analysis employed by New Zealand appears to avoid many of the pitfalls of audits, but its potential "Achilles Heel" is that it must rely on the integrity of managers and leadership to effectively carry out this sophisticated evaluation.

Criteria for Success

Ultimately, good management audits in the ethics area must focus on both compliance, and impact. The latter is harder to measure, but not as difficult as many assume. Effective management audits can take the form of perception measures, or correlate actually criminal or administrative violations with programme elements. Public agencies are reticent to undertake such evaluations because it makes them vulnerable to criticism. There is a certain amount of ethical courage necessary to say we are not perfect, we risk discovering weaknesses in a programme, but it is the only way to make them better. From outside government such a sentiment seems both rational and compelling. However, given the fury of political winds within some agencies, and certain governments, it might be perceived as a reasonable survival strategy.

Code Assessment Method Four: Public Hearings

Public hearings are a common top down approach to measuring agency heads accountability for compliance to the code of conduct and other ethics programme components. In Great Britain, The Committee on Standards in Public Life publishes an annual report on the conduct of public officials. Its methodology includes publishing a 'consultation paper' establishing the issues of principal concern, inviting submissions on the relevant issues, conducting informal interviews/meetings with stakeholders and finally public, formal hearings. The committee has published ten such reports focusing on a range of issues from conduct in the House of Lords to defining the boundaries of acceptable behaviour at the executive level.

³⁸ <http://www.ssc.govt.nz/display/document.asp?navid=94>

Other examples include legislative hearings that focus on ethical accountability of individual agencies or ethics offices themselves. Such hearings are noteworthy because the legislative oversight is often an effective counterbalance to the tendency of some bureaucracies to interpret their responsibilities minimally. Using oversight or budget authority, legislative committees can wield effective power in ensuring that executive agencies take their ethical responsibilities seriously.

Strengths and Weaknesses of Using Public Hearings in Assessing Codes of Conduct

The formal and legal nature of hearings brings this method of assessment a high degree of legitimacy. It should be noted that depending on the composition of the body conducting the hearing, political rivalry might encourage extremely rigorous examination. It is also significant that busy legislative calendars ensure that such hearings are limited in time and scope and that testimony is limited to the agency heads.

Criteria for Success

In order to be effective, hearings must recur at a regular frequency, attendance and candid answers must be required by law and enforceable, committee members must be representative of the government in place and not exclusively from one political group or another. Hearings should also be public because they serve both as an effective transparency mechanism and an essential element in a communications strategy. They add to transparency because the public has the ability to see into and understand the governmental process. They are an essential component of a communications strategy because hearings make the average citizen cognisant that ethics is important and that there are systems in place to ensure the ethical behaviour of public employees.

Transparency systems

Laws and processes that guarantee access to information about government decision-making are integral to an effective integrity system. Assessment of transparency measures can occur at the agency or programme level, or alternatively it can focus on individual transparency provisions such as interest and financial disclosure. Agency level assessments include framework analysis to determine the existence of and adherence to a range of international standards, the agency performance review or audit, and independent community oversight. Provision level assessments include process audits and surveys of officials that administer interest and financial disclosure regulations.

Transparency Systems Assessment Method One: Standards and Administrative Simplification

The development of standards for transparency in day-to-day public operations and output measures provide a baseline against which agencies can assess their activities.

Example: IMF ROSC Reports

The IMF publishes *Reports on the Observance of Standards and Codes*, which detail the level of compliance with internationally recognised standards including “accounting; auditing; anti-money laundering and countering the financing of terrorism (AML/CFT); banking supervision; corporate governance; data dissemination; fiscal transparency; insolvency and creditor rights; insurance supervision; monetary and financial policy transparency; payments systems; and securities regulation.”³⁹ As such, the ROSC Reports provide a broad-based assessment of the transparency systems in place in various countries from a third party perspective. Measuring the absence of misconduct, while difficult, makes standards

³⁹. <http://www.imf.org/external/np/rosc/rosc.asp>

especially important. A related area where standards play an important role is in administrative simplification as shown in the example below.

Example: Trade and Transport Facilitation in Southeast Europe

Administrative simplification is an important element of a transparency system and one that lends itself to analysis through output statistics. An example is the Trade and Transport Facilitation in Southeast Europe Programme, a coalition of area governments, the World Bank, US Government and the American College at Thessaloniki⁴⁰. This organisation developed an administrative simplification manual for participating agencies. Specific measures include import and border entry clearance times, reported cases of corruption, and revenue and salary analysis. Setting a standard for administrative efficiency is an important step towards insuring that the public can fairly participate in the government decision-making process.

Example: Chilean Procurement process

Chile has created a state of the art procurement process by making it absolutely transparent to anyone who is interested. All procurements are announced, processed and awarded over a secure Internet site. Objections and questions about the process or awards are also co-ordinated through the web. This system not only provides integrity to the public tender process, but it also reassures the public of its fairness. “Public-ness” is an intriguing way of doing evaluation as it allows the public to provide the evaluation elements by way of their feedback throughout the process. This not only provides a unique evaluation perspective, but it is also relatively inexpensive.

Strengths and Weaknesses of Using Standards to Assess Transparency Systems

Administrative reform can be an important integrity tool if it is effectively implemented. Simplifying systems, writing regulations and policies in common, straightforward language, reducing the number of approvals for any process can have a positive impact on the integrity of government. This is appealing because it makes government both “citizen friendly” as well as gives the citizen more confidence in the integrity of government institutions.

Unfortunately, in many countries there is little effort made beyond modification of laws or policy. Administrative simplification can be viewed as an end in itself, and simplification does not necessarily lead to integrity. It can lead to a consolidation of power in a few hands, and if those few are corrupt the “cure can be worse than the disease.”

Criteria for Success

Standards and simplification can be effective tools if there is a commensurate set of checks and balances. The tendency is to view all checks and balances as potentially redundant, and therefore unnecessary. In fact a few elements, that are independent from one another, and where there are reward systems for ensuring that the system both works and maintains integrity, can be successful. Ultimately, the tests for simplification are citizens who feel that there is both greater responsiveness to their requests and a sureness that the public servant is working on their behalf.

⁴⁰. <http://www.ttfse.org/>

Transparency Systems Assessment Method Two: Agency Audits and Performance Reviews

Transparency issues will arise in both financial and performance audits. The GAO in the US conducts such audits. Hong Kong, along with many other countries has an Independent Commission Against Corruption to review procurement procedures of various departments. Transparency systems can also be effectively combined with codes to provide an effective integrity strategy.

Example: Finland's "Values as Part of the Daily Job" and Management Barometers

Based on a 1998 employee survey, the State Employer's Office created avenues for value-based daily activity and management into the everyday work-life of Finnish civil servants. The idea was to create a system where fundamental public service values could be used as a basic management tool. Managers and executives in Finland are evaluated annually using integrity indicators for themselves and their organisations. Up to one fourth of a manager's performance will be based on their ability to implement values in practice. These are measured through integrity barometers as well as self-assessment tools.

Strengths and Weaknesses of Agency Audits and Performance Reviews in Assessing Transparency Systems and Criteria for Success

Many factors determine the efficiency and effectiveness of agency operations, but in some cases such measurements indicate institutionalised misconduct. Of course, the usefulness of output measurements is limited to the evaluation of those agencies with measurable outputs and even then must be considered relevant only in so far as output is a reliable proxy of outcome. Careful interpretation of the outputs of procurement divisions, customs agencies and law enforcement agencies can shed light on the extent to which transparency requirements are effective.

The more abstract perception indicators used by Finland can answer some of these concerns. First, it ties real time performance to integrity indicators. Second, it utilises employee and stakeholder perceptions to evaluate the "atmosphere" in a department or agency. Third, it ties a large segment of managerial success to their ability to influence that environment by focusing on the highest values of public service.

Transparency System Assessment Method Three: Community Visitors or Advisory Committees

Directly involving the public in the role of an advisory committee improves the dissemination of information to the public, which is particularly useful in the case of technically complex regulation that affects large numbers of people, such as public health and communications policy. In Canada, The Public Advisory Committee of the Health Products and Food Branch reports directly to the Assistant Deputy Minister and the Branch Executive Committee. The Public Advisory Committee was established to improve the flow of information to citizens about health protection issues and facilitate public involvement in the policy making process.⁴¹ Especially in the developing world, NGOs often act independently to monitor large government contracts.⁴²

Strengths and Weaknesses for Community Visits or Advisory Committees in Assessing Transparency System and Criteria for Success

Community visitors or advisory committees can be very effective in lending voice to the average citizens concerns. Their success really depends on how they are selected, their independence, effective

⁴¹. http://www.hc-sc.gc.ca/hpfb-dgpsa/pac_announcement_200211_e.html

⁴². <http://www.greensalvation.org/English/Partners/transparency.htm>

resources, and clear authorities. Unfortunately, it is seldom the case that governments will cede these necessary ingredients to committees or commissions.

Transparency System Assessment Method Four: Surveys

In the case of assessing the effectiveness of specific transparency related measures, such as financial and interest disclosure requirements, surveys provide a useful tool. For example, the US Office of Government Ethics surveyed ethics officials about the workflow and effectiveness of the financial disclosure process.⁴³ One issue to consider while implementing effective transparency measures is that regulations must be understandable. This is significant because surveys can also help determine the extent to which participants understand and interpret reporting requirements and gauge the need for training.

Strengths and Weaknesses of Surveys in Assessing Transparency Systems and Criteria for Success

These surveys can contribute in an important way to understand the administrative processes and problems in asset declaration systems. The weaknesses of such surveys is that they generally ask output questions, for example how many disclosures were collected, how questions were asked or answered based on the disclosures. In the limited sample, no government had ventured to ask questions about the outcome of disclosures. Examples of such measures would include a correlation between the number of negative administrative actions taken because of ethics problems and the number of cleared financial disclosures.

The criteria for success should be both administrative and policy based. Surveys can ensure that ethics asset declarations are being collected and reviewed. As importantly, there should be an assessment that the declarations are revealing and addressing ethics questions that are raised by them. As an example, too often such surveys ask how many declarations were collected, but don't ask how quickly they were reviewed, and how many problems were identified and resolved.

Transparency System Assessment Method Five: Process Audits

In addition to soliciting feedback from ethics officials about the efficacy of the financial disclosure process, the US Office of Government Ethics audits this process in all agencies. To ensure the effectiveness of the process, the agency has legislative authority to issue orders of corrective action to agencies. Such orders are not issued to the ethics official, but to the head of the agency who is ultimately responsible for the ethics programme. If ignored, Office of Government Ethics can hold an administrative hearing examining the inaction of the agency official, and making recommendations to the President (and ultimately Congress) about the suitability of the agency head.

Strengths and Weaknesses in using Standards and Outputs in Assessing Transparency Measures and Criteria for Success

Standards and output statistics, as measurement tools, are less relevant for transparency systems, such as financial disclosure and freedom of information statutes. Submission rates for financial and interest disclosure, the number of requests and the turnaround time for requests under the freedom of information guidelines, for example, may be relevant performance assessments, but understanding the effect of such statutes on the behaviour of government employees is much more difficult. Output statistics fail on several accounts. The context of the output is extremely important because if procedures or regulations change, comparisons are not possible. More importantly, what is captured is output and not outcome. Other methods of assessment are more relevant for financial disclosure.

⁴³. http://www.usoge.gov/pages/forms_pubs_otherdocs/fpo_files/surveys_ques/srvv450questions_03.pdf

Perhaps the most important assessment measure is the institutional framework study, which identifies the existence and enforceability of disclosure statutes. The existence of such regulations, the existence of a review and audit body, frequency of filing, counselling on problems, the existence of real deterrence in the form of jail terms or extensive fines etc. are all involved in the development of an international standard for disclosure regulations.

The primary obstacle to effectiveness access to information is the oversupply of information. Often, agencies will collect large amounts of irrelevant information that will overwhelm any attempt to do a manageable analysis. It is simply not feasible for any public body to adequately analyse all of the information available. In this sense, public scrutiny is an effective method of assessment. The media and interest groups play an important role here by analysing voting records, campaign contributions and financial statements.

Training Systems

Training provides employees with the decision-making tools to deal with situations that fall outside of the most common case studies. Again, the concern here is not specifically what makes up an effective training programme, but rather how an institution knows if its training programme is effective. Assessing the effectiveness of training programmes can be done on several levels:

1. Testing the trainee's understanding of the programme objectives;
2. Trainee's evaluations of trainers;
3. Trainer's evaluations of trainees;
4. Surveys of ethics officials.

Training Assessment Method One: The Trainers and/or Exit Quizzes

To the extent that ethics training is done in person and on an ongoing basis, trainers provide an important source for the evaluation of training programmes. Trainers have the ability to perform qualitative assessments of the participation they receive in classes. Do the participants take the issue seriously? Do participants believe managers take the issue seriously? Are participants simply developing the skills to choose the right answer on an ethics test, or are they gaining a better understanding of the values underlying ethical decisions? Post session feedback from trainers provides an important source of training programme evaluation criteria.

Because of its ease of use and cost effectiveness, online ethics training has become popular. Providing exit quizzes and maintaining minimum requirements is an effective way to ensure that a participant has not just clicked "next" a dozen times until the training session is complete. In researching this paper, it was possible to do just that and "complete" a training session without reading a word of it. A review of unobtrusive measures, such as time per question, could provide an indication of whether participants are taking the training seriously. Alternatively an exit quiz could signal a passing or failing grade. Some online training programmes include an exit feedback questionnaire.⁴⁴

Strengths and Weaknesses in Using Trainers and/or Exit Quizzes in Assessing Training Systems and Criteria for Success

It has been suggested that ethics training should be done early in an employee's tenure and is integrated with other socialisation and training activities. It also stands to reason that one-time training is

⁴⁴ <http://www.tdcj.state.tx.us/ace/ethics/ethics-feedback-form.htm>

probably insufficient when it comes to instilling core values. Measuring compliance with timing and frequency standards is a good place to start, however these measure should not take the place of qualitative assessment of the training programme.

The Office of Government Ethics in the U.S. conducted a survey of 175 ethics officials in various departments regarding ethics training including:

1. Programme successes, problems, and solutions;
2. Satisfaction with guidance and assistance provided by the Office of Government Ethics;
3. Satisfaction with executive branch agency senior management support;
4. Employee satisfaction with ethics training; training objectives; measures of compliance;
5. Effectiveness of training methods; and
6. Effects of budget cuts.⁴⁵

Not surprisingly, most ethics officials reported that their programmes were successful. More interestingly, officials rated the effectiveness of certain training methods and reported that videos and case study discussions were the most effective, whereas distribution of regulations was the least effective measure. They also noted that they had more success when training methods were interactive, fun and convenient.

Communication Strategies

The role of communications strategy of an integrity system is to provide ethics “marketing” on an ongoing basis to all stakeholders. Training programmes can be thought of as a subset of communications efforts and as formal educational opportunities targeting specific employee groups at specific times with specific objectives. In comparison, communications strategies may entail:

- The issuing of ethics related documents;
- Posting related documents in the workplace;
- Reference to the code of conduct in speeches and day-to-day operations;
- Press conferences and any other ongoing effort to elevate and maintain awareness of the organisation’s values.

Assessing the effectiveness of a communications strategy is similar to assessing training effectiveness in that compliance with frequency and timing standards can be measured, but surveying to determine the extent that understanding and internalisation of core values is more important.

For example, South Africa instituted The National Anti-Corruption Initiative in 1999 resulting from the National Anti-corruption Summit and the Public Sector Anti-corruption Conference.⁴⁶ This led to a series of legislative and administrative initiatives but lacked the effort to assess the effectiveness of communicating these issues to the public or public servants. However, it did lead to the creation of a number of innovative offices, including the Public Protector and the Registrar of Assets.

⁴⁵. http://www.usoge.gov/pages/dacograms/dgr_files/1997/etsurvey.pdf

⁴⁶. Selby A M Baqwa, SC, “Anticorruption Efforts in South Africa,” The Journal of Public Inquiry, Fall/Winter, 2001, pp. 21-24.

In 2002, the Office of Government Ethics of Puerto Rico surveyed all of the public employees in the Commonwealth. As part of their strategy to increase the response rate to the survey the OGE PR engaged in a broad media campaign. Using radio, television and newspapers the office did interviews and placed ads to emphasise the importance of getting accurate survey data. In so doing, they also raised significant awareness among non-government employees about their concerns towards the integrity of public servants and a significant increase in telephone calls to their hotlines. The questions were both about reporting suspicious actions and general questions about ethics in government. This was an unanticipated, but potentially effective way of measuring the impact of a communications strategy.

Communication Strategy Assessment Method One: Surveys

Communications strategies generally focus on communicating core values and norms and the application of relevant regulations⁴⁷. To begin with, an organisation must determine if a coherent communications strategy exists at all. Once in place, surveys are a commonly used method of assessment, as seen in Finland, South Africa and Canada. Each of these includes questions aimed at whether employees understand departmental values and reporting procedures on general management performance questionnaires. Some of the relevant survey questions follow:

1. Rate the clarity of the principles of ethics. (Finland 1998)
2. Who would you report problems to? (South Africa)
3. I can clearly explain the values of my department. (Canada)
4. How did you become aware of the Ethics Information Center?⁴⁸ (US OGE)

Other questions regarding the modelling of ethical behaviour by management, frequency of impact with tenets set forth in the code of conduct, and the extent to which day to day practices embody company values may also indicate the extent to which a communications strategy has worked.

One of the newest and most ambitious evaluation and communication strategies has been employed by the Korean Independent Commission Against Corruption (KICAC). Although a recently established agency it has created and used more than ten distinct evaluation systems since 2002. These include client surveys on transparency, quality of service, awareness of municipal integrity systems, fairness of government systems and the role of leadership in the integrity of public servants. These ultimately were used in an assessment model by agency, evaluating each agency's integrity with integrity scores.

KICAC adopted a "naming and blaming" communications strategy releasing performance results to the media using this as a catalyst to encourage voluntary efforts to meet this integrity challenge. The publicness of the strategy also resulted in legislative hearings for any recalcitrant departments.⁴⁹

Strengths and Weaknesses of Using Surveys in Assessing a Communications Strategy

Surveying to determine the effectiveness of a communications strategy has the same strengths and weaknesses as surveying to assess the effectiveness of a code of conduct as described previously. In this

⁴⁷. OECD Public Management Occasional Papers No. 14, "Ethics in the Public Service: Current Issues and Practices" 1996 at <http://www.oecd.org/dataoecd/59/24/1898992.pdf>

⁴⁸. http://www.usoge.gov/pages/daograms/dgr_files/1997/survey.pdf Ethics Information Center Survey

⁴⁹ http://www.kicac.go.kr/?ACTION=english_home

particular case, it can be especially difficult to disentangle the effect of a communications strategy from the effect of a training programme on public servants. However, surveys can provide a distinct perspective from citizens or key NGO private sector groups.

Criteria for Success

As mentioned above, the criteria for success for communications is often tangled in the training strategy. However, if there is an expansion of the survey group to include both stakeholders as well as civil servants, the comparative data will allow a meaningful differentiation between the training and communications strategy.

Counselling

Ethics counselling services include counselling on conflicts of interest and opinions clarifying statutes. The extent to which ethics counselling services are successful can be assessed several ways including independent review of output and client satisfaction surveys.

Counselling Assessment Method One: Independent Review

When an independent ethics body offers opinions on conflicts of interest or interpretation of a statute for a concrete case, a sample of the advice should be tracked and audited. The US Office of Government Ethics does do a sample audit of the advice given on the basis of asset declarations, but this is done only in terms of legal accuracy. There is no attempt to find out if the advice was followed or whether the employee followed the advice. This study did not find a formal process for the review of ethics body counselling, although this is most certainly performed by personal attorneys and the press.

Counselling Assessment Method Two: Surveys

The feedback of those who solicit the advice of counselling agencies is important to assessing their effectiveness, although no survey examples of this type are available to share. For example, was the request turned around in a timely manner? Was the advice given relevant, helpful and objective?

Strengths and Weaknesses of Assessing Counselling Programmes and Criteria for Success

Counselling should be the critical element for any integrity programme. These programmes are designed to prevent corruption, or the perception of corruption, before it occurs. If effective personal counsel counselling is not available the overall effectiveness of the programme is in question. The strength of such programmes is their ability to provide timely and consistent advice for government officials.

The criterion for success is whether public employees believe that they can rely on the advice that is given them. Further, a good counselling system should create an environment of ethics, where employees both know that it is legitimate to ask ethics questions and see it as a regular part of the management system.

Whistle blower Hotlines and Help lines

Whistleblower hotlines and help lines are meant to provide a safe, independent outlet for reporting misconduct and receiving ethics advice. The existence of a hotline alone is presumably preventative, but as in other cases discussed above, measuring the overall efficacy of whistle blower hotlines as a preventative measure is extremely difficult. It is possible, however, to determine if:

1. There is willingness to use the hotlines or if they exist in name only;

2. The cases reported are fairly and efficiently dealt with.

Hotline and Help line Assessment Method One: Surveys

Generally, surveys play an important role as an indirect measure of the effectiveness of ethics programmes. Ethics surveys can take two different tacts. The first is the general societal perception survey. This type of survey emphasises the perception of citizens, groups, or key stakeholders about ethical values and corruption in a country (or state). The more widely used survey targets the ethical culture of the organisation in which people work, exploring the ethical culture and pressures to commit misconduct. These types of surveys can be very useful in targeting the effectiveness of key components of the ethics programme such as hotlines and help lines.

Example: South Africa's Country Assessment 2002

One of the component surveys of South Africa's Country Assessment of 2002 asked employees and managers about their understanding of whistle blowing procedures and their own willingness to report. Willingness to report is an indicator of the perceived level of protection afforded whistleblowers. Training and communication strategies can directly address any gap between perception and actual procedure.

Example: ERC's National Business Ethics Survey 2003

As previously mentioned, the Ethics Resource Center's general U.S. perception survey, despite the title, does include private and public sector, as well as the non-profit community. The survey looks at the role of leaders, supervisors and peers, as well as focusing on how often employees see misconduct, feel pressure to commit misconduct and their willingness (or ability) to report misconduct, thus provides crucial feedback on programme elements such as help lines or hotlines. Variations of this survey have been used by ethics centres in South Africa and Turkey.

In addition, this perception survey can be used as a benchmark for government or agency specific surveys. Although this is common in the private sector, it is seldom used in the public sector. The one major exception was the Puerto Rico's Office of Government Ethics 2003 survey. The agency wanted to consciously benchmark in order to better understand the dynamics of ethics on the island.

Hotline and Help line Assessment Method Two: Stakeholder Analysis

Stakeholder analysis is used to identify and assess the importance of key actors that may affect the programme in question. More specifically, the expectations, perceptions and constraints of each stakeholder are documented and analysed. Such analysis is often done informally as a starting point for any evaluation. A formal and detailed stakeholder analysis can be extremely useful, especially in cases where confidentiality is of the essence. For example, tracking the complaints that enter a hotline system may illuminate how many complaints are being elevated and to whom, on a post hoc basis. A more proactive review of the system would identify the actors in the process and assess their expectations, perceptions and constraints.

A detailed analysis of callers, operators and any actors involved in the various levels of review of complaints can illuminate the observed outputs of the system. For example, a low rate of complaints elevated for review could be due to caller misunderstanding of the purpose of the hotline, limitations on elevation options available to operators, or simply a lack of cases requiring elevation. Stakeholder analysis, not output statistics, will illuminate the answer.

Example: Public Service Human Resource Management Agency of Canada

Stakeholder analysis is particularly useful where surveys and other quantitative analysis is not possible. Canada's Public Service Human Resource Management Agency conducted stakeholder analysis of issues surrounding the disclosure of wrongdoing⁵⁰. Their discussions with complaint processors indicated the need for independent and confidential investigations, as well as improved protection for whistleblowers and measures to protect the accused.

Stakeholder analysis is an important first step to an in depth process review. By analyzing the perceptions, expectations and constraints on the relevant actors, it is possible to understand how the participants in a process are shaping the outcome of it. Furthermore, by identifying gaps between perceptions and expectations and by documenting the constraints on actors this tool provides the foundation for a plan of action for managers wishing to improve the process in question.

Strengths and Weaknesses of Assessing Help Lines and Hotlines and Criteria for Success

Assessing the effectiveness of the hotlines in terms of either providing counselling to whistle blowers or efficiently and responsibly investigating the issue reported can be done in a number of ways. First, client feedback, while complicated by the anonymous nature of some reports, can be collected. Next, many unions encourage members to file a simultaneous report with them in order to maintain an independent record for comparison with official action. Other, perhaps even more independent, tracking procedures could be devised. In fact, for high profile cases, the press often plays this role.

Co-ordinating Ethics Bodies

The existence of a co-ordinating ethics body in itself can be an assessment of the effectiveness of a country's integrity system. However, even when such a body exists, determining a reliable method to assess the assessors is critical. Co-ordinating bodies often fill a number of roles, including acting as a watchdog agency, counsellor and promoter or marketer of ethics standards.⁵¹ Having already discussed counselling and communications strategies, focus is on assessment of the co-ordinating body's role as a watchdog agency and their overall assessment.

Co-ordinating Ethics Bodies Assessment Method One: Legislative Oversight

Ethics bodies must be accountable to a legislative body with respect to operational and financial performance. Legislative hearings, where the ethics body reports on its progress toward its performance goals and its budget performance, should be held regularly and publicly. Most co-ordinating bodies are obligated to publish Annual Performance Reports and/or testify before a legislative body regarding their performance. For example, the U.S. Office of Government Ethics issued public annual reports to Congress from 1989 to 1999. Since that time data has been gathered but not publicly released. Canada's Ethics Counsellor regularly reports to Parliament, as does the Committee on Standards in Public Life in the United Kingdom.

Co-ordinating Ethics Bodies Assessment Method Two: Self-Assessment

The US Office of Government Ethics publishes a self-assessment of their progress toward reaching their annual performance goals in the aforementioned Annual Performance Report. In the United Kingdom the Committee on Standards in Public Life has its own code of conduct, publishes performance goals and progress, and publishes its financial performance in an annual report.

⁵⁰. http://www.tbs-sct.gc.ca/pshrmac-agrhfp/rep-rap/wgdw-gtdaf5_e.asp#34

⁵¹. Ibid.

Co-ordinating Ethics Bodies Assessment Method Three: Independent Audits

New South Wales' Independent Commission Against Corruption appoints independent auditors every three years to assess processing of complaints, financial performance and the control of formal investigations.⁵² In many countries around the world, inspectors general (or those who are responsible for such a function) do management audits of ethics programmes. In Turkey and the United States this is done through the individual agency responsibility of each Inspectors General, while in Chile government wide inspectors general do this. Sometimes supplementing this oversight is the supreme auditor in a country who takes legislative responsibility for auditing ethics agencies.

The Auditor-General of Poland also undertakes some risk assessment of integrity systems. However, it is not clear as to the extent of the current approach. Risk assessment methodologies can be one of the more effective approaches in reviewing output measures. However, good risk management assessment requires a fairly sophisticated quantitative background requiring vector analysis and often factor analysis of discrete interval level variables.

Co-ordinating Ethics Bodies Assessment Method Four: Public Scrutiny

Common to most co-ordinating bodies is a commitment to detailed reporting of activities online. This enables media and public scrutiny of the agency's activities. Most government ethics offices have a presence on the worldwide web. However, there has been no attempt to evaluate these, or create a portal to take advantage of cross-government institutional knowledge.

Co-ordinating Ethics Bodies Assessment Method Five: Surveys

One goal of a co-ordinating body is to facilitate the process of harmonisation among agencies regarding ethics related procedures. The only method uncovered that is used to systematically assess progress on this front is the interagency questionnaire discussed previously, the Queensland National Integrity Systems Assessment (NISA) report. Intended to assess the effectiveness of Australia's National Integrity Systems at Commonwealth, state and territory level and also in the business sector, NISA was launched first in Queensland and findings have been published on the Internet as the Queensland NISA Handbook⁵³

Strengths and Weaknesses in Assessing Co-ordinating Ethics Bodies and Criteria for Success

There is very little attempt to assess the various co-ordination roles among the integrity functions and other anti-corruption agencies despite what seems to be an obvious area for evaluation. There are obvious issues of competition for scarce resources, but it would seem that everyone benefits from a clearer picture. In more complex systems there are competing integrity systems, and there appears to be little interest in evaluating how they impact one another. For example, in one agency in a large government there is a government ethics office, a research ethics office, business compliance and integrity office, and a clinical ethics office.

Control and Enforcement

While this paper focuses on preventative measures, the effectiveness of any integrity system component is dependent on the likelihood of punishment for misconduct and the enforceability of statutes once a violation is known. The Ethics Resource Center's NBES 2003 found that employees were more

^{52.} http://www.icac.nsw.gov.au/files/pdf/pub2_15a.pdf (p.77)

^{53.} <http://www.transparency.org.au/NISA.html>

likely to report ethical misconduct if they thought something was going to be done about it. Thus, if employees feel that those who violate the code will be punished, compliance with an organisation's code of conduct will increase. Often this discussion of punishment is mistaken for severity. Actually, it is the sureness that a penalty will occur and how quickly it occurs that affects behaviour. The Philippines has capital punishment for "public plundering" but as it is never enforced it provides little deterrence. On the other hand, governments that punish misconduct immediately with penalties such as reduction in pay or a day off without pay, appear to have more success with compliance.

A discussion of the methods to measure the effectiveness of control and enforcement mechanisms deserves its own work. Comments are limited to the obvious; for each case or type of violation, it should be clear who will conduct investigations, how they will go about it, how administrative violations will be distinguished from criminal violations, and in what way violations will be punished. The goal of an integrity system is to instil shared values that will prevent misconduct, but to achieve this goal control and enforcement mechanisms must be present and effective. Unfortunately, much of this falls outside the scope of the discussion.

Report Cards

External reviews and report cards provide an important check on the potential bias of internal assessments. The Maxwell School Government Performance Review provides a good example of a review that rates the management capacity of city, county and state governments in the U.S.⁵⁴ however; none of these report cards include ethics or integrity. In a recent article published in the Public Performance and Management Review titled *A Report on Report Cards*, over forty different report cards, assessing various government programmes and policies, were critiqued with equally disappointing results.⁵⁵ Report cards could serve as ideal vehicles for external assessment if governments could get researchers interested in issues of integrity.

Conclusion

There are many obstacles to the successful assessment of integrity system components. The nature of these obstacles is such that there is an important role for multilateral organisations. However, there first must be recognition of the importance of assessments to integrity programmes, and how to communicate this need to governments. Consensus, rather than mandate, is critical to the success of such an endeavour. Experience has shown that mandates produce iconic measures designed to please the external evaluators rather than measure the actual effectiveness of the programme. If ethics programmes are to be of value, internal evaluation measures should be part of on going operational processes and seen as a natural part of programme management.

In outlining some of the assessment methods that are currently being used around the globe, several challenges to effective evaluation have become apparent.

1. First, the ethics practice is young. For most countries in the world it is little more than a decade old. For that reason there is no general agreement on a common language⁵⁶, or a broad concurrence on set of standard system components. Within this discussion there must be a

⁵⁴. <http://www.maxwell.syr.edu/gpp/about/goals.asp>

⁵⁵. Public Performance and Management Review, *A Report on Report Cards* by Charles K. Coe, December 2003, Volume 71, Number 2.

⁵⁶. The recent OECD report, *Managing Conflicts of Interest in the Public Service*, is an attempt to develop a more common vocabulary.

recognition that a broad based integrity system -- with prevention as it's focus -- is a recently arrived at paradigm. For that reason, the concept of evaluating the components is even newer. So it is not surprising that evaluation instruments, as well as what is to be evaluated, vary widely in the international community. Where one country emphasises evaluating the effectiveness of training, another will focus on how effectively public servants understand the code of conduct. Even within each of these evaluation issues there is wide variance as to *how* a component should be measured. For example, training is measured through questions that emphasise technical understanding, application, and even whether the individual enjoyed the course. Therefore, it is also clear that there is not one, uniform system of evaluation even within governments, and sometimes ministries. The variance is in some large part due to a lack of consensus as to what government agencies are trying to measure. Because of this there is an emphasis on discrete elements of the programme, rather than having an evaluation that takes into account how all of the pieces of an integrity programme fit together.

2. Secondly, as is the case in most countries, responsibility for evaluation is decentralised. In all of the research no one, single entity responsible for the evaluation of all elements of an integrity system was found. Even the "governing" agencies such as ICAC in Hong Kong and Australia, the US Office of Government Ethics or the Registrar of Assets in South Africa are only responsible for a part of the overall evaluation. And often, even in the most sophisticated systems, there is very little actual evaluation.
3. Third, the incentive structure for integrity systems is often upside down. That is, in many ways it is in an agency's best interest not to know whether they are effective or not. Any critical report can bring unwanted legislative or executive oversight, and in the worse case a reduction of funding. For this reason, care must be taken to ensure that the incentives for valid evaluation outweigh the incentives for the appearance of success to any overseeing body.
4. Fourth, there is a persistent belief that given the nature of ethics programmes effective evaluation is not possible. The argument generally made is that since ethics programmes are designed to prevent something before it occurs, one cannot measure something that does not happen. This is a variation on the proverbial "if a tree falls in the forest and no one is around, does it make a sound?" So the conclusion drawn from this belief system is that gross measures of corruption (arrest rates, monies recovered, etc.) are not meaningful measures of the effectiveness of ethics programmes. This myth usually persists because of a lack of evaluation skills and the false assumption that if something cannot be directly measured, it cannot be measured at all. In fact there appear to be a number of robust indirect measures that, collectively, give a clear picture as to the success of ethics programmes, including surveys, stakeholder analyses and public hearings.
5. Finally, organisations continue to focus on observable outputs as opposed to outcomes in their evaluation of programme effectiveness. It is much easier to count how many people received training, how many asset declarations were filed and how many hotline calls were received. This echoes of the analogy of a man who lost his car keys in a dark alley but insists on only searching for them directly under the streetlamp. Outcome measures would redirect attention to more appropriate concerns, such as whether public officials could apply ethical principles they learned to specific circumstances. What is needed is a much more nuanced approach that addresses the relationship between outputs *and* outcomes in order to get an effective understanding of the successes and vulnerabilities of ethics programmes.

Of the challenges mentioned above, lack of a standard, the disincentive to succeed (i.e. an incentive not to uncover and/or publish ethical issues, particularly if solutions are not readily available), and over reliance on observable outputs all point to an important role for multilateral organisations. This paper has

identified only some of the key assessment strategies in use, but there remains an important gap between what is described here and a reliable plan of action for assessment. With the wide variance within integrity programmes it would be impossible to develop a set of standard measures. However, this problem does not preclude developing a framework that identifies the critical institutional elements of an ethics programme and examples of efficacious measures.

Recommendations

Ethics programmes seem to be struggling around the issue of effective evaluation. If they are to survive as deterrence systems, they must be able to demonstrate their efficacy. Multilaterals can provide a lifeline so that the organisational leaders, as well as the political leadership, can better understand how to measure impact, to distinguish success from failure. The potential role for multilaterals in this regard is multifold:

1. The first responsibility for a multilateral is to provide a primer for governments that describes legitimate methods for using secondary measures of performance of anti-corruption systems -- their advantages and disadvantages. Until there is common acceptance of the advantages of such measures, they will never be put into place and, without them, there is little chance of evaluating the various elements of an integrity system.
2. Second, multilateral organisations can help to eliminate the dangerous misconception that integrity programmes cannot be accurately evaluated. In so doing they can help identify valid and reliable indirect measures thereby promoting the secondary measures as legitimate techniques for evaluating integrity systems.
3. Third, they can use this paper as a starting point for developing a catalogue of effective evaluation techniques. Such a catalogue would emphasise that no “one size, fits all”, yet programmes can learn from how other programmes have approached evaluation problems.
4. Next, there would be considerable value in creating evaluation instruments that can be modified for use in a variety of settings. Such instruments should contain concrete examples of evaluation frameworks for each of the elements of an integrity programme and explain interrelations between elements (e.g. the importance of a code of conduct to inform effective reviews of asset declarations) as well providing examples of surveys and aggregates analyses.
5. To accompany the above resources, it would be useful to provide an in-depth analysis of effective evaluation strategies along with case studies would allow others to learn the details programme evaluation elsewhere. For example, a systematic analysis of survey methodology intended for the assessment of an organisation’s ethical climate could allow organisations to learn from past successes and failures. Such an endeavour should highlight failed and ineffective methods of assessment by way of providing bureaucracies with a list of methods to avoid.

The goal would be to prepare a toolkit of evaluation instruments that could be modified for use in a variety of settings. This toolkit would include a discussion of how to determine which method is appropriate for each setting. For example, the Puerto Rico Public Servant Survey of 2003 is an excellent model for the evaluation of ethics in public service provision but may not be appropriate for a particular agency. Evaluation techniques will differ from programme to programme and agency to agency. A multilateral could play an important role in helping organisations navigate this decision-making process and providing model programmes for consideration.

Improving the value of integrity systems requires evaluation of their effectiveness, which, in turn requires willingness to self-evaluate, and the implementation of secondary methods of assessment. The

OECD and other multilateral organisations have a singular and critical role to play in facilitating the sharing of information about successes and failures in integrity system assessment and providing a framework for implementation.

The OECD, among other multilateral organisations, has a unique position and capability to accomplish this. Because it has a finite set of members, most of which have robust integrity systems, it can easily develop the critical components discussed above. In addition, because of the existence of SIGMA (Support for Improvement in Government and Management), it can simultaneously use these newly developed integrity systems as laboratories for testing effective evaluation.

For a number of reasons citizens, governments, NGOs, and multinational organisations have an investment in the success of integrity programmes. They are the natural compliment to anti-corruption enforcement, and arguably effective enforcement cannot occur without an effective ethics programme. Knowing what is effective is the key here. And evaluation is the only way to open that door into insight.

For that reason, assessment should be a natural part of any integrity programme, but currently it is seldom the case. Multilaterals can provide the tools and the discipline to achieve this, and avoid the degeneration of these corruption prevention programmes. As Victor Hugo wrote:

He who every morning plans the transaction of the day and follows out that plan, carries a thread that will guide him through the maze of the most busy life. But where no plan is laid, where the disposal of time is surrendered merely to the chance of incidence, chaos will soon reign.

Multilateral Reports and Websites
<p>OECD Ethics and Corruption Prevention in the Public Service http://www.oecd.org/gov/ethics</p> <p>TI Sourcebook http://www.transparency.org/sourcebook/index.html</p> <p>Queensland NISA, July 2001 http://www.transparency.org.au/documents/QNISA_report.pdf</p> <p>Business Integrity Systems in Australia http://www.transparency.org.au/documents/Bisareport.pdf</p> <p>International Institute for Public Ethics www.iipe-online.org</p> <p>Word Bank www.worldbank.org/publicsector</p> <p>IMF - Reports on the Observance of Standards and Codes http://www.imf.org/external/np/rosc/rosc.asp</p> <p>UN www.undcp.org/crime_prevention.html</p>
Australia
<p>Annual State of the Service report includes an evaluation of compliance with code of conduct and implementation of values statement. http://www.apsc.gov.au/stateoftheservice/2002/chapter03.htm</p> <p>Department of Health and Ageing focus groups on code of conduct http://www.ageing.health.gov.au/workforce/code.htm</p> <p>Focus groups test “Embedding APS Values” http://www.apsc.gov.au/conduct/</p> <p>Public Service Commission (APSC) is responsible for monitoring agency performance and ensuring compliance with the code of conduct http://www.apsc.gov.au/ .</p> <p>Legislation co-ordination division of Attorney General’s office is responsible for promoting the anti-fraud policy and the Commonwealth legislation enforcement commission submits an annual report on agency fraud prevention efforts http://www.tbs-sct.gc.ca/veo-bve/theethicsinfrastructureinthepublicadministration_e.asp</p> <p>Annual NISA maps the elements of an integrity system “Identify analyze and record the institutions, laws, procedures, practices and attitudes which increase transparency and accountability and inhibit corruption” http://www.transparency.org.au/documents/QNISA_report.pdf</p>
Canada
<p>Treasury Board of Canada Secretariat (TBS) Management Accountability Framework (MAF) The management accountability framework is a framework for assessing the quality of management results, leadership, people management and organisational environment. Here in addition to building a healthier more effective workplace, the idea is that a broader assessment of management ‘performance’ could go a long way toward eliminating abuses before they start.</p>

http://www.tbs-sct.gc.ca/maf-crg/maf-crg_e.asp#Introduction .

Treasury Board of Canada Secretariat

http://www.tbs-sct.gc.ca/pubs_pol/hrpubs/tb_851/siglist_e.asp

Office of Public Service Values and Ethics, Human Resources Management Agency of Canada

http://www.tbs-sct.gc.ca/veo-bve/index_e.asp

Report of the Working Group on the Disclosure of Wrongdoing 2004 that was issued by the Public Service Human Resource Management Agency of Canada -- A report on the findings of a working group investigating the effectiveness of the 'whistleblower' reporting procedures in Canada in the wake of several high profile incidents. The group conducted stakeholder analysis including members of the public service executives' professional organisation, senior officials in foreign governments

http://www.tbs-sct.gc.ca/pshrmac-agrhfpc/rep-rap/wgdw-gtdaf_e.asp

Learning Advisory Panel survey of middle managers – ethics related results are in the Auditor General's report

Specific methods to assess the risk of privacy violations -- privacy impact assessments http://www.tbs-sct.gc.ca/pubs_pol/ciopubs/pia-pefr/paipg-pefrld2_e.asp#2.Purpose. Link to a list of resources used by the working group on whistle blowing: http://www.tbs-sct.gc.ca/pshrmac-agrhfpc/rep-rap/wgdw-gtdaf10_e.asp#8 .

Department of Defense Ethics Programme - 2000 survey of military and civilian personnel seeking to provide a baseline assessment of values used values that personnel think ought to be used, personnel expectations of the ethics programme and an assessment of ethical concerns.

http://www.dnd.ca/ethics/pages/home_e.htm

Office of Ethics Counsellor <http://strategis.gc.ca/ethics>.

Annual report - <http://strategis.ic.gc.ca/epic/internet/inoec-bce.nsf/vwGeneratedInterE/oe01417e.html>

Overview of Values and Ethics in the Public Sector in the annual report of the Auditor General

<http://www.oag-bvg.gc.ca/domino/reports.nsf/html/0012ce.html>

Tait report provided an overall "state of ethics in Canada's government" and made recommendations. An important outcome of the Tait report was a 'dialogue initiative' promoting dialogue about ethics and values within the government

http://www.ccmd-ccg.gc.ca/Research/publications/html/tait_e.html

Columbia

2002 Integrity Index for Public Institutions - measures the risks of corruption in various institutions on a 0 – 100 scale

Finland

OECD and Finland surveyed public employees and managers as to the effectiveness of ethics related measures. 1998 Survey of top management and personnel from 170 agencies focusing on changes in values of governance, principles of civil service ethics, unethical practices and factors affecting civil service ethics (1998)

United Kingdom

Committee on Standards in Public Life Reports generated from committee hearings and independent scrutiny

<http://www.public-standards.gov.uk/>

Focus group assessment of conduct in public life

<http://www.natcen.ac.uk/publications/Final%20draft23.pdf>

Ethics and standards for the Home Civil Service

<http://www.cabinetoffice.gov.uk/central/index/cse.htm>

Puerto Rico
Survey of public servants – http://www.ethics.org/releases/nr_20031027_prsurvey.html
South Africa
Corruption Assessment Report by UN and Department of Public Service Administration http://www.gov.za/reports/2003/corruption.pdf
Manikor Omnibus Study Measures perception of “maintaining transparency and accountability”
United States
Official Site www.usoge.gov
Overview of US OGE http://www.tbs-sct.gc.ca/veo-bve/theethicsinfrastructureinthepublicadministration_e.asp
Ethics Resource Center http://www.ethics.org

Figure 8. Management Accountability Framework in Canada



REVIEW ON ASSESSING EFFECTIVENESS OF INTEGRITY AND ANTI-CORRUPTION MEASURES IN THE KOREAN PUBLIC SERVICE⁵⁷

Introduction

Good governance requires proper assessment, and policies promoting integrity and countering corruption are no exception. Defining adequate approaches and developing appropriate frameworks for assessing the impacts of integrity measures is an emerging priority in OECD countries to see the effectiveness of their policy in this critical area. As the recent OECD report *Managing Conflict of Interest in the Public Service* concluded, one of the weakest point in pro-integrity efforts is the lack of assessment of impact. However, it has become essential and a growing priority to provide feedback on measures that have already been implemented.

Research on the Korean experiences was conducted as a pilot project to serve as a reference for future country reports on approaches, methodologies and processes for assessing the effectiveness of integrity and corruption prevention programmes. The overall objectives was to support governments' understanding of possible approaches and methods for assessing integrity measures.

Scope and method of the survey

The main focus of the survey was to:

- Identify the type of mechanisms for corruption control that exist in Korea.
- Compare and analyse methodologies that are used in Korea and in selected OECD member countries.
- Contribute to the development of a sound assessment framework based on good practice.

This case study compares key components and phases of assessment methodologies implemented by the Korea Independent Commission Against Corruption (KICAC) and the Seoul Metropolitan Government (SMG) through:

- Researching current efforts and practice tools.
- Conducting interviews with people involved in assessment efforts within the Korean Government and through questionnaires.

⁵⁷. The survey research was undertaken by Seong Youn Kim, Director, Korean Civil Service Commission. Seong Youn Kim was seconded to the OECD to prepare the draft of the study that was reviewed by Korean officials in July 2003 and was also commented in written procedure in the second half of 2003.

MECHANISMS FOR CORRUPTION CONTROL IN KOREA

Country Context

Corruption is a symptom of systemic failure that cannot be isolated from the social and economic context. The first chapter reviews the main factors influencing integrity and corruption prevention efforts in Korea.

Government-led development

Thanks to government-driven development, Korea accomplished an economic miracle at surprising speed. However, the growth of its economy driven by the State was achieved in conjunction with big business groups that had vested interests, which caused triangular alliance among politicians, business people and government officials. In addition, due to excessive regulation in the process of government-led economic development, politicians solicited campaign funds from conglomerates in exchange for offers of privileged business opportunities, thereby causing political corruption.

Socio-cultural legacy

The Korean administrative system stems from the age-old traditional political culture in which government interests took precedence over public interest on the basis of a tradition of centralisation, closed administration and authoritarianism. Coping with corruption of superiors was extremely difficult in the context where authoritarianism and governmental supremacy have long controlled the Korean administrative culture and thereby facilitating corruption.

Civil Service Career System

The Korean administration is traditional professional bureaucracy with political neutrality that was based on a merit system. Korean civil servants are recruited through highly competitive examinations with a guarantee of lifetime employment. This system substantially contributed to maintaining integrity and raising prestige and professionalism in the civil service. Assurance of lifetime employment provides government employees with job safety in exchange for low salaries. However, the civil service was also criticised for lacking motivation for productivity and tending to compensate low salaries with honorariums for preferential treatment in implementing the policy.

Changes in public management and governance

Over the last two decades, fundamental changes have occurred in Korea and to meet the needs for reform, the Government of Korea adopted elements of the new public management paradigm as a strategic tool for government reform. These initiatives encouraged decentralisation and a small but effective government. In particular, it emphasised transparency with the aim of reducing information asymmetries between public institutions and citizens. As part of these efforts, the Government took reform measures to enhance integrity by opening up the administration through the introduction of transparency measures, such as the OPEN system.

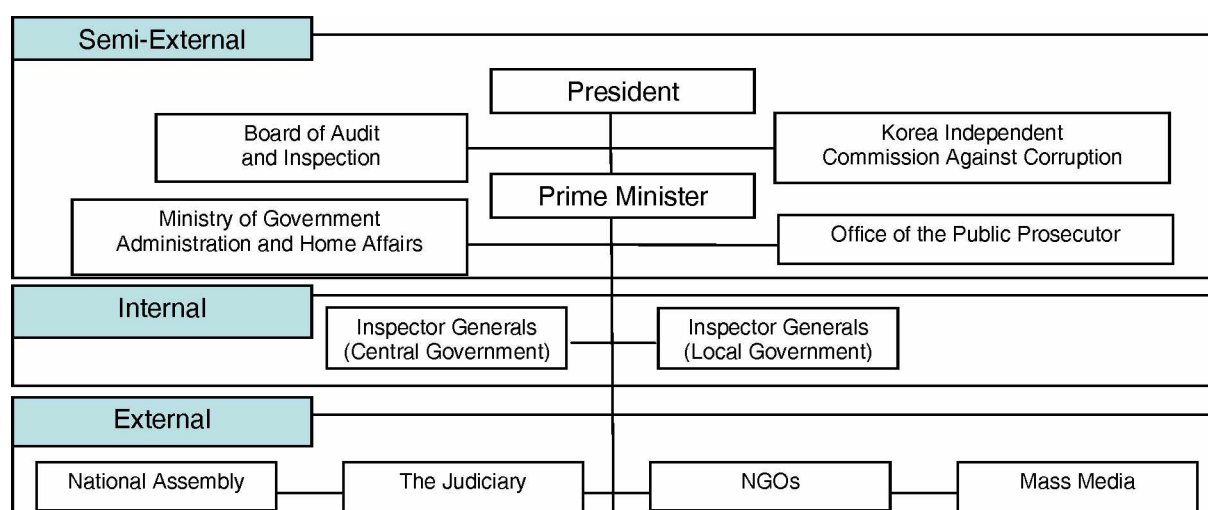
Principal Actors

Control Mechanism

Currently, the corruption control system is composed of three types of anti-corruption organisations which fall into three broad categories: external, semi-external and internal.

- External Control System: National Assembly, the judiciary, non-governmental organisations, mass media.
- Semi-external Control System: The President's Office, the Prime Minister's Office, the Board of Audit and Inspection, the Korea Independent Commission Against Corruption, the Office of the Public Prosecutor, Ministry of Government Administration and Home Affairs⁵⁸.
- Internal Control System: Inspector Generals in each central government organisation and local government organisation.

Figure 9. Principal actors



The Office of the President and the Prime Minister's Office -- These two offices are in the centre of preparing anti-corruption strategic plans and make strategic analysis of the policies implemented by administrative agencies. From a government-wide perspective, they also co-ordinate and monitor policies and programmes for promoting ethics and countering corruption implemented by the administration.

The Board of Audit and Inspection (BAI) --As a government agency regulated by the Constitution, the BAI functions as the supreme audit institution under the President. The BAI retains independence in performing its day-to-day functions. Its responsibilities include audits of all public expenditures and inspection of government operations and the performance of duties of civil servants.

Korea Independent Commission Against Corruption (KICAC) – KICAC was established in 2002 under the President as an independent and politically neutral organisation. It integrates and co-ordinates

58. The Financial Supervisory Commission, the Fair Trade Commission, the Tax Service, the Customs Service and the Defence Security also play a role in obtaining information and detecting corruption.

the activities of various anti-corruption organisations. As a dedicated anti-corruption agency, it seeks to improve the legal framework for anti-corruption, formulate and enforce anti-corruption laws and policies, implement the whistle-blowing system and also enhance public awareness of anti-corruption policies.

The Office of the Public Prosecutor (OPP) – Public prosecutors working within the criminal justice system carry out the following three functions:

- Investigation;
- Prosecution; and
- Related activities to detect crimes and to enforce sentence.

Public prosecutors are vested with sole authority and responsibility for carrying out criminal investigations, the police is required to conduct such investigations under the direction and instruction of the public prosecutor.

Ministry of Government Administration and Home Affairs (MOGAHA) – Within the executive, among a variety of functions, it plays several ethics-related roles such as audit and inspection of local autonomous bodies, investigation of civil petition, management of registration of civil servants' assets and public disclosure system, and operation of Central Disciplinary Action Committee.

Inspector Generals at the central and local levels – They inspect government organisations, affiliated organisations and subsidiary organisations. Inspector Generals also resolve petitions within these organisations.

Independence and co-operation

While control mechanisms appear too fragmented and excessive, this system is criticised for being the cause of inefficiency in eradicating corruption. Moreover, public officials are likely to be very self-protective in implementing the policy. The Government has adopted a co-operative system rather than create a single powerful agency, although the success of Hong Kong and Singapore was discussed and concern remained that a single agency is likely to be overpowered by its very nature and also has the potential to abuse of vested power. This is why the KICAC has no investigative authority.

KICAC, as the newly created central anti-corruption agency, began with high expectations, although its actual functions, such as the limitation of investigative authority, also take into consideration the notion of checks and balances in the political system. If KICAC had investigative authority, its assessment or advisory role would be a compulsory policy recommendation in practice. In the Korean context this would mean over-exercise of public power that would also be contrary to the ongoing decentralisation movement. Consequently, KICAC must co-operate with the Office of the Public Prosecutor in investigations. The functions of KICAC are still under discussion. Procedure for individual case management in dealing with corruption is outlined in Annex 1.

In this context where lack of trust among organisations and fragmentation are the major problems special attention has been given to enhance co-operation, including the following measures:

- Horizontal movement of experts.
- Exchange of information on corruption cases.
- Working jointly on individual corruption cases.

- Sharing information and ideas on policy proposals⁵⁹.

The Office of the President also plays a crucial role in sharing information, namely when organisations do not wish to share information with another organisations. When the Office of the President obtains information of a corruption case, it forwards this information to the appropriate agency to process the case.

Anti-corruption policies

All the administrations in the history of Korea have pledged to stamp out injustice and corruption. Especially at the time of inauguration, new governments announced their strong commitment to fight against injustice and corruption. These were more formalities, slogans, efforts to prolong their stay in power and ingratiate themselves with the public rather than practical measures to eradicate corruption.

The Government recognised corruption as one of the major factors that brought about the 1997 economic crisis, and declared “War on Corruption” and announced “Comprehensive Measures for Corruption Prevention” with the involvement of the civil society.

In recent years, the Government has adopted a new approach to fight against corruption, with a more comprehensive, systematic and well-planned strategy. Key elements of this new approach are:

- Building an anti-corruption infrastructure -- such as disclosure of personal assets and liabilities, protection of whistle-blowers.
- Using scientific methodology -- such as assessment of integrity and introducing perception surveys.
- Promoting public awareness -- with a variety of participatory programmes; and
- Putting equal emphasis on prevention and sanctions -- strengthening both elements in a comprehensive manner.

Central government initiatives

At the central level the newly created KICAC adopted an extensive and systematic approach to perform its four major functions: policy formulation and evaluation, making recommendations for institutional improvements, handling cases that involve whistle-blowing and government-wide educational and promotional activities.

Institutional Improvements: Protection and Reward

Protection of whistle-blowers -- KICAC took legal and institutional measures to protect whistle-blowers from reprisal in order to facilitate whistle-blowing of corrupt public officials.

Reward system -- If a whistle-blower brings material benefits to a related public institution, or prevents a possible loss, the related whistle-blower may receive a reward of up to 200 million won.

One year after the whistle-blowing legislation came into effect the protection system in operation is considered to be a prominent measure for eradicating corruption. The corruption exposure rate in whistle-

⁵⁹. *Anti-corruption systems of Korea: The efforts to balance independence and co-operation among anti-corruption agencies* presented by Wook Bong in Global Forum 3, May 2003.

blowing cases (referred for investigation authorities by KICAC after initial examination) was 67% in 2002, higher than the 56% for general reports. Total fines collected in whistle-blowing cases were approximately 50% higher than that amount from general reports. Encouraged by this result, KICAC is working on promoting concrete measures to strengthen key corruption control functions of the whistle-blower protection system, particularly assessing policy implementation and making concrete recommendations for improvement, promoting awareness through educational outreach⁶⁰.

Policy formulation and evaluation

Basic Plan for Corruption Prevention – In 2002 KICAC established a Basic Plan for Corruption Prevention for public agencies. This long-term policy plan regarding political, administrative, and corporate sectors has been under implementation. KICAC works to ensure that public agencies comply with its policy directions and make voluntary efforts to fight corruption.

Integrity Perception Index (IPI) for Public Agencies – KICAC annually measures IPI for public agencies to take scientific and systematic approaches to anti-corruption. In 2002, KICAC ranked 71 central government agencies and public corporations according to their IPI. This endeavour aims at promoting anti-corruption efforts and detecting corruption-prone areas to provide solutions.

The Code of Conduct for Public Officials – The Code, established by Presidential Decree, was designed to provide guidelines for public officials. The Code can be used as a reference when public officials face situations that demand ethical judgment. It also specifies sanctions to help public agencies to deal with violations. Offenders face disciplinary measures such as having their identities made public, put on record and attached to application for future posts.

Citizen participation programme

Clean Korea 21 -- A good example of building coalition between the public sector and civil society groups was the "Clean Korea 21" initiative under which the National Commission for Rebuilding Korea, the Transparency International Korea, the Public Corporations Association and the Federation of Korean Industry have identified and publicised best anti-corruption practices.

Meetings with stakeholders -- KICAC holds a meeting involving the President and citizens on the assessment of ethics programmes at the end of each year. This meeting also identifies good practices and support the dissemination of information on lessons learned.

Co-operative training programme with citizens -- KICAC institutes a pool of lecturers which consists of government officials and NGOs and assists the training programme of other public organisations.

Local government level: Seoul Metropolitan Government

The Seoul Metropolitan Government declared "All-out War on Corruption" on Mayor Goh's inauguration in 1998. An all-out effort was initiated to enhance high standards of ethics and performance of the city administration to recreate it "as transparent as crystal". They adopted a systematic approach, simultaneously pursuing four major lines of action: preventive measures; punitive measures; ensuring transparency in administration; and enhanced participation from the private sector.

⁶⁰. KICAC News Brief, Feb-April, 2003.

Preventive Measures such as deregulation -- Seoul is promoting deregulation in all areas of administration through eliminating unfounded regulations and clarifying unclear conducts. Seoul City organised the "Regulation Reform Committee" comprising city officials and reputable citizens. The Committee is a prominent element of the public-private co-operation that facilitates the reform process.

Punitive Measures such as the Corruption Report Card to the Mayor -- This system was initiated by the Mayor to ensure the principle of zero tolerance for corruption across the entire city administration. Return postcards are distributed to those who have business with the city government in areas prone to corruption and these cards are also systematically placed in the city and in all district civic affairs offices in order to receive direct feedback from citizens (including reports of corruption and proposals for improvement). The Mayor reads all postcards received and ensures that every wrongdoer is properly punished.

Ensuring transparency in administration by operating an OPEN System (Online Procedures ENhancement for Civic Applications) -- The Seoul Metropolitan Government introduced the OPEN system as an advanced measure to prevent corruption through ensuring transparency in city administration. This system make public on the Internet those administrative procedures closely related to civic life to satisfy citizen's right to be informed and to prevent corruption.

Citizen Participation Programme such as the Citizen Ombudsman System and the Direct Dialogue Channel -- The Citizen Ombudsman System is operated for citizens who have received unjust administrative treatment. Two citizens are appointed as 'citizen ombudsmen' to hear civic affairs and investigate cases. In addition, various channels of direct dialogue are available between citizens and the Mayor, including hot-lines, e-mails, and regular hearing such as "the Mayor's Saturday Date with Citizens".

APPROACHES AND TOOLS FOR ASSESSING INTEGRITY

Evaluation of anti-corruption programmes

Case 1: National evaluation of corruption-prevention initiative and results by KICAC⁶¹

Legal basis -- Pursuant to the Anti-Corruption Act and the Enforcement Decree of the Act, KICAC has a statutory responsibility to evaluate the implementation of corruption-prevention initiatives in public organisations. Paragraph 2 of Article 11 of the Anti-corruption Act says, the Commission shall perform the following activities:

Surveying the actual state of the policy and evaluating progress taken to prevent corruption in public agencies.

Objectives -- The overall objectives are to diagnose precisely government's efforts in anti-corruption initiatives and analyse their impact. A complementary objective is to proactively analyse problems as well as devise solutions to problems encountered in the course of implementing ongoing corruption-prevention initiatives.

Timeframe -- Since 2002, KICAC has conducted the evaluation project on a regular basis. The timeframe was divided into three phases:

- Phase 1 -- Commissioning a specialised institute to determine initiatives to be evaluated, developing an evaluation model and analysing the results;
- Phase 2 -- Conducting paper-based and on-site evaluation of implementation;
- Phase 3 -- Analysing final results and reporting the findings.

Procedures -- As a first measure, KICAC formed the 'Policy Measures Evaluation Council' consisted of external experts to ensure fairness and objectivity in the evaluation process. The Council is responsible for general planning of the evaluation as well as coaching and supporting KICAC with the actual implementation.

KICAC then used an independent research institute, the 'Korea Institute of Public Administration' (KIPA) to establish basic plans for the evaluation, to select initiatives to be evaluated and develop evaluation metrics. The Korea Institute of Public Administration appointed 19 examiners then began the analyses of selected programmes through both paper-based and on-site assessment. At the final stage, KICAC involved the evaluated public organisations to actively support the adjustment of corruption-prevention initiatives.

Scope -- KICAC evaluates the central administrative agencies including ministries, presidential councils and local administrative agencies. KICAC also plans to expand the evaluations to include municipal governments and government-sponsored organisations. With input from professional researchers from the Korean Institute of Public Administration, KICAC drew up a preliminary list of candidate initiatives and had the list reviewed by the 'Policy Measures Evaluation Council'. Although

⁶¹. KICAC Annual Report 2002, Anti-corruption legal framework published by KICAC in 2003, and KICAC website (<http://www.kicac.go.kr>)

initiatives change year by year, they substantially review two types of activities -- common initiatives that must be carried out by all organisations, and voluntary initiatives that are internally planned and implemented by individual organisations. Common initiatives include:

- Institutionalising the Code of Conduct.
- Facilitating whistle-blowing.
- Enhancing transparency of contract-related works.

Self-driven initiatives and high-corruption level areas found in the integrity assessment programme are included in voluntary initiatives.

Evaluation areas and performance measures in 2002 -- KICAC developed an evaluation metrics that took into consideration the entire process of planning, implementation and effect. The method used to evaluate Anti-Corruption Policy in 2002 was a non-measurable one based on working accomplishment of each assessed institution. In practice, each evaluation commissioner analysed the document submitted by evaluation research institute and verified the fact by visiting the institutions on person. The method to evaluate the result is based on qualitative and non-measurable one. For assessing each task, the following evaluation index has been used.

Table 4. Evaluation metrics

	Planning	Implementation	Effect
Evaluation Areas	- Input - Plan for output	-The level of commitment of the organisation's head -Implementation structure	- Level of implementation -Prevention Achievement Rate
Performance Measures	Existence of an Implementation Plan: -Including guidelines and related rules -Point of planning -Anticipated problems and effects, means, and interconnection. Appropriate goals: -Appropriate targets -Appropriate plan vs. goals -Modification of goals and reasons for such modifications	The level of interest of the organisation's head: -Level of the head's involvement in approval and the decision making process in relation to the initiative -Orders from the head -The head's participation in training Appropriate Implementation Structure: -Appropriate structure for meeting goals -Presence of a planning organisation, commission, dedicated team, dedicated staff and a task force -The makeup of the implementation plan -Clear division of roles and responsibilities within the implementation system	Evaluation of implementation level: -Comparing the implementation performance against the plan -Reasons for non-implementation and the level of follow-up actions Effect Evaluation: -The initiative's level of contribution to corruption prevention -Level of efforts to address side effects -Exciting achievement that exceeds initial expectation

Follow-up measures -- the main types of follow-up measures taken by KICAC include:

- Publication of results -- KICAC made public the evaluation results including suggestions for improvement, identified weaknesses and specific issues related to each organisation.
- Prize-awarding -- In order to show appreciation of achievements based on evidence produced by the evaluation, KICAC officially presented prizes to both individuals and organisations. The prizes ranged from a Presidential Prize to a mark of honour.
- Promotion of best practice -- KICAC distributed information on identified best practices and encouraged other institutions to benchmark their practice across the public sector.

Based on the experiences of evaluations in 2002 and 2003, KICAC further developed the "Evaluation Index" in late 2003. While the fundamental basis of the "Evaluation Index" remained on assessing working accomplishment of each institution through qualitative, non-measurable index, the quantitative, measurable index became more significant in the evaluation process. Furthermore, this advanced "Evaluation Index" applies diverse indices tailored to each task instead of applying an identical single method for all subjects.

*Case 2: Evaluation of the OPEN System of the Seoul Metropolitan Government*⁶²

Objectives -- The Seoul Metropolitan Government (SMG) developed two survey methods, a regular one (the TI Korea survey) and a one-off survey conducted by the Seoul Institute of Transparency (SIT survey). Commissioned by the SMG, TI Korea has regularly conducted surveys on monitoring the OPEN System since 2000 while SIT evaluated the effectiveness of the OPEN System in 2001⁶³. On the one hand the purpose of the TI Korea survey was to adjust the OPEN System process by measuring overall awareness and its use; on the other hand the objective of the SIT survey was to evaluate the effects of the OPEN System on processing civic affairs by the city administration such as anti-corruption.

Organisational scope -- The TI-KOREA survey used a random sample of ten district offices with an average of 100 citizens that was randomly selected from each district office to respond to the survey. Altogether 1000 citizens took part in the survey which was based on one-to-one individual interviews. The SIT survey focused on both city officials in city and district offices and citizens who were actually involved in processing civic applications. The survey of citizens was based on tele-research, carried out on 500 citizens who filed civic applications at the SMG and in each district office.

Table 5. Evaluation metrics of the TI-KOREA survey

Evaluation area	Questionnaires
The perception level of transparency in implementing civic application	-Opinion regarding efforts of enhancing transparency in the SMG -Satisfaction with the Service -Quality of the Service
The awareness level of the OPEN system	-Awareness level -Mass media channel
The efficiency of the OPEN system	- Usage of the OPEN system - Reason of using the OPEN system - Merit of the OPEN system - Factor for transparency in OPEN system
The effectiveness and challenge of OPEN system	- Satisfaction with OPEN system - OPEN system's effect on preventing corruption - OPEN system's effect on time spent for civic application - Improvement points of the OPEN system

62. Additional sources of this chapter include the following documents: "Clean and Transparent" published by SMG in 2003, "IT and Corruption Control: OPEN system of SMG" by Lee Geunjoo, "Implementation on anti-corruption programmes by SMG" by Suntai Ahn, "Monitoring report on OPEN system" by TI-Korea, "Report on assessment of effectiveness of the OPEN system" by SIT, and SMG website (www.metro.seoul.kr)

63. SMG also researched into the costs and benefits of the OPEN System with another consulting company in 2002 with a view to upgrade the OPEN System. According to this study, the present value of social benefit such as corruption prevention estimated from 1999 to 2008 amounts to 11 billion won (approximately 9 million USD). Reference: "B/C analysis of the OPEN system with strategies to upgrade the system in 2002" conducted by I-Finder.