Prime witnesses?

Case studies of staff assessments for monitoring integrity in the European Union

Edited by T. Lamboo, W. Van Dooren and P. M. Heywood

CORE VALUES

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Foreword

The importance of integrity for trust in governments and effective public policies is highlighted by the internationally recognised standards for integrity and anti-corruption policies. But a formal adoption of laws, regulations and policies does not guarantee actual implementation by public bodies or that integrity policies have an impact by influencing conduct and awareness of public officials. Too often there is an implementation gap between paper and practice. This gap could be addressed more effectively if governments would check through monitoring and evaluations if the desired implementation and outcomes are actually achieved and use the results to inform and adapt their policies. Such a focus on evidence-based policies requires a strongly felt responsibility for effective integrity policies and an active policy community that facilitates learning. Effective policies hence need both an evidence base and a policy community within countries.

The Dutch Ministry of the Interior and Kingdom Relations (BZK) stimulates practices that will advance effective integrity policies and transparency. It aims to do so within the Netherlands, but also as part of the ongoing international dialogue on strengthening evidence based integrity and anti-corruption policies for the public administration. In light of the Dutch Presidency of the European Union in the first half of 2016, the Ministry of BZK has initiated the current report.

This report provides a first overview of how central institutions within the public administration act on a responsibility for (measuring the) effectiveness of integrity policies and discusses in detail six cases: Belgium, Croatia, Estonia, Hungary, Netherlands and Poland. As integrity policies are targeted at public officials, this report focuses on audits and monitoring mechanisms that use staff assessments. We hope to facilitate an exchange of practical information that will support practitioners in the further development of effective integrity policies within their jurisdiction.

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Introduction: Monitoring integrity and staff assessments

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Introduction

The need for effective integrity policies is underscored by international reports showing how corruption undermines trust, hampers economic growth and reduces the wellbeing of citizens (European Union 2014; OECD 2013). Such reports are based on analysis of international comparative data such as the Corruption Perceptions Index of Transparency International, the World Governance Indicators of the World Bank, or the Eurobarometer corruption surveys published by the European Commission (European Commission, n.d.; Transparency International, n.d.; World Bank, n.d.). Though most countries have developed policies to enhance integrity and fight corruption, they expend less effort on actually monitoring and evaluating the implementation and outcome of such policies. Demmke and Molainen (2011) in their report for the Polish EU Presidency and the informal network of EUPAN, concluded that despite the attention to obligations and policies (inputs) few efforts have been made to evaluate their effectiveness. Also the OECD has called in various reports for an evidence based integrity framework (e.g. OECD 2005).

International evaluations use a variety of sources to assess and compare public integrity, such as expert assessments, surveys of business leaders and citizens, and data on legal proceedings. The public officials, from the highest ranks to those at the frontline, are generally and somewhat surprisingly underused as a source of information. Yet, crucially, they are the target of integrity policies. Public officials are the primary observers of the adoption and impact of integrity policies, and of the ethical culture within their organisation. Being prime witnesses, staff can help to inform evidence based integrity policy.

In addition, the reliance on international monitoring steers away from the responsibility of countries for effective integrity policies. An inventory of international assessments brought to light that these often do not pay explicit and consistent attention to whether and how national governments take responsibility for their integrity and anti-corruption policies by evaluating and monitoring their effectiveness. As a result this report provides only a preliminary overview of all EU member states and their use of staff surveys to monitor integrity policies.

This report brings to the foreground those examples where countries have developed some form of monitoring that involves the public officials who are the target of integrity policies. By doing so, these monitoring efforts contribute to a culture of transparency and accountability which lies at the heart of the concept of integrity. Moreover, these national monitoring mechanisms also trigger processes of learning from indicators. In this way, they combine quantitative indicators with situational indicators, local knowledge and sense-making (Moynihan, 2008).

This report provides six cases from EU member states on monitoring integrity policies that use some form of staff surveys: Belgium, Croatia, Estonia, Hungary, Netherlands and Poland. These six cases show variation in the authority responsible for the monitoring (Ministries, Supreme Audit Institutions, and involvement of Universities), variation in the scope of the survey (only managers or all staff; the central civil service, or all public bodies), and in the content of the questionnaires. Some are clearly used for public accountability and transparency, while others focus on stimulating an internal dialogue on integrity and effective policies. As such, they add to the insight that effective policies are context-dependent. This report is not about comparing the results of the questionnaires, but about providing insight by lessons learned from each case, as well as the lessons that can be learned from comparing between the countries.

In this introductory chapter, we take stock of integrity monitoring so far and discuss an agenda for the years ahead. We first provide a definition of integrity and we discuss the main dimensions of an integrity policy. Next, we discuss why integrity monitoring is needed and why it is lagging behind in many countries. Thereafter, the different national approaches to monitoring are discussed. We make the case, however, for the use of staff assessments. The final section draws some lessons from the case chapters in this volume.

Integrity, broadly defined

The concepts of integrity and corruption are intrinsically linked in public and academic debates and both have been the subject of attempts to arrive at clear definitions (Heywood, 1997; Heywood & Rose, 2014). The concept of corruption has been defined as narrowly as bribery between a public official and a private company or citizen, and as broadly as to encompass all abuse of power for private interests, including embezzlement and patronage. Given the complications of coming to an acceptable uniform definition it is no surprise that the United Nations Convention Against Corruption refrained from providing one. Likewise, there is no one generally accepted definition of integrity, or related concepts such as ethics. We recognise that various definitions and concepts are used not only in academic debates, but also between countries. In the six cases presented in this report, the Eastern European countries focus on a broad concept of corruption, Belgium uses a deontological concept (which means adhering to rules), and the Netherlands operates with a wide definition of integrity and a narrow definition of corruption (limited to bribery). For the purpose of understanding the variety in integrity monitoring, we provide here a short discussion of the concepts of integrity and corruption.

There is an implicit understanding in many studies that address integrity that it results from eliminating corruption. Thus, the 'national integrity system' (NIS) approach of Transparency International, for instance, tends in practice to emphasise anti-corruption measures. Discussions about corruption in turn often centre on bribery in terms of gifts, promises, facilitation payments and so forth. Given that many definitions of corruption focus on an abuse of power and the favouring of one party at the expense of others, corruption undermines the basic principle of impartiality of governance. Such breaches of impartiality help explain why within the member states of the European Union many citizens believe their government is corrupt, although they have little direct experience of bribery (Rothstein, Charron, & Lapuente, 2013). Indeed, the 'quality of government' (QoG) argument developed by Rothstein and colleagues stresses the importance of impartiality on the part of government institutions, meaning that 'when implementing laws and policies, government officials shall not take into consideration anything about the citizen/case that is not stipulated beforehand in the policy or the law' (Rothstein, 2011: 13). The concept of QoG has some parallels with the notion of 'ethical universalism' (Mungiu-Pippidi et al., 2011), which entails every citizen being treated equally by the state and all public resources being distributed impartially.

Although the NIS approach by TI as well as both the notion of impartiality and 'ethical universalism' provide helpful

ways to explore the ethical performance of political systems, they still miss much of what is generally thought of when discussing 'integrity' (Agnafors, 2013, p. 435). Any conceptualisation of integrity needs to be sensitive to the ultimate role or purpose of integrity in public life, not least of which is to provide a foundation for citizens to trust their political systems (Rose and Heywood, 2013: 149-150; Rose, 2014: 12). If public officials do not have integrity, it is difficult to see why citizens should trust them or why they should assume good faith in their activities. The fact that a public official is not corrupt does not, however, guarantee that s/he is acting with integrity: there is a wide range of behaviours – including wilful laziness, sloppiness, disrespect to employees or citizens – that would not be captured within conventional definitions of corruption, but that fall well below what we understand by acting with integrity. Therefore, a satisfactory definition of integrity has to be about not just '**doing the right thing**', but also doing it '**in the right way**' and, critically, doing it '**even when no one is watching**' (Heywood and Rose, 2015). Acting with true integrity would mean that accountability mechanisms and anti-corruption measures would be redundant, although in practice it is of course inconceivable that we would ever reach such a situation.

None the less, the notion of 'doing the right thing, in the right way, even when no one is watching' does raise the difficult questions of what is 'right' and who decides it is right. This goes beyond the legal requirements in laws, regulations or codes of conduct that define the boundaries of misconduct or corruption. These are the tough questions of normative ethics that do not allow for a universally acceptable answer (Mackie, 1977). Public responses to official conduct, condemning or condoning ethically dubious actions, vary over time, as well as between individual cases and between countries. Nonetheless, individuals within societies do generally have a more or less coherent idea of what is morally 'right' and what is morally 'wrong' (Dan-Cohen, 2001: 420). There will naturally be disagreements, given the inherent subjectivity of such assessments, but that is true of any moral judgment. Ultimately, decisions about moral rightness will be made by society, using exactly the same criteria that are presently used (see Agnafors, 2013: 438). In effect, this adds a public opinion criterion to integrity alongside any formal definitions.

Moreover, the action needs to be done in 'the right way', which is to say that actions need to follow fair and proper procedures (Carman, 2010; Tyler, 1994). In order for societies to be able genuinely to interpret the moral rightness of actions it is essential that individuals have access to the information necessary to evaluate those actions. Openness is thus a key procedural component of integrity. This is in line both with philosophical notions of

integrity (Agnafors, 2013: 442-3) and with political interpretations of public integrity (see, for example, the principle of 'openness' included in Nolan's *Seven Principles of Public Life*, Nolan, 1995: 14). Whilst the requirement that officials should be as open as possible is central to the notion of integrity, no less important is ensuring that citizens have equal access to representation within the machinery of decision-making (Buchanan, 2002, p. 710)

In addition to normative justice, openness, and individuals having an equal say, integrity also requires the presence of neutral, or impartial, authorities (Rothstein, 2011; Tyler, 2000). The application of power in a way that systematically favours one group over another for no reason other than partial preferences on the part of those wielding power is a fundamental violation of integrity, as well as being classically corrupt. Of particular importance is that the elements of integrity identified here form a continuous interaction between officials and citizens; integrity is part of an on-going process, not merely something that exists in temporally specific actions like corruption. It follows, then, that public integrity is not best ensured by regulating the details of specific interactions and exchanges; rather, it requires careful and detailed organisation and management of the general decision-making structures.

The practical regulation of public officials' ethics has often been conceptualised in terms of two traditions: a values-based approach on the one hand, and a compliance or rules-based approach on the other (Maesschalck, 2004; Paine, 1994; Roberts, 2009; Scott and Leung, 2012; Bies, 2014). Each of these two traditions places a different emphasis upon the regulation of integrity: in the case of the values-based tradition, the main emphasis is placed upon the personal values of public servants, whereas compliance-based approaches focus on the direct and specific regulation of behaviour. Not only do these approaches have a different fundamental logic, they are also enacted differently, and have very different strengths and weaknesses in their practical effects. Integrity instruments that emphasize guiding staff towards integrity – for instance through dilemma training – aim at internalising values. Integrity policies that formulate rules to punish wrongdoers, by contrast, put external pressure on staff to do the right thing. Smart integrity policies develop an instrument that mixes both rule driven and value driven approaches. The instrument may also differ across contexts. The OECD (2008b) observed that there is 'a never-ending balancing exercise between the rules-based and the values-based approaches. The exact relative importance as well as the actual shape of both approaches will depend on the actual social, political and administrative context, as well as on the history of the organisation concerned' (p.13). One of the pioneers of developing a values based approach is Finland (see Box 1).

Box 1. Finland: Twenty years of value-based integrity surveys

In the late 1990s, Finland realised that public sector reforms for higher efficiency posed new challenges for integrity. Even in a low corruption country such as Finland, the reduction of bureaucratic controls required a renewed attention on integrity. In response, Finland pioneered the development of an ethics infrastructure that aimed to integrate values in the daily job. The Finnish value based approach informed integrity policies of several other member states and influenced the work of international organisations such as the OECD (see the various reports).

The Ministry of Finance, responsible for promoting high standards of ethics in the Finnish State administration, set up a Working Group with the overall objective of looking for ways to maintain and promote traditionally high quality ethics in the State government. The Ministry monitored this process carefully with targeted integrity surveys. The first survey in 1998 contained questions on:

• changes in the values of administration
• principles of civil servant ethics and discussions about them
• existence of and attitudes towards ethically problematic situations and procedures, including questions on trips, presents, and hospitality
• factors affecting civil service ethics, including use of different responsibility mechanisms, openness of administration, personnel management and development of the personnel
• present state and future of civil service ethics, including differences between public and private sector ethics

The results supported the assumption that the value basis of civil service ethics had changed in the past decade and that new integrity policies were warranted. The questionnaire was sent to about 170 agencies and institutions of the central State administration. The questionnaire was addressed to the head of the agency, who was asked to allocate the questionnaire to the top management of the agency and to personnel representatives. Only 14 agencies did not answer the questionnaire at all. A total of 647 questionnaires were received.

The survey was repeated in 2006 and was sent to all ministries and the agencies within their authority; 177 central government operational units in all. In total 642 surveys were returned, evenly divided over top management (30.2%), middle management (36.3%), and staff representatives (33.5%). 'The results showed that legislative means alone are not sufficient to develop civil service ethics, but they need to be complemented by more open discussion in daily activity situations, strengthening of cooperation, induction and training' (2007, p9).

The value-based approach to integrity was piloted in a wide range of public organisations: from a university to the bureau of investigation. The pilots resulted in a practical handbook, intended to assist and support the operational units of the state in turning the values into practices.

The Finnish approach is to integrate values and integrity into the daily practice, as the 'values in the daily job' project suggests. In the first place, this implies the integration of ethics into HRM and personnel policies. A next step is the integration of values in overall public management. As a result, integrity policy as a distinct, observable practice is no longer observable. Therefore it becomes vital that general assessments ask questions on whether management is paying attention to values, and to whether integrity breaches indeed are ruled out. Monitoring is therefore an integral part of implementation.

A new surveywas conducted in the end of 2015 and is comparable to the previous surveys thereby providing a timeline over almost twenty years. In addition a survey among citizens will be conducted in 2016.

Why monitor integrity?

In its recent Toolbox for Practitioners for promoting the quality of the public administration, the European Commission (2015) explicitly refers to the need for evaluation as part of the Plan-Do-Check-Act cycle that should be included in each policy process. The Toolbox states: "One of the key qualities of good policy development is that implementation is subject to review and reflection, so that lessons are learned, adaptations are made, or even policy is abandoned in response to findings" (p26). The OECD has also for many years addressed the need for monitoring and evaluating integrity policies in order to strengthen the evidence-base and their effectiveness. In particular is has promoted the use of staff surveys (see the various OECD reports).

Despite this recognition of the relevance of monitoring and evaluations, in practice international assessments of integrity and anti-corruption policies seem to neglect the responsibility of countries in this regard. At least little explicit or consistent information was found within the National Integrity System reports by Transparency International on all EU member states (2013-2014) or the Anti-corruption report by the European Commission (2014). This is in itself remarkable and maybe a consequence of a greater international focus on formal policies rather than on real implementation and outcomes.

Within public administration in general performance monitoring has often been seen as an unwelcome distraction (European Commission, 2015, p. 26). Most policy sectors however already have taken initiatives to strengthen their evidence base. Educational performance, for instance, is compared through data collected via standardised tests of students. In health policies, standardised registration systems – the so-called *Diagnosis Related Groups* - strengthen the evidence base. These represent just some examples. Where education and health are policy sectors with concrete inputs, outputs and outcomes, the bureaucratic activities and outcomes of the public administration are more elusive (Social and Cultural Planning Office, 2015). In their report on the public performance of EU member states the SCP provide several reasons why measuring the outcomes of public administration is complicated. To start with, there are no clear definitions of the boundaries of 'public administration', which can be described in terms of developing and maintaining policies and implementing decisions, or as governing the relationship between the state and society. Nor is there agreement within society on the desired outcomes for public administration. Their solutions to this issue include measurements of the quality of its public officials and the quality of the processes of public administration. The report of the SCP uses international comparative data on good governance and

anti-corruption efforts. In this report we focus on efforts within countries.

There are at least four good reasons to follow the example of other sectors and to strengthen the evidence base of integrity policies through monitoring – not just internationally, but most of all within countries:

(1) The recent financial-economic crisis has brought even more clearly to light that integrity is the bedrock of a well-functioning public sector. As providing ethics training or campaigns to raise awareness and compliance can be costly in a time of austerity measures, this calls for more efficient policies, which could only be developed on a solid evidence base. But the costs of integrity policies may also pay off more generally. In recent decades, the governance literature ((see for example Hood, 1991; Schick, 1998) has debated the sequencing of public sector reforms in developing countries. The overall argument has been that the establishment of the basic functions of the state and the operation of a virtuous state apparatus have to precede reforms that focus on improving efficiency and effectiveness.

(2) Monitoring integrity by national governments would allow for assessing the actual implementation and outcomes of integrity policies. Many governments have invested over the last ten years in developing integrity frameworks in the public service (OECD, 2008; EU 2014). International organisations such as the OECD and the EC are increasingly interested in assessing the effectiveness of these frameworks. Yet, due to the constraints of international comparative research, their focus is too often on *having* integrity policies rather than on actual implementation, or outcomes. National governments have easier access to their civil servants, allowing for surveys that could check actual implementation of policies within organisations. For example, a useful measurement of the outcomes of a whistleblower arrangement may be whether staff know about the possibility to denounce unethical behaviour, express trust in the system and ultimately use the instrument. When staff are unaware of the whistleblowing arrangement or do not believe a complaint will be handled fairly, we know that the integrity policy is failing on this point.

(3) A third purpose of integrity monitoring would be to learn and to improve (Van Dooren, Bouckaert, & Halligan, 2015). Outcome measurement on its own seldom leads to improvement. Rather, measures should feed into learning processes in order to be meaningful. The dialogue about the indicators is more important than the raw numbers. Moynihan (2008) formulated a practical theory on learning forums for the discussion of performance indicators. Learning forums are routine events where organisational actors responsible for an outcome discuss both quantitative

and experiential knowledge. Basic assumptions of causality between programmes and outcomes are identified, examined and suspended. The identification of good practice can enrich the debate. Comparative measurement across countries, across organisations or tiers of government may be useful additions to learning forums.

(4) A fourth motivation for monitoring integrity is the agenda setting power of this kind of assessment. Experience in various policy sectors has demonstrated that indicators can be a strong driver of policy agendas. The naming and shaming of good and bad performers is a key element in this agenda-setting dynamic. In regard to integrity, the most widely cited international indicator is the Corruption Perceptions Index by Transparency International, alongside others such as the corruption ranking within the World Bank governance indicators, the Rule of Law index, or the World Economic Forum competitiveness indicators. Examples from other policy fields show the potential of rankings not only for debates between countries but also within them. One of the most notable international examples is the PISA ranking by the OECD which triggered education debates in many countries (Dixon et al., 2013). Some believe that national rankings of variation between schools within regions have allowed parents to select the best school for their children, thereby showing how transparent ranking can involve citizens and civil society.

However, whilst some rankings may be solid and useful, most rankings are not without problems. Often countries or organisations resist ranking. One main problem is that the use of rankings for learning and improvement is generally considered incompatible with the use for agenda-setting (Van Dooren e.a., 2015). Agenda-setting works only when the indicators to be put on the agenda are few. Using many indicators diffuses the message of good and bad performers, because typically organisations do well on some indicators and badly on others. A single number composite looks straightforward, but is not necessarily more meaningful. Reality *is* often more diffuse than a single number can capture. A final issue is that rankings can often drive behaviour in unanticipated ways, leading to - unintended - attempts to manipulate results or else to make political capital from them (Andersson & Heywood, 2009)

Generally, the methodological critique boils down to three main problems (Arndt & Oman, 2006; Van de Walle, 2006; Heywood 2015; Cooley and Snyder, 2015). First, there are often issues of reliability (i.e. are indicators robust?). Are the number of respondents to perception-based surveys of public performance high enough to show statistically significant results and are confidence intervals reported? In some rankings data from different sources are lumped together. Secondly, there are issues of validity (i.e. are

indicators accurate?). Governance indicators often claim to measure hard performance, although in practice they are mostly perceptual. There is nothing wrong with perceptual data, per se, but only when they are presented for what they are. There is a conceptual difference between real corruption and perceptions of corruption. Indicators of both are useful, but they are not the same. A third problem is over-aggregation: the compilation of often unrelated indicators into one composite measure.

Box 2. The difficulties of measuring integrity

The **difficulty of measurement** may explain why measurement of integrity is relatively underdeveloped. As is the case with corruption, evidence needs to be collected on what is by its very nature a hidden phenomenon (Heywood & Rose, 2014). We cannot see integrity or the lack thereof in the same way that we can see patients getting better, pupils acquiring reading skills or increasing biodiversity. Three issues emerge from that fact:

(1) First, integrity in the public sector is to be found **behind the walls** of public organisations. Citizens may observe integrity issues at the frontline of public service delivery. Yet, the back office remains hidden from public view. This is a strong argument for using staff as a prime witness of integrity in government.

(2) A second difficulty of measuring integrity is the **lack of concrete standards** and benchmarks. Pollution levels, life expectancy and economic performance can be compared relatively straight-forwardly across countries and constituencies. Note that while there is a common ground to discuss a certain outcome in these sectors, the causes of pollution or early deaths from economic hardship are obviously not same. Integrity is generally also regarded to be context-dependent. Yet, this contextual dependency applies not only to the causes of integrity, but also to the definition of integrity in itself.

(3) Thirdly, misconduct is mostly **covert** and all those involved are accomplices to the fact. When a bribe is paid, both the payer and receiver are involved and neither would probably speak out. As a result, the decay of integrity goes from the inside out. And when the public starts to experience the impact of a lack of integrity, the administrative system may already be deeply affected.

A model for effective integrity policies

Through a variety of laws, policies, regulations, and codes of conducts targeted at such specific issues as conflict of interest, abuse of office, protection of whistleblowers and so forth, integrity policies ultimately aim at promoting high standards and reducing cases of misconduct and corruption. Figure 1 provides a simplified model (based on the theory of planned behaviour (Ajzen, 1991)) for effective policies. The first step is the adoption of integrity instruments. You need to have a policy in place before it can have an effect. The adoption of integrity policies is however not enough. A chain of impact is needed. Employees need to be aware of the integrity instruments and need to have positive attitudes towards integrity (policies) for the instruments to have an effect on actual conduct. This may sound obvious. Yet, integrity policies often do not go beyond formal adoption. It is the difference between having and doing; between adoption and implementation (de Lancer Julnes & Holzer, 2001).

This is not to say that changes in public integrity depend solely on integrity policy. The overall ethical climate of organisations is also very important as is shown by Trevino & Weaver (2003). Four core dimensions of the ethical climate are: organisational fairness, the example set by leadership, public service motivation and a goal orientation that provides a sense of mission (Hoffmann & Van Dooren, 2013; Trevino & Weaver, 2003). These are influenced by general management policies and the broader public culture, but integrity policies nonetheless can be important levers to maintain or improve the ethical climate.

The relations in this model are not straightforward. Registered misconduct typically increases as ethical standards are being raised. More infringements will be recognised as misconduct when tolerance for misconduct decreases. Furthermore, there may be feedback loops within the model. Reducing misconduct may improve the ethical climate, which in turn has an effect on the attitudes and behaviour of employees resulting in a lower tolerance of misconduct and recognition of previously unnoticed minor infractions. This is the so-called integrity paradox (see Huberts 2014, p238). The complexity of developing a successful integrity policy is a case in point for a good evaluation strategy that covers the different dimensions from a variety of sources (see below).

Various sources and traditions of integrity monitoring

In the previous sections, we made the case for monitoring integrity. As such it seems relevant to distinguish between monitoring, evaluation and performance audit, but as these boundaries are blurred (European Commission, 2015, p.26), and as little is known yet on how countries monitor, evaluate or audit their integrity policies, we adopt a broad view. Like the European Commission, we also recognises that assessments are not only done by governments, but that they should also encourage external scrutiny by independent bodies. European member states have different traditions in monitoring the effectiveness of integrity policies, of which staff assessments are only one. This variety of approaches reflects the variety of administrative traditions in Europe, but also offers an opportunity for learning and mutual reinforcement of integrity policies.

In general, within most organisations some form of monitoring takes place within the bureaucracy as part of regular systems of management control, such as internal control and audit, or staff satisfaction surveys. The collected information is mainly used internally at the organisational level, but may also be included in published Annual Reports. In some countries where the national executive bodies (Ministries) are organised centrally, this information may be collected for the whole of the national executive government, for example through a central coordination unit for the civil service.[1]

Figure 1: A simplified model of integrity policy
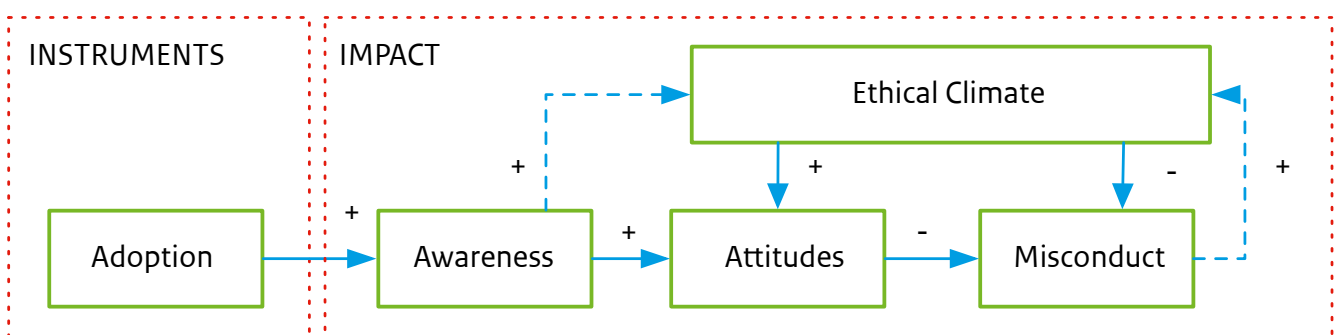
In most countries, one or more Ministries are responsible for securing an effective integrity system through laws, regulations and policies, and sometimes also extending obligations to the subnational governments. Given this responsibility, evaluating the effectiveness of the integrity system on an ad hoc basis or as part of repeated monitoring, may be initiated by the responsible Ministry as part of its accountability mechanisms. This may also be assigned or left to autonomous bodies.

Integrity policies can be supported by dedicated integrity actors in autonomous or independent central bodies. These may include a Civil Service Commission or equivalent, Ethics Committees, Supreme Audit Institution, Ombudsman, Anti-Corruption Agencies, or law enforcement bodies. They generally provide some form of public reporting on their activities, and depending on their mandate, this may also include the results of monitoring the development, implementation, enforcement or effectiveness of elements of integrity policies by government. For example, some Supreme Audit Institutions have extended their traditional audits on efficiency to auditing performance which then may include audits of elements of the integrity policies (see various examples in this report, the cases of Hungary, Croatia, Netherlands, Belgium). Other examples are the European Union bodies aimed at protecting the financial interest of the EU and the integrity of its officials. The European Anti-Fraud Office OLAF publishes annual reports on the number and type of reports and investigations concerning fraud, corruption or any other illegal activity affecting the EU's financial interests.[2] In addition, the Investigation and Disciplinary Office of the Commission (IDOC) provides annual information on the number of disciplinary cases relating to EU officials.[3]

The criminal justice approach mainly monitors cases of corruption through statistics drawn from the justice system. In France, for instance, the Ministry of Justice is responsible for policies that focus on the prevention of corruption. The Service Central de Prévention de la Corruption (SCPC) collects and publishes information related to the detection and to the prevention of corruption and can make proposals to the Government (notably for legislative reforms) regarding policies on prevention of corruption. The SCPC also provides training on prevention of corruption and can provide assistance in developing deontological codes. Its annual publications provide statistics on the number of corruption cases, and focuses on a particular theme.[4] Given this focus on corruption as a legal issue, France does not really measure the implementation or perception of integrity policies within the bureaucracy, neither have we found general staff satisfaction surveys of the civil service. One explanation could be that integrity is seen as part of the statute under which civil servants are employed and to which they are supposed to adhere.

The Open Data model, or 'sunshine model', is based on the presumption that disclosure of data will stimulate external scrutiny and discourage dishonesty. Databases of, for instance, reports by public officials of their obligation to report private interests, assets, and gifts, or post-employment clauses are made public, although such publications are often restricted to specific officials, such as politicians, management, and the judiciary. Examples are the website of the French High Authority for Transparency in Public Life (HATVP[5]) with access to information on all national and subnational politicians or the Netherlands Judicial website to access information on side activities of judges[6]. Besides such open data on possible conflict of interest, governments also promote budget transparency and public information on public procurement. External eyes are expected to discourage dishonesty.

A final approach rests on external measurement efforts: by the media, non-profit bodies and civil society organisations. These often have an agenda-setting focus, or in the case of academic research the focus generally lies on developing theoretical insights. An example is the Netherlands where the Vrije Universiteit Amsterdam has conducted several surveys among subnational governments to assess the type and number of cases of fraud and corruption before the Ministries would instigate such research (see Huberts, Anechiarico, & Six, 2008). As such initiatives generally have an ad hoc character, we have made no attempt to provide an overview of external efforts, which would also include the initiatives by (local chapters of) Transparency International or Freedom House. Efforts by the media and civil society organisations are important and can be highly effective, but in this report we focus on how governments take responsibility for the effectiveness of their integrity policies.

Notwithstanding this variation in monitoring, we single out one approach, *staff assessment*, as a promising prospect for assessing the effectiveness of integrity policies. Of course, it is up to individual countries and country experts to assess the relevance of staff assessments and of the cases provided in this report for their own national context.

Staff assessments as a source for monitoring integrity

Staff assessments are one of many sources for monitoring integrity, but potentially a very strong one. In the first place, staff know best what is happening within the back office. They are prime witnesses of improvements or decline in integrity or the integrity climate. As a result, staff assessments can provide more valid indicators of real integrity compared to assessments of outsiders that often (but not always) have no direct experiences with misconduct. Their judgement is not reputational or based

on hearsay, but instead based on what they see in their daily job.

Secondly, staff surveys are sensitive to context. When staff are asked, they will assess integrity with respect to the standards that apply in a particular context (organisation, country). This is both an advantage and a disadvantage. The downside of contextual specificity is that comparison becomes more difficult. Low-level misconduct in an ethical environment counts as much as serious misconduct in a less favourable context. Yet, minor misconduct in a high integrity context may be important for the country involved. Above, we discussed the role of staff assessments as an early warning device. For well-performing bureaucracies, the value of these early warnings should not be taken lightly.

Finally, staff assessments are actionable. They can be linked to concrete working contexts and instruments of integrity policy. When staff are not aware of a whistleblowing arrangement, the arrangement will obviously not work. When staff indicate that disclosure of interests procedures are not adequate, corrective action can be taken. When top and middle managers indicate that they do not succeed in implementing integrity instruments, an in-depth analysis can explain why.

There are also some risks to take into account. Just like any measurement system, staff assessments of integrity may fall victim to gaming and window-dressing. Staff surveys are generally anonymous, but when it is in the interest of staff to respond positively to surveys, gaming may creep in. Adoption surveys of top managers are also susceptible to window-dressing. Top managers may be tempted to report in an overly positive manner on their integrity policies. Specifically in cases of a deep integrity breakdown, when misconduct is endemic and when a large portion of the workforce is involved, the incentive to report honestly on (the lack of) integrity may be low. This is luckily not the case in most developed bureaucracies. Yet, the possibility of deep integrity failure informs us that staff assessments should never be the only means of monitoring integrity. Staff assessments can be particularly useful as an early warning system for integrity decline. They can also accompany the introduction of strict integrity enforcement in a broken system. In any case, there should be checks in the integrity monitoring system, for instance through a close scrutiny of the criminal justice statistics or a solid measurement of business and citizen experiences.

We can observe different ways in which staff can be involved, using different methodologies and the different seniorities. We restrict our analysis however to the large surveys of staff, but we are well aware of the qualitative, in-depth studies of integrity that also build on witnesses

from public officials. Three approaches to integrity monitoring can be distinguished.

- First, countries perform dedicated surveys of integrity with their staff. These surveys mainly address the *impact* of integrity policies (see figure 1). Most of the cases in this report are examples of this approach. Within the EU, the Netherlands and Finland pioneered these surveys, which are typically repeated with intervals of several years.
- Secondly, countries perform management surveys with top executives of public agencies. These surveys typically address the *adoption* of integrity instruments. We have several examples of management surveys in this report.
- Finally, many countries include integrity items in the general staff satisfaction surveys. Items in a typical staff satisfaction survey may in particular help to assess the ethical climate. The UK survey is a good example (see Box 3).

Although general staff satisfaction surveys are not included as a full case study in this report, it is the one type of staff survey that has been the subject of previous reports. A research report by Hoffman and Van Dooren (2013) compared staff surveys of Austria, Finland, Flanders (Belgium), Netherlands and Scotland. Issues related to the ethical climate were most commonly included in almost all the surveys. More specifically, surveys probed the satisfaction with leadership, treatment of co-workers, work atmosphere, and non-discrimination.

The approaches also differ in important ways. The range of questions on integrity was highly divergent, from 12 questions in Flanders to 34 questions in the Dutch survey (2012). Large differences were especially noticeable with regard to integrity policies. While Austria and Flanders do not ask any questions on integrity policies in their staff surveys, the Netherlands has a substantial number on policy issues.

Staff satisfaction surveys have some significant advantages when it comes to integrity monitoring. Most importantly integrity is placed in the context of other organisational trends. Methodological advantages are that the survey infrastructure is already in place and the addition of a limited number of items can be done at low cost. They are government wide and conducted at regular intervals. Staff satisfaction services can provide a cross-cutting assessment. Time series allow for keeping track on the trends. A limitation of staff satisfaction surveys is the number of items that can be included. They cover a broad range of issues of which integrity is only one. Integrity items in staff satisfaction surveys should therefore go to the heart of the matter and ask directly about the occurrence of misconduct (OECD, 2012)

Box 3. United Kingdom: World Class Civil Service - Monitoring the Effectiveness of Integrity Policy within the UK Civil Service

Within the UK, various tools are used to monitor the effectiveness of integrity policies. This mixed approach brings together a range of functions to ensure the right processes are in place, and to test how far they are both utilised and well understood. It includes:

- Codes of Conduct and complaints procedures (introduced in 1996), that also form part of Civil Servants' formal terms and conditions;
- A central team within the Cabinet Office to build effective relationships across relevant organisations, providing advice on handling and adherence, and gathering local intelligence;
- Using the annual Civil Service People Survey to gather formal evidence of awareness and take-up;
- Using the independent Civil Service Commission to monitor and investigate complaints brought under the Civil Service Code.

The Civil Service People Survey
A key measure of employee engagement is the annual Civil Service People Survey (CSPS), one of the largest staff surveys in the UK, with over 270,000 individuals in 101 organisations responding in 2014. It was established in 2009 as part of a wider employee engagement programme to help raise organisational performance and improve staff wellbeing. The survey is undertaken each October with benchmark results and summary scores of all participating departments and agencies published on Gov.uk in November. In 2014, the UK Civil Service also published results by demographics (health status, gender, ethnicity and sexual identity).

There is no single definition of employee engagement nor standard set of questions. The CSPS uses five questions to assess pride, advocacy, attachment, inspiration and motivation to measure employee engagement. In addition the core questionnaire includes 52 other questions to measure employees' experiences of work, grouped into nine themes. Each department can also ask its own 'local' questions to understand specific issues. The Survey provides comparable annual data, allowing cross-Civil Service analysis (of functions, professions and diversity groups) as well as progress to be measured year-on-year.

Over 9,000 management reports are produced annually. Results are analysed at Civil Service and departmental level, allowing actions to be implemented as appropriate. For example, the survey has been used to inform the development of a Talent Action Plan which operates across the Civil Service as a whole. Alongside this, the Cabinet Office has been working with those teams with outstanding survey scores, in order to produce case studies that can be used by all.

The CSPS and Integrity
The CSPS is an important tool in gauging trends across the workforce, identifying areas of potential concern, skills gaps or strengths, as well as areas of good practice. The Survey is a particularly important vehicle for testing the extent to which key ethical principles and Codes of Conduct are well understood and acted upon across Government.

Four questions within the survey specifically focus on an employee's ability to raise issues and challenge the way things are done. Scores for all these questions have risen since 2009:

1. I think it is safe to challenge the way things are done in [my organisation]: 41% (no change from 2014, up 2 percentage points since 2009).
2. Are you aware of the Civil Service Code? 91% (up 1 percentage point from 2014 and up 16 percentage points from 75% in 2009)
3. Are you aware of how to raise a concern under the Civil Service Code? 66% (up 2 percentage points from 2014 and up 22 percentage points from 44% in 2009)
4. Are you confident that if you raise a concern under the Civil Service Code in [your organisation] it would be investigated properly? 68% (down 1 percentage point from 2014 but up 10 percentage points from 2009).

Findings in these areas inform the work of the Propriety & Ethics Team within the Cabinet Office who work with other Departments to ensure Codes of Conduct are adhered to and keep pace with evolving challenges. It is a helpful early warning system and provides a robust evidence base, and has been identified as a key tool in allowing >

> Departments to undertake trend analysis, notably around whistleblowing where recent improvements have been made to ensure information in this area is considered more regularly by Departmental Boards and Audit and Risk Committees.

The survey is, however, only one part of the picture - and sits alongside the more anecdotal or informal (but equally rich) findings that may emerge from regular contact with departments.

The Propriety & Ethics Team also work alongside a network of Nominated Officers within organisations who provide a 'safe space' for staff who wish to raise concerns or who see themselves as 'whistleblowers'. Nominated Officers are appointed by

the head of the organisation (usually the Permanent Secretary); they provide advice and support to individuals on Departmental policy and act as an impartial intermediary between the individual and any formal investigation, if required.

In addition, the independent Civil Service Commission has two specific roles in relation to the Code: it hears complaints brought by civil servants and works with Departments to help them promote the Code. The Commission publishes details of the complaints heard under the Code, and recommended remedies, providing another useful source of evidence and assurance to civil servants that concerns will be handled robustly.

Overview of monitoring integrity policies in the EU Member States

For this report practices of EU member states have been collected through public sources such as reports by international organisations (e.g. the TI NIS reports on all EU member states, the EU anti-corruption report, OECD reports), and through personal contacts of the editors. This stock taking exercise brought to the light that international assessments do not pay explicit and consistent attention to whether and how national governments take responsibility for integrity and anti-corruption policies by evaluations or monitoring. This is in itself remarkable and maybe a consequence of a focus on formal policies and less so on real implementation and outcomes. As a result, we have been able to provide only a preliminary overview of all EU member states and their use of staff surveys to monitor integrity policies (see Table 1). Where information was available on other types of integrity monitoring, these have also been included, to take into account the variety in monitoring traditions between countries. The overview may not be complete, but this is the first time an attempt has been made to provide an overview of integrity monitoring and in particular the use of staff surveys of all EU member states.

This overview shows that seven countries have experiences with specific integrity surveys. In one case, that of Sweden, the survey was not included as a case study as it was aimed at elected local officials, and not at the wider public servants. Some cases were not selected as the surveys were not repeated in recent years. In the case of Finland, box 1 summarises their experiences with staff surveys. Five countries used

general staff surveys, which include some questions on ethics. The UK case in box 3 provides a more detailed example.

Based on this overview, six cases were selected to be included in the report: Belgium, Croatia, Estonia, Hungary, the Netherlands, and Poland (see Table 2). These six cases show variation in the authority responsible for the monitoring (Ministries, Supreme Audit Institutions, and involvement of Universities and autonomous institution), variation in the scope of the survey (only to managers or to all staff; to the central civil service, or all public bodies), and in the content of the questionnaires. Some are clearly used for public accountability and transparency, while others focus on stimulating an internal dialogue on integrity and effective policies.

The six cases

Hungary and Poland put an emphasis on the adoption of integrity policies. In Hungary (HR), for instance, the integrity survey is used to calculate sophisticated risk indices of corruption in public institutions. Calculations are based on the vulnerability of the tasks and the office as well as on the integrity policies that are implemented. Poland (PL) measures the degree of compliance with integrity regulations. Both Poland and Hungary survey a very broad population of all public institutions at sub-national and central level. The Netherlands and Estonia also supplement their surveys on the impact chain with surveys on the adoption of policies.

In Poland, the population are the 2300 administrative offices while in Hungary, the target group are 15 000 public services (including nurseries and schools). A survey is

Table 1: EU member states: overview of monitoring integrity policies (as of 2015)

EU MS	Survey type	Other types
Austria	General staff survey	Statistics (on corruption 2011, 2013)
Belgium	Integrity staff surveys General staff surveys	
Bulgaria	Integrity staff survey 1999, 2003	Public polling
Croatia	Integrity staff survey	
Cyprus		No monitoring found
Czech Republic		Data on public procurement
Denmark		No monitoring found
Estonia	Integrity staff survey	Statistics on corruption
Finland	General staff survey Specific integrity survey 2007, new survey 2016	
France		Statistics (criminal on corruption, disciplinary sanctions)
Germany	General staff survey	
Greece		Public polling
Hungary	Checklist survey on integrity	
Ireland		No monitoring found
Italy		No monitoring found
Latvia		Public polling
Lithuania		Public polling
Luxembourg		No monitoring found
Malta		No monitoring found
Netherlands	General staff survey Integrity staff survey Checklist organisations	Statistics (disciplinary procedures)
Poland	Integrity staff survey Checklist organisations	Statistics (explanatory/disciplinary proceedings, sanctions)
Portugal		Other (report by University 2006)
Romania		Statistics (criminal cases)
Slovakia		No monitoring found
Slovenia		Public polling
Spain		Other (report by University)
Sweden	Survey elected local officials	
United Kingdom	General staff survey	
EU institutions, bodies and agencies	General Staff Survey	Statistics (cases affecting the financial interests of the EU; and disciplinary cases)

Table 2: The cases: institutions responsible for the integrity surveys

Case	Institutions responsible for the staff survey
Belgium	University of Leuven; Office of Administrative Ethics and Deontology
Croatia	State Audit Office
Estonia	Ministry of Finance, and Ministry of Justice
Hungary	Audit Office
Netherlands	Ministry of the Interior and Kingdom Relations and National Integrity Office[7]
Poland	Civil Service Department, Chancellery of the Prime Minister

The six cases discussed in this report cover a variety of dimensions in their surveys on integrity (see Figure 2).

Figure 2: The cases: coverage of the integrity surveys

	ADOPTION	AWARENESS	ATTITUDE	ETHICAL CLIMATE	MISCONDUCT
Belgium		✔	✔	✔	✔
Croatia		✔	✔	✔	✔
Estonia	✔	✔	✔	✔	✔
Hungary	✔				
Netherlands	✔	✔	✔	✔	✔
Poland	✔	✔		✔	

probably the only way to obtain adoption data from such a high number of organisations. Belgium, by contrast, restricts the survey to 65 federal ministries and agencies. The Belgian (Be), Croatian (Cr), Dutch (NL) and Estonian (Est) surveys are comparable in their coverage of the impact of the integrity policies.

They ask for instance about the *awareness* of ethics codes (Be), confidential advisors in the office (Be) or knowledge of integrity principles (CR). Countries typically measure *attitudes* towards integrity using Likert-scales that score tolerance towards misconduct such as conflicts of interest, gifts or discrimination. Questions on the *ethical climate* include perceptions of organisational fairness and leadership. Established measurement scales are used in Belgium (Ethical Leadership Scale and Ethical Climate Questionnaire) and the Netherlands (Corporate Ethical Values Model). Poland also has items on the impact of integrity policies on the overall ethical climate as well as the capacity of employees to cope with ethical dilemmas.

Finally, four countries ask about occurrence of *misconduct* (Be, CR, NL, EST). Given the sensitivity of these questions, the surveys use different strategies to obtain information. Self-reporting asks respondents to report on their own unethical behaviour (Be). Proxy reporting asks about misconduct in their direct work environment (Be, NL, EST) or shifts responsibility to higher tiers in the organisation (CR – 'did you get an order from your superiors to execute a decision that you know is not in accordance with the ethical principles?'). Victim reporting asks whether respondents experienced misconduct (Be).

The countries make different choices in the coverage of the integrity surveys. This may be a reflection of the variation between countries in the institution responsible for the monitoring. For example the Hungarian SAI focuses only on adaption of policies and publishes this information to encourage public scrutiny.

Lessons learned

First, we take a look at the lessons learned from the integrity surveys. Clearly, the surveys are used by governments, albeit in different ways.

Different actors take up the responsibility for monitoring integrity. In Poland, Estonia, and the Netherlands the public administration actively monitors or evaluates the effectiveness of integrity policies. This is part of a general responsibility of the respective Ministries to build evidence-based polices and to be accountable to Parliament and the public. In Belgium the Ministry was involved, but here a University took the initiative and the involvement of the Ministry was more facilitative. In Hungary and Croatia, the supreme audit institution (SAI) is the main actor. In addition, the case-studies showed that in the Netherlands and Belgium, the SAI also conducted audits of integrity policies. SAIs are independent institutions. Although many SAIs encourage learning and evaluation, they will be also be perceived as a watchdog. The independent position of the SAI may lend credibility to the data. The downside may be that respondents do not tell the true story if the monitor may be used for external control. Conversely, monitoring inside the bureaucracy may be less intrusive, but also less convincing for the outside world.

Estonia has what the authors call a soft approach. The results of the survey are mainly used by the civil service agencies for discussion, learning and improvement. Results of the integrity surveys feed into the next round of integrity policy making as well as into training programmes. This is also the Belgian approach. Participation is voluntary and the reports are not made publicly available. The main purpose is internal learning within the ministries and agencies.

The earlier discussions in this introduction on the usefulness of rankings for learning, is reflected in the note by the authors of the Belgian chapter that the survey data became particularly meaningful when broken out to the

division level. Only then, substantial differences could be observed. The Dutch case also discussed that analysing data at the national level showed little variation between levels of government and showed little change between measurements in time. This shows that benchmarking at a national level, or even at an organisational level may be less useful than measuring at a divisional level. But again, this depends on the purpose of the monitoring: is it focused on learning, or on general public accountability? The challenge of involving managers in the monitoring of performance is also mentioned in the Polish and Dutch cases. The latter found some concrete evidence of public bodies that responded to survey results with a reinforced integrity policy with, amongst others, some concrete integrity toolkits.

The SAI of Hungary follows a different approach. Based on the survey data, they publish a map of Hungary on a website with the regional distribution of the integrity risks. In this way, citizens, journalists and interest groups can exert pressure on government to improve integrity. For Hungary, there are good reasons to follow this public strategy. In a sense, it seems that the main purpose of the survey is to sensitize for integrity, rather than to collect information. In the words of the chapter authors, the survey is a catalyst for building an integrity culture. Efforts are made to form an integrity community as the participating organisations are invited to join the so-called Circle of Integrity Supporters and results of the survey are used in training programmes of civil servants. The role of SAIs is also seen in the cases of Belgium and Netherlands. Here audits by the SAI go side by side with monitoring and evaluations done by or in cooperation with the responsible Ministry.

Overall, the cases show that integrity monitoring represents a trajectory of development. Hungary, Poland and Croatia are taking their first steps. More firmly established systems in Belgium, the Netherlands and Estonia are the result of different rounds of integrity monitoring. The Dutch chapter provides a clear account of the growth process of the integrity monitoring system. In the 1990s, integrity was not felt to be a problem in the Netherlands. Towards the turn of the century, however, indications of infiltration by organized crime distorted this picture. The Netherlands started to develop an integrity policy by the Ministry of the Interior and Kingdom Relations. At first the Netherlands Court of Audit (NCA) followed up with an audit on the integrity policies of the Ministries. This further raised awareness of the issue of integrity. As the NCA has authority only at national government level, the Ministry still had to follow up with an adoption survey for all levels of governments. In the next decade, increasingly sophisticated integrity surveys have been set up by both the NCA and the Ministry of the Interior. Some notable features of the latest efforts by the Ministry are questions on integrity of politicians and the registration of disciplinary investigations.

The analysis of the trajectories of survey development also reveals the importance of learning from other countries. The Estonian trajectory started with a survey partially following the example of the Finnish approach. In the next rounds, they developed new initiatives based on the needs of the Estonian public sector. Estonia also found inspiration in – amongst others – the Dutch and Slovenian integrity risk assessment tools. The Belgian initiative was developed in close cooperation with the Netherlands. Hungary mentions a European Union twinning project with the Dutch Court of Audit as a source of learning. They also mention how they adjusted the Dutch approach to the specificities of the Hungarian context. Poland and Estonia cite the OECD as a source of inspiration, but also as an external pressure to put integrity policies on the agenda. The Netherlands and Belgium finally point us to learning across tiers of government. The federal government in Belgium builds on the work of the regional, Flemish government. In the Netherlands, the interaction between cities and the national government is strong. Summing up, different kinds of learning should be explored: from other countries, from international organisations, and from other tiers of government. International learning may bring in more radical innovations and new ideas. The advantage of learning within a country is that approaches are more context-proof.

Some of the more technical design choices of the integrity surveys in this report are represented in Table 3. A first dimension is the coverage in terms of the nature of the public institutions. The coverage determines the population of the survey respondents. Some countries confine the survey to the core of the central public administration (Be, CR, EST), others take also other tiers of government on board (NL, Pl, EST), while the broadest scope looks at all institutions working with public funds (HU). The coverage also determines to what level results can be extrapolated. Arguably, there are some trade-offs. A narrow coverage allows for more in depth analysis and follow-up of the survey. Comparability is generally better, but the results cover only a part of the public sector. Belgium opts for a voluntary participation of the ministries, although most ministries did participate. The main purpose of the Belgian system is organisational learning, while other countries to a different degree use the surveys for general comparison and accountability. Hungary has a very broad coverage, which makes sense for the agenda-setting purpose they envisage.

A second design choice is the form of the survey. Given the current technologies most countries use web-based applications where selected employees receive an email invitation to the survey. Yet, some countries supplement the online strategy with paper-based surveys, depending on the targeted public officials.

	Survey	Year	Coverage	Form and Sampling	Respondents	Response Rate
BE	Wave 3 integrity survey	2013	22 agencies (out of 48)	web based, population	employees	40,3% (27% complete)
BE	Wave 2 integrity survey	2011	2 central ministries (out of 17)	web based, 50% sample	employees	
BE	Wave 1 integrity survey	2010	12 central ministries (out of 17)	web based, 50% sample	employees	34%
NL	Policy survey Monitor	2012	Ministries and selection of central public organizations, provinces (12), municipalities (about 400), water authorities (about 25)	web based (+ mail), population	top executives	39%
NL	Employee integrity survey	2012		web based panel	civil servants politicians	41%
NL	Employee integrity survey	2006		web based, panel	civil servants	
NL	Policy survey	2008		Post / email survey population		
NL	Policy survey	2004		post survey population	top executives	
PL	Civil servants survey	2014	All government administration offices (2300)	online, self selection	employees	n=1291
PL	Executives survey	2014	Ministries, central offices, voivodeship offices, treasury and tax audit offices (98)	post survey population	top executives	107/98
PL	Independent experts	2014	Selected public administration theorists and practitioners (54)	post survey population	independent experts	13%
HU	Integrity survey	2011 - 2017	Budget institutions (6000 out of 15000 per year)	web based self selection	top executives	25% in 2014 (self selection)
CR	Ethics infrastructure survey	2013	20 ministries		civil servants	RR=33%
EST	Roles and Attitudes of the Civil Service	2005 / 2009 / 2013	State and local civil service	web based stratified sample	civil servants	
EST	Analysis of integrity coordination issues	2013	Civil servcie institutions (73)	population	top executives	RR=90%
EST	Three target groups study	2004 / 2006 / 2010	Citizens, businesses, public officials	web based stratified sample	citizens, busines-ses, public officials	RR=20% (complete)

In some countries, the invitation was placed on a website (online strategy) which would be commonly visited by the relevant employees. This excludes sampling and has a serious risk of non-response bias. Yet, when the number of respondents is sufficiently high, statistical controls for tiers of government or organisations can be introduced when the data are collected. Estonia takes a stratified sample to ensure that a sufficiently high number of respondents are included for different types of organisations.

Response rates differ across surveys. For general integrity surveys, a response rate of about 40% seems to be the maximum. Yet, there is always a risk that respondents who are not indifferent towards the subject are more inclined to answer. This non-response bias can go different ways. Respondents from organisations with an established integrity policy may be convinced of its importance and hence fill out the survey. Or respondents from organisations with a bad track record may be upset with misconduct and hence fill out the survey. The problem is that we do not know about these effects. Therefore, sampling should be taken seriously.

For top executives, the response rates vary widely from 90% (EST) to 25% (HU). Adoption surveys by top executives in particular run the risk of showing more flattering overall results. These surveys are less anonymous because the organisation's results are typically published. Those organisations with a strong integrity policy may want to show their track record to the broader public administration community. There is what we might call a display-bias. The extent to which there is a display bias can be checked by taking a sample from the non-responses and investigating these cases in depth. It should be noted however that a display bias does not necessarily make the survey redundant. The organisations that score well can provide an example for other organisations.

Conclusion

The evidence base of integrity policies today rests heavily on international benchmarking. Complementary to these rankings, countries need to develop their own national practices of integrity monitoring. In this regard, staff assessments of integrity are a very useful source of information. Since staff are a prime witness of integrity and misconduct, integrity surveys can provide actionable performance information to build better integrity policies.

This report documents cases of integrity surveys from Belgium, Croatia, Estonia, Hungary, the Netherlands and Poland. The cases show the potential of integrity surveys and avenues for further development. Over time, integrity surveys typically shift from a focus on adoption towards the

inclusion of knowledge, attitudes, and misconduct. The ethical climate also receives full attention. The technical quality of the surveys is another field of development. Finally, the country cases reveal a wide range of uses: from accountability and agenda-setting to internal discussion. Several countries use the integrity surveys to adjust integrity training towards the needs of the administration.

The cases invite learning from good practice. Clearly, there is no magic recipe for integrity monitoring. With good reasons, the six case-countries have six different approaches. In practice, the cases offer a menu of choices. Rather than copying, learning is about looking at the reasons why countries opted for specific approaches. This fit with the national context is the essence of building a nationally owned integrity monitor and, more broadly, developing a deeply embedded governance capacity.

Evidence of integrity should be integrated. As we argued above, staff assessments are only one of the sources for monitoring integrity. We can discern different ways in which staff can be involved, using different methodologies and the different seniorities. We restricted our analysis however to the large-N surveys of staff, but we are well aware of the qualitative, in-depth studies of integrity that also build on witnesses from public officials. A successful evidence-based integrity policy brings different sources of evidence to the same table and draws conclusions from an integrated analysis. International rankings can be used for a broad-brushed sketch of integrity and to set the agenda. Surveys of citizens, businesses and civil servants can be used to pinpoint issues and to identify fields of action. International review reports can be used to identify policy measures. In depth, qualitative analysis may help to identify the micro mechanisms that stimulate or obstruct the path towards more integrity. All of these initiatives are important, and this report seeks to provide a starting point for further work in this area.

Given the accumulated evidence about the problems with naming and shaming strategies, we believe that the better strategy is to focus on learning if possible. The focus of this text is also on what member states can learn from integrity assessment and monitoring, rather than a proposal for a benchmarking exercise.

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Notes

[1] For example in the Netherlands where most public organisations publicize yearly reports on finance and organisation. For the Ministries this is combined in one yearly report for central government.

[2] http://ec.europa.eu/anti_fraud/documents/reports-olaf/2014/olaf_report_2014_en.pdf

[3] IDOC provides disciplinary follow-up in cases where OLAF investigations have identified irregularities, and IDOC deals with all cases that do not fall within the jurisdiction of the European Anti-Fraud Office or which are not already under investigation by the latter. See http://ec.europa.eu/anti_fraud/investigations/eu-staff/collaboration_en.htm. It seems their annual report can only be located through a formal access to information request. See: http://www.asktheeu.org/en/request/investigation_and_disciplinary_o?unfold=1.
In addition DG HR holds annual staff surveys; see their annual activity reports at http://ec.europa.eu/atwork/synthesis/aar/index_en.htm. The Annual Staff Opinion Survey includes % of staff who are aware of / know ethics and discipline policy and rules.

[4] http://www.justice.gouv.fr/le-ministere-de-la-justice-10017/service-central-de-prevention-de-la-corruption-12312/

[5] http://www.hatvp.fr/consulter-les-declarations/

[6] http://namenlijst.rechtspraak.nl/

[7] The most recent survey (2012) was conducted formally by the National Integrity Office, at the request and in collaboration with the Ministry.

Part 2:
Case studies

Belgium:
The 'integrity at work' survey within the Belgian federal government[1]

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Introduction

This case study reports on a survey (or, more exactly, a series of surveys) concerning 'integrity at work' within the Belgian federal government[2]. These surveys were conducted in the period 2010-2013 by researchers of the Leuven Institute of Criminology (LINC) at the KU Leuven, albeit in close cooperation with the Office of Administrative Ethics and Deontology (Henceforth the AED Office)[3] within the Ministry of Budget and Management Control. This office was established in 2006 (then, as Office of Integrity Monitoring) and is responsible for the development of integrity policy within the federal government.[4] This means that the office (1) advises ministers on federal integrity policy, (2) formulates proposals to ministers on the implementation of federal integrity policy and (3) follows up on the evolution of integrity policy both at national and international level.[5] The AED Office is also responsible for the implementation of the ethics code of the federal government and for the coordination of the regulations concerning conflicts of interest.[6] This survey was conducted to support the AED Office in these tasks. It is important to emphasise that the survey was essentially an academic exercise. Yet, in addition to offering data for scientific research, the survey also offered useful information to both the AED Office and the participating organisations' management about the implementation of integrity policy and about the prevalence of unethical behaviour. It also intended to make the survey's participants more aware of the importance of integrity and integrity policy. The survey was explicitly not intended to be an instrument of accountability towards controlling actors or the public. The confidentiality that was necessary to ensure valid survey results (see below) prevented the wider publication of the results.

The study was conducted in three consecutive waves: the first wave (2010) in 12 central ministries, the second wave (2011) in two additional central ministries and the third wave (2013) in 22 agencies (public social security institutions, public utility institutions and scientific institutions).[7] Overall, a large part of the Belgian federal government was covered: **14 of the 17 ministries and 22 of the 48 agencies**. These surveys fit into a broader line of survey research within the Leuven Institute of Criminology.[8] For example, an earlier version of the survey was conducted in 20 organisations within the Flemish government in 2007 (Geeraerts et al., 2008). Other studies were conducted in the security unit of a transport organisation (2012) and in 14 local police agencies (2014-2015).

This case study reports on the background, methodology and results of that survey. Yet, before delving into the actual survey, it is useful to briefly offer some general background about integrity policy in the Belgian federal government. As for perceived corruption levels, Belgium's position in the Transparency International Corruption Perception Index[9] was 15 out of 174 in 2014, beneath the Nordic countries and neighbouring countries like the Netherlands and Germany, but higher than France and Spain. As for the general state of integrity policy in Belgian public administration, it is important to emphasise that Belgium is a federal country with many policy competencies devolved to regional parliaments. Each has its own government and administration with the autonomy to develop their own integrity policy. This case study focuses on the federal administration only. While the administration has, naturally, always had some essential elements of integrity policy such as an ethics code and disciplinary procedures, the move towards an explicit integrity policy only really started at the turn of the 21st century. A number of scandals about corruption and some dramatic cases of government failure in the 1990s created openness and willingness for reform, as exemplified by a large project of administrative reform in the federal government called Copernicus and a drastic reform of the police system. The latter was part of a broader attempt to improve policy making in this policy area, for example by installing a strategic planning cycle for criminal policy. 'Anti-corruption', with both repressive and preventive dimensions, was chosen as a strategic priority

within that planning cycle. In fact, the establishment of the AED Office in 2006 fitted the preventive dimension of that policy. The fact that anti-corruption policies featured so highly in the strategic plans can, at least partly, be explained by pressures from the OECD (e.g. the 1997 OECD-convention[10]), the Council of Europe and other international actors. These pressures also led to improved anti-corruption legislation. As a result of all this, Belgium now has a fairly developed legal framework to support and enforce integrity among federal public servants (Stinckens & Maesschalck 2012, p.105). This framework includes a general ethics code ('deontological framework'), legislation on the mandatory publication of mandates by senior politicians and public servants, and the recent installation of a reporting system with protection for whistle-blowers. Yet, in spite of the existence of these formal instruments, there is still important work to be done. For some instruments, implementation is still very limited. A case in point is the very weak implementation of the plans for the installation of internal control and auditing systems, although there are some very recent signals that this might be improving. Likewise, it remains to be seen whether the efforts to increase awareness about the risks of conflicts of interest have actually changed attitudes in practice. A persistent problem is the lack of overall coordination among the many actors who play a part in integrity policy within the federal administration. Finally, it is important to note that there is no administrative investigative capacity within the federal government. When the *Hoog Comité van Toezicht* was abolished, the police adopted its judicial investigations but no actor adopted the responsibility for administrative investigations at a federal level. The example at the level of the Flemish regional government (where administrative investigations are the responsibility of the agency *'Audit Vlaanderen'*) shows that it is both necessary and feasible to have such an actor complementary to the police who would remain responsible for judicial investigations.

Monitoring, auditing and evaluation of the federal administration's integrity policies is very limited. The AED Office tries to monitor integrity policies within the ministries and agencies, but does not do so in a systematic way and depends on the willingness of ministries and agencies to offer information. In fact, the survey discussed in this case study is the most systematic attempt until now to do that kind of systematic monitoring. The Ministry for Personnel and Organisation (P&O) also organised some surveys with some limited relevance to integrity policies. The obvious examples are the staff satisfaction surveys organised by P&O at the request of ministries or agencies. While these do not explicitly measure unethical employee behaviour or aspects of integrity policy, they do probe for aspects like working conditions or work climate that might be relevant for integrity management. P&O also provides an instrument, sent to the ministries and agencies every two years, that serves as an inventory of the management tools used by the federal organisations. This probes for some aspects relevant to integrity policy such as the presence of an ethics code and the use of risk analyses.

While the AED Office and the P&O Ministry's activities are limited to monitoring, there is one case of genuine external auditing of integrity policies. The Belgian national audit office (the *Rekenhof* or *Cour de Comptes*) conducted several external 'thematic' audits of the federal administration's integrity policies. In 2007, integrity policies within the federal government were studied on the basis of a survey sent to all federal central ministries as well as the federal police.[11] In 2009, the same study was repeated in five public social security institutions, public utility institutions and scientific institutions.[12] In 2012, the integrity policy within five units within the Ministry of Finance[13] - the largest ministry within the federal government - was audited. In 2015, an ethics audit was performed in the Ministry of Mobility and Transport.

Scope of the survey

Overall set-up of the survey
As mentioned above, the survey was essentially an academic activity. The collected data were to be used for a PhD project[14] and for academic publications (e.g. Wouters & Maesschalck 2014). In addition to this, the survey also intended to collect data on the state of integrity policies and integrity within the participating organisations that would be useful for the organisations to improve their integrity policy. As mentioned above, the survey was explicitly not intended as an instrument of accountability towards controlling actors or the public.

The division of responsibilities was agreed from the outset of the study. The researchers of LINC would be responsible for the development, implementation, analysis and reporting of the study while the AED Office staff would be consulted for the development of the survey, would be an important partner in the implementation of the survey and would be a preferential partner in the reporting of the survey. Any specific consulting on the basis of the survey would be done by the AED Office, not by the researchers.

This division of responsibilities was considered crucial, given that the nature of the questions (e.g. asking respondents to report on unethical employee behaviour by themselves or their colleagues) required confidentiality. It allowed the researchers to guarantee that the databases containing the respondents' answers would only be seen by the researchers and certainly not by anybody in the federal government. The results were only published as aggregated data and individual respondents could not be identified.

In addition to this anonymity of individual respondents, the researchers also guaranteed confidentiality of the cooperating organisations. The reports were not made public. The general reports were only sent to the senior managers of the participating organisations and the AED Office; the organisation-specific reports were only sent to the senior manager of the respective organisation (see below).

The following paragraphs will describe the practical aspects of the survey's implementation and briefly address the contents of the questionnaire. It should be noted that this is the description of a standard approach that was not necessarily applied to all organisations during all waves. In some organisations, specific circumstances required exceptions to the standard approach. Moreover, the standard approach here was developed gradually during a learning process in the course of the study. Hence earlier waves of the study will not contain all elements (both in terms of contents of the questionnaire and its practical implementation) that are described below as the standard approach.

Practical organisation of the survey

The study was conducted by means of an **online questionnaire**. This drastically reduced costs and thus allowed the researchers to distribute the questionnaire among very large groups. Most participants were invited to participate by an email with an individualised link to the questionnaire. Those who did not have a personal email address were invited by means of a hard copy letter with the address of an individualised link.[15] The individualised link was thought to be essential because it prevented respondents from filling out the questionnaires several times and because it allowed respondents to interrupt the completion of their questionnaire and to continue where they left off, later. The individualised link also made it possible to present the respondent with the appropriate version (e.g. language, organisation) of the questionnaire.

A 'token table' was used for the generation of the individualised links, particularly in the third wave. Each organisation had two 'token tables'. The first table included the actual email addresses and names of the employees and was used by members of the organisation (typically by the contact person or by staff in the ICT department) to send out the surveys. It was not seen by the researchers. The second table, which was seen by the researchers, was an anonymized version of the first table. Specifically, it did not contain the actual email address or names of individuals or organisational units. Instead, the table contained an individual code ('token') for each respondent, the language of the respondent and a number that referred to his or her organisational unit. The researchers integrated this table with the dataset containing the actual survey responses. In this way the researchers would never see actual names, and the staff of the participating organisation, who had

assembled the table, would never see the actual data. This division guaranteed that an individual's responses would never be linked to his or her name or his or her organisational unit's name. Nevertheless, the fact that the table contained a number that referred to the staff member's organisational unit made it possible for the researchers to see, during the analysis, which respondents worked together in the same organisational unit without knowing the actual name of that unit.

Because personal data (albeit anonymized) were collected during the process of assembling the token table, because the questionnaire itself asked for personal data and because the survey was done within the Belgian federal government, the survey had to be authorised by the **Belgian Commission for the Protection of Privacy**. The commission demanded that staff members should have the opportunity to object against the transfer of their personal (albeit anonymized) data to the researchers. Hence, all possible respondents received a 'pre-notice' email informing them about the research and about the opportunity to object to the transfer of data.

As for the practical organisation of the survey, each participating ministry or agency appointed a **contact person** with whom the researchers cooperated closely. The contact persons helped with collecting the background information about both the organisation (e.g. organisational chart) and the respondents (e.g. demographic information so as to assess representativeness of the response), helped with communicating the survey and motivating staff to participate. The contact persons of all participating organisations were introduced to the project during an introductory seminar, to which the senior managers of the organisations were also invited, and that was organised in cooperation with the AED Office. They also received a booklet containing all the information concerning the survey, confidentiality, the general and organisation-specific reports, etc. as well as a 'communication package' (e.g. containing exemplar emails). Following that introduction, they received several (typically 4 to 5) newsletters offering updates (e.g. the latest response rates, tips to increase response) and/or asking for additional information.

Many efforts were made to **increase response**. The contact persons were kept informed about the response rate of their organisation. Both the invitation email and the reminders emphasised the importance of participating in the survey and the relevance of the survey results for actual policy practice. Experience also showed the importance of non-written communication, such as the senior manager mentioning the survey during speeches or the contact person attending staff meetings across the organisation to announce the survey. The researchers also noted that smaller organisations with a motivated contact person had

a higher chance of achieving a good response rate. Two organisations that had the survey presented to their staff in a meeting also saw a considerably higher response rate.

The study resulted in **two types of reports**. For each of the three waves, a 'general report' was published containing general, aggregated data for all participating organisations. In addition to that, each of the participating organisations also received an individual report. These results were presented at a closing seminar, organized in cooperation with the AED Office, to which the senior managers as well as the contact persons were invited.

Contents of the questionnaire

A number of concepts were measured in all versions of the questionnaire.

First, all versions asked questions about the respondents' **knowledge of specific aspects of integrity policy**. The questions were adopted and sometimes adapted from the '*Integriteitmeter*' developed by the *Bureau Integriteit Nederlandse Gemeenten* (BING) (Kolthoff, 2007), but the answering scale was replaced by a more specific one. Two examples of items[16] are: *"How well do you know the ethics code that is relevant for you?"* and *"How well do you know the rules concerning confidential information?"*. The answering categories were 'I never heard of it', 'I know it exists, but I do not know its contents', 'I know its contents diagonally', 'I know the contents well' and 'Not applicable in my organisation'. Second, a number of questions also asked about respondents' **perceptions concerning aspects relevant to integrity policy**. Examples of items include: *"People not conforming to the ethical standards of the organisation are disciplined"* and *"The organisation makes it sufficiently clear how we should behave"*. Most of these questions were adopted or adapted from the '*Integriteitmeter*' of BING (Kolthoff, 2007) and ethical culture instruments of Treviño and colleagues (Treviño & Weaver, 2001, p.661; Treviño, 2007). In the third wave, a large number of items were added from the 'corporate ethical virtues model' (CEV-model) of Kaptein (2008). Examples include, *"In order to be successful in my organisation, I sometimes have to sacrifice my personal norms and values"* and *"Management is aware of the type of incidents and unethical conduct that occur in my immediate working environment"*. All the questions were answered using a 7-point Likert scale with labels varying from '*entirely disagree*' to '*entirely agree*'.

A third concept measured in the questionnaire was **organisational fairness**. Research suggests that staff that perceive their organisation to be unfair are more likely to commit unethical behaviour (e.g. Locke, 2000; Gilliland, Steiner, & Skarlicki, 2001; Treviño & Weaver, 2003). The concept was measured by means of the 'General Justice' questionnaire of Treviño and Weaver (2003, pp. 267-292). Examples of items include: *"In general, my organisation treats its*

employees fairly" and *"Employees can count on being treated with courtesy and respect in this organisation"*. Answers were formulated by means of the same 7-point Likert scale that was used to gauge perceptions.

The importance of the fourth concept, **ethical leadership**, is almost self-evident. Ample research has suggested that staff members' perception about their management's integrity is an important antecedent of staff members' ethical or unethical behaviour (e.g. Lasthuizen, 2008). Our operationalisation of the concept built on Brown and Treviño's 'Supervisory Ethical Leadership Scale' (Brown & Treviño, 2006), using a shortened version of the Dutch version of this scale that was used in the '*Integriteitmeter*' of BING (see also Delbeke et al., 2008) and a slightly adapted answering scale. The scale measures two aspects of ethical leadership: moral person (does the manager herself behave ethically?) and moral manager (does the manager stimulate and enforce integrity among staff?). Examples of items include *"My direct supervisor sets an example of how to do things the right way in terms of ethics"* and *"My direct supervisor disciplines employees who violate ethical standards"*. Answers were formulated by means of the same 7-point Likert scale used for perceptions and fairness.

Finally, and perhaps most importantly, the questionnaire also asked respondents to report on their own **unethical employee behaviour** (self-report). Specifically, respondents were presented with items describing 'incidents at the workplace' and for each of them they were asked *"How often have you engaged in the following behaviour in the last 12 months?"*, with the instructions emphasising that it had to be intentional behaviour performed during the job. Items were adapted or adopted from the '*Integriteitmeter*' of BING (see also Delbeke et al., 2008) and Maesschalck (2004). Some examples of items include *"Improper use of confidential information"* and *"Bullying a colleague"*. Other items were new. Examples are *"Bending rules or procedures to get results faster"* and *"Strictly following rules when this is actually absurd"*. For methodological purposes, the list of items not only contained unethical employee behaviour but also some more 'desirable' behaviour, for example *"Giving up a lunch break"*. As for the answering scale, respondents were presented with the options '*0 times*', '*1 time*', '*2 times*', '*3 to 5 times*', '*6 to 10 times*', '*11 to 20 times*', '*more than 20 times*' and '*not applicable*'.

A few concepts were only measured in some of the surveys.

In the first wave, the self-report of unethical employee behaviour was complemented by a measurement of the respondents' **attitude** towards those types of behaviour. Specifically, for each of the types of unethical employee behaviour, respondents were asked to indicate on a 0 to 10 scale how acceptable they considered that behaviour.

In the third wave, the self-report was complemented by a proxy-report and a victim-report. The **proxy-report** presented respondents with largely the same types of unethical employee behaviour as the self-report, but asked respondents "*How often has this event occurred in the last 12 months in your unit?*", with the instructions emphasising that it had to be intentional behaviour performed during the job. Respondents were presented with the options '*never*', '*seldom*', '*sometimes*', '*often*', '*very often*' and '*not applicable*'. The **victim report** asked respondents how often they had been victim, in the last 12 months, of unethical employee behaviour such as bullying, discrimination, etc. The respondents were presented with the same options as the self-report with the exception of '*not applicable*'.

Also in the third wave, a shortened version of Maesschalck's (2004) adapted and translated version of the **'Ethical Climate Questionnaire'** (ECQ) of Victor and Cullen (1987, 1988) was used. Answers were formulated by means of the same 7-point Likert scale used for perceptions, fairness and leadership.

With the Belgian federal administration being bilingual **French and Dutch**[17], the questionnaire had to be made available in both languages. The original version of the questionnaire was developed in Dutch. The French translation was made by a professional translator of the Ministry of Budget and Management Control. This translation was evaluated by the researchers as well as by another person who had French as mother tongue. Any differences were discussed and decided upon by the researchers. Because some important changes were made to the questionnaire between the second and third wave, it was re-translated by another translator of the Ministry of Budget and Management Control. Important differences were discussed with another person who had French as a mother tongue and again, ultimately decided upon by the researchers.

Survey results

Response

The participating **organisations were sampled** on a purely **voluntary** basis. Organisations were invited and stimulated by the AED Office to participate by means of a letter, communications through a network of ethics officers and, in some cases, presentations within the organisation. Eventually 14 of the 17 ministries and 22 of the 48 agencies agreed to participate. This relatively high participation rate might have had to do with peer pressure among the management of the organisations as well as with the guaranteed confidentiality, not only of respondents, but also of the participating organisations. While 14 ministries and 22 agencies represent a large part of the Belgian federal public administration, there is certainly no guarantee that

this sample is representative for the whole of the federal administration. For example, it is possible that organisations willing to participate have a stronger commitment to integrity, which might in turn impact the survey results.

During the **first two waves**, half of the staff members[18] received the 'integrity at work' questionnaire. The other half was presented with another questionnaire that was to be used in preparation of a PhD.[19] Of the 22,364 staff members who received an invitation to the electronic 'integrity at work' questionnaire, 7607 (or 34%) answered at least one question.

In the **third wave**, no sample was drawn. All staff members received the 'integrity at work' questionnaire[20]. Of the 11,535 staff members who received an invitation to fill out the questionnaire, 4,655 (or 40,3%) responded to at least one question and 3194 (or 27,7%) filled out the entire questionnaire. Hence, about one third of the respondents who started filling out the questionnaire stopped before they had completed, demonstrating how important it is to keep the questionnaire as short as possible.

While these response rates are low, they are not uncommon. In a meta-analysis, Randall and Gibson (1990) found that the response rates in business ethics research ranged from 10% to 96%, with a mean response rate of 43%. Baruch (1999, p.429) in an analysis of empirical research in five of the leading journals in the management and behavioural sciences in the years 1975, 1985 and 1995, found an average response rate of 55.6% with a standard deviation of 19.7. In another study, Baruch and Holtom (2008, p.1150) found an average response rate of 52.7% with a standard deviation of 20.4 for organisational studies that utilised data collected from individuals. The relatively low response rates for our current survey might have had to do with the sensitivity of the topic (the self-report of unethical employee behaviour in particular) as well as with the length of the questionnaire. Moreover, research (e.g. Anseel et al. 2010, p.347; Shih & Fan, 2008) shows that the average response rates of online surveys are somewhat lower compared to the more traditional paper-and-pencil surveys. Sheehan (2001), for example, found in a study on response rates to e-mail surveys[21] undertaken from 1986 to 2001 in journals devoted to marketing, sociology, communication, organisational behaviour, education, statistics and health, a mean response rate of 36.83%. Moreover, as researchers (e.g. Cook et al. 2000, p.821) have argued, the representativeness of responses is more important than the response rate in survey research. Therefore, each organisation-specific report contained information on representativeness.

Some general results

This section will briefly address some basic, descriptive results. When interpreting these results, two important **limitations** should be kept in mind. First, the research reports on perceptions of policies and behaviour. These might differ from the actual policies and the actual prevalence of certain types of behaviour. Second, with a topic so sensitive, there is an evident risk of social desirability bias. Respondents might not have answered what they really thought, but what they thought to be the acceptable answer. Many efforts were made to avoid this bias (e.g. emphasis on anonymity of the respondent and confidentiality of the organisation, careful formulation of items and answering scales), but the risk, of course, remains.

As for **knowledge of specific aspects of integrity policy**, the largest category (i.e. modus) for most items was *"I know its contents diagonally"* (i.e. broadly speaking, in general), while only a minority reported that they knew the instruments' contents well. In most participating organisations, the weakest scoring items had to do with conflicts of interest policies, with the rules and procedures concerning reimbursement of expenses or with the reporting channels to report indecent behaviour.

As for **perceptions concerning aspects of integrity policy**, the average score for most items on the 7-point Likert scale from '*entirely disagree*' to '*entirely agree*' was around the middle position '*neutral*'. The answering category '*neutral*', together with the answering category '*somewhat agree*', was also often the largest one. Items that scored relatively highly in most organisations typically had to do with the protection of information and with rules and procedures (e.g. for the registration of leave or for the registration of sick days). Items that scored relatively low had to do with whistle-blowing arrangements, registration of unethical employee behaviour and rewards for ethical behaviour.

As for **organisational fairness**, the average score for most items was also around the middle position and, for most items, '*neutral*' and '*somewhat agree*' were the largest categories. Moreover, as was found in earlier research (e.g. Treviño & Weaver, 2001; De Schrijver et al., 2010) the scores of the different items were not too different.

As for **ethical leadership**, three general observations emerged. First, as was found elsewhere (e.g. Brown & Treviño, 2005), differences between the items are limited. Second, senior management typically gets lower scores than immediate supervisors. Third, staff tends to be more positive about its supervisor's own ethical behaviour (the 'moral person' dimension) than about his or her efforts to stimulate and enforce integrity among staff (the 'moral manager' dimension).

The types of **unethical employee behaviour** were measured by means of a self-report (in all waves) and a proxy-report (in the third wave). As for the self-report, response choices were '*0 times*', '*1 time*', '*2 times*', '*3 to 5 times*', '*6 to 10 times*', '*11 to 20 times*', '*more than 20 times*' and '*not applicable*'. As expected, for most types of unethical employee behaviour, the largest category was '*0 times*' and the average score for most items was between 0 and 1. As for the proxy-report, response choices were '*never*', '*seldom*', '*sometimes*', '*often*', '*very often*' and '*not applicable*'. For most types of unethical employee behaviour, the largest category was '*never*' and the average score for most items was between 0 ('*never*') and 1 ('*seldom*'). However, for some types of unethical employee behaviour (e.g. "*Doing slow or sloppy work*", "*Wasting company materials*", "*Gossiping about a colleague*") the largest categories were '*seldom*' or '*sometimes*' and the average score was between 1 ('*seldom*') and 2 ('*sometimes*'). Overall, for both the self- and proxy-report, two groups of items scored slightly higher. The first group concerns behaviour that is often not considered as unethical employee behaviour or as only a minor form of it, such as not exhibiting sufficient effort or taking a longer lunch break without permission. The second group concerns 'rule fetishism', which refers to an over-conformity to rules or norms that would be negatively evaluated by the majority of society.

As for the **victim-report** (only in the third wave), most items also had '*0 times*' as their largest category with average scores ranging between 0 and 1. Items that scored a bit higher (i.e. scores around 1) concerned a lack of respect by colleagues and bullying by colleagues.

When formulated in such general terms, these results seem rather unsurprising. However, this becomes very different when the results are analysed at an **organisational level**. Particularly when those organisational-level results are compared with those of other similar organisations, the results present a much more useful basis for consulting management on how to improve integrity policies or other policies in general. Moreover, scores of the items measuring types of unethical employee behaviour(through self-report, proxy-report or victim-report) become much more telling at an organisational level. Taking a close look at the actual numbers of respondents who ticked categories other than '*0 times*' when reporting unethical employee behaviour can be particularly informative. Even where the overall average score of an item is very low, this might hide a small but significant group of respondents who do score high. When managers thus find out that a group of their respondents, even when it is a small group, reports to have committed, seen or suffered serious forms of unethical employee behaviour, this can act as a very useful wake-up call and an important stimulus for integrity policy improvements.

Follow-up after the survey

Given the sensitivity of the survey questions, it was essential that the participating organisations and respondents had sufficient trust in the care with which their answers would be treated. That is why, from the outset, it was not only decided that individual respondents would remain anonymous, but also that the names of the organisations would be kept confidential. This also implied that the 'integrity at work' survey could not be used as an instrument of external accountability towards overseeing bodies or the general public. Instead, the survey results were used as source of information for management to improve their integrity policy, while the dataset was available for scientific research.

As agreed from the outset, the researchers' role was finished once the reports were delivered and presented at the closing seminar. Yet, the organisations were invited to use the survey results to analyse and improve their integrity policy and the AED Office was available to consult and support them in doing so. No systematically collected data about this follow-up are available. The AED Office deliberately chose not to systematically monitor the follow-up because it wanted to avoid a perception of control (the AED Office is part of the Ministry of Budget and Management Control) and because it wanted to honour the principle that the survey would not be used as an instrument of accountability. Nevertheless, anecdotal evidence suggests that, in at least some organisations, the survey results were used to improve integrity policy. This was particularly the case in those organisations where an internal 'entrepreneur' (e.g. the ethics coordinator) was willing to push the topic on the agenda, sometimes helped by an external report (e.g. by the *Rekenhof*) or an incident. For example, in one large ministry, results about the survey were – together with a critical report by the *Rekenhof* that was published one year after the survey – used by management as leverage to introduce specific measures of integrity policy, including the introduction of specific ethics codes, courses in ethical leadership and an information portal about integrity on its intranet. This organisation also asked for a second wave of the 'integrity at work' survey (applied in 2014) so as to identify progress made and intends to organise further follow-up surveys in the future.

Lessons learned

Based on our experience, a few general lessons can be drawn.

First, during the course of the study, we drew some useful **practical lessons**. The network of local contact persons in the participating organisations proved to be a crucial success factor. The contact persons gave important suggestions to improve communication about the survey, passed on important information about their organisation and were very important in motivating employees to participate. Our experience also suggests that non-written, non-standardised communication, particularly by senior management, made an important difference in motivating participation.

Second, given the sensitivity of the topic, **gaining trust** of both the participating organisations and the individual respondents was essential, not only to achieve sufficient responses, but also to achieve honest responses. To ensure trust from individual respondents, great care was taken to ensure their anonymity. The use of the anonymized table of 'tokens' (see above) and the 'information wall' between researchers on the one hand and ICT experts and contact persons of the organisation on the other, ensured such anonymity. They made it possible that, in spite of the personalised links that were sent, individual respondents' answers could never be linked with their name. Confidentiality of the name of the organisation is equally important. Managers will be much more likely to stimulate their staff to report on misconduct if they know that this information will not be made public. Only with this type of confidentiality will the survey results be useful enough to support management in improving integrity policies. The disadvantage of this is that the survey cannot be used as an instrument of accountability towards overseeing bodies or the general public. For that purpose, other instruments are more appropriate.

Third, if a large survey in many organisations is done by a research institute, then **cooperation with a central actor** will be invaluable, as our very smooth cooperation with the AED Office shows. The office offered important assistance in adapting the questionnaire to the specific circumstances and was crucial for its translation. The office also proved to be a very important partner in motivating organisations and then individual respondents within those organisations to cooperate. At the same time, efforts were made to ensure that this smooth cooperation did not get in the way of the organisations' and respondents' trust in the confidentiality of the organisational-level results and the anonymity of the respondents.

Fourth, however important the safeguards just mentioned are, they also somewhat **reduce the pressure on organisations to act upon the results of the survey**. Specifically, the confidentiality of the survey results at an organisational level might reduce pressure on managers to take the results seriously. On the other hand, while managers do not have to reveal the actual survey results, they might still be stimulated to report on the efforts they made to address the issues raised by the survey.

While the exercise as a whole proved to be valuable, there is also **room for improvement**, particularly with regard to

organisational learning on the basis of the survey. One obvious way to do so could be to consider the survey more as an instrument of accountability: results would be made public and organisations would have to explain publicly, and in detail, what they have done to address the issues raised by the survey. However, we would argue that this is not the way to go. The validity of the survey results strongly depends on the willingness of both the organisations and the respondents to cooperate and provide honest answers. We believe that willingness to participate would drastically decrease if the survey would be used in such a way. Other monitoring and auditing instruments are much more appropriate for purposes of accountability. Another, in our opinion, much more effective, way to increase learning would be to embed the survey in a broader government-wide change project that would also include consulting, e.g. by a central actor. In the case study discussed above, the ministries and agencies only made limited use of the opportunity to receive consulting by the AED Office. This was probably because of the office's limited means, but also perhaps because the office was situated in the Ministry of Budget and Management Control and thus still perceived as a controller rather than as a consultant.

In conclusion, the survey delivered **useful information** for managers and the collected data will be an important source for data-analyses for scientific purposes, e.g. to validate the measurement instruments or to test hypotheses. Meanwhile, there are many **possibilities to continue the research**. In one ministry, the same survey was implemented a second time and the plan is to repeat the survey at regular intervals so as to monitor progress. Similar arrangements could be made with other organisations. Such longitudinal research looks very promising, both for scientific and practice-oriented purposes. However, at least as promising is the idea of further, cross-sectional research by increasing the number of organisations involved. This would allow for comparative research within Belgium (e.g. with regional or local administrations), but of course also internationally. International comparative research is certainly challenging, particularly with the different languages involved, but our experience with the Dutch-French translation shows that this is not impossible. In the coming years, we will particularly be looking forward to opportunities for such comparative research.

Practical information

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Links to relevant literature and sources

Wouters K. & Maesschalck J. (2014). Surveying organisational culture to explore grid-group cultural theory: instrument design and preliminary empirical results. *International Journal of Organizational Analysis*. 3-R Executive Systems, 22, 224-246.

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The website 'integrity at work': www.integriteitophetwerk.be

The website of 'Research line 6: Policy and Management in the Criminological Field' of the Leuven Institute of Criminology: http://www.law.kuleuven.be/linc/onderzoek/onderzoekslijn6.html

The website of the Office of Administrative Ethics and Deontology: www.begroting.be/NL/pages/deont.aspx

The Dutch website on integrity policy in government, with lots of useful references, tutorials and examples: http://www.integriteitoverheid.nl

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Notes

[1] The authors wish to thank advisor-general Peter De Roeck of the Office of Administrative Ethics and Deontology and director-general a.i. Ben Smeets of the Ministry for Personnel and Organisation for their helpful suggestions. However, the responsibility for the contents of this chapter lies entirely with the authors.

[2] The Belgian federal government includes 'federal public services' and 'public planning services', which largely coincide with what elsewhere is called 'ministries'. In this paper both types of organisations will be called '(central) ministries'. In addition to those ministries at the core of the administration, there are also various agencies in specific policy areas such as social security, public utility and science. The federal government also contains various other institutions, but these were not included in our survey. Examples are the federal police, the army, the judiciary and some public companies (e.g. Belgian railways).

[3] In this context 'deontology' does not refer to the particular ethical approach that is often associated with the philosopher Immanuel Kant, but to the meaning of the term '*deontologie*' in French and Flemish (the Dutch that is spoken in Belgium), i.e. the duties of a particular profession (e.g. judges, medical doctors, but also public servants).

[4] www.begroting.be/NL/Pages/deontMission.aspx [consulted on June 3, 2015]

[5] www.begroting.be/NL/Pages/deontMission.aspx [consulted on June 3, 2015]

[6] www.begroting.be/NL/Pages/deontMission.aspx [consulted on June 3, 2015]

[7] In 2014, a second measurement was conducted in a ministry that had been surveyed for the first time in the second wave. The contents and results of this second measurement are beyond the scope of this chapter.

[8] For more information, see: http://www.law.kuleuven.be/linc/english/research/copy_of_researchintegrityattheworkplace.html

[9] http://www.transparency.org/cpi2014/results [consulted on June 29, 2015]

[10] OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted 21 November 1997, entered into force 15 February 1999). For more information, see: http://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf.

[11] 164e Boek van het Rekenhof, Volume I, pp. 526-549.

[12] 166e Boek van het Rekenhof, Volume I, pp. 600-619.

[13] Rekenhof, Integriteitsbeleid in de federale belastingadministraties, verslag, 34p.

[14] For more information, see: http://www.law.kuleuven.be/linc/english/research/researchtowardsanintegratedtheoryonunethicalbehaviour.html

[15] In some subunits of one participating organisation a paper and pencil survey was used because it was difficult to organise access to a computer for staff members.

[16] All the quoted survey items in this paragraph are translations by the authors from the original Dutch version of the questionnaire.

[17] In fact, Belgium has three official languages. Yet, because the third language, German, is used by only a very small minority and because most of those public servants would know one of the other languages, it was considered justifiable, although certainly not ideal, not to develop a German version of the questionnaire. German speaking public servants received a French version of the question- naire, but they could easily change the language of the questionnaire into Dutch when they preferred this.

[18] With the exception of those who opted out following the pre-notice email.

[19] This occurred as part of Wouters' PhD project 'Culture at work. A study of the impact of culture on unethical employee behaviour'. Data collection and data-analysis of this doctoral project have been completed and submission of the thesis is planned in October 2015.

[20] It should be noted that in the third wave, in fact three versions of the questionnaire were distributed because a 'missing-data-design' (specifically the 'three-form design' of Graham (2012)) was used. This design presents reduced versions of the original questionnaire in such a way that statistical techniques during the analysis allow to present the results as if the complete survey had been presented to all respondents.

[21] Initially within companies and from 1994 onwards on the World Wide Web.

Republic of Croatia:
Performance Audit of the Ethics Infrastructure in Governmental Administration Bodies

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Introduction

According to the Constitution of the Republic of Croatia, the State Audit Office is the country's supreme audit institution and is fully autonomous and independent. The Auditor General, who is appointed by the Croatian Parliament, manages the State Audit Office. The Auditor General informs the Croatian Parliament about the work of the State Audit Office.

The State Audit Office is not an authority directly involved in combating corruption. As the country's supreme audit institution, its objective is to shed light on irregularities and different forms of unethical behaviour and to assist in efforts to promote and enhance ethics and improve the efficiency of the entities that make up the public sector.

The mandate of the State Audit Office is defined by the State Audit Office Act (*Narodne novine* (RoC Official Journal), no. 80/11). This Act does not specifically regulate the audit of topics associated with issues concerning ethics and integrity in the public sector but its broad mandate allows the State Audit Office to conduct audits on such issues in accordance with its annual work plan and programme.

In 2013, the State Audit Office conducted a performance audit dealing with the *Functioning of the Ethics Infrastructure in Governmental Administration Bodies*. This audit will be further discussed in this case study. In 2015 it launched a performance audit on the topic of *Preventing and Detecting Fraud in Companies Owned by Local and Regional Governments*. In addition, the State Audit Office performs annual audits of the financial statements and operations of political parties. Accordingly, the 2013 audit (which covered 29 political parties) sought to explore whether these political parties

had adopted the codes of ethics and/or other documents that define rules about conduct as well as high and clear standards of the ethical behaviour required of their employees and members, in particular those discharging public and political duties; and how these rules were applied in political and other activities related to the operation of each political party.

The performance audit on the *Functioning of the Ethics Infrastructure in Governmental Administration Bodies* was conducted on the basis of prior analyses that showed that an ethics infrastructure was in place in the Republic of Croatia and that regulations had been enacted to define key ethical values and ethical principles for employees in specific public sector segments. However, it also revealed the existence of significant irregularities in the operations of public sector entities as well as in the perception of corruption[1] and other forms of unethical behaviour.

Given the aforementioned irregularities and the perception of corruption and other forms of unethical behaviour in the Republic of Croatia, it was concluded that an audit should be conducted with the objective of assessing whether government bodies were undertaking the required activities and developing appropriate practices to promote ethical values and ethical principles in their daily operations, and whether the high ethical standards set for the public sector were being effectively achieved. It was also concluded that any findings and recommendations might assist Governmental Administration Bodies in strengthening their ethical profile and in pursuing high ethical standards in the operation of the public sector as a whole, with a view to minimising irregularities, fraud, corruption and other forms of unethical behaviour.

State authorities auditing and monitoring integrity/corruption

Since negotiations were opened with the European Union on Croatia's membership, the country has implemented institutional reforms in its judicial and political systems to ensure a more effective legal and political fight against bribery and corruption. Indeed, corrupt practices had been subject to sanction under Croatia's criminal legislation before this, but there had been no specialised institutions or bodies such as those that have existed in other EU Member States for many years. Furthermore, during the course of the 1990s Croatia became an independent and internationally recognised state, in which capacity it also became a member of the United Nations, the World Trade Organisation, the Organisation for Security and Cooperation in Europe, and other international bodies. As a result, the Republic of Croatia signed up to a number of international conventions whereby it undertook to combat different forms of corrupt behaviour. For these reasons, since 2001, Croatia has established a series of institutions and bodies in its legal and political systems that are designed to engage in systematic efforts to eradicate corruption from Croatian society. These include the Anti-Corruption and Organised Crime Office (USKOK); the Anti-Money Laundering Office; the National Public Procurement Review Commission; the Commission for the Preventing of Conflicts of Interest in Public Service; the National Council for Monitoring the Implementation of the Anti-Corruption Strategy; the Commission for Monitoring the Implementation of Anti-Corruption Measures; the Anti-Corruption Department within the Ministry of Justice; as well as anti-corruption departments in the County Courts in Zagreb, Split, Rijeka and Osijek.[2]

The legal framework governing ethical behaviour in the public sector consists of the *Law on State Servants* (Official Gazette [OG] 49/12) and the *Code of Ethics* (OG 40/11, 13/12) as well as rules and regulations that are partly related to the application of rules of ethical conduct in the public sector. These include the *Law on Public Internal Financial Control in the Public Sector* (OG 141/06), the *Law on Conflict of Interests* (OG 26/11), the *Anti-Corruption Strategy* (OG 75/08), and the *Strategy for Human Resources in the Civil Service, 2010-13*.

Under the provisions of the Code for Civil Servants, the Ministry of Public Administration (the central government body responsible for civil service affairs) monitors the implementation of the Code of Ethics, seeks to ensure compliance with international standards in the field of ethical conduct for civil servants, and makes proposals for improving ethical standards in accordance with international practice. The Code of Ethics provides for an Ethics Committee (an independent working body) that gives its opinion on the content and application of the Code of

Ethics (disciplinary sanctions) and promotes ethical principles and standards in the civil service. The Ethics Committee is appointed by the Croatian Government for a period of four years, and has six members (three appointed from the ranks of civil servants, two from the trade unions and a representative of NGOs). The headquarters of the Ethics Committee is at the Ministry of Public Administration. The ministry is also responsible for receiving complaints from civil servants as well as by citizens against unethical behaviour, keeping records of any such complaints received, and the details of any investigation procedures prompted by them. The Ministry also cooperates with the Ethics Committee, gives instructions and explanations to ethics commissioners, monitors the situation and proposes regulations governing the ethical behaviour of civil servants, keeps records on the implementation of education of Ethics Commissioners, and participates in education programmes for officers in the area of ethical conduct. Once a year, by no later than 31 January, the Ministry prepares a report, published on its website, about complaints filed against unethical behaviour by civil servants in state bodies. The Ministry also offers a free phone line for receiving complaints from citizens about unethical behaviour by civil servants.

The Ministry of Public Administration is itself subject to audit by the Supreme Audit Office. However, in practice, both institutions cooperate in other formal ways (through various committees, working groups and so forth) on the issues related to the development of an ethics infrastructure within the public sector. Indeed, the Ministry see the SAO's findings and recommendations as a very useful tool to improve the functioning of ethics infrastructure and to enhance existing monitoring mechanisms of ethics standards in the public administration.

Performance audit: Functioning of the ethics infrastructure in Governmental Administration Bodies

Scope and objectives of the audit

The Republic of Croatia has put into place an ethics infrastructure and enacted regulations defining the key ethical values and ethical principles for employees in some segments of its public sector (including civil servants in state administration, judicial authorities, criminal authorities, the administrative staff of the Croatian Parliament, the Office of the Croatian President, the administrative staff of the Croatian government, the administrative staff of the Constitutional Court and the Ombudsman's office). However, to ensure compliance with
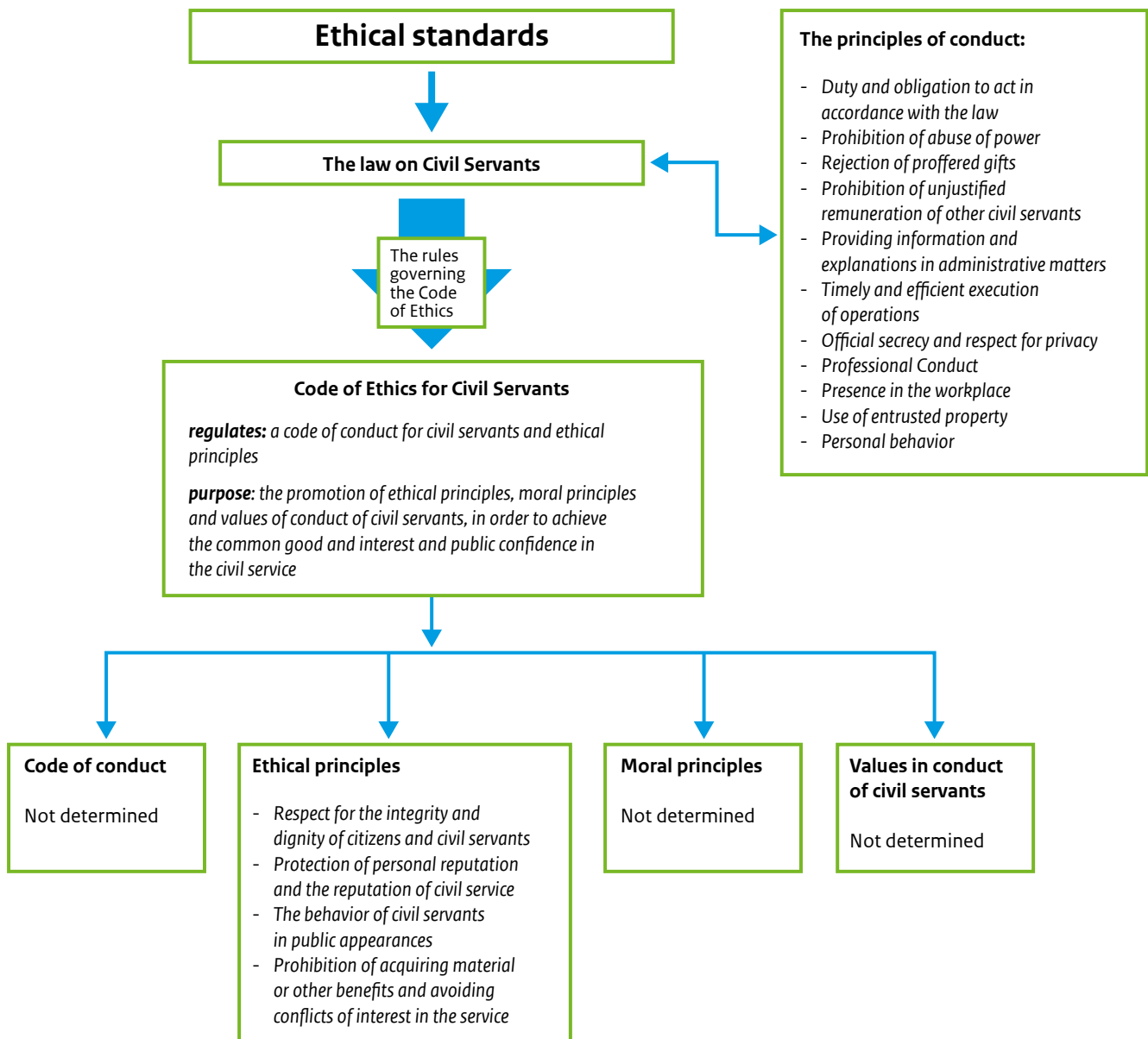
the stipulated ethical values and the application of ethical principles, as well as to increase their impact, these ethical values and initiatives need to be carefully developed, implemented, monitored and benchmarked against best practice. Also, the relevant legislation should encompass the public sector as a whole, rather than just focus on particular segments.

Given the significant irregularities that, over the years, have occurred in the public sector, it was concluded that it would be worthwhile to conduct an audit with the objective of assessing whether governmental bodies were implementing the required activities and developing the appropriate

practice to promote ethical values and ethical principles in their daily operations, and whether the high ethical standards set for the public sector were being effectively achieved.

Accordingly, the scope of the audit was defined in such a way as to cover specific activities related to the application of the Civil Servants Act, to assess the extent to which these pertained to the principles of conduct by civil servants and their adherence to the Code of Ethics, compliance with ethical values and their application in daily operations, as well as the functioning of the ethics infrastructure in governmental administration bodies.

Figure 1: The Ethics infrastructure

Ethical standards

The law on Civil Servants

The rules governing the Code of Ethics

Code of Ethics for Civil Servants

regulates: *a code of conduct for civil servants and ethical principles*

purpose: *the promotion of ethical principles, moral principles and values of conduct of civil servants, in order to achieve the common good and interest and public confidence in the civil service*

The principles of conduct:

- *Duty and obligation to act in accordance with the law*
- *Prohibition of abuse of power*
- *Rejection of proffered gifts*
- *Prohibition of unjustified remuneration of other civil servants*
- *Providing information and explanations in administrative matters*
- *Timely and efficient execution of operations*
- *Official secrecy and respect for privacy*
- *Professional Conduct*
- *Presence in the workplace*
- *Use of entrusted property*
- *Personal behavior*

Code of conduct

Not determined

Ethical principles

- *Respect for the integrity and dignity of citizens and civil servants*
- *Protection of personal reputation and the reputation of civil service*
- *The behavior of civil servants in public appearances*
- *Prohibition of acquiring material or other benefits and avoiding conflicts of interest in the service*

Moral principles

Not determined

Values in conduct of civil servants

Not determined

The key goal of this audit was to assess efficiency in the functioning of the ethics infrastructure established in twenty ministries. This objective also encompassed the assessment of the ethics profile with regard to the behaviour and conduct of civil servants, assessing the extent of their compliance with, and application of, ethical principles, as well as actions taken in cases of breaches thereof. The specific objectives of this audit were to review and assess the integrity of the ethics infrastructure in the public sector, the legal framework for the application of ethical principles and values in the civil service, the application of rules and regulations pertaining to ethics and ethical conduct, the extent to which the ethics infrastructure was embedded in governmental administration bodies and the efficiency of its implementation, and the development of ethics-related knowledge and skills on the part of civil servants. In addition, the audit explored activities associated with the development, promotion and application of ethical values and the application of ethical principles in everyday work, as well as monitoring adherence to ethical standards and the prevention of unethical conduct. It also looked at how often action was taken in response to complaints and how they were handled, as well as reporting procedures and cooperation with other relevant bodies. Finally, the audit sought to assess the propriety and sufficiency of measures taken to eliminate and minimise unethical conduct, and to raise awareness about the importance of ethics for good governance and also the importance attached to ethics in governmental administration bodies and its place in the development strategy of the Republic of Croatia.

The number of civil servants covered by the audit totalled 6,346 and excluded the Ministry of the Interior of the Republic of Croatian (police forces) the Croatian Defence Ministry (armed forces) and the Croatian Ministry of Justice.

Audit methods

In keeping with the accepted framework of auditing standards of the International Organisation of Supreme Audit Institutions (INTOSAI), the audit was planned and conducted in order to obtain the required evidence, provide reasonable grounds for audit findings and recommendations, and ensure the achievement of audit objectives. For the purposes of conducting the audit, several evidence-gathering methods were used such as interviews, meetings and reviews of relevant documentation.

Interviews and meetings were held with executives at senior management level in governmental administration bodies (ministries), as well as with twenty ethics commissioners, representatives of the Service for Ethics and the Value System in Public Administration and members of the Ethics Commission. The review covered the relevant documentation in all ministries, including internal and external audit reports, documents related to the work of ethics commissioners, complaints procedures about the conduct of civil servants, guidelines for the promotion of ethical values and rules of conduct, education and training plans.

In addition to the foregoing, other appropriate methods were used as well, such as analysing regulations to define audit criteria and approaches (laws, codes of ethics, internal by-laws). In addition, the internal organisation and operation of auditees was analysed to check the implementation of regulations and efficiency in the functioning of the established ethics infrastructure (with regard to the type and number of ethics violations and measures taken in response to them). Further, efficiency in the functioning of ethics infrastructure among the entities covered by the audit was compared alongside the level of communication between entities forming the ethics infrastructure.

Finally, the State Audit Office developed a questionnaire for civil servants in order to assess the functioning of ethics infrastructure in governmental administration bodies as well as ethics in the conduct of civil servants. The questionnaire was designed for civil servants and included four sections. The first section consisted of a letter of introduction providing basic information about the goals of the survey and the reasons why civil servants were required to participate in it and to offer honest answers. It was stated that the questionnaire was anonymous and that the data would be used solely for audit purposes. The second section of the questionnaire contained four basic demographic questions about the age of civil servants, their qualification level, job title and the years of service they had spent undertaking 'vital'[3] tasks. The third section contained eleven questions about civil servants' personal knowledge of ethics, and the fourth section consisted of 21 questions focusing on the functioning of the ethics infrastructure, adherence to ethical values and the application of ethical principles in the work environment.

A total of 32 questions were asked. The questions were close-ended and combined, which means that for 26 questions, the respondents could check one of the answers offered and, for six multiple-choice questions, they could check one or more of the answers offered or answer at their own discretion. The survey was conducted by allowing civil servants access to a web tool, about which ethics commissioners notified them, with questionnaires gathered over a period of two weeks. Data obtained through the study were processed by means of statistical software used for the processing of qualitative and quantitative data for social research purposes. The analysis was mostly made by using average values as indicators of structure and ratios (proportions). The reason the SAO chose such an approach was to collect objective answers.

Results and conclusions of the audit

The State Audit Office received 1,933 completed questionnaires, most of which came from the Ministry of Finance, followed by those from the Ministry of the Interior and the Ministry of Maritime Affairs, Transport and Infrastructure. Other ministries delivered a limited number of questionnaires, whilst the Ministry of Regional Development and EU Funds failed to submit any. The basic information on civil servants obtained on the basis of questionnaires pertained to their age, qualification levels, job titles and the years of service on 'important' jobs.

The questionnaire's data show that the largest number of civil servants (54.0%) falls in the age group between 31 and 45 years. They are followed by the age group 46 - 60 years (36.7%). Accordingly, it can be concluded that a majority of civil servants had certain professional knowledge and experience. In terms of education levels, the highest numbers of civil servants (52.5%) have a bachelor's degree, followed by those with secondary school qualifications (22.4%) and those with an associate degree (17.7%). In regard to their positions, the largest numbers of civil servants were assigned to civil servant jobs (76.5%), followed by those who occupied jobs at the middle management level (18.0%) and jobs at the senior management level (2.4%). According to the data, a majority of civil servants (1,065 or 55.1%) have never worked on 'vital' tasks; that is to say, they have never made critically important decisions or rewarded others. However, there is also a considerable number of civil servants (835 or 43.2%) who *have* worked in such jobs.

Based on the audit procedures and the information revealed, the State Audit Office concluded that a basic framework for ethical conduct on the part of civil servants in governmental administration bodies had indeed been put in place, but that these bodies were not making special efforts to motivate and encourage civil servants to embrace specific ethical principles and values or to apply them in their everyday work (see Tables 1 and 2). It was also concluded that civil servants in managerial positions failed to use their own behaviour and the internal documents available to them to point out, clearly and transparently, which ethical values and principled were to be applied by civil servants.

Table 1: Are you familiar with the roles and duties of the ethics and values system?

Responses	Number	Percentage
Yes	439	22.7
No	1437	74.3
No answer	57	3.0
Totals	1933	100.0

Table 2: Are you aware of the Ministry of Public Administration's initiative 'We are here for you', designed to promote ethical values in the state administration?

Responses	Number	Percentage
Yes, thoroughly informed about it	128	6.6
Yes, but only through flyers and posters	999	51.7
No, not familiar with it	771	39.9
No answer	35	1.8
Totals	1933	100.0

The State Audit Office proposed a series of measures to the Ministry of Public Administration. These included, firstly, activities aimed at *developing a legal framework* to set forth and clearly define regulations that would ensure the prevention of any conflict of interest on the part of employees in the public sector as a whole.

The second proposal concerned activities aimed at *amending the Code of Ethics* so that it contains provisions regarding ethics, moral principles and values, and the rights and obligations of civil servants in cases where they failed to act in accordance with the Code of Ethics. It should also contain an obligation to report on any filed and resolved complaints against unethical conduct by civil servants, with specified deadlines for holding Ethics Commission sessions and for rendering opinions on complaints (see Table 3). Furthermore, the Code should define the process to nominate and select candidates and the requirements to be met by candidates in order to be ethics commissioners as well as the development of procedures and guidelines related to the rights and obligations of such commissioners and their responsibilities in promoting ethical behaviour and resolving complaints against unethical conduct. The Code should also specify a deadline and obligation for civil servants to submit, at the request of ethics commissioners and within the required time frame, written statements about any information related to complaints against conduct by civil servants in order to step up the complaint handling procedure.

Table 3: Are you familiar with the role and tasks of the Ethics Commission?

Responses	Number	Percentage
Yes	566	29.3
No	1319	68.2
No answer	48	2.5
Totals	1933	100.0

Thirdly, it was proposed that an additional four members should be hired to join the Ethics and Value System Service, and that training for the enhancement of ethical standards for civil servants as a whole should be included in standard training programmes. These measure should be supported by intensified efforts at promoting ethical values through such initiatives as distributing stickers and leaflets in all governmental administration bodies designed to explain, in a straightforward manner, the purpose and importance of upholding such values and the role of civil servants in doing so. Equally, action should be taken to examine, in detail, which activities would bring benefits if implemented.

Fourth, written procedures should be produced specifying how to select candidates for membership of the Ethics Commission and defining the necessary requirements.

Fifth, a training programme for Ethics Commissioners should be developed, identifying their needs and assessing which areas of ethics are of particular importance to ensure that appropriate training courses and workshops are organised. Meetings of Ethics Commissioners should take place no less than once in every three months so as to allow them to discuss specific ethical dilemmas and problems related to handling complaints against unethical behaviour. Finally, the deadlines for establishing the existence of grounds for complaints and delivering responses to complainants should be extended.

In relation to the *Ethics Commission*, it was proposed to hold regular sessions in line with its Procedural Rules, to prepare minutes in the event of an emergency session held by phone or e-mail in keeping with the provisions of Article 16 of these rules, and to render its opinions on the existence of grounds for complaints within the established time frame, giving reasons for its opinions (for instance, further instructions on actions to be taken by Ethics Commissioners to step up the process with a view to improving the quality of handling complaints).

In regard to other *governmental administration bodies*, proposals were made to publish decisions on the appointment of Ethics Commissioners in compliance with the Code of Ethics, to prepare internal documents (procedures, rules, guidelines) related to the tasks of Ethics Commissioners in order to provide them with clear guidance for the promotion of ethical standards, and to set targets for

governmental administration bodies with regard to the ethics profile of civil servants and in connection with the work of ethics commissioners (see Table 4). Also, deputy Ethics Commissioners should be appointed with defined obligations in regard to training. Ethics Commissioners should be appointed at a level high enough to ensure their formal authority, and – for governmental administration bodies with higher staffing levels and more complex interactions with citizens leading to increased risks of unethical behaviour by civil servants –ethics committees should be created rather than just having Ethics Commissioners. In addition, ethical principles and key ethical values should be built into the internal documents of governmental administration bodies, to define clear mechanisms within them that would allow on-going efforts to promote and encourage ethical behaviour and to motivate civil servants to act in compliance with ethical principles. Finally, training programmes should be prepared that would cover all civil servants, with training methods and forms defined to ensure continued efforts to raise awareness about the importance of ethical conduct and the need to promote the Code of Ethics.

Table 4. Do you know who the Ethics Commissioner is in the government body where you work?

Responses	Number	Percentage
Yes	900	46.6
No	1004	51.9
No answer	29	1.5
Totals	1933	100.0

The State Audit Office holds that the implementation of the above recommendations could contribute to improvements in the legal and institutional framework and lead to the development and enhancement of organisational mechanisms that would support and promote ethical behaviour on the part of public sector employees (that is, that the implementation of the recommendations would increase efficiency in the functioning of governmental administration bodies as a whole).

Reporting on audit results

Following the provisions of the State Audit Office Act, once the audit was completed, a draft audit report was prepared and delivered to the auditees. During the audit, and whilst the draft report was being prepared, the auditees were consulted to reach agreement on all issues, after which the auditees gave their comments in writing. These comments were incorporated in the final Audit Report. The Audit Report incorporating the auditees' comments was delivered to all auditees as well as the Croatian Parliament, and was published on the web site of the State Audit Office. The findings and recommendations were discussed at a plenary session of the Croatian Parliament, which was one of the

most direct ways to inform the public about the audit results.

In their written comments, the auditees highlighted the circumstances in which the irregularities identified by the audit had occurred, and accepted the recommendations made. In the forthcoming period, the State Audit Office plans to follow up on the implementation of these recommendations. In this sense, it is planned to carry out similar research.

Lessons learned

Only a limited number of supreme audit institutions have, thus far, dealt with the issues under consideration and, in our experience, we recommend that, where possible, supreme audit institutions conduct audits related to the issues of ethics/integrity/corruption. When supreme audit institutions or other relevant bodies are about to set up an audit or survey, we present the following advice based on our knowledge and experience:

- It is important to clearly define the topic, auditees and the assessment criteria.
- When research is carried out by means of a questionnaire, it is necessary to clearly define who the respondents are (when a survey among employees is required), to design the survey questionnaire so as to ensure the collection of relevant information, and to use survey results in formulating conclusions and recommendations.
- Before the audit commences, its topic and objectives should be discussed with the auditees.
- Once the audit is completed, the recommendations should be subject to solid consent because their implementation will also determine the effects of the audit.
- Written resources on business ethics and auditing is widely available and highly instructive. A good understanding of the subject matter is advisable before commencing any audit.

Practical information

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Relevant literature and sources

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Republic of Croatia, State Audit Office: www.revizija.hr
Republic of Croatia, Ministry of Public Administration: https://uprava.gov.hr/kampanja-tu-smo-zbog-vas/11864
EUROSAI Task Force for Audit & Ethics (TFA&E): http://www.eurosai-tfae.tcontas.pt

Notes

[1] Based on the study by Zoran Malenica, M.Sc., and Ranka Jeknić M.Sc: "Percepcija korupcije i borba protiv korupcije u Republici Hrvatskoj" ('Perception of Corruption and Combating Corruption in the Republic of Croatia'), *Zbornik radova Pravnog fakulteta u Splitu*, yr. 47, 4/2010, pp. 837-859.

[2] Based on the study by Zoran Malenica, M.Sc., and Ranka Jeknić M.Sc: "Percepcija korupcije i borba protiv korupcije u Republici Hrvatskoj" ('Perception of Corruption and Combating Corruption in the Republic of Croatia'), *Zbornik radova Pravnog fakulteta u Splitu*, yr. 47, 4/2010, pp. 837-859.

[3] Employment in important jobs means that civil servants worked in jobs that gave them some power in terms of making important decisions and/or rewarding.

Estonia: Coordinated Monitoring within Public Administration

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Introduction

The aim of this case study is to give an overview of how horizontal surveys on civil service integrity and anti-corruption can be used in policymaking. We present three different studies that provide important input for field-based policymaking in Estonia. Two of the surveys are focused on civil service ethics, coordinated by the Ministry of Finance. The third survey deals with the perception of corruption and is organised by the Ministry of Justice. The case study begins with a brief introduction of the coordination of the development of civil service integrity and anti-corruption policy. Next, each of the three surveys is described in more detail, focusing on the methodology, the main results as well as how the results have been used in the policy-making process. Finally, an overview of the practices used to communicate results to the wider target groups will be given.

Civil Service Integrity and Anti-Corruption Coordination

Coordination of the civil service ethics

In Estonia, the Department of Public Administration and Civil Service of the Ministry of Finance is centrally responsible for the coordination of civil service ethics. At the same time, the coordination of ethics is also integrated within the general anti-corruption framework. Civil service ethics is defined as the values and standards characteristic for civil servants. Estonia follows an integrity-based approach based on the assumption that we cannot regulate every ethical question in laws. Ethical questions are rich with nuance and thus it is necessary that officials are able to recognise ethical problems and make value-based decisions.

Although the Parliament adopted previous Code of Ethics as an annex to the Civil Service Act in 1999, there were no supporting measures in terms of horizontal integrity training, guidelines, surveys etc. until 2004. Thus the interpretation as well as the implementation of the Code

was under the discretion of each official or organisation. Systematic coordination of civil service ethics started in 2004, when the position of an Ethics Advisor was established at the Civil Service Department in the Government Office. In 2010, the department was transferred to the Ministry of Finance and merged with the former Public Administration Department. Two departments were merged in order to integrate the roles of civil service coordination, which had previously been divided between different institutions. Since then, the coordination of civil service ethics, as well as the post of the Ethics Advisor, has belonged to the structure of the Public Administration and Civil Service Department of the Ministry of Finance.

The Ethics Advisor is a regular civil servant whose role was, and still is, to raise awareness of officials on civil service values, to provide advice to the public sector institutions developing the integrity framework and to support the implementation of a Code of Ethics for officials across the civil service. More specific tasks include coordinating the implementation of the horizontal integrity training programmes and the elaboration of central guidelines. The scope of some coordinating activities has gradually been extended from core civil service to the general public sector. In 2010, for example, central integrity training programmes were extended to include members of councils of local government, employees of state-owned enterprises and other public sector target groups.

In 2013, the Government established the Council of Ethics for Civil Servants, an independent body located at the Ministry of Finance. The mission of the Council is to reinforce the core values and ethics of officials. The Council of Ethics consists of 9 members including high-ranking officials, a former official and experts from academia. The Council of Ethics reports to the Government. Documentation of the Council of Ethics is prepared by the Ethics Advisor. In 2015, the Council of Ethics adopted new Code of Ethics for Officials, which is the most important guideline on values and principles for civil servants. Next, the Council of Ethics will focus on its other duties, namely,

providing explanations for the implementation of the Code of Ethics, providing advice on single cases as well as elaborating on the more general guidelines (e.g. on self-expression in social media on work-related topics). The Council of Ethics may also participate in drafting the development plans and legislation that determine the strategic development directions of the ethics of officials.

In general, Estonian civil servants recognise that working in the civil service presumes following particular values – 88% of civil servants agreed with this statement in 2013[1]. The values peculiar to the democratic civil service are highly accepted among officials – honesty, legality and competence are considered as important by almost 100% of civil servants. At the same time, according to the findings of the survey, the awareness and systematic implementation of the Code of Ethics has been insufficient and there are issues that officials are not sure about what is ethical (e.g. commenting on work-related topics via social media, attitudes towards gifts and benefits etc.).

There are two surveys on civil service ethics that provide input for central development activities. The survey "Roles and attitudes in civil service", is focused on the attitudes and opinions of civil servants on ethical issues. "The analysis of ethics infrastructure in state agencies" maps the measures and structures of integrity development applied in individual agencies.

Coordination of anti-corruption policies

The criminal policy department of the Estonian Ministry of Justice coordinates the development and implementation of anti-corruption policies. Estonian anti-corruption policy is guided by the Anti-Corruption Act. Anti-corruption activities are planned in the Anti-Corruption Strategy[2], which currently applies to the period 2013-2020. The strategy's implementation will be coordinated by the Ministry of Justice. One of the aims of this strategy is to raise awareness of corruption, both in the public and private sector.

In 2012, the parliament adopted a new Anti-Corruption Act, which came into force on 1 April 2013. The new law (previous anti-corruption law dates from 1999) led to several changes. Among other things, the system of declaration of interests was reformed.

Objectives of the Estonian anti-corruption policy are:
• Promotion of the awareness of corruption;
• Improvement of transparency of decisions and actions; and
• Development of investigative capabilities of investigative bodies and the prevention of corruption that could jeopardise national security.

As mentioned, one of the aims is to improve the transparency of the decisions. Particular focus is paid to the transparency of legislative and political decision-making within government financial operations and administration, public performance, public procurement, award decisions, influence of the prevention of law enforcement and defence agencies, the courts and healthcare. Based on the corruption study of three target groups, and the implementation analysis of the previous anti-corruption strategy, measures for improving transparency will focus mainly on the following areas: transparency of legislative drafting and political decision making process, transparency of decisions and financial transactions of the state and local governments, public procurements, financial benefits, the work of law enforcement and national defence authorities and courts; and healthcare. The highlighting of these areas does not mean that no attention would be paid to other corruption-sensitive areas determined in the course of implementing the Strategy.[3]

An integral part in planning and assessing anti-corruption policy is played by sociological studies (for example, the corruption study of three target groups, corruption risks in health care), which will be provided by conducting surveys mapping the extent of, and attitudes towards, corruption, surveys explaining fraud and corruption risks of various areas, and analyses of the impact of anticorruption policy, measures and laws.[4]

The Survey 'Roles and Attitudes in Civil Service'[5]

Purpose and content of the survey

The survey on roles and attitudes is a horizontal staff integrity survey that was launched by a Government Office in 2005. It was carried out by the Estonian Institute of Humanities of Tallinn University in cooperation with the survey company OÜ Faktum & Ariko. The second[6] and the third surveys were repeated surveys, and were commissioned by the Ministry of Finance and conducted by research agency TNS EMOR, in 2009 and 2013 respectively. The survey is necessary in order to regularly monitor the state of ethics, gather fact-based input for developing measures to raise ethical competence and to assess the effectiveness of the central activities. The survey focuses on four wider topics: main characteristics describing the work of civil servants, civil servants' values, attitudes towards ethically questionable activities and opinions on effectiveness of the measures developing ethics.

The main objective is to identify officials' attitudes to civil service values, ethical dilemmas and situations that are important in terms of trust and integrity (e.g. criticising employers in social media, lunch invitations from

cooperation partners etc.). It is not a test on whether the officials know the rules and regulations on integrity, although several topics covered in the survey are also regulated in laws. Most of the questions are focused on perception and attitudes – e.g. how ethical, professional and trustworthy is the civil service perceived by officials. A few questions are also fact-based – whether the respondents use the Code of Ethics, whether they have attended ethics training courses, whom they contact in case of an ethical dilemma etc.

The survey provides a comprehensive set of data, which is direct input for designing the ethics training programmes, ethical guidelines and measures to support the development of the integrity infrastructure. When the Ministry of Finance or Council of Ethics elaborates on a guideline on taking gifts or expressing opinions on work-related topics in social media, it is possible to identify how ethical or unethical those activities are considered to be by officials based on the results of the survey. After the approval of the guidelines, the survey is a monitoring mechanism to find out whether the attitudes of officials have changed within few years. The survey indicates the topics that should be integrated in horizontal integrity training programmes.

Methodology and organisation of the survey
The main part of the questionnaire consists of 19 multiple-choice questions. This is followed by background questions on the respondents' gender, education, age, length of service, salary range, position and regional location. It is possible to find correlations by linking the responses to the background data and responses to the questions in the main part (e.g., whether the attitudes towards social media are different among managers and regular staff or officials aged under 30 and over 60 etc.). Although there have been some amendments to the questionnaire, the comparison of the results of the three surveys allows to the identification of important trends as well the impact of general societal developments on the values of officials.

The questionnaire was developed by the Government Office, experts on civil service ethics and sociologists. Previously, the available materials were reviewed and nine group interviews were carried out with high-level officials to collect input for the extension of the questionnaire. The availability of similar surveys was limited and the Estonian survey was probably among the first ones to focus entirely and so comprehensively on values and integrity. The most similar integrity survey available was conducted in 2000 by the Ministry of Finance of Finland[7].
The quota sample of the Estonian survey consists of 1000 state and local government civil servants (the total number of civil servants is around 28,000). The sample is proportional in terms of different types of civil service

institutions and posts (managers, senior officials and junior officials). Data processing is done in an SPSS programme. The results are weighted in accordance to actual distribution in the different types of institutions and posts.

The sample was based on public information. Since the contacts of most of the officials are publicly available, it is also possible to take into account location and position during the sampling process. The survey is anonymous and, although there is some general background data on the respondent, the respondents do not reveal their names.

Survey results
The results reflect the state of affairs of civil service ethics and also enable the assessment of the impact of integrity development measures on the attitudes of officials. Next, some examples are provided how the results of the survey can be used in the process of designing and assessing the effectiveness of these integrity measures.

Ideally, each official must be aware of the Code of Ethics. In practice, the percentage of such officials was 86% in 2013. Encouragingly, there has been a minor increase in officials who have at least read the Code (62% in 2005, 66% in 2013). The 2013 survey also indicates that the officials who have at least read the Code tend to be more critical towards integrity violations (gifts, favouring relatives, using public resources for personal interests). At the same time, the percentage of officials who knew the Code well is not encouraging (see Chart 1). Only 1/3 of officials have used the Code to solve ethical dilemmas or have read the Code thoroughly. An even more worrying result is that around 1/3 of officials have never read the Code or were not aware of its existence. These scores might serve to indicate the limits of the central coordinating body to reach each individual official as well insufficient attention paid by individual organisations on the implementation of the Code. According to the "Analysis on Ethics Infrastructure in State Agencies" only 25% of the agencies have a systematic and comprehensive integrity framework. In order to raise the awareness of individual organisations and officials, the Ministry of Finance started to provide organisation-specific seminars from 2014. The agencies have also shown more interest in introducing the new Code of Ethics to their staff. It is interesting to see whether a more active approach will be reflected in the results of next survey in 2017.

Figure 1: The awareness and implementation of the Code of Civil Service Ethics in 2005, 2009 and 2013
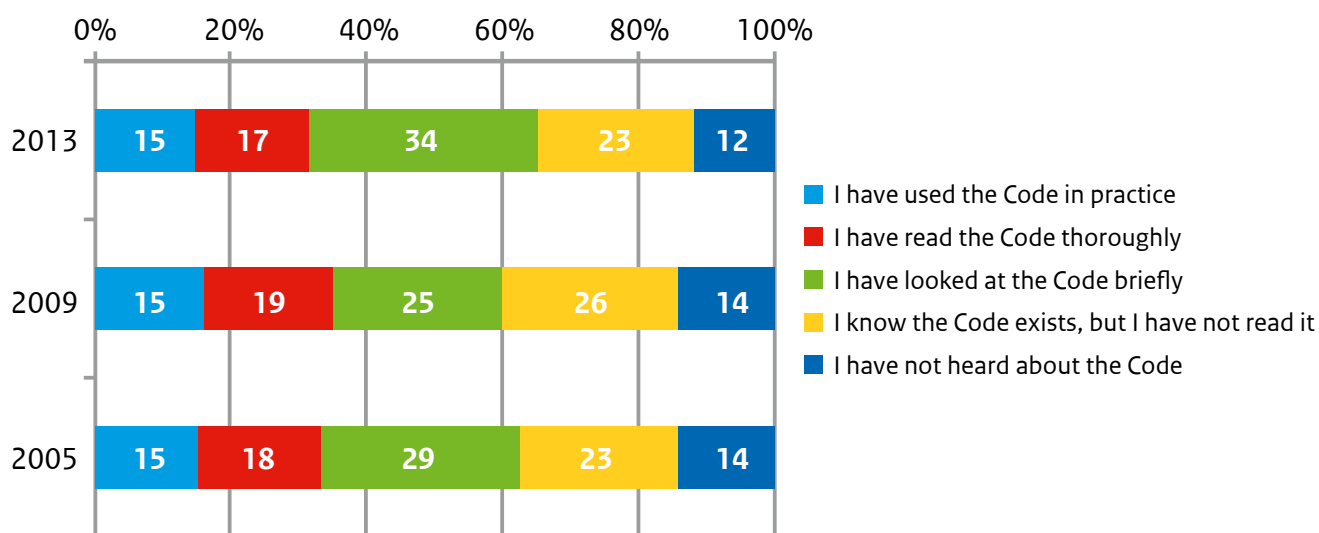

The questionnaire includes a list of 30 questionable activities that could be considered a source of an ethical dilemma and that have relevance in the Estonian civil service in terms of ethics counselling, public concern or central developments. They include issues related to conflicts of interest, principles of good governance and behaviour outside working hours. The results of the survey highlight those topics that need to be addressed in the training programmes and guidelines. For instance, while officials have been critical towards accepting rewards for delivering public services, leaking public information or the preferential treatment of a specific interest group (more than 95% consider those activities very serious or serious ethical violations), their attitudes are more lenient towards delivering work-related lectures at conferences for money, leaving the civil service to work in an enterprise over which the official excercised direct supervision, and using work equipment for personal interests (less than 50% of respondents consider these acts very serious or to be serious violations).

The survey results also show a correlation between whether opinions towards ethically questionable acts are more critical among those officials who have attended a training course, compared to those who have not. The results indicate a positive correlation in terms of the activities that are not directly regulated by law. Since the survey is regular, it is also possible to monitor the changes of attitudes over time. Positively, in case of most ethical violations, the attitudes have become more condemning in 2005-2013. For instance, in 2005, only 66% of officials considered accepting reward for delivering public services very unethical whereas, in 2013, the figure had been increased to 78%. Similarly, while in 2005, 51% of respondents considered preferential treatment of a specific interest group to be very unethical, the figure in 2013 was 59%.

The survey findings have provided relevant input for the elaboration of a new Code of Ethics of Officials, which was approved by the Council of Ethics for Officials in March 2015[8]. The new Code consists of six core values and more concrete principles that explain the values. The core values of the Code are lawfulness, focus on people, trustworthiness, professionalism, neutrality and openness/cooperation. In addition, the preamble of the Code includes honesty, a value considered to be the most important by the officials and which is also included in the Oath of Office. According to the survey, honesty, lawfulness, professionalism and trustworthiness were considered very important by more than 80% of respondents (see Chart 2). Those values were included in the preamble or as core values in the new Code. Generally, the ranking of civil service values has been stable in 2005-2013 with two important exceptions. The importance of the value 'openness and transparency' has increased by 50%. In 2005 only 44% of officials considered it very important and by 2013, the figure has been increased to 62%. The same trend, although to a lesser extent, also applies to the value 'impartiality' – in 2005 58% considered this very important and by 2013, the figure increased to 65%. These trends indicate changes in society and administrative culture and so the values of openness and impartiality were also included as core values in the Code. In addition, 'focus on people' was added to the list of core values. This value was proposed by the officials who participated in integrity dilemma seminars where the applicability of the draft Code was tested before its approval. In sum, the core values included in the Code reflect the values of our civil servants.

Figure 2: Importance of the civil service values
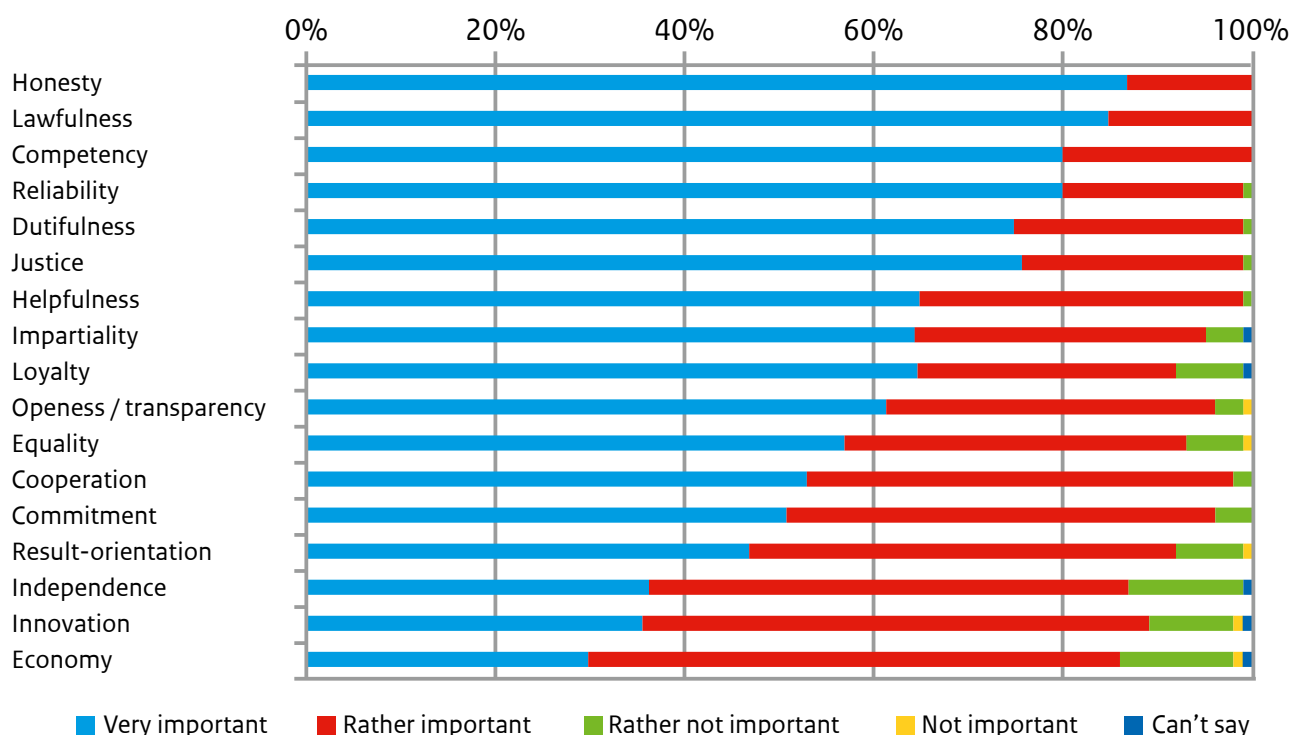
The survey also indicated that Estonian civil servants assume traditional civil service values such as competency, lawfulness and honesty. The values common to the ideology of the New Public Management (NPM) (innovation, economy and results-oriented) are not considered so important. Despite Estonia's strong emphasis on NPM in the public sector, the officials probably do not consider business-like values as particularly 'public'[9], although during the period of economic recession in 2008-2009, the percentage of those respondents who considered the value 'economy' very important increased from 26% in 2005 to 34% in 2009. In 2013, when the more difficult times were over, the figure dropped again to 30%.

The 'Analysis of Ethics Infrastructure in State Agencies'

The analysis of ethics infrastructure has been carried out once in 2013. There was a need to map the state of affairs of integrity infrastructure in civil service state institutions before the elaboration of a central methodology on integrity risk assessment. The survey was commissioned by the Ministry of Finance and carried out by the Ragnar Nurkse Institute of Tallinn Technical University[10].

The goal of the analysis was to map the measures, processes and structures supporting the development of integrity in state administrative agencies, to assess the completeness of the integrity infrastructure and to provide recommendations for the future. The preparation phase involved the examination of available integrity risk assessment materials (e.g. Canada, the Netherlands, Slovenia and the OECD). Legal frameworks and obligations arising from Estonian Anti-Corruption Act and Civil Service Act were also carefully mapped.

The analysis was carried out in two stages. Firstly, an electronic questionnaire was sent to the contact persons of each state institution (73) who filled out the questionnaire or involved other colleagues who are responsible for coordinating integrity management in their organisations. This was necessary because of the variations between organisational structures. Depending on the specific organisation, the internal control department, personnel department or development department may be responsible for coordinating integrity policy. Positively, more than 90% of institutions responded. The survey did not include local government institutions (213 towns and parishes). The questionnaire consisted of 23 questions of which most were multiple-choice, focusing on measures of integrity development, implementation of values by organisations, their rules on anti-corruption and integrity, reporting ethical violations, special measures for new

officials and managers etc. Secondly, the group interviews were carried out in seven organisations in order to gather more qualitative feedback on the same topics. The results in the report were presented according to the type of organisation, although the respondents also provided the name of their organisation.

One of the main conclusions of the analysis was that Estonian state administrative agencies need to pay more attention to the development of systematic integrity infrastructure. Very often the institutional awareness of the various components and measures of the integrity infrastructure is insufficient. Only 25% of state institutions have a comprehensive integrity infrastructure involving clear responsibilities in terms of integrity development and corruption prevention, regular analysis of integrity risks, the ready-availability of relevant rules, regular in-house integrity training etc. In practice, all ministries have appointed an official who is responsible for coordinating anti-corruption and integrity issues on an organisational level who belong to the steering group of Anti-Corruption Strategy coordinated by the Ministry of Justice. Regarding the smaller agencies under the ministries, the analysis showed that most of them deal with integrity questions on an ad hoc basis. County governments (15) appeared to be the most problematic group, where the applied measures were limited to the minimum requirements prescribed by law.

The results of the questionnaires indicate the need to support organisations in the prevention of corruption and integrity risk assessment. Since 2014, the Ministry of Finance has paid more attention to organisation-specific integrity training seminars that have been carried out in cooperation with individual agencies. The focus of the seminars is on the issues most relevant to the individual organisation in order to support the development of ethical competencies of officials and support the development of an integrity infrastructure. Secondly, the Ministry of Finance, in cooperation with the Ministry of Justice, is revising the questionnaire to include horizontal integrity self-assessment methodology. The idea is to develop a user-friendly, electronic analysis tool that enables organisations to systematically assess their integrity risks.

The Survey 'Corruption in Estonia: Study of Three Target Groups'[11]

A corruption study of three target groups was, in 2004, carried out for the first time by the Ministry of Justice. The study has been conducted two more times since, also in 2006 and 2010. The last two studies were conducted in cooperation with the University of Tartu.

The aim of the study was to gather information on corruption. It provided us with additional measures to monitor, enabled us to plan anti-corruption activities, to assess anti-corruption levels and helped us to shape our attitudes towards corruption in general. Official crime levels do not show the actual level of corruption nor exactly *where* the corruption is located since such offences are often hidden.

Through time, the studies have been focused on three questions:
1. Ethical attitudes: what is corruption, how is it condemned and how receptive are people towards corruption;
2. Perceptions of corruption: how widespread and how big a problem is corruption considered;
3. Encountering corruption: how frequently have respondents encountered corruption.

The studies have been questionnaire surveys focused at three target groups: residents[12], entrepreneurs and public officials.

Methodology and organisation of the survey

The same methodology has been used over the years. Nevertheless, there have been some changes made in the questionnaires, mostly before the survey in year 2006. This case study discusses a study that was conducted in 2010 more thoroughly.

A sample of residents was taken of permanent residents of the Republic of Estonia, aged 15-74 years. The interviews were conducted by the CAPI-bus interviewing (Computer Assisted Personal Interviewing) method. Interviews took place in the homes of the respondents and were run by a computer-assisted personal interviewer. The survey questions and responses were entered immediately into the computer. The socio-demographic structures of the samples, based on gender, age, nationality and place of residence, were compared to the statistical indicators of the general population. Altogether, 502 interviews were conducted (in total 1244 addresses were visited).

The base of the sample of entrepreneurs was from the Business Register. The target group of the study was senior managers (directors, executives, managers, owners). A theoretical sample was taken in proportion to the activity field of businesses, but not in proportion to the size groups of businesses (1-19, 20-49, 50+ employees). This provided the sufficiently sized sub-groups needed to compare the results. The interviews were computer controlled telephone interviews (CATI- Computer Assisted Telephone Interviewing). The survey questions and responses were entered immediately to the computer. Altogether, 501 interviews were carried out (the base sample consisted 1787 telephone numbers, in total 1717 telephone numbers were used).

Companies were divided into five economic sectors:
I group (A): primary sector (e.g. agriculture, fishing, hunting, forestry).
II group (B-F): secondary sector: (e.g. construction, manufacturing industry and mining industry).
III group (G-I): trade and service sector.
IV group (J-N): transport, communication and finance sector.
V group (O-S): social and personal services sector.

The public sector sample was formed based on a non-proportional selection in order to ensure large enough sub-groups. This enables comparing the results of different groups. The sample was divided into five sub-groups:

- Group 1: ministries, county governments, constitutional institutions except courts, public legal persons (other than universities, theatres, museums, research institutions).
- Group 2: civil service, inspectorates, government agencies, agencies under the administrative field of ministries.
- Group 3: law enforcement agencies (Police and Border Guard Board, Prosecutor's Office, Estonian Tax and Customs Board, courts, probation departments).
- Group 4: political agencies: Parliament, city councils, and township councils.
- Group 5: local governments, municipal governments.

The survey was web-based (CAWI - Computer Assisted Web Interviewing). Respondents were sent an e-mail with a link to a questionnaire and were asked to fill out the form. In total, 4,888 emails with a link were sent out and the response rate was approximately 20%: 997 completed questionnaires were received. The size of the planned sample was 700 respondents.

The unweighted data of the survey gives an opportunity to compare the results between sub-groups but the proportions of these groups do not correspond to reality. The weighted data enables us to generalise about the entire target group, but it should be noted that it is not a representative survey in a strict sense because it was a web survey.

Survey results

The results of the surveys are mainly used in compiling and assessing the measures of anti-corruption activities. For example, quite a large number of respondents were found not to condemn corruption. In a hypothetical situation[13], 10% of public officials, 34% residents and 35% entrepreneurs would behave corruptly. There are many activities in the implementation plan of the anti-corruption strategy for increasing people's awareness of corruption and shaping their attitudes, such as videos for shaping young people's attitudes and guidance for teachers in social education classes; organising training courses for journalists in order to increase media employees' awareness and thereby shape the attitudes of residents and organising ethics training courses for officials and other public sector target groups. The view of Estonians and non-Estonians towards corruption differ to quite a large extent. For example, 28% of Estonians and 47% non-Estonians would agree to pay a bribe. Estonians are also less accepting towards corruption in general. Several activities have been foreseen with the anti-corruption strategy, that are targeted at non-Estonians. For example, information (in the website www.korruptsioon.ee) about corruption is translated into Russian in order to shape the attitudes of Russian-speaking residents and to help distribute the relevant information in Russian-speaking channels. In addition, there is training for Russian-speaking journalists and entrepreneurs.

Although the corruption awareness of public officials is higher than in other groups, there are also activities planned to shape their attitude towards corruption and to increase awareness. The main measures are ethics training courses for officials and other public sector target groups, preparing an online version of a video lecture to introduce the Anti-Corruption Act and updating the content of the handbook[14] on conflicts of interest etc.

Comparing the latest study to the previous study, which was conducted in 2006, there have been several positive changes. When presenting residents with a hypothetical situation, 34% of them were ready to offer a bribe to an official, 10 percentage points less than in 2006. 54% of the residents consider it corruption if an official accepts a present in return for his or her services. This is 10 percentage points more than in 2006. The number of entrepreneurs that consider the acceptance of presents to be corruption has increased as well – now it is at 62% whereas it was 57% earlier. Entrepreneurs consider corruption to be less common in all fields when compared to 2006. There are also less public sector employees who believe that the employees of their institutions are being paid bribes – in 2010, 20% of them thought this way, but in 2006, this figure was 23%. In 2006, 73% of residents thought that bribery was a means to avoiding penalties and punishments, but now this figure has decreased to 53%. It is also remarkable that whereas bribery is generally not considered to be a very common way of getting a job, there is an increasing share of public sector employees from year to year who believe that bribes are a common way of getting a job (9% in 2010 and 6% in 2006). 21% of residents and 16% of entrepreneurs have responded that they know someone else who has encountered a conflict of interests of an official – a situation where an official orders a product or a service, paid for with funds of an institution or the state, from an enterprise where his or her relative is a shareholder.[15]

The number of people having encountered corruption has decreased. For example, while in 2006, 15% of entrepreneurs had been asked to give bribe, in 2010 this figure was 10%. While in 2006 8% of residents had paid extra to an official or brought a present, now this figure is 4%. There were 2 percentage points less of those residents who had bought presents for officials in return for their services (8% in 2010 and 6% if 2006). In the case of entrepreneurs, this figure has decreased by 3% (from 11% to 8%).[16]

Follow-up

The reports of the integrity and anti-corruption surveys are available at the central websites. The main conclusions are presented at the meeting of the secretary-generals of the ministries, at the events of the cooperation network and via field-based e-mail lists and press releases. But first of all, it is very important to discuss the results of the surveys with the civil service agencies to improve their integrity infrastructures and raise the ethical competencies of the officials. The next survey on 'Roles and attitudes in civil service' takes place in 2017. The 'Analysis on integrity infrastructure in state administrative agencies' indicated several areas that need to be addressed on an organisational level. Thus, the Ministry of Finance and the Ministry of Justice will elaborate central methodologies on integrity risk assessment that allows the regular monitoring of integrity infrastructure in civil service organisations. Positively, it could be said that the interest of individual organisations to ask advice on developing integrity infrastructure, expand organisational guidelines and discuss individual cases has increased remarkably.

The results of the 'Corruption in Estonia: Study of Three Target Groups' are used to draft the Anti-Corruption Strategy, including preparation of the activities to the implementation plan of Anti-Corruption Strategy. Among other things, results of the studies are used to assess the effectiveness of the Anti-Corruption Strategy and plan the new activities if necessary. The next survey is planned for later than 2016. The reports of the studies are available at the corruption website, which is created to help people to learn more about corruption in general, how to recognise corruption and anti-corruption activities.

In conclusion, Estonia is a country that stands out for its long-term tradition of integrity and anti-corruption surveys. Repeated surveys allow the evaluation of the changes in perception and attitudes of different target groups in the long run, provide input for evidence-based policy making and provide indications as to whether the anti-corruption and integrity-raising activities have contributed to the changes in values, attitudes and perception. In that sense, it is good that the surveys have different methodologies,

enabling some cross-survey comparisons on similar topics and target groups. In case of civil servants, all studies have shown that their awareness on unethical practices has increased year by year. Although there are many challenges ahead, especially in the public sector, the 'soft' approach on ethical competence and advising has had a positive impact over the long run.

Practical information

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Notes and References

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[3] Ibid.

[4] Ibid.

[5] Report of the survey 'Roles and Attitudes in Civil Service' (2013, in the Estonian language). URL: http://www.avalikteenistus.ee/public/eetika/Rollid_ja_hoiakud_avalikus_teenistuses_2013.pdf

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[9] Similar conclusion is also indicated in the paper 'Public Sector Value Congruence Amond Old and New EU Member-States. Empirical Evidence from the Netherlands, Denmark and Estonia'. Zeger van der Wal, Aive Pevkur, Karsten Vrangbaek. Public Integrity, 2008, vol 10, no 4, pp 315-333.

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11 This chapter is based on and referred from the survey report K. Vajakas, M-L Sööt, 'Corruption in Estonia: study of three target groups' 2010. URL: http://www.korruptsioon.ee/et/korruptsioon-eestis-kolme-sihtruhma-uuring-2010-justiitsministee-rium-ja-tartu-ulikool

12 Resident refers to the person who lives permanently in Estonia, regardless of citizenship

13 There were five different situation in the questionnaire, which were same to all target groups, example the entrepreneur offers to the elite school director the vacation trip, in return he expects his son will be accepted into that school and the public official uses employers car for private purposes etc.

14 Handbook of conflict of interest is a web-based manual, which can be updated if necessary. URL: http://www.korruptsioon.ee/et/huvide-konflikt/huvide-konflikti-juhtumeid-ja-lahendusi

15 K. Vajakas, M-L Sööt, "Corruption in Estonia: study of three target groups" 2010. URL: http://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/summary_of_the_study_corruption_in_estonia_study_of_three_target_groups_in_2010.pdf

16 Ibid.

Hungary:
Integrity survey by the State Audit Office

Gyula Pulay, supervisory manager, State Audit Office of Hungary

The role of the SAO in the National Integrity System

The State Audit Office of Hungary (SAO), responsible for conducting the integrity survey, is the supreme financial and economic audit organisation of the National Assembly of Hungary. The SAO is fully independent from executive power. Hungary is a country that fully complies with international requirements concerning the independence of SAIs, and also with the recommendations of the United Nations on this matter. The SAO is proactive and assumes an active role in the fight against corruption. Through its audits and in-line with its strategic goals, the SAO ensures a transparent public finance system and enforces the principle of accountability.

In terms of its legal status and audit powers, the SAO operates as an office-type institution. The SAO audits and formulates findings and recommendations. The SAO does not settle legal disputes and does not issue mandatory legal opinions. Moreover, it does not conduct investigations and does not issue direct sanctions. Based on its findings, the SAO may initiate proceedings against the audited bodies and the persons in charge within the framework provided by the Act on the SAO. (The first Act on the SAO was passed by the National Assembly in 1989 as one of the basic pieces of legislation creating the new democratic political institutions in Hungary. This law was later renewed by another Act on the SAO and accepted by the National Assembly in 2011.) Besides its auditing activities, the SAO has an advisory role as well. In order to fulfil this role, the SAO prepares analyses in different fields related to its audit activities. The SAO is primarily the advisor of the National Assembly, but by making its studies public, the SAO's analyses, evaluations and suggestions also reach other institutions and citizens interested in these matters. As its advisory role is not regulated in the Act on the SAO in detail, the National Assembly will, from time to time, determine certain advisory tasks for the SAO by special resolution. (The draft of the resolutions is prepared by the SAO, which means that the SAO makes suggestions to the National Assembly and the Assembly generally approves them, sometimes with minor modifications.)

In 2007 – as a part of the process described above – the National Assembly instructed the SAO in one of its resolutions to pay close attention to the typical triggers and areas of corruption, as well as to point out any deficiencies in law enforcement. (The background of this decision was that the SAO had discovered many suspicious cases of corruption and wanted to do more to prevent corruption beside its auditing activities.)

In fulfilling its tasks as defined in the resolution, the SAO strove to learn and adapt to best international practices. During this process, the SAO learned of the internationally recognised Dutch practice of corruption risk assessment and analysis, which enforces the requirements of the integrity-based operations of public administration, and subsequently, launched an EU twinning project[1]. Within the framework of this project, implemented between 2007 and 2008, the SAO cooperated with the Netherlands Court of Audit to adapt the Dutch methodology of organisational integrity to the situation in Hungary. Once familiar with this integrity approach, the SAO then suggested to the National Assembly and government that it should commence its own integrity based corruption-prevention programme in Hungary. Having recognised the significance of developing a culture of integrity, the National Assembly confirmed the SAO's mandate on the area of preventing corruption in a new parliamentary resolution in 2009. The Hungarian government acknowledged this activity and gave the SAO access to EU funding for the development and implementation of a project aimed at creating a culture of integrity within the public sector of Hungary. As a result of this political support, the SAO launched its project financed from EU funds entitled 'Mapping Corruption Risks – Promotion of an Integrity-Based Culture of Public Administration' (Integrity Project) in 2009.

As part of the project, national data surveys were carried out among institutions of the public sector on two occasions (2011 and 2012). The SAO undertook to carry out the integrity survey in the public sector on an annual basis, following the completion of the project in 2012, during the maintenance phase, which will last until 2017.

In possession of the knowledge acquired from the collaboration with the Netherlands Court of Audit, the SAO developed a new methodology for the assessment of corruption risks and the level of integrity controls aimed at defending the organisation against corruption. It should be emphasised that, even though the SAO's methodology is based on the same principles as used in the Dutch one, it is not a copy but an adaptation which takes into account the unique features of the Hungarian public sector.

During the eight years that have passed since 2007, the initiatives for the prevention of corruption have developed significantly. An Act on the SAO, accepted in 2011, created a new opportunity for the SAO to promote the culture of integrity by including advisory activities and the support of good governance in its mandate. The law made it clear that, based on its legal status and mission, the mandate of the SAO is to support actions for preventing corruption, actions against corruption, to curb corruption and to promote and introduce a culture of integrity.

In Hungary, there are also other authorities with the power to audit and monitor issues exposed to corruption, for example the Central Audit Office of the Government or the Public Prosecution Office. However, their activities are focused on the detection and retribution of corruption rather than on its prevention. They therefore do not use surveys for their work. Staff surveys (on work satisfaction, mobility etc.) are very rarely used within the public administration in Hungary. There is not a central institution that either commissions or conducts surveys among public officials.

The fight against corruption is the task of many state institutions such as the ministries, the public prosecution offices and the judiciary organisations. The main coordinating role lies with the government, which works out and implements strategies and action plans against corruption. This task is usually the responsibility of one of the ministries. During the previous government, it used to be the Ministry of Justice and Public Administration that was responsible. In the present government, it is the Ministry of Interior. There is not a special government agency with the sole task of fighting corruption.

The perceived level of corruption in Hungary and the Hungarian integrity policy

The perceived level of corruption[2]

'Real' levels of corruption are almost impossible to measure. It is therefore usually not corruption itself that is measured by the different surveys, but the perception of corruption. According to these, corruption is a serious and widespread problem in Hungary.

In 2013, according to an international survey implemented by Transparency International, Hungary's CPI (Corruption Perception Index) scored 54 points, thus ranking 47 out of the 177 countries surveyed. Among the European Union's 28 member states, Hungary ranked 20th (in the previous year it ranked 19 out of 27 member states). This shows that its ranking remains unchanged in the bottom third. In a regional comparison, Hungary is in the mid-range, following Estonia, Poland, Lithuania and Slovenia.

According to the 2013 Special Eurobarometer on Corruption:
- 89% of Hungarian respondents consider that corruption is a widespread problem in Hungary (EU average: 76%), while 19% of respondents feel affected by corruption in everyday life (EU average: 26%).
- 13% of Hungarian respondents stated that they were expected or asked to pay a bribe (as compared to an EU average of 4%). The vast majority of these allegations concerned the healthcare sector.

According to the 2013 Eurobarometer Business Survey on Corruption:
- 47% of Hungarian respondents consider that corruption is widespread in public procurement managed by national authorities (EU average: 56%) and 48% in that managed by local authorities (EU average: 60%).
- 81% of Hungarian business respondents consider that favouritism and corruption hamper business competition (EU average: 73%).
- 59% of respondents say that corruption is a problem for their company when doing business in Hungary (EU average: 43%).

Anti-corruption policy in Hungary

In 2012, the Hungarian Government adopted a two-year anti-corruption programme comprising a range of integrity-related measures for the central public administration. It did not cover the rest of the public sector or the business sector since the government tried to focus on organisations with major authority over public resources, and that were directly supervised by the government. In relation to the central public administration, the anti-corruption programme focuses on prevention policies, such as the setting up of an integrity management system that started

in 2013. This includes the appointment of integrity officers responsible for monitoring compliance with ethical requirements, anti-corruption training for civil servants, the publication of a code of conduct for employees of state institutions, corruption impact assessments of governmental proposals and decrees, the protection of whistle-blowers, and further awareness-raising activities. The approach is compliance-oriented but ethical behaviour and values are also an important part of the anti-corruption training. Based on ethical standards in the public service, a code of professional ethics for public servants and a code of conduct and ethical process for law enforcement bodies were adopted in mid-2013. In the last few years, some municipalities have adopted ethical codes that mostly provide general guidelines on fair treatment of clients without necessarily covering practical rules concerning gifts or favours.

In 2015, the government accepted a new and nation-wide strategy and a related two-year action plan. This covers the whole public sector including state owned companies. The strategy invites the so-called 'constitutional institutions', independent from the government, to cooperate with the government in order to reach the aims of the strategy. The creation of a culture of integrity is also a central element of the new strategy.

Methodology and content of the survey

Scope of the survey
The management of the SAO defined the scope of the survey after consultations with the representatives of the Hungarian Government. The survey covers the so-called 'budgetary institutions'[3] of the Hungarian public sector as a whole. This scope reflects the position and formal powers of the SAO: the SAO is the auditor of the organisations using public funds and public property and has less to do with private sector entities. As far as the scope of the programme was concerned, there were two other options. The first option was to limit the scope of the survey to the public administration similar to the Dutch case. But the decision makers decided for the broader option, taking into consideration the fact that high corruption risks were present in the whole public sector and not only in the public administration. The second option was to also include state-owned companies in the survey. But it turned out that corruption risks and potential integrity controls for the two types of organisations (companies versus budgetary institutions) are so different that they could not be covered by the same survey. One can see that decisions on the scope of the survey were made on a professional basis and not influenced purely by political considerations. Naturally, corruption is a sensitive political question and therefore the

decision makers have had to include political considerations as well. In order to enhance the professional background of the survey, external, academic experts were invited to participate in the design of the questionnaire and other elements of the survey. Two governing bodies were set up: one for the continuous monitoring of the implementation of the project and a more high-ranking one, for supporting the strategic decision-making. In both of the bodies, the relevant ministries and civil organisations (e.g. Transparency International) were represented.

In 2011, when the first survey was implemented, there were about 15 000 budgetary institutions in Hungary. At that time, there were about 3000 central budget institutions[4] and about 12 000 municipal budget institution[5]. From them all, the central budget institutions were invited to take part in the survey and another 3000 municipal budget institutions were selected on a random basis as potential participants of the projects, i.e., the questionnaire was sent to them. Since 2011, very profound changes have been carried out in the Hungarian public sector, resulting in a decrease in the number of the budgetary institutions (small institutions were merged into bigger ones). In spite of these changes, the SAO was sending the questionnaire to around 6000 institutions a year. In this manner, the survey has been covering an increasingly bigger part of the public (budgetary) sector of Hungary.

Goals of the survey
The goals of the Integrity Project were clearly defined in advance of receiving the EU funding. The goals were the following:
- To identify the risks which may influence the integrity of the given budgetary institution adversely;
- To expand the circle of institutions that accept and endorse the integrity-based culture;
- To promote cultural change and to create an integrity-based institutional operation in the Hungarian public sector.

The essence of the method
The method applied in the SAO's Integrity Project does not examine the existence of corruption. Rather, it examines the vulnerability of an organisation to corruption and the type and extent of the control system (the level of the integrity controls) that the organisation has established in order to manage and avert corruption risks. This preventative approach is the special feature of the integrity survey of the SAO.

The main innovations of the Hungarian integrity survey
By adopting, enhancing and extending the survey to include the entire Hungarian public (budgetary) sector according to the Dutch method, aimed at strengthening the

organisational integrity of public administration bodies, the SAO developed a unique "Hungarian model". The most important innovation of the Hungarian adaptation is that the evaluation of the corruption risks and protection of integrity controls are not performed by the individual institutions, but by a survey questionnaire sent by the SAO to thousands of budgetary institutions in the public sector. The evaluation of the questionnaires is also performed by the SAO, based on a computer programme using a pre-fixed algorithm. The algorithm is very simple: all the potential answers have a weight, and the indices (see later) of a certain organisation are calculated as the weighted average of the answers given by this organisation. One can see that this method is also a kind of self-assessment, as answers of the organisations are not being controlled by the SAI before calculating the indices and publishing them. In spite of this, the participation of the SAO in the process helps to make the evaluation more objective, transparent and better organised. (The answers are recorded by the SAO and therefore there is the chance of a potential audit. Questionnaires are to be answered within a limited period).

Why was this innovation so important in the Hungarian case? Hungarian budgetary institutions were not familiar with the integrity approach and did not perform self-assessments. There was therefore a need for an organisation – in this case, the SAO – that would act as a catalyst in creating an awareness of integrity and, ultimately, to it being included in the everyday practice of the managers of the Hungarian budgetary institutions.

A second important innovation was the creation of a 'Corruption Risk Map' (see picture below), which made the differences between corruption risk levels and levels of integrity visible for both the organisations participating in the survey and for the broader public. The Corruption Risk Map is a real geographical map of Hungary on which the main survey results of the participating budgetary institutions can be seen. This map shows citizens whether their local government or the public school of their children were participating in the survey or not, and, if they had, what scores they received for corruption risk and their level of the integrity controls.

Finally, it is important to mention that the completion of the questionnaire was voluntary, unlike the Dutch case, where central public administration institutions are obliged by law to regularly make such integrity self-assessments. Why did the SAO decide for it to be voluntary? Because the SAO wanted to *create* a culture of integrity and in order to create a new culture, you have to convince people that participating in the survey is in their own interest rather than just compelling them to fill in a questionnaire without knowing the sense of it.

Figure 1: The Corruption Risk Map of Hungary
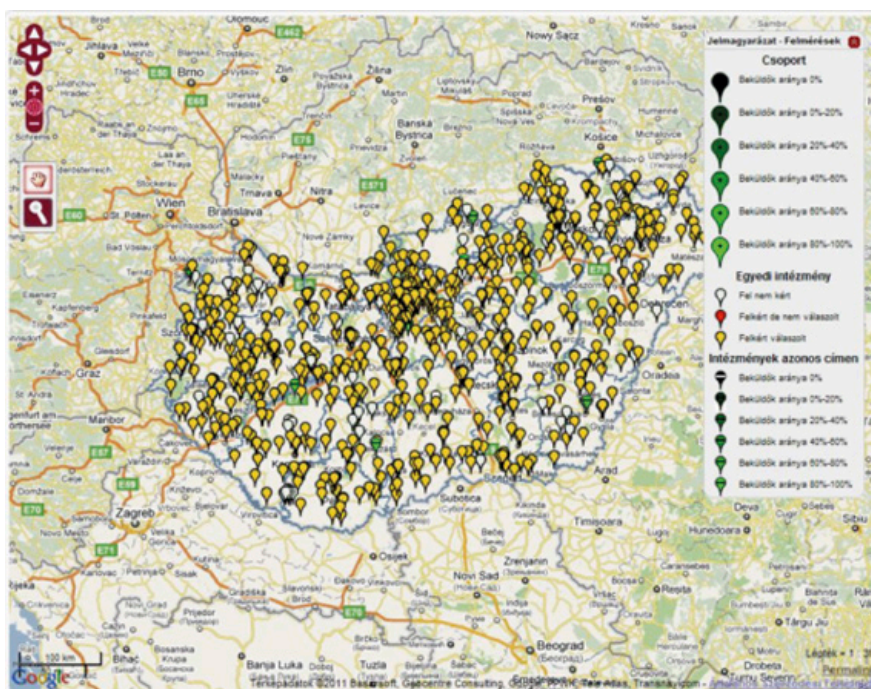
Technical details of the survey

The SAO applies the standard electronic questionnaire method to the way in which it records survey data. The questionnaire includes 155 questions in total, divided into 16 question groups. For the most part, the questionnaire consists of dichotomous (i.e. yes/no) questions. The questionnaire also includes multiple choice questions. The third question group contains questions where the responding organisation provides a response by entering various numerical data.

The questionnaires completed by the respondent budgetary institutions arrived via the SAO's document management system into the Geospatial[6] Integrity Information System (TiiiR), the electronic database developed as part of the Integrity Project. It automatically loads the response data into a database and uses it to calculate complex indicators (so-called vulnerability and control indices) using the simple statistical algorithms mentioned before. Using geospatial information methods, the TiiiR also displays risk indices on an online platform, creating the Corruption Risk Map refered to above.

The IT system calculates three indices from the questionnaire data:
- *The Inherent Vulnerability Index (IVI),* which makes the components of the inherent vulnerability that depend on the legal status and tasks of budgetary institution, measurable. If, for example, an organisation issues official certificates, licences, exercises infringement powers, levies fines, these are identified as risk factors and the value of the index increases accordingly.
- *The Enhancing Factors Index (EFI),* which captures the components that increase inherent vulnerability depending on the operation of various institutions. If, for example, the respondent budgetary institution received EU grants in the period under review, participated in, prepared or conducted a public procurement procedure or utilised any of its real properties, held securities or rights and concessions, then these are identified as 'enhanced factors'.
- *The Existence of Controls Index (EoCI),* which reflects whether a given budgetary institution has institutional controls in place and whether those controls can effectively fulfil their objectives. Here we examine the existence of controls such as the existence of rules for conflicts of interest and the acceptance of gifts, the controls of the use of external experts for public procurements or the selection of new workforce.

These indices show the level of corruption risk and the controls of public sector organisations in percentage terms (0-100). With risks, the higher the value of an index, the more risk factors exist in the organisation. In respect of controls, a high value suggests a high number of controls.

The number of questions belonging to the various index numbers and the maximum points attainable for answering these questions are shown in Table 1.

Table 1: Number of questions and the maximum points attainable for answering these questions by index

Index names	Index maximum values	Number of questions
Inherent Vulnerability Index	70 points	30
Enhancing Factors Index	148 points	64
Existence of Controls Index	113 points	61

The questionnaire focuses on areas such as European Union funding, public procurement, official powers, human resource management and anti-corruption measures.

The value of indices are calculated:
- For individual respondent institutions
- For all respondents
- For each of the 16 groups[7] of respondent institutions.

The survey results

Given the voluntary nature of the survey, changes in the number of organisations participating in the survey are an indicator of the spread of long-term commitment to the strengthening of integrity and the fight against corruption. 1584 organisations participated in the 2014 survey, the highest number so far (see Figure 1). These respondents employ 55.6 per cent of the total staff working in the public sector. This means that the coverage of the survey is relatively good. On the other hand, we face the same problem of every voluntary survey: namely that it tends to be the more committed institutions that respond and, therefore, the results calculated by their answers tend to give us a better picture than what the reality may be.

Figure 1: Number of respondent organisations between 2011 and 2014
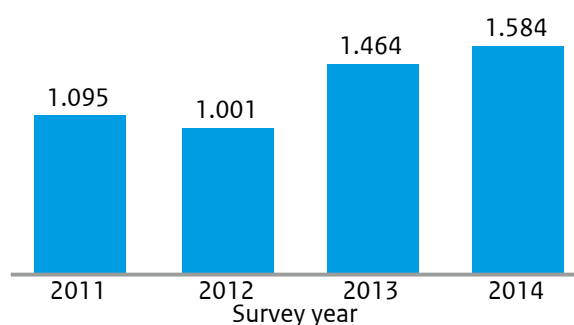
Comparative analysis of 2013 and 2014 survey results

953 institutions, employing 47.5 per cent of the total public sector personnel, took part in the survey in both 2013 and 2014. This enabled us to conduct a distortion-free[8] comparison. (It should be noted that the total number of respondents and the current sample show great similarity in terms of distribution and, therefore, with certain exceptions, the conclusions drawn here are deemed to also be correct and relevant in the case of the former as well.) The index values calculated for the aforementioned range of institutions are shown in Table 2.

Table 2: Trends in index values between 2013 and 2014 (%)

Index	2013	2014	Change compared to 2013 results (percentage points)
Inherent Vulnerability Index	38.30	37.44	- 0.86
Enhancing Factors Index	26.27	25.54	- 0.73
Existence of Controls Index	61.93	63.12	+ 1.19

From the table above, it can be seen clearly that, when compared to the results in 2013, there was no significant change in the index values calculated for the 953 institutions in 2014: the level of inherent risks and enhancing factors dropped by 0.86 per cent and 0.73 per cent respectively and the level of existing controls rose by 1.19 per cent. The slight decrease in corruption risks and the concurrent increase in the level of existing controls have produced a positive effect, signalling a narrowing gap between risks and controls in this set of institutions. These results are in line with professional expectations. Inherent vulnerability is – by nature – a slowly changing characteristic in an organisation. The slight decrease of the average index is due to the shift of many administrative tasks from the local government to regional, administrative bodies. There are much more local governments than regional administrative bodies, a fact that is reflected in the index calculated as a weighted average. Factors that greaten the risk of corruption also usually change slowly. More interesting is the impoovement of the 'Existence of Controls' index. This may reflect three factors. The first factor is changes in the legal environment forcing budgetary institutions to increase their integrity controls. In this case – as we will try to show later – this factor played an important role. The second factor is that the budgetary institutions alo try to enhance the level of their integrity controls from their own initiative. In our case – as it is reflected by the slight increse of the use of the 'soft controls' – this may have a role but is not very important. The third factor could be that organisations try to play with the indices and fill the questionnaire with false data in order to look better. The relatively slight increase of the 'Existence of Controls' index shows that this was not the case here.

Connection between exposure to corruption and the establishment of integrity controls

Based on the data provided by the assessment of integrity, the situation of public institutions can be analysed using various methods and from various points of view. I am going to highlight one of them with the sole purpose of demonstrating the potential use of the data.

In this analysis[9], we (my colleagues and me) were seeking answers to the question: 'Is there a connection between an institution's exposure to corruption and the establishment of integrity controls?' We compared the index rates of the inherent exposure of certain types of institutions to the index rates of controls in those types of institutions. Based on the index rates of the institution groups, we have drawn a linear trend line to be used as the basis of comparison. The results are presented in Figure 2.

Implementation of hard controls

The survey's questions covered many of the hard integrity controls. From them we selected a group of controls that were directly introduced to fight against corruption. We call them 'special' corruption measures. Using the comparable data set of the 2013 and 2014 surveys, we can conclude whether there was a significant rise in the number of institutions using these specials controls. Results are presented in Figure 3.

The figure shows progress in different areas of the special controls. There was a significant increase in the number of organisations that: had a code of ethics, procedures to deal with complaints, whistleblower reports, provided anti-corruption training to their employees and conducted special corruption risk-analyses. The positive shifts were primarily due to the changes of the legal environment. In 2013, a Code of Ethics was accepted both for the civil servants of the central public administration and for the employees of the judiciary organisations. Therefore the ratio of organisations having a Code of Ethics reached almost 100 percent among the judiciary organisations, government bodies and regional administrative organisations. Between the two survey periods, a new law came into force concerning procedures to deal with complaints and whistleblower reports. This widened the scope of the organisations compelled to regulate these issues. Performing corruption risk analyses and organising anti-corruption training have become compulsory for the central public administration units.

Figure 2: Relation between Inherent Vulnerability Index and Existence of Controls Index (%)
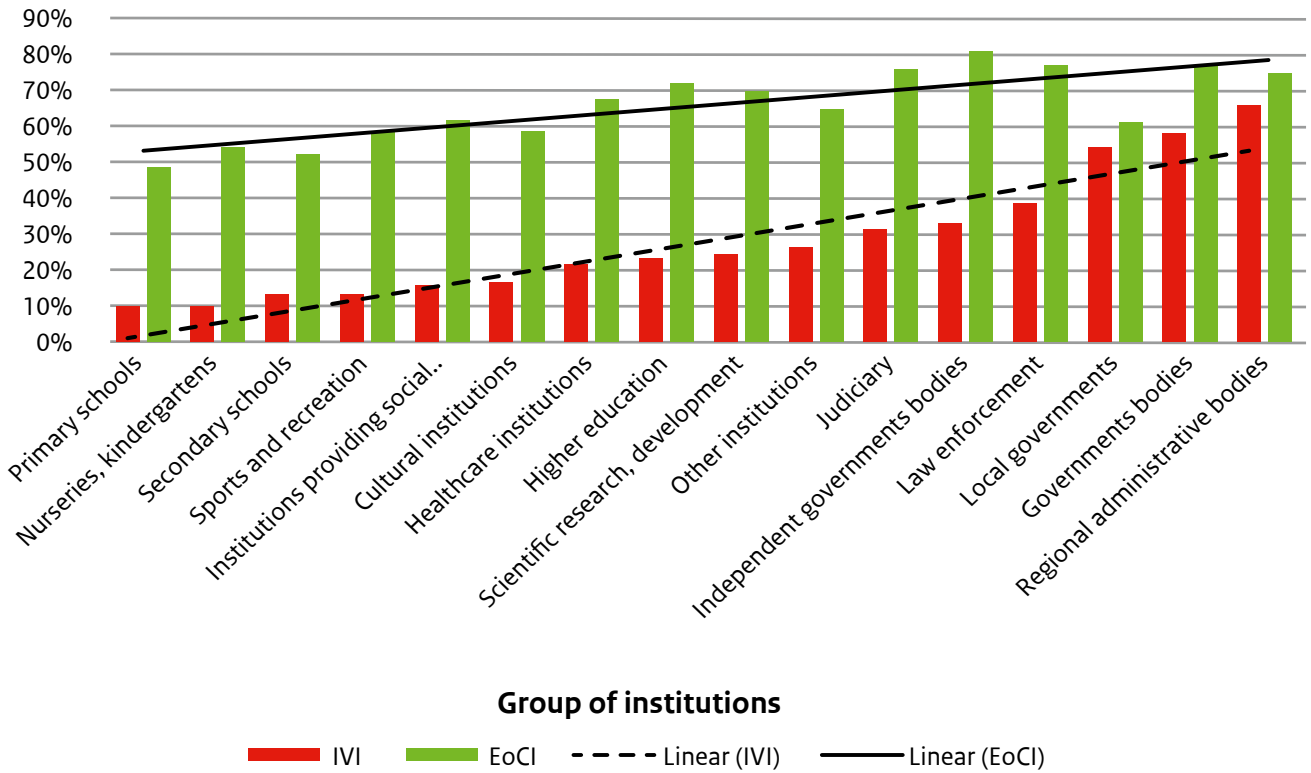

Figure 3: The ratio of institutions applying special anti-corruption measures (2013-2014)
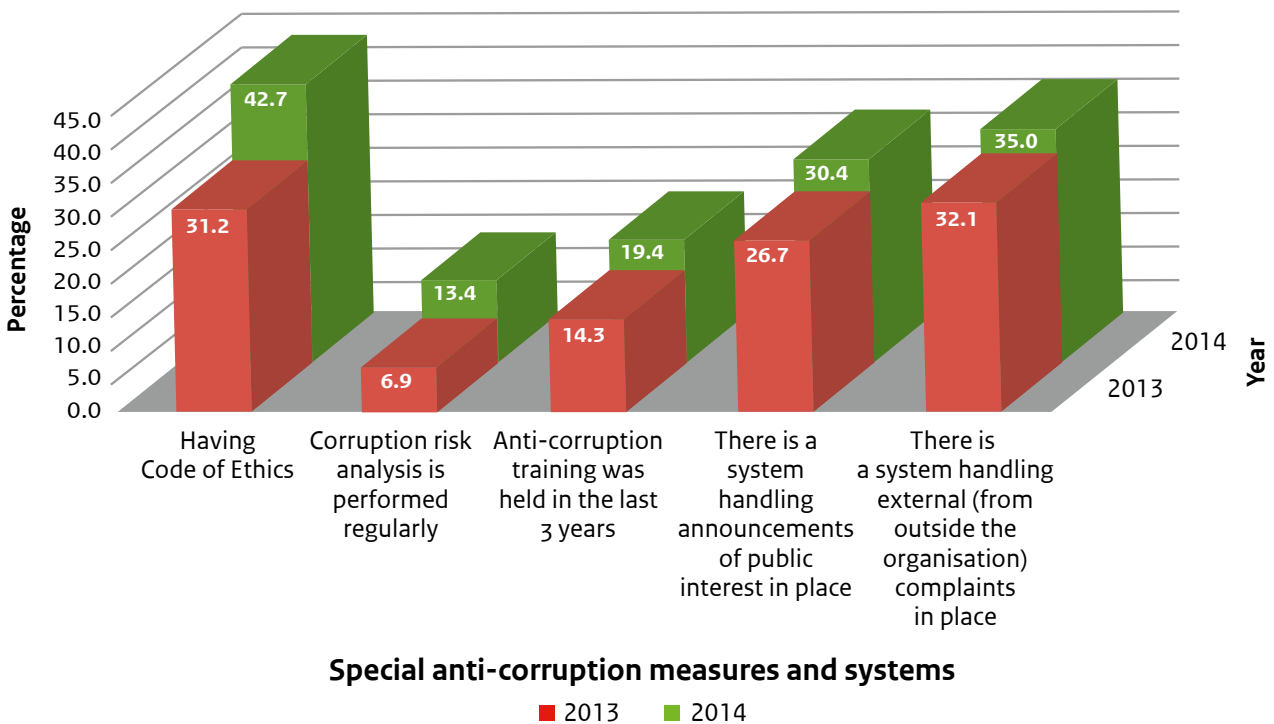
Table 3. Changes in the ratio of the application of soft controls(%)

Soft controls	2011	2012	2013 comparable*	2014 comparable*
The issue of a conflict of interest is regulated	82.4	85.5	80,3	82,7
Aspects of equity consideration are publicly disclosed	40.8	81.9	86,7	88,1
Relationships with outside players are regulated	9.7	11.1	21,7	21,6
Performance assessments has impact on the annual income of employees	52.6	53.7	51,1	46,9
Strengthening integrity is a strategic aim.	54.7	52.5	57,4	57,8
Acceptance of gifts, invitations and trips are regulated	16.8	19.0	20,9	27,0

*Ratio was calculated from the data of the 953 institutions that took part in the survey in both 2013 and 2014.

Survey results related to the soft controls

The term 'soft control' was almost unknown in Hungary before the SAO defined it. Controls not stipulated as 'mandatory' in the statutes were categorised as 'soft'.[10] These include areas related to ethics or human resource management.

There were six[11] specific questions in the questionnaire by which the SAO tried to measure the existence of soft controls. Table 3 presents how the ratio of organisations applying soft controls has changed over the last four years.

Based on the data of the four surveys we can state that – with one exception – there was moderate growth in the application of soft controls.

The communication of the results

Indices calculated for participating organisations are published on the SAO's integrity website[12] on the Corruption Risk Map.

Besides informing the public, it is essential for each institution participating in the survey to be able to assess its own level of integrity as an organisation. The SAO strives to hold up a mirror to these institutions. In doing so, it uses two methods:

On the one hand, the SAO publishes a summary evaluation report based on the results of the integrity survey on an annual basis. These reports show the three index numbers, what they look like compared to the national average and compared to various groups of institutions. The reports also raise awareness of corruption risks and analyses achievements concerning integrity controls. As a result, we have seen slow but steady development in the establishment of integrity controls.

On the other hand, the SAO analyses the corruption risk and integrity control levels of various groups of institutions based on the annual surveys. Using this analysis, budgetary institutions can compare their own results to those of the similar institutions. For instance, a hospital can compare its results to those of other hospitals. Such analysis can be considered as an almost perfect mirror, as by looking into the findings, the head of a hospital can investigate why the integrity controls most hospitals employ do not function properly in his or her institution.

The SAO is committed to share the methodology of this successful initiative. For this purpose, the SAO has created a special website which is also available in English. On the website the following can be found:
- Studies that present and summarise the annual survey results (both in Hungarian and English);
- Integrity analyses by groups of institutions;
- Additional issues related to data collection;
- Related articles, news and interviews.

The methodology and the results of the integrity survey have been described at both bilateral and multilateral meetings.

The SAO organised international seminars in 2014 and 2015 in order to bring the methodology and the application of the integrity survey, designed to strengthen the integrity of the Hungarian public sector, closer to the professionals of different supreme audit institutions within the frame of knowledge sharing.

Stakeholders response to the results of the survey

One of the most significant results of the past years is that the fight against corruption became an issue that is considered at the level of national strategy. In the spirit of the state bodies' anti-corruption efforts, on 18 November 2011, the State Audit Office of Hungary signed a joint declaration with the Ministry of Public Administration and Justice, the Supreme Court, and the Office of the Prosecutor General ensuring harmonised action within public

administration. The National Office for the Judiciary joined the initiative in 2012, followed by the Ministry of the Interior in 2014. As a result of cooperation, the anti-corruption activities of the various state institutions became closely connected and interrelated in several areas.

The above-mentioned institutions have become active supporters of the integrity surveys. For example, the minister of Public Administration and Justice in 2013 and, in 2015, the minister of the Interior wrote letters to the budgetary institutions encouraging them to participate in the survey. In 2014 and 2015 – as a result of the active support of the head of the National Office for the Judiciary – every judiciary organisation took part in the survey.

The Public Administration's Corruption Prevention Programme launched by the government in 2012 was mostly based on the recommendations advised by the SAO's Integrity Project. The new National Anti-corruption Strategy of the government is also influenced by the results and the findings of the Integrity Project.

Cooperation against corruption is also symbolised by the first generation of integrity advisers graduating in 2013. Experts were trained with the cooperation of the SAO, the Ministry of Public Administration and Justice and the National University of Public Administration.

The concept of 'integrity' has become increasingly well known to the Hungarian public. The main findings of the studies prepared by the SAO on the basis of the integrity survey are frequently quoted by newspapers and by civil organisations dealing with corruption-related issues. At the same time, there is little evidence that the integrity indices were used by local communities for evaluating individual budgetary institutions; for example, blaming a local hospital for the low level of its integrity control system.

Changes in the integrity policy of the SAO generated by conducting the survey

The main activity of the supreme audit institutions is auditing. So the question arises: how can the State Audit Office use the integrity survey in its audit work?

The SAO selects its audit topics and areas based on risk analysis. The results of the integrity survey provide a good basis for this because they point out what groups of institutions and scope of activity show the highest risks.

Another area in which it can be used is for is the development of an audit methodology. This would enable us to incorporate groups of questions in our audit programmes from the issues raised in the integrity survey. In this way, regular audits can be made more focused. In addition, we attempt not only to audit the 'hard controls'

required by law, but also to include the development of soft controls because they play a significant role in the question whether a public institution is able to effectively serve the public good.

Plans of the SAO for future surveys

The SAO is developing a separate integrity questionnaire for companies owned by the state or by the municipalities. According to our plans, a pilot survey will be implemented by the end of 2015 and will be followed by regular surveys, annually, for at least three years. By the end of the maintenance phase of the Integrity Project (by 2017), the SAO would turn its questionnaire into a self-assessment tool available for every budgetary institution on its website. The SAO would encourage the continuation of integrity assessments after the survey type assessments are finished.

One of the issues of the survey is that it focuses on corruption risks typical for the public administration and is therefore less relevant for budgetary institutions that don't have administrative functions. The SAO therefore plans to develop a special integrity survey questionnaire for those budgetary institutions that provide public services but do not have administrative functions (for example hospitals, schools, museums research centres). In the new survey, the SAO will try to approach the existence and functioning of the soft controls in a new way in line with the internationally accepted term of soft controls.

Lessons learned

The integrity of an organisation is part of the culture of the organisation. Cultural changes can't be achieved overnight. Rather, it is a relatively long process. However, a catalyst could accelerate the process. The SAO's integrity survey and the role the SAO played are two examples of such catalysts. A few years ago, the concept of integrity was almost unknown in Hungary. Nowadays, many hundreds of budgetary organisations participating in the survey are striving to identify corruption risks and strengthen their integrity controls. Hundreds of managers are aware that, besides the compulsory hard controls they can do much against corruption by also creating and utilising soft controls.

To speed up the creation of the organisational culture of integrity, it is worth creating a protective environment. In 2013, the SAO therefore organised the Circle of Integrity Supporters. This integrates the public entities that undertook to participate in the surveys up until 2017. It's important that respondent institutions complete the integrity survey questionnaire each year, thus ensuring the comparability of the data of all years. Having recognised this, in 2013, the SAO proposed the cooperation of the organisations participating in the data recording. More than 85% of institutions completing the integrity survey accepted

the proposal and joined the Circle of Integrity Supporters. Out of the institutions that undertook long-term cooperation, nearly one thousand completed the questionnaire in 2014. The SAO set up a special forum for them on its integrity homepage providing them additional information on integrity related matters.

Corruption is a bad thing and integrity is a good thing. Managers do not like to deal with corruption and prefer to pass anti-corruption responsibilities to their subordinates or external authorities. Integrity is about positive values, about creating something good. More managers are convinced that integrity is something they must deal with personally.

The issue of integrity became a topic covered during the training of civil servants. Integrity advisors are trained at the University of Public Administration and the SAO's integrity survey results are a part of the curriculum. The curriculum is focused on knowing the rules and on analysing corruption risks, but it has value-oriented parts as well.

The integrity survey proved to be the trigger that set-off the creation of a culture of integrity.

Practical information

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Notes

[1] 'Twinning projects' are a method of capacity building and technical assistance in the EU. During the project, representatives of the learning organisation work closely with the experts of the teaching organisation, which is the counterpart (the 'twin') of the teaching organisation in another EU member state. (The author of the study was taking part in the twinning project and, since 2013, is in charge of the implementation of the Integrity Project of the SAO.)

[2] This subsection uses data and findings from the 2014 Corruption Report of the European Commission on Hungary.

[3] Institutions such as hospitals, schools, museums, ministries that run their activities from a budget defined by the budget law or by a decree of the local government.

[4] Institutions financed from the central state budget.

[5] Institutions financed from the budget of one of the local governments.

[6] 'Geospatial' means that the addresses of the respondents are also recorded by the system. Data is also processed with a territorial dimension and the information is presented in a map of Hungary.

[7] Public agencies participating in the survey are grouped into 16 categories: government bodies, local governments, regional administrative bodies, independent government bodies, law enforcement, judiciary, scientific research and development institutions, nurseries and kindergartens, primary schools, secondary schools, higher education, healthcare institutions, institutions providing social services, cultural institutions, sports and recreational organisations and other institutions.

[8] If we compare the results of the surveys of two years, the comparison would be affected by the different composition of the responding organisations. We could avoid this problem by comparing only the results of those organisations that responded to both surveys.

[9] See in detail: State Audit Office of Hungary (2014).

[10] This definition doesn't describe how soft controls are used internationally, but in the Hungarian case, it was practical to use this definition in order to differentiate hard controls from soft controls. There is a part in the questionnaire that deals with the role of HR, management and culture.

[11] At the beginning there were eight, but in the meantime, two of them have become compulsory for a group of the budgetary institutions. They therefore no longer met the criteria of 'soft controls.'

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The Netherlands:
Developments in Monitoring Integrity in Public Administration

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Introduction

The Dutch public administration is known for its high standards of integrity and the preventative scope of its integrity policies (European Commission 2014). As early as 1992, integrity was put high on the political agenda when the then Minister of the Interior, Ms Ien Dales, gave a ground-breaking speech before a yearly conference of the Dutch municipalities. This resulted in the formulation of comprehensive integrity policies, various laws and regulations. However, it took until 2004 before the Ministry monitored, for the first time, the formal implementation of integrity policies within the Dutch public administration. This was repeated in 2008. In 2012, the scope of the monitor was expanded to include employee surveys. The main objective of monitoring both the integrity policies themselves and common perception of these policies is to get a better grip on the level of integrity within the different organisations. At the same time, the Integrity Monitor fits into a broader wish to formulate evidence-based policies.

The focus of this case study will be the Integrity Monitor of 2012. First we will present the role of key players within the Dutch National Integrity System and a short history of how the integrity policies, and the way in which they are monitored, have been developed within the Dutch public administration. Integrity policies concerning elected or political appointed officials are also monitored, but these results are not discussed in this case study.

Key players in the National Integrity System

The responsibility for safeguarding the integrity of public officials is divided between several key players in the Netherlands. Most importantly, the Ministry of the Interior and Kingdom Relations which is responsible for strengthening integrity through preventive policies; and the Ministry of Justice, for fighting corruption through criminal policies. In addition to these bodies, external control exercised over the central government by the Netherlands Court of Audits[1] has, from the beginning, played a significant role in addressing the effectiveness of integrity policies and stimulating new policies through audits of the central government.

In 2006, the minister of the Interior and Kingdom Relations established the National Integrity Office (BIOS) to support public sector organisations in their efforts to organise, manage, and implement effective integrity policies. To this end, BIOS develops practical instruments; disseminates integrity-related knowledge; connects policy makers, practitioners and scholars by hosting a variety of conferences and workshops; and conducts academic research. Since 2015, BIOS also has a helpdesk for local governments providing advice on how to deal with integrity breaches by political officials. BIOS does not conduct integrity investigations. Its role is purely supportive.

The Ministry of the Interior and Kingdom Relations has a general responsibility for the quality of public administration. As Dutch public administration – currently consisting of 11 Ministries, 12 provinces, 393 municipalities, approximately 25 Water Authorities and various central public organisations[2] – is decentralised, the individual organisations are autonomous. Also on a central level, the individual ministries are autonomous in their organisational policies. The minister of the Interior and Kingdom Relations fulfils a more supra-sectorial, coordinating role, and makes sure the laws, rules, codes, and instruments are in place for organisations to carry out their responsibilities. For integrity policies, the main legal instrument is the Civil Servants Act. Most provisions within this Act require interpretation in sector regulations or by the local authorities. As integrity is linked with the quality of public administration, the potential scope of integrity policies is wide and goes beyond the prevention of fraud, corruption and conflict of interests, to include issues such as the correct use of official powers and information, correct dealings with colleagues and citizens, and any conduct that might damage the public office.

Because of this decentralised system, the Ministry has almost no formal powers to enforce actual implementation by intervention. It must rely on more informal means; one of which is the power of knowledge and persuasion. For this, the Ministry gathers structural information on all aspects of the quality of the public administration

Development of integrity policies[3]

Before 1992, the general idea in the Netherlands was that corruption was not a real problem. A wake-up call came in the early 1990s from indications that criminal organisations were attempting to infiltrate Dutch government and police forces, several incidents in which confidential political information was leaked and, most importantly, incidents of large-scale corruption and fraud between the construction sector and municipalities in the Southern Province of Limburg became public (Dohmen 1996; Dohmen and Verlaan 2003). This resulted in a speech by the then Minister of the Interior Ms Dales who framed integrity in absolute terms (see Dales 1994). According to her, 'the government has integrity or not. You cannot have a bit of integrity.' Integrity was about more than preventing fraud and corruption; it was also about what she called 'the decay of power'. Her speech was critically received by the municipalities and the public administration as it seemed to imply that the Dutch public administration was corrupt. The Minister then stated that the Dutch public administration generally adheres to high standards of integrity, but in light of the democratic rule of law, the issue of integrity requires active and conscious attention. Since then, these views have formed the basis of all integrity policies carried out by the Ministry of the Interior. Initially this was done by focusing on the responsibilities of organisations to assess and address their risks and vulnerabilities as part of their general operational policies (personnel, finance, administrative procedures etc.), which included attention to the culture of an organisation and the awareness among public officials concerning the boundaries of proper conduct. The Ministry of the Interior reported yearly to Parliament about the developments on integrity policies within the central government and the police (the two sectors for which it carried direct responsibilities), and the wider public administration (provinces, municipalities and the Water Authorities). Under pressure of Parliament and the critical audits of 1996 and 1999 by the Netherlands Court of Audit, which demanded more central and structural policies, provisions were introduced in 1997 and 2003 in the Civil Servants Act obliging governmental organisations to regulate conflict of interests.

In the years around 2000, the Netherlands was once again faced by a series of scandals relating to fraud within the public sector and new – this time nationwide – corruption, fraud and price-fixing scandals within the construction sector, which resulted in a Parliamentary inquiry (2002). Although no apparent bribery took place, it was clear that high officials were at least passive in the face of these practices. Some even stated that the Netherlands had become a fraudulent country. The Prime Minister started a national debate on public morals.

As a result, the responsibilities of the public administration concerning integrity policies were formulated more explicitly by the Ministry of the Interior in a comprehensive national integrity policy presented to Parliament in 2003.[4] It was in this context that the first Integrity Monitor was introduced in 2004. The new focus on integrity was further put into effect through a formal 'administrative agreement' between the Ministry and the decentralised public administrations, the 'basic norms for integrity policies for the public administration', also called the integrity standards (published 2006). At the same time, principal changes in the Civil Servants Act came into effect in March 2006. Most importantly, the new provisions in the Act obliged all organisations falling under the Civil Servants Act to have an integrity policy, to have a Code of Conduct, and the Oath of Office was reintroduced after its abolition some years earlier.

Monitoring Integrity: 2004–2012

The development of the monitoring system went through different stages, building up towards an integral Integrity Monitor in 2012. Integrity is not only an issue for the public administration (i.e. ministries and decentralised bodies), but is also integrated factual implementation with perceptions of implementation and perceptions on the organisational culture.

Check-box inventories

In 2004, the Ministry published its first Integrity Monitor of the implementation of integrity policies at the four levels of public administration (MinBZK 2004). It was a check-box inventory designed to assess if organisations have the required elements of the integrity policies in place. The results showed a lack in the implementation of policies. As the responsibility for integrity policies lies with the individual organisations, which are, in turn, controlled by their local council, all the results were published on the Internet and were searchable by organisation. This level of transparency was rather unique and not repeated with later monitoring, partly due to the extension of the survey to

include perceptions of the respondents instead of only factual questions.

After changes to the Civil Servants Act and the formulation of the standards for integrity policies, the second Monitor in 2008 focused more on the implementation of the various aspects of integrity policy as required by law, regulations and other formal agreements. The results showed clear progress in the formal implementation of the policies: most elements of integrity policies had been implemented.

Development of an employee survey on integrity

In 2006, the third integrity audit by the Netherlands Court of Audits once again showed disappointing results. The rules were in place, but most of the time the implementation of these formal preventative measures went no further than the paper they were written on. However, the Ministries objected to the focus on formal measures that were easy to measure. They stated that their policies focused on the culture of the organisation, fostering awareness and the role of managers, which were, to a lesser extent, measured in the audit.

The Ministry of the Interior rose to the challenge by developing a staff survey to measure perceptions of integrity and integrity policies. The use of employee satisfaction surveys is common practice within the Dutch public administration. The survey was developed as part of the facilitative role of the Ministry. In 2003, the programme 'Internetspiegel' had been established by the Ministry of BZK, with the intention to develop uniform surveys for government organisations to enable them to benchmark and learn from each other at lower costs.

The employee survey on integrity and integrity policies was tested in 2006. At the same time, seven questions concerning integrity became part of the bi-annual, general personnel satisfaction survey (called POMO) in an attempt to gain information on integrity that could be used to evaluate the effectiveness of the integrity policies.[5] The results of the two surveys were combined in a report and sent to Parliament, stating that the level of integrity within many organisations' cultures was shockingly low. One of the headline results was that ten percent of the respondents had little confidence in the integrity of their manager.[6]

Content of the employee survey on integrity and integrity policy

The Internetspiegel Integrity Survey consists of multiple elements that measure an organisation's policies (hard controls, organisational policy on integrity, soft controls), and elements that measure the desired effects (following rules, morally conscious behaviour, ethical behaviour). The survey is based on the work of Treviño and Weaver (2003).

Figure 1: Model of the Integrity employee survey
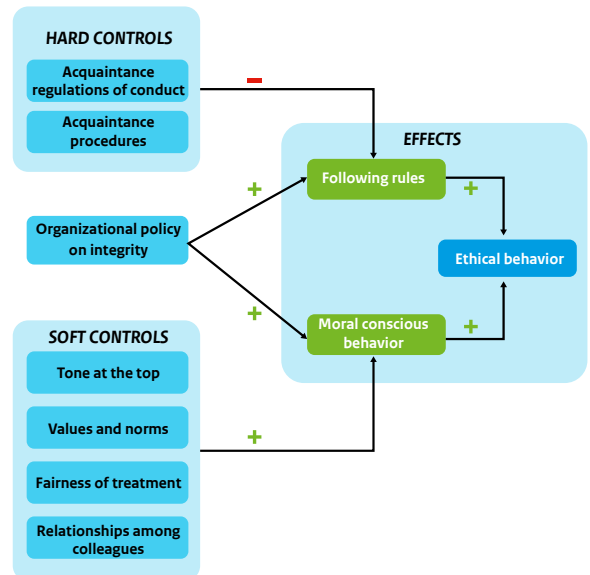
1. In order to measure hard controls, the questions focus on the respondents' awareness of existing regulations and the procedures for the reporting and handling of incidents in their organisation.

2. To measure the perception of the organisation's policies on integrity, positively formulated statements are used. As an example: Employees are adequately informed about all aspects of the organisation's integrity policies.

3. For the measurement of soft controls, four validated constructs are used – tone at the top, values and norms, fairness of treatment, relationships amongst colleagues. It includes questions that can be found in many employee satisfaction surveys as they reflect on the general culture, which has a clear relation to employee satisfaction. Examples are: Management upholds ethical standards in its decision-making, my colleagues know and understand the values and norms in my organisation, my immediate supervisor treats employees with respect, my colleagues help me to get the job done.

4. Following rules and exercising morally-conscious behaviour are two aspects that should contribute to an ethical attitude to work. Examples of questions are:

   • Following rules: How often have you come across the following kinds of behaviour in your immediate work environment this past year? Accepting invitations for events, dinners etc. that are not relevant to the organisation?

- Moral conscious behaviour: My colleagues are perfectly aware of the consequences of their actions.

- Ethical attitude to work: My colleagues do not take responsibility for the results of their work.

Some questions do not refer to respondents' own behaviour but instead, to behaviour they observed around them. This is in order to reduce the possibility of a social desirability bias. Nonetheless, these questions sometimes met with critical reactions by managers who associated these kinds of questions with 'reporting' on colleagues.

Improvement of the registration of disciplinary cases

In 2005, the reports of the National Court of Audit (Algemene Rekenkamer 2005), the Vrije Universiteit Amsterdam (Huberts and Nelen 2005) and GRECO (2005) concluded that the Dutch public administration lacked insight into the number and type of disciplinary investigations. Ministry of the Interior and Kingdom Relations took on this critique and developed a model for the uniform registration of disciplinary cases (2007), although this was not always followed by the Ministry.

The experiences of the central government are a showcase for developments in registration. Already for some years, central government had included the number of disciplinary cases in the yearly report on personnel and governance. The increased coordination between the ministries in policy matters, including integrity and the attention for (uniform) registration, resulted in a sharp increase of the number of registered disciplinary cases to approximately 500 confirmed cases of disciplinary infringements a year. In 2010, the registration was further expanded to include both reports and investigations, resulting in approximately 1000 registered reports of possible misconduct. These numbers have remained fairly stable in the years 2008-2013. Overall, they show that the ministries take integrity seriously, not only through preventative policies, but also in their disciplinary consequences.

A comprehensive Integrity Monitor: 2012

The aforementioned developments paved the way for new integrative monitoring. Firstly, the Court of Audits broadened the scope of their fourth audit on the effectiveness of integrity policies of the ministries, resulting in a report (2010) that included a survey among the civil servants of the ministries.

The ministry initiated a coordinated effort to monitor the integrity and integrity management of the public administration. In an 'administrative agreement' with the associations of the decentralised governments[7], it was agreed to monitor (perception of) integrity and integrity policy, indicating that securing integrity within organisations is of the upmost importance.

The Integrity Monitor 2012 consisted of three parts:

1. A checklist of formal policies (written survey, distributed by mail to enhance response rate).

   a. to the Secretary (the highest civil servant, and Director of the organisation) for the policies directed at civil servants and the Executive Board
   b. to the Clerk (which supports the Council) for the policies directed at the Council Members

2. Perceptions survey of integrity and integrity policies:

   a. among civil servants (web-based survey among a public administration-wide panel)

   b. among political office holders (written survey, distributed by mail to enhance response rate).

3. A short inventory of the number of disciplinary cases was added to the checklists concerning civil servants and (alleged) integrity incidents for political officials.

Figure 2: The Integrity Monitor 2012 Model
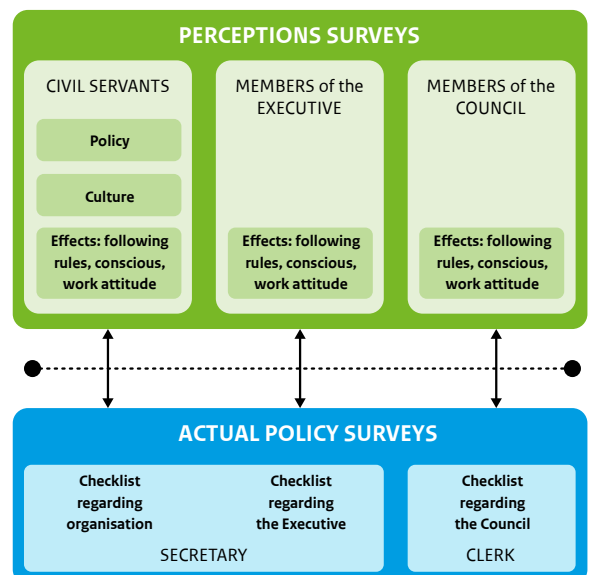
This way, for the first time, the public administration could gain a coherent view of the integrity policies in place, people's perception of these policies, the integrity culture, and the number of investigated incidents. The checklist maps the formally implemented policies as prescribed in the Civil Servants Act and the Basic Norms. These were expended with elements of the Integrity Infrastructure of the National Integrity Office.[8] Also included were the perceptions of the Secretary and the Clerk concerning priority given to integrity and integrity policies by the Executive (e.g. Mayor and Alderman) and Council, respectively. It also included, for the first time, a perceptions survey among political office holders. The survey for civil servants was shortened and adapted to fit the executive and political context.

However, for reasons of privacy and enhancement of the response rates, the various surveys could not be linked to individual organisations, proving to be a serious limitation to the monitor 2012. This means that only general conclusions can be made about the relations between developments in integrity policies, awareness of policies and organisation's culture.

Type and number of respondents

The response to the surveys was satisfactory, varying between a high 83% by the provincial secretaries to a low 25% by the political public officials of the Water Authorities.

Table 1: Type and number of respondents

Respondents	Sector	Number of organisations / civil servants[9]	Number of surveys	Response	
Secretary	Central	11	18	17	*
	Municipalities	415	415	143	34%
	Provinces	12	12	10	83%
	Water Authorities	26	26	15	58%
	Total	**464**	**471**	**185**	**39%**
Civil Servants	Central	122.537	2.370	1.041	44%
	Municipalities	175.176	3.170	1.222	39%
	Provinces	13.217	945	399	42%
	Water Authorities	10.085	593	253	43%
	Total	**321.015**	**7.078**	**2.915**	**41%**

* The surveys for the Secretary General were distributed internally among the divisions within the ministries (such as the Ministry of Finance and the Tax Authority). This increased the number of actual respondents. Due to anonymity measures, it was not possible to calculate the response rate.

Results of the Integrity Monitor 2012

Management perception of implementation of integrity policies

An overview of the results of the checklist survey shows that most elements of the various integrity policies for civil servants, as obliged by law and other formal agreements, have been implemented by the central government, provinces, municipalities and Water Authorities. Table 2 shows the totals for the whole public administration.

The results show some variations between the levels of government, with central government being a front-runner in terms of its implementation of policies, while the municipalities lag behind. This is not surprising as the majority of municipalities are relatively small organisations.

The table presents a mixed picture. Many elements are generally implemented, but those elements that would make implementation stronger, lag behind.

For example, almost every organisation has integrity policies (98%) and a Code of Conduct (97%). The oath of office is taken almost everywhere (95%), integrity is part of personnel policy (98%), and there are procedures for reporting misconduct (97%) and side jobs (98%).

At the same time, whistle blower regulations and procedures providing access to an independent body (63%), procedures for disciplinary investigations (60%), the disclosure of side jobs (59%), regulations for reporting financial interests (49%), and activities directed towards the identification of vulnerable positions (43%) are not very developed. Moreover, integrity training, which would raise awareness, is lagging (54%).

In addition, it appears that the integrity policies in place have not been kept up-to-date. In the past three years, more than half the organisations asked have not updated their integrity policy plan (56%), nor their codes of conduct (66%). Moreover, monitoring and the evaluation of policies do not take place on a regular basis (54%). Although there

Table 2: Implementation of formal integrity policies according to Secretaries

Type	Laws and Standards specified according to survey questions	2012
	General integrity policies	
Secretary	Integrity policies laid out in writing	98%
	Code of Conduct	97%
	Oath of office (or solemn affirmation)	95%
	Monitoring/evaluation of integrity policies in 2010/2011	54%
	Integrity part of personnel policy	
Civil Servants	Integrity involved in parts of the personnel policy	98%-100%
	Integrity part of appraisal/assessment interviews	91%
	Integrity part of management or work meetings	82%
	Training and development are part of personnel policy	54%
	Procedure for reporting of misconduct	
Law & Standards	Procedure for reporting of misconduct	97%
	Confidential integrity counsellor	92%
	Access to independent body	63%
	Procedure for investigating misconduct/integrity violations	60%
	Conflict of interest regulations	
Law & Standards	Regulation for reporting side jobs	98%
	Overview of side jobs	70%
	Mandatory disclosure of side jobs for selected officials	59%
	Regulation for reporting financial interests	49%
	Vulnerable positions and processes	
Standards	Segregation of tasks or duties	83%
	Risk assessment of vulnerable positions and processes	43%
	Overview of vulnerable positions	28%

are no formal requirements to update policies or code, it is necessary to do so, particularly in view of recent developments such as the increased use of social media and the impact of the financial-economic crisis.

For a more accurate interpretation of the results above, it needs to be taken into consideration that these figures have been established on the basis of self-evaluation, whereby social desirability in answering the questions has to be taken into account. More importantly, these figures say little about the quality of the measures taken. A subsequent analysis of actual integrity policy plans carried out by the National Integrity Office (Hoekstra, Makina, Talsma 2013) showed that there are fewer organisations with a well-developed and formalised integrity policy plan than the self-evaluation suggests.

Civil servants' perceptions of integrity policies and organisational culture

While we did see some variations between the levels of public administration in the implementation of policies, these differences are not reflected in the perception surveys among civil servants, which show a high level of unanimity between the levels of government.

Table 3 also produces a mixed picture. Three-quarters of the respondents (74%) indicated that they were aware of the existence of various procedures concerning integrity (e.g. regarding side jobs, gifts and expense claims). Civil servants are, to a much lesser extent (47%), familiar with general integrity policies, and only one in three (36%) indicated awareness of the procedures with respect to dealing with suspicions of misconduct. This seems to coincide with the levels of implementation that we saw above.

In terms of soft controls, most positive are the results from civil servants concerning cooperation between colleagues in the workplace. These show that almost four in five of those surveyed (78%) are satisfied. Soft controls that are indirectly linked to management are perceived as less favourable.

Two-thirds are positive about the quality, relevancy and guidance of organisational values and norms. Less are satisfied about the fairness of treatment by (personnel) management (57%, the most positive item concerning respectful treatment by a direct supervisor is approximately 75%), and only around a third are content with the role of management in relation to integrity and ethics. In general, the results on soft controls show great consistency within the constructs with little variance between items.

At the same time, the secretary survey points out that 92% of top managers are positive about the role model qualities of management. The dissimilarity in the perception of management versus personnel concerning ethical leadership is known as the 'it's lovely at the top' phenomenon (Treviño, Weaver, Brown 2008). This implies that top officials and managers often have a rosier picture of the structure and functioning of the integrity policies, and their own exemplary role, than the rest of the organisation. Managers tend to overrate their own performance and the policies for which they are responsible while underestimating the risks.

In the end, integrity policies are aimed at producing outcomes. Nearly nine in ten of those surveyed (88%) think their colleagues have an honest attitude towards work (the questions were phrased negatively, such as being dishonest about results, being non-productive during work, and calling in sick). In terms of ethical awareness, this goes down to two thirds. The survey questions whether colleagues can oversee the consequences of their actions and if they seek advice in moral dilemmas.

Two in five civil servants (39%) reported that, in their perception, certain integrity rules (six items, e.g. concerning the acceptance of gifts or invitations, and dealing with confidential information) were not complied with. However, this happens 'seldom', whereas only approximately 2% of respondents think rules are broken 'frequently'. There are no remarkable differences between survey items for the outcomes: a consistent picture.

Table 3: Awareness of integrity policies and perceptions of organisational culture by civil servants

Type	Cluster	Total
Hard controls	Regulations, Code of Conduct	74%
	Procedures concerning dealing with violations	36%
General controls	Integrity policies	47%
Soft controls	Exemplary management	39%
	Values and norms	65%
	Cooperation with colleagues	78%
	Fair treatment	57%
Outcomes	Honest attitude towards work	88%
	Moral consciousness	66%
	Non-compliance with rules (negative statements)	39%

The results of the 2012 survey among civil servants were compared with the surveys conducted in 2006. Remarkably, these showed no differences in results. This could be explained in various ways. Firstly, integrity policies started in 1992 and the most progress in changing culture may have been made in the first years. However, this remains unknown, as there is no survey data available. Secondly, it could indicate a stable culture of the Dutch public administration. Thirdly, the differences between organisations and units are most likely larger than the average differences between levels of government. Some data is available on the organisational level, but access is limited due to anonymity measures. It could also be that the survey questions are no longer relevant. All these considerations are taken into account in the development of a revised Monitor for 2016.

Registration of disciplinary investigations

The Monitor focused on outcomes of policies, on easily identifiable types of misconduct, or unethical behaviour of colleagues. These do not coincide with the types of misconduct as defined in the registration form for disciplinary cases.

In the survey for top management, questions concern how many disciplinary investigations were registered in 2011, and what kinds of (disciplinary) sanctions have been administered. The figures in the table below show the breaches and sanctions that occurred in the civil service, presented per sector.

As this is one of the first attempts in the Netherlands to collect such data (e.g. Heuvel et al. 2010), it is fair to view this critically. As not all organisations have submitted data, the table is not complete and cannot be compared with the total number of civil servants. In addition, almost a fifth (17-21%) of the surveyed top managers were unable to indicate how many investigations were conducted and what sanctions had been applied. In those cases registration was lacking, incomplete, or otherwise unclear.

The data shows more about the municipalities, as the survey results show only 79 cases, while the two major cities Amsterdam and Rotterdam are known for publishing their yearly reports on the disciplinary investigations, and each of them has over a hundred cases a year. The numbers for central government are more accurate as, according to the yearly report on central government in 2011, there had been 537 disciplinary investigations registered, 128 (of which 37 conditional) dismissals, and 171 other disciplinary measures.

That there can be great differences between individual organisations is also clear. 279 of the investigations in Table 4 were reported by just one Ministry. The Ministries are known for a wide variety in their chosen risk profiles and number of civil servants, e.g. the Ministry of Justice includes the entire prison system, and the Ministry of Finance includes the tax authority, which are both known for having strict integrity policies reflecting the vulnerable position of their civil servants.

Table 4: Registered disciplinary investigations for the year 2011

	Investigations	Disciplinary dismissal	Other disciplinary measures/actions	Reporting to public prosecutor
Central Government	439	40	117	14
Municipalities	79	21	66	12
Provinces	8	2	14	2
Water Authorities	6	3	0	1
Total	**532**	**66**	**197**	**29**

Follow-up and lessons learned

The results were published as a report as well as on the website of the National Integrity Office.[10] All background information and data (tables) were also made available. The report was sent to Parliament and was formally presented to the press and discussed during a high-level meeting attended by the Minister of the Interior and Kingdom Relations, the presidents of the associations of the municipalities, provinces and the Water Authorities. The representatives reflected on the results, made formal statements and signed a joint letter of intent.[11]

In this letter of intent, the monitor was declared to be a useful instrument to periodically measure the improvements made to foster integrity. Based on the results, they stated that organisations still have to formalise and institutionalise the integrity function in these same organisations. Besides the aspects that are already well implemented (like the code of conduct and the oath), the themes that still have to be improved (like better accountability about integrity policies, transparency of side jobs, the better registration of integrity breaches and vulnerable processes) were explicitly mentioned. They concluded that they agreed upon the importance of integrity for the public sector. They recognised that integrity is indeed the cornerstone of 'Good Governance', as was stated in the Netherlands Code for Good Public Governance (2009). Based on this response, we can conclude that the report was well received and accepted. Further, BIOS published a statement about the monitor results and an article was published in a well-known public sector journal (Zwaap 2012).

Although we don't have a clear overview of the activities that have taken place in the different sectors as a direct response to the monitor results, we have witnessed some activities that seem to be related. Both the Water Authorities and the municipalities started a project to develop integrity toolkits, and the ministries set up a project to improve their integrity management approach as well. A next monitor, planned for 2016, will reveal to what extent these initiatives prove to be fruitful.

The Monitor and follow-up showed many valuable lessons that will be applied to the Monitor 2016. Real integration of the results was insufficiently possible, partly due to constraints related to adhering to anonymity for respondents, and partly due to a lack of similar questions between the various surveys: checklist, perceptions of policies, perceptions of misconduct, and information on disciplinary registrations. The consistency within the results of the perceptions survey could show the quality of the survey, but, as such, it doesn't seem worth repeating it unchanged in 2016. With advice from various experts in discussion sessions, a proposal will be made for a new perception survey.

The 'I-monitor' 2012 was an initiative of the Ministry of the Interior in close cooperation with (umbrella) associations for the Municipalities (VNG), Water Authorities (UvW) and the Provinces (IPO). This co-production seems to work well. It ensures higher response rates, support for the results and the actions to be taken to address weak areas and, at the same time, stresses their own responsibility in this endeavour.

Another valued aspect of the Monitor is that it provides more than just an analysis. Part of the report is a separate chapter by the Netherlands Integrity Office that provides clear guidance with specific measures that can be taken to improve integrity and integrity policies within the organisation. This guidance document makes clear why specific measures are considered to be important, what risks occur when they are neglected or not well implemented, and which specific integrity instruments can be used to counter these risks.

By disclosing the results, we try to raise awareness within the public sector and also give insight into the state of government integrity to the public. In the past there have been several evaluations focused on the measures organisations had in place (code of conduct, gift rules, etc.). Having instruments in place does not mean that integrity was a standard in the organisation's culture. This is why this Monitor also focused on employee's perceptions on the integrity of their organisation. With the new Monitor, we tried to combine both approaches of monitoring integrity for the first time. By combining the inventory of implemented measures with a perception-based research approach, one is able to see if certain measures are not only available on paper but also carried out in the day-to-day activities of all civil servants and other officials. This gives a more realistic image of the integrity of the government.

Practical Information

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Notes

[1] The NCA has no powers over the decentralised public administrations as these have their own local Courts of Audits. The NCA conducted its first audit of the integrity policies of central government in 1996. Other audits followed in 1999, 2005 and 2010.

[2] These are agencies such as legal entities with statutory duties (RWT) or independent administrative body (ZBO). These are autonomous, but the Ministries do have some political accountability for them.

[3] See: Hoekstra, A. and M. Kaptein (2014); and Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (2014).

[4] Tweede Kamer (1993), Integriteit openbare sector, TK 1993-1994, 23400 VII, nr. 11 (Parliament, Integrity public sector)

[5] These questions were repeated in the POMO-survey of 2008, but replaced in 2010 and 2012 with the questions on ethical behaviour of the Internetspiegel.

[6] In the offer letter to Parliament for the report 'Integrity of Government' (2007) which includes the results of both surveys, the then Minister of BZK Remkes called the results 'worrisome'.

[7] Association of Provincial Authorities (IPO), Association of Regional Water Authorities (UvW) and Association of Netherlands Municipalities (VNG), and in addition the Group of the Integrity Coordinators of the Ministries.

[8] http://www.integriteitoverheid.nl/international/models-and-instruments/integrity-infrastructure-model.html.

[9] Source: www.arbeidenoverheid.nl, information on 2010.

[10] http://www.integriteitoverheid.nl/i-monitor.html

[11] http://www.integriteitoverheid.nl/fileadmin/BIOS/data/Publicaties/I-monitor/Bestuurlijk_Statement_Monitor_Integriteit_Getekend.pdf

Poland:
Review of integrity policies for the civil service

Katarzyna Dudzik, Counsellor, Civil Service Department, Chancellery of the Prime Minister

Background information

In the 1990s, only a few attempts at eliminating corrupt practices were taken in Poland, all mostly ineffective[1]. The Polish government started to demonstrate genuine determination towards its anti-corruption policies in response to its EU membership prospects, as reflected in the Programme for Fighting Corruption, implemented in two stages (200 -2004 and 2005-2009)[2]. Most activities scheduled under those two strategies were accomplished – those efforts are being continued in the current Government Programme of Fighting Corruption for 2014-2019. The impressive number of legal acts adopted before joining the EU – resulting from the obligation to adjust to Europeans standards – has not corresponded to effective enforcement of the legislation in the first years after the accession. And although Poland appears to have overcome the systematic corruption of this transition period[3], corruption remains constantly present in social life. According to the Central Anti-corruption Bureau – the most important institution in Poland among law enforcement agencies – state investment in infrastructure, digitalisation of public administration, use of EU funds, the defence sector, healthcare and power engineering are all areas of public life where a risk of corruption still remains[4]. At the same time, Polish citizens believe that corruption is a big problem in our country. According to the results of the opinion polls conducted by the Polish non-governmental organisation, Public Opinion Research Centre in 2013, such a statement was confirmed by 83% of respondents[5]. These results have also been confirmed by the Special Eurobarometer[6] – according to the report issued in 2013 – with 82% of Polish respondents perceiving corruption as an important and widespread problem in the country. On the other hand, according to the same European Union survey, a vast majority of respondents (83%) denied that they had experienced or witnessed corruption for the previous 12 months.

Today, public intolerance of corruption is high and corruption is increasingly being condemned. However in the mid-1990s, corruption was perceived as a phenomenon of a systematic nature[7]. In this context, the civil service constituting politically neutral personnel was created. At present, the civil service corps accounts for approximately 120 412 staff[8]. This constitutes about 19% of all public administration employees. It is a concept of a narrow scope of government administration existing in ministries and central offices at national (central) level and voivodeship offices at regional level, as well as services, guards and inspectorates strictly defined by law, operating at the regional and upper-local levels (in total, approximately 2300 government offices at central and territorial level); they are focused on the core functions of the Government. The core values of the civil service, namely: professionalism, reliability, impartiality and political neutrality, have been defined in the Constitution of the Republic of Poland (1997) and the Civil Service Act (first adopted in 1996, the one currently binding signed in 2008). These four principles have been elaborated upon since Poland regained its independence in the first code of ethics for the civil service that came into force in 2002. It remained in force for nearly nine years. In 2011, based on evidence highlighting its shortcomings, the legal act was replaced by the new one - *ordinance no 70[9] of the Prime Minister on the guidelines for compliance with the rules of the civil service and on the principles of the civil service code of ethics* (ordinance no. 70). The document acts as a code of conduct - increasing awareness, giving the right directions, resolving issues of doubt but also detailing the inevitability of punishment for violating the rules. It introduces an accountability framework as regards the compliance with the Ordinance with Head of Civil Service indicated as a guard of Ordinance observance.

government – the Prime Minister who has the power to appoint the HCS on the basis of criteria defined in the act on civil service, acting upon advice of the Civil Service Council (an advisory and opinion-giving body). The Prime Minister is also in power to dismiss the HCS (in cases where the circumstances enumerated in the act on civil service occur). The HCS fulfils duties set out in the act. In particular: administers the process of staff management, collects data on the civil service corps, plans, organises and supervises central training for the civil service. S/He is also responsible for ensuring that the principles of the civil service are complied with. The role of the HCS in this regard is crucial – s/he acts as a guard of the civil service rules and ethical principles of the civil service corps in the country. The scope of this task is elaborated in the applicable secondary legislation, namely the aforementioned ordinance no. 70. In accordance with the guidelines addressed to the HCS, s/he is responsible, among other things, for:

- Monitoring compliance with the principles of the civil service in all government administration offices at central, regional and upper-local level;
- Analysing periodic reports and other information on the implementation of civil service rules and application of guidelines, submitted by directors-general of offices;
- Explaining the problems arising from the application of the principles;
- Making recommendations to the directors-general in order to compensate for the shortcomings in the observance of civil service rules, and controls the implementation thereof;
- Cooperating with the directors-general to disseminate the principles of civil service amongst the members of the civil service;
- Monitoring the recruitment procedure for compliance with the principles of the civil service;
- By ordering an investigation to be taken against the directors-general of office, is entitled to require an ombudsman for disciplinary matters to determine whether a breach of the duties of the civil service corps member does not constitute at the same time a breach of particular rules of the civil service etc.

The service to the HCS is provided by the Chancellery of the Prime Minister (in particular by the Civil Service Department and the Legal Department – organisational units within the structure of the Chancellery of the Prime Minister).

However, the public administration in Poland is relatively highly decentralised compared to other OECD countries[10]. It refers also to the Polish civil service. HR management in individual offices remains the responsibility of the director general of the given offices[11] (or, in cases where there is no position of director-general in the given office, the head of such office). Every director general remains an independent

Figure 2: Experience of corruption cases in the previous 12 months. Source: Special Euro barometer 397 „Corruption", European Commission, 2013

Case study – introduction

The monitoring of the effectiveness of Ordinance no. 70 was conducted in 2014. With all its weaknesses, it depicts the direction of the integrity policy development in the Polish civil service as well as systematic approach to the review of integrity policies in the Polish civil service. This monitor and its results is the main focus of this case study, preceded by information on the key players and developments in the integrity policy in the civil service.

Key players in the integrity system

The central organ of government administration in charge of civil service issues is the Head of Civil Service (hereinafter referred to as "HCS"). The HCS reports directly to the head of

employer and retains a significant degree of discretion with respect to HR management policy, being responsible for hiring, developing, assessing, awarding/ punishing and dismissing employees in the given office. The directors-general/heads of such offices report directly to the relevant minister. However, pursuant to the act on civil service, they are also under an obligation to cooperate and to provide the HCS with information on the performance of tasks allocated for the previous year that are to be performed pursuant to the act on civil service. Such an annual report also includes information concerning compliance with civil service principles in the given office (e.g. number of explanatory and disciplinary proceedings initiated, the rules violated, number of cases when penalty of 'expulsion from the civil service/ from the employment in an office' was applied). Since 2011, ordinance no. 70 has imposed new responsibilities on the directors-general concerning integrity policies in the civil service. According to the ordinance they are obliged, in particular, to:

- Ensure that the rules of the civil service in the office are complied with;

- Take them into account while developing programmes for human resource management / set the scope of preparatory service;

- Ensure compliance with the rules of the civil service while conducting inspections and internal audits in the office;

- Disseminate the rules in the office;

- Provide ethical training to civil service corps members employed in the office.

The guidelines (areas of responsibility) are directed towards the most significant entities responsible for the efficient operation of the Polish civil service system – next to the HCS and directors-general of offices, there are guideline directed at members of the civil service corps holding managerial positions (department directors, division heads, etc.), Civil Service Council, National School of Public Administration as well as ministers and other persons holding high-ranking posts in governmental administration, who are obliged to cooperate with the HCS in ensuring compliance with the rules of the civil service by members of the civil service.

Developments of the integrity policy in the civil service

Ordinance no. 114 of the Prime Minister, the first code of ethics for the civil service after Poland regained its independence, was signed in 2002. It governed, amongst other things, the issues of conflicts of interest, abuse of position, susceptibility to external influence, relationships with representatives of political and business circles and skill development. The intention was to point civil service corps members towards acceptable solutions in ethically compromising situations while not imposing any restrictive, obligatory rules in this regard. The primary aim of this ordinance was to educate and inform. Six years after the enactment of this legal act, having regard, amongst other things, to the results of research on ethics conducted by the Institute of Public Affairs (ISP) in 2004[12] as well as on the basis of the analysis of the efficiency of mentioned ordinance no. 114 in 2008[13], the decision was taken to replace the aforementioned code with a new ordinance. Its enactment constituted an exercise of the statutory authorisation specified in the civil service law (2008), according to which the Prime Minister shall, by way of an ordinance, determine the guidelines on compliance with civil service principles as well as with the ethical principles of the civil service corps.

The development of the new disposition – ordinance no. 70 (2011) proves the systematic approach towards assessing and - in consequence - improving the ethical regulations in the civil service in Poland. The currently binding act of law addresses most of the identified weaknesses of the 2002 ordinance. Therefore it:

- Introduces an accountability framework as regards the compliance with the Ordinance, with the HCS acting as a guard of Ordinance observance;

- Introduces the inevitability of punishment - the direct connection between violation of the civil service rules with the violation of the civil service duties that makes the civil service corps member liable to discipline (with sanctions enumerated in the Law on Civil Service);

- Takes into account the rapidly changing environment, which makes it possible to respond to new challenges faced by the government, public offices and members of the civil service corps alike. The ordinance puts a greater emphasis on improving the level of confidence in the government, on the quality of the services performed and on the relationship between the officials and the government; takes into account the accountability of civil service corps members and places an emphasis on the client orientation of the government administration.

For three years since the enactment of the ordinance, the HCS has undertaken a number of measures to ensure compliance with the rules and ethical principles of the civil service corps:

- Initiate cooperation with the directors-general with the aim to disseminate the principles of civil service amongst the members of the civil service;

- Organise training events;

- Issue special edition of the bimonthly paper of the civil service (2011) dedicated to newly signed Ordinance of the PM as well as thematic supplements to the paper (2014), dedicated to the selected rules;

- Appoint a special team for monitoring and analysing some areas of the civil service and deal with the most complicated ethical dilemmas in the civil service;

- Explain doubts arising from the application of the ordinance, signalled by the offices as well as individuals;

- Monitor the recruitment processes in the civil service;

- Monitor the compliance with the principles of civil service (by analysing the annual reports, issued by the directors-general).

Nearly three years of ordinance no. 70 being in force has justified the need to examine the impact thereof on the civil service corps and to assess its functioning. One cannot underestimate the significance of the recommendations of OECD experts, the authors of the Public Government Review – Poland Implementing Strategic-State capacity, 2013. In the section dedicated to human resources management, the OECD experts have praised the initiatives aimed at promoting integrity and ethical behaviour among public servants. However, they have also pointed out the need to reinforce the mechanism aimed at popularising and promoting the provisions of ordinance no. 70 of the Prime Minister among the members of the civil service corps as well as the mechanism designed to monitor compliance with the applicable rules[14]. The monitoring of ethical regulations in the Polish civil service, or, to be precise, the monitoring of the functioning of ordinance no. 70 again reflects the systematic approach towards evaluation of the ethical regulations in the Polish civil service. It was commissioned by the Head of the Civil Service in 2014.

Methodology and content of the monitoring

The scope of the monitoring scheme was defined by the HCS. The monitoring was aimed to assess the functioning of the ordinance from the standpoint of three different groups of respondents; the intention was to assess the degree of comprehension of the contents of the regulation as well as the subjective evaluation of its usefulness and functional features.

The survey was carried out in three groups of respondents:

(1) Members of the civil service corps. In this case the survey pertained, on the one hand, to the degree of implementation of the ordinance in their respective offices and, on the other, to their subjective assessment of the functioning and effectiveness of the ordinance – the members of the civil service corps were asked to complete a questionnaire containing 16 questions (most framed as closed questions, with a few allowing for supplementary information to be provided). The questions pertained, among the others, to the following issues:

- Knowledge of the principles enumerated in the ordinance;

- Impact of the entry into force of the Ordinance on changes in the civil service;

- The need/advisability of expanding the list through the addition of new rules;

- Comprehensibility/clarity of the guidelines and principles laid down in the Ordinance;

- The usefulness of the Ordinance for the purposes of solving professional dilemmas.

In addition, the correct understanding of the principle of 'selflessness' and 'dignified conduct' as well as the need to provide training in the field of compliance were also assessed. The questionnaires were available on the website of the Civil Service Department. The respondents were requested to fill, and submit it electronically to a dedicated e-mail address.

(2) Directors-general of individual offices – persons responsible, amongst other things, for ensuring the functioning and continuity of operation of the office as well as for human resources management, directors of treasury offices and directors of tax audit offices. In this case, the survey was intended to verify the scope and manner of implementation of tasks which they were under a duty to perform according to the provisions of the ordinance, including:

- The manner in which compliance with the rules in the given office is ensured;

- Information on whether the applicable principles were complied with when adopting decisions authorising members of the civil service corps to undertake additional employment or authorising civil service employees occupying higher positions within the civil service to undertake income-generating activities[15] (and, if so, which of the principles were applied?);

- The manner in which the principles in question are taken into account in the human resources management programmes that are being developed[16];

- The manner in which the relevant principles are taken into account in the course of determination of the scope of preparatory service stage etc.

The survey had the form of a questionnaire and was delivered, with a letter from the HCS, by post. However it was also available on the website of the Civil Service Department and all directors were requested to submit it electronically to a dedicated e-mail address when they had filled it in.

(3) Independent experts – public administration theorists and practitioners. In this case, the survey was intended to obtain an additional, independent specialist evaluation of the functioning of ethical regulations within the civil service; to obtain suggestions on the ethical principles applicable to the civil service; and to identify the aspects of the management process which may need to be supplemented or updated, clarified or emphasised to a greater extent or even corrected or elaborated. It took the form of a request of the Head of the Civil Service for opinions/suggestions as to the regulations currently in force, submitted by way of a letter.

The scope of the survey made it possible to obtain knowledge on the experiences and practices concerning the application of the provisions of the ordinance on ethics by some members of the civil service corps and independent experts. It also enabled the assessment of the degree of implementation of the guidelines by directors-general (i.e. entities upon which the relatively largest number of obligations is imposed by the law). The scope of the survey was broad enough to provide the information necessary to conduct an analysis pertaining to the manner of implementation of the presently discussed principles. At a subsequent stage, the scope of the survey was to facilitate the commencement of a debate on the possible changes to the existing regulations, enhancements of the current provisions etc. (the results obtained, however, show that, at the present stage, there are no grounds for such debate).

Results of the monitoring

The response rate differs a lot, depending on the group of respondents. We have received 1291 questionnaires completed by members of the civil service corps (that constitutes approx. 1% of all civil service corps members), 107 questionnaires dedicated to the directors (that constitutes 100% of all directors-generals, directors of treasury offices and directors of tax audit offices (98 in total) and some additional surveys, filled in (on a voluntary basis) by the head of the tax offices and 7 replies from independent experts (that constitutes approx. 13% of all experts invited to the study (54)). The response rate is not fully satisfying, especially as regards the first group of respondents. However, keeping in mind that this survey was the first such exercise conducted on a large scale, the response is promising and the information gathered could be used to further develop integrity policies in the Polish civil service system.

The survey carried out among the directors-general made it possible to obtain information on the manner in which they perceive the degree of implementation/application of the provisions of the code of ethics in ministries as well as central and voivodeship (province-level) offices. Analysis of the answers provided has made it possible to assess the degree of implementation of the guidelines aimed at directors-general of offices – the persons tasked with ensuring the functioning and continuity of operation of their respective offices, and responsible for the conditions of the operation thereof; work organisation; performing actions related to labour law with respect to the individuals employed at the office; as well as for the human resources policy applied in such office. The results obtained are positive and make it possible to reach the conclusion that directors-general of offices are performing the obligations imposed upon them directly by the ordinance on ethics. The information obtained demonstrates that directors-general of offices:

- Ensure compliance with the civil service principles at their respective offices by way, amongst others, of applying such principles in the course of enactment of internal regulations and procedures (appointment of internal ethical commissions, commissioners for ethics

Table 1: Type of respondent, numbers of respondents and response rates

Group of respondents	Total number	Number of responses	Response rate
Directors-general, directors of tax chamber, directors of tax control office	98	107	109%
Civil services corps' members	120 412	1291	1%
Independent experts	54	7	13%

and corruption prevention, coordinators for corruption prevention, coordinators for equal treatment etc., in the course of implementation of anti-discriminatory, anti-mobbing and anti-corruption procedures, in the course of performance evaluation of employees, granting bonuses or imposing penalties etc.);

- 98% of all offices apply the principles when expressing their consent for their employees to undertake additional employment or to take on additional income-generating activities – the key principles in this regard being the principle of selflessness, impartiality and professionalism;

- The principles are taken into account in the course of development of human resources management programmes, primarily by way of direct inclusion of the principles in the said programmes or by way of reference to the ordinance on ethics;

- At a vast majority of offices, the principles of civil service were taken into account in the course of determination of the scope of preparatory service – these issues were included in the service programmes in the form of thematic blocks, modules, sections (in most cases of mandatory nature), in training courses or lectures conducted within the framework thereof, and were also present in the course of examinations conducted at the end of the preparatory service. These issues were mostly touched upon in the course of the theoretical part of the preparatory service, sometimes also in the form of e-learning programmes;

- 97% of all offices make available to the members of the civil service corps the information on compliance with the principles of civil service as well as on the application of guidelines with respect to compliance with the principles of civil service in the subordinate office, while at the same time providing the Head of the Civil Service with reports on the implementation of the act on civil service for the previous year;

- Information on compliance with the principles is regularly provided in annual reports submitted to the HCS in accordance with the Civil Service Act;

- The principles of civil service were disseminated among the members of the civil service corps employed at the given office in 100% of all offices – the most popular method of dissemination thereof being their publication on the Intranet (21% of all responses), publication using information boards (21% of all responses) and conducting training courses on ethical issues (9%);

- In 79% of all offices, members of the civil service corps employed at the given office were provided with training on compliance with civil service principles – all in all, approximately 55,000 training positions were provided;

- 95% of all offices provides the texts of the ordinance to the members of the civil service corps employed at the given office, imposing upon them an obligation to confirm in writing that they became acquainted with the ordinance;

- The offices' ombudsmen for disciplinary matters were requested by directors-general – by way of a request for preliminary investigation – to determine whether a breach of the duties of a civil service corps member does not concurrently constitute a breach of specific principles of civil service.

One might consider these remarkably optimistic results as a declaration – a subjective assessment by the respondents of the way in which they apply the guidelines at their own offices. Nevertheless, the responses provided on voluntary basis by the civil service corps members confirm the veracity of the assessment made by the directors-general. The content of the questionnaires directed to the members of the corps was different, focusing on the assessment of the ordinance itself as opposed to the compliance of the given entity with the guidelines. However, the analysis of the data provided makes it possible to perform an efficient verification of the information submitted by the directors-general of offices. The survey conducted among members of the civil service corps shows that:

- Nearly 100% of all respondents have declared that they were familiar with the principles of civil service and the ethical principles of the civil service corps. It confirms the declarations made by the directors-general as to the common knowledge of the principles among the employees, ensured by way of organising training courses, appropriate determination of the scope of preparatory service or designing programmes for the management of the human resources in specific offices;

- The respondents have described methods for ensuring compliance with civil service principles at the offices where they were employed that were consistent with the statements of the directors-general of the said offices including, among others, training courses, internal regulations and procedures (rules, guidelines, procedures, internal ordinances), familiarisation of all employees with the principles or the application of the appropriate provisions;

- The analysis of the questionnaires completed by civil service corps members has also made it possible to

perform a positive verification of the manner in which information was made available concerning ensuring compliance with the principles and the application of the guidelines on compliance therewith;

- 53.68% of all respondents confirmed that they have participated in training courses, which also confirms the level of activity in the field of training course organisation as stated by the directors-general.

Furthermore, the analysis of responses submitted by the members of the corps unambiguously demonstrates that:

- The principles are commonly known and understood by the members of the civil service corps;

- The list of civil service principles, as well as ethical principles of the civil service corps, is sufficiently broad and there is no need to expand it at the present stage;

- The guidelines are clear and give rise to no interpretative difficulties;

- The principles of: (1) legality, rule of law, and increasing public confidence in public administration, (2) selflessness and (3) professionalism were considered to be the three most significant principles contained in the code of ethics;

- The vast majority of respondents were able to properly identify ethically compromising situations, which has been confirmed on the basis of the analysis of the manner in which the respondents interpreted the principle of selflessness and dignified conduct;

- Despite the fact that training courses pertaining to management regulations are common, most respondents (over 62%) agree that there is a need for more training courses concerning compliance with civil service principles and the ethical principles for the civil service corps.

The analysis of responses provided by independent experts appears to confirm that the provisions of the current ordinance are clear and unambiguous. This view can also be supported by opinions received according to which the ordinance constitutes "an excellent, concise and transparent document which should serve as an example for other public offices to which the provisions of the act on civil service do not currently apply". The few remarks that were received pertained mostly to the functioning of the provisions on ethics and were related to the independent actions taken by certain offices in which the civil service corps operates, including the fact that the provisions of the ordinance are not sufficiently embedded in the institutional

consciousness of the offices and, consequently, in the consciousness of the officials themselves.

It can be stated that the monitoring conducted presents a favourable image of the ethical infrastructure in the Polish civil service. There is no ground for the provisions of the ordinance to be modified at the present stage. There is, however, a need to conduct more training courses and workshops in this regard. Despite the optimistic conclusions of the present report and the existence of fixed standards for the exercise of official functions by the members of the civil service corps, the HCS and the remaining entities for which the guidelines on compliance with civil service principles are intended should strive towards ensuring that the current ethical regulations become even more embedded in the consciousness of the individuals employed in government administration. This objective can be achieved primarily by way of regular training programmes and presentations, as well as by promoting desirable conduct – in other words through wide-ranging and constant education of the members of the civil service corps in this regard.

Follow up and lessons learned

Information received during the monitoring has been already applied in the course of performance of tasks specified in Resolution no. 37 of the Council of Ministers on the Government Anti-corruption Programme for years 2014-2019 (2014) even though the report on the monitoring has not been published and debated in public yet. The resolution in question, coordinated by the Minister of Interior, has imposed upon the HCS an obligation, amongst others, to conduct a review of the standards for ethical conduct of civil service corps members and to reinforce the said standards. This objective shall be achieved, among others, through the following actions:

- Conducting an analysis of the case law on disciplinary actions in the civil service pertaining to corrupt practices;

- Organising seminars and conferences on ethical standards in the civil service as well as preparing and disseminating guidelines facilitating the application of the civil service rules and the ethical principles of the civil service corps in practice.

Resolution no. 37 imposes upon the HCS an obligation to include anti-corruption education in the educational and professional development programmes for members of the civil service corps, including training courses pertaining to professional ethics and the prevention of conflicts of interest. For that reason, as a result of implementation of the government plan for the performance of the tasks and

activities provided for under the Government Anti-corruption Programme, in 2014 almost 200 officials took part in a training titled: "Ethics, counteracting corruption and conflict of interests".

In sum, the functioning of codes of ethics or codes of conduct (compliance with the rules contained therein) is of key importance for the purposes of shaping public perception of public administration. It has a significant impact on the actions aimed at fostering the ethos of the civil service, developing mechanisms aimed at the prevention of harmful phenomena within the civil service, building the prestige of a government official's profession and, as a consequence, increasing the level of trust among citizens.

Monitoring ethical regulations should constitute an important aspect of integrity policies in every country – the absence of monitoring remains one of the basic obstacles that hinder the implementation of an effective ethical policy. However, in order to succeed, a survey which touches upon so sensitive a theme must, on one hand, contain properly designed questionnaires which take into account the objective of the study and which ensure the full anonymity of its respondents in the course of the survey. A poor response rate should be reason enough to question and rethink the methodology used in this exercise. On the other hand, it must also be conducted with the involvement of top management, who must take an active part in conducting the monitoring scheme and in implementing the recommendations elaborated on the basis on results achieved. Commitment of the leadership in monitoring the integrity policy and, even more important, in the implementation of the recommendations submitted, guarantees that the actions performed are far from a façade and, in vast majority of cases, are highly productive.

Practical information

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Notes and References

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[9] http://dsc.kprm.gov.pl/sites/default/files/pliki/ordinance.pdf

[10] OECD Public Governance Review – Poland. Implementing Strategic-State capacity, 2013

[11] At the present stage there are 63 directors-general in Poland – this position exists in ministries (18), voivodeship (province governor's) offices (16) as well as in central agencies (29). In the remaining government administration offices in which members of the civil service corps are employed (approximately 2300 in total), the tasks allocated under the act on civil service to directors-general are performed by the heads of the relevant agencies.

[12] The report entitled "The position of civil service corps members on ethical issues", conducted in 2004 by Jacek Kucharczyk, PhD, and Cezary Trutkowski, PhD from the Institute of Public Affairs, a Polish non-governmental organisation, shows that the members of the civil service corps (76% of all respondents) believed, at the time of the survey, in the existence of a civil service ethos, although they were unable to translate this notion of belonging to a group abiding by such professional ethos into specific rules governing their conduct. At that time, the members of the civil service corps were characterised by a low ability to define unethical situations, with the exception of uniformly condemned corrupt practices. One of the most significant factors resulting in the applicable rules being breached was considered to be the absence of effective sanctions for unethical behaviour.

[13] In August 2008, the Chancellery of the Prime Minister filed a request to selected experts – administrative theorists and practitioners – to express their opinion on the Civil Service Code of Ethics. According to the results of the analysis conducted, the main arguments for the replacement of the 2002 Civil Service Code of Ethics with a new legal act included the ambiguity of regulations contained therein, the absence of guidelines pertaining to the implementation of ethical principles and ensuring compliance therewith, the lack of effectiveness of the ordinance resulting, inter alia, by the absence of any sanctions for non-compliance, the absence of a specialised agency tasked with enforcing compliance (the lack of a specific entity that would be responsible for enforcing compliance with the applicable principles).

[14] OECD Public Governance Review – Poland. Implementing Strategic-State Capacity, 2013, p. 284.

[15] According to the Polish act on civil service, a member of the civil service corps may not take on additional employment without the consent of the general director of the relevant agency. Furthermore, every civil service official and every civil service employee occupying a higher position within the civil service must obtain the written consent of the general director of the relevant office in order to take on additional income-generating activities. Under the provisions of the ordinance on ethics, directors-general of offices are under an obligation to comply with the principles of civil service when granting the consent referred to above.

[16] Pursuant to ordinance no. 3 of the Head of the Civil Service dated May 30, 2012 on the human resources management standards in the civil service, every general director of an office (and, where the position of general director does not exist in the given office – the head of such office) shall be under an obligation to develop a human resources management programme (or to adjust the existing programme), which shall, including, in particular, include the following elements: a diagnosis of human resources management; priorities with respect to human resources management; fields of human resources management (organisation of human resources management, recruitment and induction, employee motivation and training, termination of employment); annual targets and human resources management implementation schedule for a period of at least 3 years; monitoring and assessment of human resources management. According to the ordinance, the human resources management programme shall be updated at least once every 3 years.

Case studies of staff assessments for monitoring integrity in the European Union

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