

Integrity and Integrity Management in Public Life

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Document Version

Publisher's PDF, also known as Version of record

Citation for published version (Harvard):

Heywood, P, Marquette, H, Peiffer, C & Zuniga, N 2017 'Integrity and Integrity Management in Public Life' European Union. <<http://anticorpp.eu/publications/integrity-and-integrity-management-in-public-life/>>

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EU Grant Agreement number: 290529

Project acronym: ANTICORRP

Project title: Anti-Corruption Policies Revisited

Work Package: WP11 Building accountability: transparency, civil society and administrative responses

Title of deliverable: D11.4 Academic Report on Integrity management

Due date of deliverable: 28 February, 2017

Actual submission date: 28 February, 2017

Authors: Paul M Heywood, Heather Marquette Caryn Peiffer, Nieves Zúñiga

Organization name of lead beneficiary for this deliverable: The University of Nottingham

Project co-funded by the European Commission within the Seventh Framework Programme		
Dissemination Level		
PU	Public	X
PP	Restricted to other programme participants (including the Commission Services)	
RE	Restricted to a group specified by the consortium (including the Commission Services)	
Co	Confidential, only for members of the consortium (including the Commission Services)	

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Integrity and Integrity Management in Public Life

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EXECUTIVE SUMMARY

1. Integrity in public life is an essential component in establishing trust between citizens and their governments. However, over recent decades there has been increasing concern worldwide that standards of integrity are in decline. In part, that concern reflects a parallel focus on corruption as a core threat to good governance. The two concepts – corruption and integrity – are thus often understood as two sides of the same coin, an increase in one leading to a decline in the other.
2. In practice, much of the attention devoted to integrity has been largely implicit: rather than exploring in depth what should be understood by integrity in public life, and how to achieve it, researchers, activists and policy-makers have too often seemed to assume that integrity will result from the elimination of corruption. Their focus has therefore overwhelmingly been on tackling corruption, rather than on promoting integrity.
3. To focus primarily on corruption inevitably places emphasis on the negative behaviours we are seeking to prevent as opposed to the positive behaviours we wish to encourage. Integrity means more than just ‘not corrupt’, and involves doing the right thing in the right way.
4. Lack of clarity about what integrity is has hindered attempts to promote it. In particular, the relationship between personal integrity and role-based integrity, as well as between integrity at the individual or at the institutional level, has resulted in confusion about the how the concept can be translated into practical action.
5. Integrity thus entails complex relationships with other dimensions, and can be analysed from various perspectives. For the purpose of developing an approach to integrity management (that is, the formal framework to ensure ethical behaviour by public officials), the report distinguishes core characteristics of personal and political integrity. The former entails: wholeness (thinking beyond just the personal); action that is consistent with principles (doing the right things); morality (doing things for the right reasons); and process (doing things in the right way). The latter encompasses: normative justice; openness and transparency; citizen engagement; and impartial authorities.
6. Predominant anti-corruption approaches respond to a logic that does not sit easily with the promotion of integrity. The reason is that policies designed to combat corruption are usually developed as a reaction or response to particular scandals, or else are designed to prevent specific behaviours. They are driven by an attempt to address the visible expression of corruption, focusing primarily on institutional configurations or regulatory frameworks, rather than the promotion of a pro-integrity mind-set amongst public officials.
7. The report therefore addresses the issue of integrity management, focusing on what the OECD (2009) has referred to as an implementation deficit, as well as on the relationship between compliance-based and values-based approaches to ensuring high standards in public administration. The reports pays particular attention to the issues of culture and leadership in promoting appropriate models of integrity.
8. The report is informed by fieldwork that was undertaken in Bolivia and Rwanda, as well as by desk-based research on relevant primary and secondary sources.

Integrity and Integrity Management in Public Life

Paul M Heywood, Heather Marquette, Caryn Peiffer and Nieves Zúñiga

Introduction

Integrity in public life is an essential component in establishing trust between citizens and their governments. However, over recent decades there has been increasing concern worldwide that standards of integrity are in decline. In part, that concern reflects a parallel focus on corruption as a core threat to good governance. The two concepts – corruption and integrity – are thus often understood as two sides of the same coin, an increase in one leading to a decline in the other. Yet, in practice, much of the attention devoted to integrity has been largely implicit: rather than exploring in depth what should be understood by integrity in public life, and how to achieve it, researchers, activists and policy-makers have too often seemed to assume that integrity will result from the elimination of corruption. Their focus has therefore overwhelmingly been on tackling corruption, rather than on promoting integrity. However, to focus primarily on corruption inevitably places emphasis on the negative behaviours we are seeking to prevent as opposed to the positive behaviours we wish to encourage (Heywood and Rose 2015: 102).

Many understandings of corruption see it as being a deviation from an ideal state – most often expressed through the analogy of illness (usually, cancer) – and suggest that its eradication will restore affairs to their proper purpose. Hence: cure corruption and integrity results. In fact, though, ensuring that public officials do not behave corruptly does not guarantee that they will instead act with integrity. It is quite possible to act non-corruptly, but also without integrity – for instance, by performing a task with little effort, habitually turning up late to work, refusing to cover for colleagues, and so forth. However, whilst the absence of corruption does not imply the presence of integrity, it is not so obvious that the reverse holds: if public officials are acting with integrity, they generally cannot – by most understandings of the definition of the term – be acting corruptly.

This report explores the seeming paradox of this one-directional correspondence in more detail. It sets out from the observation that we need a better conceptual understanding of integrity in public life and its relationship to corruption to build an effective model of integrity management – that is, the formal framework that ensures public officials engage in ethical behaviour, acting with honesty and fairness whilst complying with prevailing legal norms. A key argument is that predominant anti-corruption approaches respond to a logic that does not sit easily with the promotion of integrity. The reason for that is that policies designed to combat corruption are usually developed as a reaction or response to particular scandals, or else are designed to prevent specific behaviours. They are driven by an attempt to address the visible expression of corruption, focusing primarily on institutional configurations or regulatory frameworks, rather than the promotion of a pro-integrity mindset amongst public officials.

It is also true, however, that the promotion of integrity faces core challenges, amongst them the difficulty of defining what we mean by the term – compounded by its overlap not just with anti-corruption, but also with ethics, morality and good governance. Equally, practical questions about how best to implement pro-integrity policies, or integrity management, have received relatively little attention in comparison to the focus on anti-corruption. This report sets out from the basis that this imbalance needs to be addressed as a matter of urgency if the growing distrust between the public and the political class evident in many jurisdictions across the world is to be reversed.

The report is structured as follows. In the first part, we examine the concept of integrity to show how it can be defined in such a way as to inform its practical implementation in public life. We distinguish integrity from related ideas that focus on anti-corruption and good governance, and address issues such as how to identify different types of integrity, how to measure its extent and depth, and how to address competing conceptualisations at different scales of operation (individual, organisational, regional, national and so forth). The second part of the report addresses the issue of integrity management, focusing on what the OECD (2009) referred to as an implementation deficit, as well as on the relationship between compliance-based and values-based approaches to ensuring high standards in public administration. We pay particular attention to the issues of culture and leadership in promoting appropriate models of integrity. The report is informed by fieldwork that was undertaken in Bolivia and Rwanda, which are covered in more detail in other papers.

Part 1: Defining Integrity

What Integrity is Not...

In a political context, the notion of integrity is often referred to in parallel with seemingly similar concepts, such as quality of government, good governance, or anti-corruption. However, whilst there are overlaps between them, integrity entails additional elements that go beyond these more widely-used terms. In line with William Connolly's observation that to elucidate a concept involves unpacking its complex connections with other concepts to which it is related, we seek in this section to disentangle integrity from these alternative notions. Our approach reflects the belief that, in politics, 'language is not a neutral medium that conveys ideas independently formed; it is an institutionalized structure of meanings that channel political thought and action in certain directions' (Connolly 1983: 1).

Over recent decades, one key characteristic of approaches to measuring the quality of government has been a focus on control of corruption, and the extent to which jurisdictions have designed and implemented effective anti-corruption policies (QoG 2010). In turn, by effective anti-corruption policies, what is generally meant is evidence of institutional and legal enforcement provisions. According to the World Bank (2004, cited in Andersson and Heywood 2009: 751), 'corruption prevails where there is ample opportunity for corruption at little cost', a viewpoint similar to Klitgaard's (1988: 75) famous dictum that corruption equals monopoly power plus discretion minus accountability ($C=M+D-A$). Such an understanding, reflecting rational-choice models of incentive driven behaviour, has been highly influential in anti-corruption approaches. By this logic, anti-corruption measures should increase the expected cost of corrupt behaviour by raising the risk of being caught and ensuring that punishment is sufficiently severe to act as a deterrent.

However, evidence demonstrates that responses to incentives are less predictable than such models assume and, at best, rationality is bounded (Jones 1999). Faced with the same set of incentives in any given context, different individuals may respond in different ways, reflecting the complex interplay of personal motivations and situational factors that influences behaviour. Despite this, it is widely assumed in many approaches to anti-corruption that the problem to be addressed is effectively just rent-seeking (generally, bribery), with its consequent impact on economic efficiency. Thus, alongside unrealistic assumptions about motivation, there is a tendency towards a reductionist view of what corruption entails.

Arguably, both these characteristics have been driven in large measure by a focus on the economic consequences of corruption. Indeed, the growth of international concern about corruption over the last twenty-five years has largely reflected worries about its financial costs to business, rather than about the exploitation of the most vulnerable or poorest in society. Accordingly, much of the work on corruption has set out from attempts to measure or quantify its extent. Whilst it is clearly essential to have an idea of the scale of any problem that we seek to address, the manner in which predominant corruption measures have been developed has entailed efforts to reduce the complexity of the phenomenon to numerical indicators, narrowing its meaning to what the numbers indicate. Such an approach ignores more abstract aspects of the issue of corruption such as its political, social

and ethical dimensions, as well as ignoring contestation over its very meaning (Erkkila and Piironen 2009: 126). Indeed, the quantification of corruption has effectively encouraged a de-politicisation of the topic, with dominant approaches to anti-corruption constructing it as a technical, institutional design issue.

Such an understanding of corruption/anti-corruption has had two consequences. First, it has promoted a tendency towards 'isomorphic mimicry' (Pritchett, et al. 2010) in the shape of technocratic measures to combat corruption wherever it occurs, offering broadly uniform strategies with little consideration for specific or local contexts. However, as we explore in more detail in this report, there can be marked divergences between generic and local understandings of corruption (Heywood and Johnson 2017). The second, related, consequence is that these standard approaches to combating corruption focus primarily on addressing its direct manifestations rather than its underlying causes. Although corruption is almost universally seen as wrong and undesirable (Rose and Peiffer 2015; Rothstein and Torsello 2014), in those parts of the world where its existence is endemic, corrupt practices can still be socially accepted as a norm (Walton 2014). Indeed, corruption can be both condemned in principle and accepted in practice, so we need to explore the circumstances under which citizens may tolerate the existence of corrupt activities (Peiffer and Marquette 2016). In turn, that means digging deeper into the values and beliefs that determine social attitudes towards corruption, for even if institutional reforms and technocratic interventions can help bring about short-term changes in overtly corrupt activities, lasting change requires more fundamental changes in values.

One potential way of addressing this need for deeper-rooted change is to focus on promoting integrity rather than on directly combating corruption. This places emphasis on the positive pole of public ethics rather than its negative pole, and addresses the issue that not being corrupt does not automatically translate into behaving with integrity. Moreover, if social perceptions of and responses to corruption reflect the way it is understood and interpreted in any given context, then we need a better understanding of the values and meanings that underpin such responses. Because integrity has a core focus on values and ethical principles, this can help balance the tendency in anti-corruption approaches to pay attention to the rules framework and governance structures as opposed to underpinning motivations that shape behaviour (Heywood and Rose 2016). Moreover, an integrity approach encompasses not just the actions of public officials, but also the wider network of trust relationships between government and citizens, institutions and clients, as well as public and private sector actors.

Integrity and Quality of Government

Quality of government (QoG), like integrity, is a difficult concept to define. It generally encompasses a range of dimensions, including the absence of corruption, the presence of the rule of law, the depth of democracy and the efficiency of government. However, there is debate over whether the focus should be solely on matters of process, or whether it should also include policy content. If policy content forms part of the analysis, this runs the inevitable risk of partisan judgements over what constitutes 'good' or 'correct' policy, as well as the likelihood that ethnocentric bias will influence assessments. Whilst this latter

risk is also present in procedurally based approaches, there are none the less safer grounds on which to assess whether processes – as opposed to policies – meet a given standard (Dahl 1989).

Rothstein defines quality of government as impartial public administration, that is ‘having impartial government institutions for the exercise of public power’ (2013: 6). According to Rothstein and Teorell (2008: 170), impartiality means that ‘when implementing laws and policies, government officials shall not take anything about the citizen or case into consideration that is not beforehand stipulated in the policy or the law’. This definition meets three core conditions, in Rothstein’s view. First, it is based on a core value or basic norm, reflecting in this case Rawls’ right-based theory of justice and its principle of equal human worth. Second, it shifts focus from the ‘input’ side (who wins elections, who decides policies, who votes for what) to the ‘output’ side, since ‘impartiality is ... first and foremost an attribute of the actions taken by civil servants, professional corps in public service, law enforcement personnel, and the like’ (Rothstein 2013: 28). That is, impartiality cannot constitute a moral demand in relation to the content of policies, but must instead be exercised in the implementation of policies: for example, a policy to favour the appointment of women to correct gender imbalance in a given sphere would not be impartial in its content, but should be implemented impartially, meaning that all female applicants should be treated equally in the selection process. Third, impartiality implies universalism, in that it represents a basic norm that should be applicable to any institutional system, rather than to a specific one.

The focus on impartiality as the core principle of quality of government has several elements in common with the concept of integrity. For example, they both have a normative character, they both refer to policy implementation, and they both have universal applicability. However, there are also some key differences, most notably that the idea of integrity implies the need to go beyond just policy implementation. As pointed out by Agnafors (2013: 434-6), the version of impartiality proposed by Rothstein and Teorell runs the risk of being reduced to strictly following rules, regardless of what those rules are. Their response, that QoG as impartiality must be conducive to morally preferred outcomes (to avoid the charge that impartial extremist regimes could score high on their definition) remains problematic, since it implies that such outcomes should be a *criterion* of their definition – and that undermines the insistence on focusing on just the output side, since it would mean we need to identify the content that is conducive to such preferred outcomes (Aganfors 2013: 436).

At a more prosaic level, the focus on procedure rather than policy content would allow for a situation in which a government that is fiercely committed to fighting corruption seeks to prosecute anyone about whom there is any suspicion, but pays scant regard to human rights in doing so. If all presumed corrupt individuals were treated in the same way, this would meet the criterion of impartiality, but would hardly be compatible with any claim by that government to be acting with integrity. Alternatively, as outlined by Aganfors (2013: 426):

Consider two modes of governances, G1 and G2, each aiming at the same values and outcomes and both being identical on the input side. G1 strictly follows the norm of impartiality and achieves outcome 0, meaning that under G1 the people are on the

brink of starvation, despite no unusual circumstances burdening the state in question. However, had the government and its officials been more flexible and taken other values into account, outcome 0 might have been avoided. In such a case, it seems odd to say that G1 is an instance of ideal QoG. G2, in contrast, slightly deviates from impartiality and achieves outcome 1 in the same circumstances, meaning that the people under G2 prosper to an unprecedented degree. It seems to me that G2 is more deserving of the label QoG than G1, *ceteris paribus*, despite G2's deviation from the ideal of impartiality.

Thus, acting with integrity entails more than just applying rules equally to all, without regard for the particular circumstances pertaining to any given individual; indeed, the notion of integrity implies what might be termed 'the principle of policy complementarity'. By policy complementarity, we mean that the implementation of policy, and the effects thereof, should be consistent with a broader normative principle of ethical government that takes into account the moral status of the laws and policies in question.

What Integrity Is...

Integrity is like the weather:
everybody talks about it but nobody knows what to do about it.
(Carter, 1996)

The concept of integrity has been analysed from a wide variety of perspectives. Menzel (2005) offers a five-fold classification of the literature on ethics and integrity in governance, although he does not provide any explicit definition of integrity: ethical decision-making and moral development; ethical laws and regulatory agencies; organisational performance; ethics management; and the ethical environment. Huberts (2014) dissects the literature by academic discipline, identifying works in public administration, philosophy, sociology and anthropology, criminology and law, psychology and neuroscience, economics and business administration, and political science. Whereas some researchers focus on social and institutional contexts as key explanatory factors for integrity violations, others pay much more attention to individual motivations or moral attitudes as key drivers.

This basic divide between structural and agency-focused approaches underlines the breadth of the concept, though in essence most definitions of integrity entail some sense of acting in accordance with accepted moral principles. However, even if this seemingly straightforward idea captures the essence of integrity, it gives rise to a host of questions: whose moral values; who decides; how are such decisions made; to whom do they apply; how do they change; and so forth. Moreover, it raises questions about the difference between ethics and morals. Dutelle (2012: 2-3) suggests that morality refers to customs or manners in a given society and can therefore be different in different cultures, whereas ethics are constant and refer to an absolute standard of behaviour – although, in practice, the two terms are often used interchangeably.

Huberts (2014: 38ff), whilst defining integrity as the quality of acting in accordance with relevant moral values, norms and rules, draws a distinction between integrity and integritism – the latter defined as inappropriate integrity judgements ‘because the values or norms and not moral or are irrelevant for the subject studied’ (Huberts 2014: 39). This sense of relevance also underpins the approach taken by the Organisation for Economic Cooperation and Development (OECD) in its 2009 report on establishing an integrity framework, in which integrity is defined as ‘the application of generally accepted values and norms in daily practice’ (OECD 2009: 9). Carter (1996) states that integrity goes beyond just honesty: it is about being willing to act openly and consciously in line with what you believe to be right as opposed to wrong based on moral reflection. According to Benjamin (1990), the three core elements of integrity are a coherent and stable set of highly cherished values and principles, the public expression of the same, and conduct that is consistent with them.

Naturally, as Huberts (2014: 52) observes, not all values and norms are relevant in discussions of moral judgements. For example, views as to what counts as beautiful, conventional or effective are not germane to any definition of integrity; instead, the moral questions at stake are those that pertain to right or wrong, good or bad. At issue here is how to reach agreement over such inherently normative assessments.

Integrity is often seen as being related to values such as trustworthiness, consistency and reliability. Montefiore (1999) defines a person of integrity as someone upon whose word it is possible to rely and who accepts the responsibility to answer for their actions. Indeed, the values most closely associated with the notion of integrity are sincerity and honesty. As Montefiore (1999) shows, however, it is possible to show sincerity without having integrity, since the latter requires consistency in behaviour. Thus, an overt display of sincerity on a given issue would not necessarily reflect integrity unless the person in question always demonstrates such sincerity.

If we apply such a reflection to the political realm and focus on the intrinsic need of political leaders in democratic societies to seek to persuade voters of the merits of their position, we can ask whether such a requirement for consistency applies in the same way. Cox et al. (2003) agree that insincerity and hypocrisy are incompatible with integrity, but add that the expectation that politicians should always speak with perfect sincerity is misplaced. Telling the truth is of course expected in politics, but that expectation should not be simplistic, since politicians can hardly speak without regard to their audience, the occasion, the potential impact of their speech, and how it will be interpreted by commentators or political opponents (Cox et al. 2003: 110). Grant (1997) goes further when she argues that certain kinds of hypocrisy are a necessary feature of democratic politics because of the mutual vulnerability and dependence of voters and democratic politicians: accordingly, it is not feasible to imagine that a model of political integrity could exclude every form of insincere behaviour.

The question, then, is where the line should be drawn to protect integrity in politics, since insincere behaviour clearly diminishes citizens’ sense of the trustworthiness and responsibility of the political class, also seen as crucial to integrity. Cox et al. (2003: 11) go back to the issue of relevance: ‘a certain insincerity of speech is not by itself a defeater of integrity, but the telling of avoidable lies about important matters of public concern

certainly is'. To understand what counts as avoidable, we need to think of possible scenarios in which political promises may be modified because of circumstances beyond the control of political actors. Of course, it is recognised that political circumstances can change and it may be unavoidable to tailor or modify commitments or promises in relation to such changes.

For instance, if political leaders promised not to raise taxes when they were elected, but then reluctantly decided to do so when faced some time later with a global economic crisis that was having a major impact on the country, it would be harsh to judge them as being insincere. However, if those same promises were made solely to secure victory in the election, with no intention of following through once in power, then clearly such actions would lack integrity.

The key, then, lies in the original intention when making a political promise – something that may not be straightforward or even possible for outside observers to deduce. None the less, the distinction allows us to differentiate in a political sense between making promises with integrity and acting with integrity. The former entails being sincere, not engaging in self-deception and being serious in intent (Cox et al. 2003); the latter means seeking to do one's best to fulfil promises unless and until forced to alter them by *force majeure*. In similar vein, Kaiser and Hogan (2010) argue that integrity is not so much about following the rules in any rigid sense, but rather in ensuring 'fair play' within the rules. It is conceivable that on occasion following rules could harm others, and in that circumstance, acting with integrity would require setting the rules aside. Ultimately, the views outlined so far indicate that assessments of integrity in politics tend to focus on the behaviour of individual actors, who are expected to 'live' the values they espouse by being fully committed to them.

It is clear that being authentic and true to oneself are widely seen as a key element of acting with integrity. However, this raises the dilemma of how to reconcile a clash between personal beliefs and the requirements of an official role – as demonstrated in the case of Sally Yates, the acting US Attorney General who in January 2017 issued an instruction to justice department lawyers not to enforce President Trump's Executive Order on 'Protecting the Nation from Foreign Terrorist Entry into the United States'. On the one hand, her refusal to support the Executive Order could be seen as acting with integrity, in the sense of being true to her belief that it was potentially unconstitutional; on the other, it could be seen as acting without integrity in that her role as acting Attorney General should have obliged her to enforce an ostensibly legal order. That there is no simple answer to this question is highlighted in McFall's insistence that integrity can only be demonstrated by people who have commitments that a reasonable person would accept as important, and therefore potentially subject to constraint: 'personal integrity requires that an agent subscribe to some consistent set of principles or commitments and, in the face of temptation or challenge, uphold these principles or commitments, for what the agent takes to be the right reasons' (McFall 1987: 9). To the extent that Yates was acting in manner consistent with her principles or commitments, she could be said to be displaying integrity – but there will be inevitable dispute over whether she did so for 'the right reasons'.

Thus, integrity is inextricably connected to moral conceptions of the good. McFall draws a distinction between personal integrity and moral integrity, suggesting that it is possible to have the former without the latter, proposing as an example a lover of literature who is prepared to stop people burning books by killing them: 'Although we may find his actions morally abhorrent, we may still be inclined to grant him the virtue of personal integrity. We would not, however, hold him up as a paragon of moral integrity' (McFall 1987: 14). This example underlines that personal integrity, as such, may not always be compatible with broader considerations – and that further complicates the relationship between the idea of integrity and its practical application to those who hold public office. If we view integrity in terms of 'identity-conferring commitments' – that is, the fundamental essence of what drives us – then upholding these may clash with moral principles understood in terms of impartiality and universality. According to McFall (1987: 16), 'if moral integrity presupposes personal integrity, and personal integrity requires identity-conferring commitments, then moral integrity is, generally, inconsistent with impartiality'. Indeed, McFall's argument highlights that neither personal nor moral integrity cannot exist in a vacuum, unconnected to the wider social setting in which someone lives. To that extent, therefore, integrity is necessarily a relational concept.

Kaiser and Hogan (2010: 217) argue that 'like beauty, integrity is in the eyes of the beholder'. Huberts (2014: 45) proposed a similar idea when he states 'one cannot be the judge of one's own integrity'. Instead, it is wider public or the community directly affected by an individual's behaviour that makes such judgements. The reason, according to Huberts, is that morality and ethics 'concern values and norms that people feel rather strongly about because serious interests are involved that affect the community they are part of' (2014: 50). Heywood and Rose (2015: 113) have argued that 'an action taken by a public official that a significant majority of people think is morally wrong is not an action taken with integrity'.

These arguments suggest that judgements on whether actions are undertaken with integrity are context dependent, since they will be influenced by public attitudes at any given time. In turn, however, this also requires further elaboration, since it is not clear how public attitudes should be assessed when opinion is sharply divided over an issue – as, for instance, on matters such as abortion, or capital punishment. Equally, is it only the public *within* a given jurisdiction that counts in terms of judgements over moral principles? If there was clear majority support for what outsiders might consider morally offensive (for instance, use of the death penalty in politically motivated anti-corruption campaigns), would the implementation of such a policy allow a government to claim it was acting with integrity?

From a philosophical perspective, Calhoun (1995) sees integrity as not just an individual, but also a social virtue, since it requires that citizens should understand their role as being part of a wider evaluative community. Being part of a community implies having regard to the deliberative judgements of others, and so acting with integrity means considering the potential impact of any decision on the wider interests of the community (Calhoun 1995: 257). A person of integrity, in this view, is aware that their own judgements serve a common purpose and therefore a lack of integrity reflects an inability to understand that need to assess the views of others.

Other disciplinary perspectives, such as organisation ethics, also stress the link between integrity and the existence of community. Brown (2005) shares Calhoun's emphasis and talks of 'relational awareness', defined as 'a consciousness of the relations in which one participates' (Brown 2005: 6). So, consistency does not suffice as an essential element of integrity; indeed, remaining consistent without appreciation of the wider community can actually stand in the way of integrity. In Brown's terms, 'the relational self exists prior to, and serves as the foundation for, expressions of the individual self' (Brown 2005: 5).

These reflections by Calhoun and Brown on the social character of integrity apply more to the *process* of decision-making than to the content of decisions themselves. Hubert (2014: 51) emphasises a similar idea when he argues that integrity in government is not about policy content, but rather about the behaviour of the participants in decision-making and the subsequent implementation (in terms of processes and procedures) of the outcomes. Thus, as the ideas elaborated so far clearly show, the concept of integrity is far from straightforward even in a conceptual sense, and requires careful unpacking if it is to inform policy formulation (see Grebe and Woermann 2011).

Conceptualising the operation of integrity in practice

A focus on integrity, at least at a rhetorical level, is not a new development. For instance, the US-based NGO, Global Integrity, has been publishing data for over a decade in the form of country reports with scorecards that cover the functioning of key institutions, and formerly produced Global Integrity Reports (2006-13). Transparency International developed a National Integrity System (NIS) assessment approach that focuses on the key pillars in a country's governance system, 'both in terms of their internal corruption risks and their contribution to fighting corruption in society at large' (TI 2017). The NIS reports, that now number around 70 in total, provide valuable and detailed information on the individual countries. However, they have also been criticised for having a narrowly institutional focus, a lack of cultural sensitivity, poor conceptualisation of the notion of integrity, and an emphasis on compliance-based approaches to combating corruption (Grebe and Woermann 2011; Heywood and Johnson 2017). We focus in more detail in what follows on the NIS approach, as well as the Seven Principles of Public Life (the so-called 'Nolan Principles') established by the UK government in 1995, and the Community Integrity Building approach developed by the NGO, Integrity Action.

- Transparency International's National Integrity System (NIS) assessments

NIS assessment reports focus mainly on the legal tools and institutional structures that prevent corruption in a given country. According to TI (2017), the NIS offers 'a comprehensive means of assessing a country's anti-corruption efficacy sector by sector. It allows a nuanced analysis of national efforts to stamp out corruption'. The integrity system is conceptualised in the NIS approach as a collection of 'pillars' representing institutional and political elements 'both in terms of their internal corruption risks and their contribution to fighting corruption in society at large' (TI 2017). The model takes the form of a Greek temple with thirteen pillars, representing the core components of a

country's governance system: legislature, executive, judiciary, public sector, law enforcement, electoral management body, ombudsman, audit institutions, anti-corruption agencies, political parties, media, civil society and business.

Underpinning the temple, its foundations comprise public awareness and society's values: 'if public awareness is high and values are strong, both will support the 'pillars' which rest on them, giving them added strength. On the other hand, if the public is apathetic and not watchful, or if the values are widely lacking, then the foundations will be weak. The 'pillars' will be empty and ineffectual, and lack the underpinning necessary if they are to safeguard the nation's integrity' (Pope 2000: 36). On top of the temple roof, three balls represent the principles of sustainable development, rule of law, and quality of life, with the idea being that the roof should remain level to prevent these balls rolling off.

NIS assessments examine both the formal framework of each institution and their actual performance. They are based on the belief that the evaluation of the different components must be addressed in a holistic manner (Pope 2000), and that to keep corruption in check, all the pillars should function well. Indeed, if the pillars are not of similar heights, the structural resilience of the temple will be compromised – although the NIS approach does allow for some pillars to compensate for, or support, others. None the less, the ideal is that the quality of the integrity system is best ensured through completeness, with all pillars present and functioning properly. The NIS approach thus has a strongly institutional focus, based on the idea that when governance institutions 'function properly, they constitute a healthy and robust National Integrity System. However, when these institutions are characterised by a lack of appropriate regulations and by unaccountable behaviour, corruption is likely to thrive, with negative ripple effects for the societal goals of equitable growth, sustainable development and societal cohesion' (TI 2017).

The temple metaphor has been widely criticised, notably its emphasis on pillars (Heywood and Johnson 2017). Not only is it unlikely that all pillars would be able to reach the maximum height, even in low corruption jurisdictions, but their separation underplays the extent to which a national integrity system relies on interaction between different elements and components. To reflect this, scholars in Australia have suggested an alternative metaphor of a bird's nest, in that it does not depend upon any individual stick, but a well made nest will be structurally strong. The absence of any individual stick can often be compensated for by other sticks, in the same way that poor functioning in some public institutions can potentially be compensated for by above average performance among other institutions. If the goal of NIS assessments is to diagnose problems and provide policy makers with potential solutions, then understanding the interrelationships between institutions may be just as important as understanding the functioning of individual components (Sampford et al., 2005: 104; see also Six and Lawton, 2013: 640).

The NIS model was developed specifically with the idea of universal applicability, allowing for an assessment of how a country performs against some ideal standard. Consequently, it has been criticised for exhibiting a western bias that favours more

industrialised countries that have a longer history of democratic functioning. Indeed, some have argued that the NIS approach does not make sufficient allowance for contextual specificity and, in particular, the nature of the political settlement and forms of political contestation within a given jurisdiction (Heywood and Johnson 2017).

- The Seven Principles of Public Life in the United Kingdom

Ever since the reforms that ended so-called ‘old corruption’ in the United Kingdom in the late 19th century, the country has often been seen as offering an example of high levels of integrity in public life. However, a series of scandals in the late 1980s and early 1990s prompted a renewed focus on the issue, resulting in the creation in 1994 of the Committee on Standards in Public Life (CSPL), an advisory non-departmental body, to focus on ethical standards amongst holders of public office. In the Committee’s first report, published in 1995, it set out the ‘Seven Principles of Public Life’, also known as the Nolan Principles after the name of its first chairperson, Lord Patrick Nolan. The seven principles are: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership. They have become established as a guiding framework for all public institutions and activities in the UK.

The CSPL defines integrity as follows: ‘holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefit for themselves, their family or their friends. They must declare and resolve any interests and relationships’ (CSPL 1995). It is notable that this definition focuses primarily on what to avoid doing, but says little that offers a proactive guide to positive behaviour, apart from declaring conflicts of interest. Indeed, this is reinforced through the imperative and normative language used, which recalls the compliance-based approach discussed above. It also stands in contrast to the overall tone favoured by the CSPL, that has favoured a values-based approach: ‘the “Nolan principles” were designed to work within the traditions of the public sector ethos, in part because statute had rarely been a favoured option to establish ethical standards’ (Heywood 2012: 481). The contrast between the aims and the language used suggests that the CSPL understanding of integrity is limited to what is not right, rather than what is the right thing to do or the right way to behave.

- Integrity Action’s Community Integrity Building

The goal of Integrity Action, a UK-based organisation, is to help tackle corruption by building integrity in some of the world’s most challenging environments. A key plank of the approach is Community Integrity Building (CIB) that seeks to strengthen accountability and guarantee that citizens are better prepared to deal with corruption challenges, advocate for better services, and reduce waste in public funding (Integrity Action 2017).

Integrity Action sees integrity as requiring the alignment of four factors: accountability, competence, ethics, and corruption control. Accountability is defined as the ability of

stakeholders to check that promises are fulfilled, as well as responsiveness to legitimate internal and external demands. Competence is the ability to do something well, which means having and deploying the skills and capabilities required to achieve personal or organisational goals. Ethical behaviour is defined as behaving in accordance with principles and commitments established to guide decision-making, as well as being aware of what is legally, morally, or professionally obligatory or permissible. Finally, corruption control means zero tolerance towards corruption and ensuring that an organisation has a framework in place to reduce the risk of corruption taking place.

The definition of integrity provided by Integrity Action seeks to be concrete and reasonably measurable, as expressed in the formula: $I = a(A, C, E) - c$, where Integrity (I) = the alignment (a) of Accountability (A)/Competence (C)/and Ethical behaviour (E), without corruption (c). However, the notion of competence in this context is potentially problematic. Whereas some measure of competence is necessary to have integrity, and some measure of integrity is necessary to do a job well, simply having the capacity to achieve a certain standard is insufficient to ensure it happens (Cox et al. 2003). Whereas one person may be competent to perform a task properly, but lacks motivation or desire to do so, and another may lack the necessary skills but tries to make up for that through determination and effort, neither would be acting with integrity. Equally, an assessment of competence is often derived from results, but it may be the case that the poor outcome of a task has nothing to do with lack of capacity or integrity, but is instead driven by factors beyond an individual's control that make it *look* like they lack competence.

The three conceptualisations outlined above provide different perspectives on how to assess integrity in practice. What they have in common is that integrity is not presented as a goal to be achieved, nor as a positive way to promote ethical behaviour. Instead, they present integrity in terms of its negative pole, laying stress on what should *not* be done, rather than outlining what the positive characteristics of integrity entail, and the reasons why such characteristics are important. To that extent, there is insufficient attention paid in these accounts to the issue of motivation: the reasons that underpin the positive dimensions of integrity as a guide to action.

The core elements of integrity

- Wholeness: consistency and cohesion

Etymologically, the word 'integrity' derives from the Latin *integer*, which means 'intact' or 'a thing complete in itself'. Standard dictionary definitions see integrity as the state of being whole or entire, and 'to integrate' means to bring together, combine or incorporate into a whole or a larger unit. Thus, a core characteristic of integrity is wholeness, involving the union between different parts, and its opposite would be separation and division.

Wholeness can operate either internally or externally. In the literature on integrity, the internal focus relates to individuals demonstrating consistency, coherence and a correspondence between thought and action. This is achieved when there is alignment

between a person's views and their behaviour over time and in different settings (Musschenga 2014, cited in Huberts 2014). External wholeness refers to how elements relate to each other to achieve unity. Integrity is more than just the relationship between the parts that make up the whole; it is also about having the 'right relationship', highlighting the normative dimension of integrity. Brown (2005) identifies some characteristics that can help ensure the 'right relationship': *relational awareness* when interacting with others; *inclusion*, to ensure openness to difference and disagreements; and pursuing a *worthwhile purpose* whilst ensuring consistency between conduct and the wider institutional aims.

Being part of a larger network of interactions requires social awareness and sensitivity to social issues (Kapstein and Wempe 2002), civic cooperation (Brown 2005) and social responsibility. In a political context, wholeness operates at different levels: in institutional terms, for instance, it requires all public officials to be guided by the same institutional goals and mission, ensuring cohesion and unity. In terms of a national government, integrity in the sense of wholeness requires coherence between the political discourse about the administration's vision or goals and the specific policies it implements. Thus, a government that promises more equitable welfare policies, but introduces tax cuts for the richest and reduces social expenditure would not be acting with integrity.

- Action: more than just intention

Integrity requires consistency between thought and action. As outlined by Montefiore (1999), this means that an individual's desires and working principles are fully integrated; the individual is not in conflict with him/herself; the individual does not engage in unexpected departures from his/her normal pattern of conduct. By the same token, integrity is undermined by fragmentation and by a failure to ensure that values and commitments are aligned (Cox et al. 2003).

Although some authors lay stress on consistency and alignment as the core elements of acting with integrity (Montefiore 1999; Calhoun 1995), others insist that integrity can only be exercised in the face of addressing conflicts or difficult decisions (Cox et al. 2003; McFall 1987). According to this latter view, integrity is less about the commitment to particular values and principles than about how individuals behave when placed in situations that challenge them. Whereas the first position suggests a less dynamic sense of what integrity entails and reduces the space for ambivalence, the second position suggests the need to test the strength or reality of claims to act with integrity. In essence, these two positions reflect opposing poles or certainty and self-doubt.

- Morality: working for the public interest

Consistency between what one says and what one does is a necessary, but not sufficient, condition for behaviour to have integrity in anything other than the narrowest sense of being true to oneself at a personal level, as outlined by McFall (1987). However, in a political sense, acting with integrity implies in addition that behaviour should be consistent

with ethical principles and morality. According to Cox et al. (2003), the content of one's commitments, values and desires is as important as their translation into agency.

For some, this moral dimension to integrity when applied to a political setting means the pursuit of the public interest and the common good. Appleby (1952) says that when actions are disconnected from the public good, society becomes morally corrupt. Public officials thus have a responsibility to prevent this by ensuring they remain committed to acting in a moral and socially ethical manner. In turn, that means having continuous regard to the public interest and the overall needs of the community rather than the interests of any individual or private interests.

In the literature, integrity and ethics are often used interchangeably, but the two can be distinguished. Ethics operates more at the level of values or beliefs, whereas integrity requires some form of practical manifestation of those ethical values. In the words of Huberts (2014: 51), 'the ethics of governance focuses on the moral values and norms that apply to decision-making and implementation, and integrity points to the actual behaviour of the actors involved in the policy process and whether that behaviour is in accordance with the relevant moral values and norms'. Thus, someone could be described as having ethical principles and beliefs, but they can only be said to have integrity if those are reflected in their actual behaviour. For this reason, codes of ethics for public officials do not suffice to ensure integrity – and prioritising ethics over integrity risks focusing on intention rather than action.

- Process: design and implementation

Integrity is expressed in process rather than outcome, since the moral and ethical commitments that lie behind any given action cannot guarantee the intended results. Moreover, it is in the process of acting that opportunities arise for reflection and adaptation to changing circumstances, allowing for the realisation of confronting challenge that some see as essential to the definition of acting with integrity (Cox et al. 2003).

In political science literature, there has been much focus on outputs, particularly whether specific policies have achieved what they set out to. However, the process by which policies are developed and implemented is also a critical element in assessing whether governance is functioning appropriately, particularly in a democracy (Rose and Heywood 2013: 148-9).

Thus, for political action properly to be described as having integrity, it should manifest wholeness in the sense of coherence between proper aims and means to achieve them, with morality underpinning the actions undertaken and the process through which they are implemented.

Key debates on integrity in practice

As we have seen, integrity is not a straightforward or uncontested concept. Accordingly, there are several ongoing debates about integrity and its application to political contexts that need to be considered, focusing especially on: degrees of integrity, the universality of its scope, where it properly resides, and whether it can be measured.

- Degrees of integrity: is integrity a binary concept?

For some, integrity is something you either have or do not. The Dutch Minister of the Interior, Ien Dales, gave a widely-cited speech in 1992 in which she stated, 'A little bit of integrity is not possible', prompting a focus on the whole issue of integrity management in The Netherlands (Hagedoorn and Hermus 2016: 33). For others, a 'little bit of integrity' is indeed possible, and – given any set of norms and values – human behaviour can range from exemplary, through acceptable, deviant and unacceptable. Huberts (2014: 57) argues that integrity can denote different things at different social levels or in different moral spheres, meaning – for instance – that a person can act in an exemplary way at work, but behave very differently in their private life. How much integrity a person has depends on the moral expectations of the relevant public that is equipped to judge, and the public may change its view over time.

Equally, there is a question of whether a single act that is out of character by someone who otherwise behaves fully in accord with expectations undermines their claim to integrity (Marquette 2015). If such a slip can be forgiven in someone who would normally act with integrity, is it also the case that someone with lesser standards of behaviour can sometimes act with integrity in a given situation. This suggests that when we are dealing with specific actions, it is possible to talk of degrees of integrity, but when we are assessing whether a person can be defined as 'having integrity', consistency of behaviour is more important.

- Is the concept of integrity universal?

The public administration literature on global ethics and the universality of values (Ghere 2005; Widdows 2011) raises questions that are also relevant to the concept of integrity: to what extent can integrity be exported, or does it need to be developed locally? This is of particular relevance to questions of good governance and anti-corruption, where tensions between universalistic and relativistic understandings are well-established. Some argue that the fact that some societies appear more tolerant towards corruption than others raises the question of whether what is deemed to be corrupt varies from country to country. Might understandings of integrity also be context-dependent?

- Types of integrity: individual and institutional

It follows from the discussion so far that integrity can operate at different levels, including personal, professional and institutional. A public official could act with integrity even if the department they are employed by has no code of ethics. Although integrity is often seen as an attribute of individuals, institutions can play a key role in promoting integrity. They can

help redirect individuals to focus on the public good, as well as provide an appropriate context and conditions to enable people to work with integrity. If public officials work in settings with codes of conduct, codes of ethics, effective human resources support and so forth, they are more likely to be able to show integrity in exercising their duties. Grebe and Woermann (2011) argue that the integrity of institutions (that is, institutions that are coherent and perceived as legitimate) results directly from congruence between the codes, norms and rules of an institution and the behaviour of individuals who work within it. Moreover, they underline the importance of the nature or type of institution being appropriate to the task it is designed to perform, identifying this as a third level of integrity alongside individual and institutional performance.

- Can integrity be measured?

There have been various attempts to measure quality of governance, levels of corruption and related ideas. There is also a very extensive literature on the problems and pitfalls of measurement, particularly in relation to corruption. These have generally focused on the difficulties – both conceptual and methodological – involved in any attempt to measure what are essentially normative concepts, and they relate primarily to a mismatch between concepts and their measurement, an over-reliance on proxy indicators, and western-focused elite bias (Bukovansky 2015; Heywood 2015; Heywood and Rose 2014). As we have already seen, existing approaches to conceptualise integrity in relation to governance have often seen it as a residual of anti-corruption: when corruption is absent, integrity will be left. Equally, we have seen that most prevailing approaches to anti-corruption have had a strongly institutional focus. Accordingly, it is hardly a surprise that those measures of integrity that do exist exhibit a similar institutional bias, as outlined above when discussing Transparency International's National Integrity System assessments.

One of the most recent approaches to measuring integrity exhibits both of these characteristics. The Index of Public Integrity (<http://integrity-index.org>), developed by Mungiu-Pippidi and Dadasov, specifically measures a country's capacity to *control corruption* by focusing on six individual and, it is suggested, actionable components: judicial independence, administrative burden, trade openness, budget transparency, e-citizenship, and freedom of the press. The overall aim of focusing on these six dimensions is to reduce opportunities and increase constraints, but the Index lacks any specific elaboration of what is understood by integrity. Instead, it is quite overtly focused on corruption: 'The Index of Public Integrity (...) assesses a society's capacity to control corruption and ensure that public resources are spent without corrupt practices' (<http://integrity-index.org>). As with much of the literature on integrity in public life, the term here stands as a proxy for the control of corruption and, as such, overlooks the complex challenges of identifying what exactly integrity entails.

Part 2: Integrity Management

Integrity management refers to the formal framework that ensures public officials engage in ethical behaviour, acting with honesty and fairness whilst complying with prevailing legal norms (Behnke and Maesschalck 2016). Such a framework needs to combine law enforcement and motivation in an appropriate system of rules, values, guidelines and socialisation mechanisms (Heywood 2012: 486).

Since the 1980s, there has been widespread tendency to adopt New Public Management (NPM) reforms in public administration, aimed at introducing managerial techniques to enhance the quality and efficiency of public services. As Hood (2001: 12553) explains:

‘Its focus on public service production functions and operational issues contrasted with the focus on public accountability, ‘model employer’ public service values, ‘due process,’ and what happens inside public organizations in conventional public administration. That meant New Public Management doctrines tended to be opposed to egalitarian ideas of managing without managers, juridical doctrines of rigidly rule-bound administration and doctrines of self-government by public-service professionals like teachers and doctors.’

NPM as both a term and an approach has been highly controversial, but it has often been associated in the literature with an increased focus on results-driven, managerialist ethos that undermines autonomy and responsibility amongst public officials. However, one alleged pathology of NPM is that it has led to a greater, rather than reduced, focus on ‘rules-based, process-driven’ bureaucracy with an emphasis on compliance rather than results (Hood 2001).

If NPM has come to be associated with compliance, with a focus on regulations and procedures, an alternative approach has emphasised the importance of integrity, with a focus on values and ethics. Whilst in practice integrity management inevitably entails a combination of compliance and values, the core challenge is to find the right combination for any given jurisdiction to support effective and accountable government.

Compounding that challenge is what has been referred to as an implementation deficit, meaning that despite general agreement on the need to ensure integrity and ethics are at the heart of government, insufficient attention has been paid to making it happen. The lack of a clear operational definition of integrity, a superficial understanding of how to embed it in practice, and the absence of political will are among the key obstacles that need to be overcome.

In this section of the report, we explore in more detail the relationship between compliance-based and values-based approaches to integrity management, tracing the evolution from ‘Old Public Administration’ to ‘New Public Management’ and ‘New Public Service’. We outline what an integrity-focused model of public administration entails, and address the issue of the implementation deficit, laying emphasis on the role of institutional culture and of leadership.

Towards a public integrity management model

New Public Management (NPM) has its intellectual roots in managerialism, institutional economics and rational or public choice models. One of its central tenets is that public sector efficiency and success depend on the quality and professionalism of managers (Denhardt and Denhardt 2003: 20). The emphasis is on policy implementation rather than design, moving from traditional 'public administration' to what is termed 'public management' (Denhardt and Denhardt 2003), with a primary focus on productivity and performance. Such an approach has been strongly associated with privatisation of state assets and contracting-out of public services, in the belief that these will enhance both efficiency and effectiveness (Kolthoff, Huberts and Van Den Heuvel 2007). In the NPM conception, citizens operate as customers and consumers of public agencies, and their relationship with those agencies parallels that of transactions in a market place.

The NPM approach was developed as an alternative to so-called Old Public Administration (OPA), a default model that built upon on the ideas of Max Weber that had been originally introduced in the United Kingdom and Prussia in the late 19th century (UNDP 2015: 5). OPA shares with NPM the aspiration to achieve efficiency, utilising some core business principles, but is managed in a different way. Under OPA, the optimum means to achieve efficiency is through hierarchical organisation with managers exercising control from the top and expecting public officials to act with neutrality and professionalism, enacting without demur the directives that come their way (Denhardt and Denhardt 2003: 12). This contrasts with the NPM approach, which sees managerial control exercised most effectively through the use of incentives. Under OPA, there is a clear separation between politics and administration, with appointed officials held to be accountable to their political principals, and only via them to the public (Denhardt and Denhardt 2003: 7). Officials and the public thus have little direct involvement in policy design, which is properly the remit of elected politicians.

As with NPM, the intellectual foundations of OPA owed much to public choice theorists, notably Herbert Simon's classic *Administrative Behavior* (1957) that equated rationality with efficiency and argued that the most rational behaviour is whatever enables an organisation to achieve its goals in an effective way. The premise underlying this view of rational behaviour is a positivistic view of scientific knowledge, in which validity depends on being able to demonstrate that a proposition is either true or false – thereby placing a premium upon efficiency rather than values in any discussion of organised action (Simon 1957).

The idea of running government more like a business already had its origins in OPA, but NPM approaches have entailed more than just the application of market mechanisms and techniques in government. NPM also shifted thinking about the role of public officials, the nature of their profession, and their purpose (Denhardt and Denhardt 2003: 13). According to some, this shift in thinking also led to a refocusing of the values that had traditionally characterised the public sector, moving from an emphasis on service towards the prioritisation of efficiency and effectiveness. In addition, NPM saw greater focus placed on rules and regulations over ethical values. Denhardt and Denhardt (2003: 28-9) identify substantial conceptual differences between OPA and NPM (see Table below).

	Old Public Administration	New Public Management	New Public Service	Integrity Model
Public interest	Politically defined and expressed in law	Aggregation of individual interests	Dialogue about shared values	Defined by shared values and mission
Public officials	Clients and constituents	Costumers	Citizens	Co-responsible citizens
Government role	Rowing (designing and implementing policies focused on single political defined objectives)	Steering (acting as a catalyst to unleash market forces)	Serving (negotiating and brokering interests among citizens creating shared values)	Awakening commitment to the public interest by citizens and public officials
Individual motivation	Pay and benefits, civil service protections	Entrepreneurial spirit; ideological desire to reduce the government	Public service; desire to contribute to society	Desire to fulfill their role as empowered people to achieve a better society

* Table based on and amplified from Denhardt & Denhardt, Table 1 in *The New Public Service. Serving, not Steering* (2003: 28-29).

The widespread adoption of NPM approaches from the 1980s onwards has stimulated a debate over the relative virtues of compliance-based and values-based approaches to integrity management (discussed in more detail in the next section), and has also sparked questions about the allocation of power within public administration and the responsibility of public institutions towards citizens. The NPM approach places administrators at the helm of the ship of state, overseeing the goals, direction and strategy of public institutions. By doing so, this increases the risk of forgetting who owns the ship (Denhardt and Denhardt 2003: 23); indeed, some proponents of NPM seem to overlook the fact that governments operate on behalf of citizens (King and Stivers 1998) and that the role of public officials should be to serve citizens, as well as to build public institutions characterised by integrity and responsiveness (Denhardt and Denhardt 2003: 23).

In response to concerns about the potential pathologies of NPM approaches, an alternative model known as New Public Service (NPS) – associated principally with Denhardt and Denhardt (2000) – has been proposed. NPS places public service, democratic governance and civic engagement at the heart of what public administration is about: governments should be responsive to citizens, whose rights and obligations are enshrined by law, and should protect their capacity to influence political decisions (Denhardt and Denhardt 2003: 27). Calling into question the idea of judging public administration solely on the basis of efficiency, NPS emphasises other factors, such as equality, equity and responsiveness (Frederickson 1980). Service should be the main purpose of public officials, focusing on the needs of citizens rather than on exercising control and authority. Thus, public officials should contribute to building a collective and shared notion of the public interest, placing primary value on people, not just productivity (Denhardt and Denhardt 2003: 42-3).

This drive towards a more values-based approach in public administration, promoting integrity and ethical principles, has been gaining ground in recent years. As outlined in the OECD Report, *Towards a Sound Integrity Framework: Instruments, Processes, Structures and Conditions for Implementation* (OECD 2009),

‘Public sector integrity management – often called ethics management – has been high on the agenda in many OECD countries for over a decade now. Underlying this evolution is a growing understanding that integrity is a keystone of good governance, a condition for all other activities of government not only to be legitimate and trusted, but also to be effective’.

The global impact of corruption in its various forms, alongside the disappointing results of anti-corruption policies based on institutional reform and law enforcement, has emphasised the need for a new public administration paradigm. A claimed strength of NPS is that its values-focused approach reclaims the importance of a sense of service, and also role of citizens as responsible co-participants in society’s functioning and well-being. NPS is also concerned with instilling appropriate values and commitment in public officials, laying emphasis on integrity by addressing intentional and motivational behaviour and focusing on the causes of issues rather than just their impact or resolution.

Compliance- and values-based approaches: Seeking the right balance

New Public Management reforms were introduced largely through applying new rules and regulations, paying little attention to the issue of public officials’ own view of their ethical commitments to the public good (Storlazzi 2009: 184; Van Deth and Scarborough 2003; Heywood and Rose 2015). The emphasis on compliance with these rules reflected a belief that ‘integrity is ensured when behaviour is maximally regulated, regardless of the intentions of those holding office’ (Heywood and Rose 2015: 110).

However, there has emerged a growing debate about both the relative merits, and the appropriate relationship, between such regulatory, compliance-based approaches to integrity management and those that focus on values (Huberts et al. 2008; Heywood 2012; Chapman 1998). Where compliance-based approaches reflect a belief that people do things because they are required to, values-based approaches assert that the appropriate motivation for behaviour is the desire to do the right thing (Foster Back 2006: 8). Compliance stresses procedures, following rules and monitoring systems to detect violations; a values-focus stresses ethics, moral awareness training, ethical codes and the importance of leadership setting positive examples. Compliance implies regulation and punishment of poor behaviour, whereas values-based approaches focuses on preventing the behaviour taking place. [See box, below]

It is evident that compliance and values should not be seen in crude either-or terms: both are necessary in any system of public integrity management, and the critical issue is to identify the appropriate balance between them in any given jurisdictional setting. A recent study conducted in The Netherlands, where there has been extensive focus on this issue, looked at the effectiveness of different integrity instruments at the local government level

(Huberts et al. 2014). It found both that rules and codes are considered very effective, and also that training about moral awareness and/or acting with integrity – provided by only half the municipalities – was similarly deemed very effective (Huberts et al. 2014: 177). The authors suggest that it is the interaction of policies to promote integrity and to fight corruption that provides the most effective approach to integrity management (Huberts et al. 2014: 179).

Such a conclusion inevitably raises the question of what that interaction, or relationship, should look like in practice. There are five key variables that need to be taken into account when seeking to identify an effective approach to integrity management: context; timing and sequencing; diversity; mutual reinforcement; partnership.

- *Context:* Adaptation to the particular context is of course critically important. In a situation where different forms of corruption are deeply embedded in virtually all levels of public administration, it would be naïve to expect that an emphasis on promoting ethical values through an emphasis on integrity will have much purchase. In such cases, the priority may need to be on enforcing respect for the most basic standards of behaviour, and compliance-based approaches are the only ones that would have any chance of having any short-term impact. Equally, however, where public officials are trustworthy, compliance strategies may risk generating more unethical behaviour than they solve. As we have seen, the response to corruption scandals has increasingly been to implement new regulations and legal requirement. However, such responses run the risk of creating an us-vs.-them attitude among groups of officials whose work is stripped of an ethical discourse, which in turn can create the space for conflicts of interest between group loyalties and obligations to the law.

Indeed, the nature of the political settlement in any given jurisdiction will have a profound impact on what kinds of reform are even possible: where informal governance and networks are the norm, meaning that authorities are able to bypass the formal structures of decision-making and accountability, it may be that there are more fundamental issues that need to be addressed before the integrity of public officials can even be considered. Thus, any attempt to find an appropriate balance between compliance and values will be conditioned by the political context, which will delimit the range of possible options.

- *Timing/sequencing:* Following on from the issue of context, in situations where corruption is deep-rooted, it may be that a first stage of reforms requires the imposition and application of tough laws in order to generate a sense that malfeasance will not be tolerated, before it is possible to focus more directly on integrity-building initiatives. Our research on Bolivia offered just such an example. In the city of La Paz, the mayor Juan del Granado (1999-2010) introduced a zero-tolerance approach to corruption when he first assumed office. This approach was so comprehensive and so strict that it was only semi-jokingly described by Pedro Susz, a key Del Granado aide, as a 'policy of terror' in which the administration would 'shoot first and ask questions later' (Zúñiga and Heywood 2015). The new administration vowed to take action against the slightest hint of corruption, although always in line with due legal process. However, this draconian persecution of corruption was just the prelude to a much more comprehensive programme of reforms designed to reshape the relationship between the public institutions of La Paz and its citizens, based on establishing

greater transparency, improving service delivery and creating mechanisms for participation designed to build trust (Zúñiga and Heywood 2015).

It was clear from the Bolivian example that, to have credibility, action needed to be taken by Del Granado immediately upon assuming office. Any delay in addressing the issue of corruption would have allowed doubts to become established about his commitment. Equally, he needed to take hardline action against corruption first, before focusing on building ethical values and integrity amongst public officials, in order to root out bad practices that had become established and the people responsible for maintaining them. Only then could he set about building new ways of working, based on an ethical commitment to promoting integrity.

- *Diversity*: the implementation of any system of integrity management needs to take into account the diverse range of likely responses amongst public officials. Research suggests that when presented with a code of public ethics, for instance, some officials will follow it immediately because they believe in and want to live by the principles espoused; others will accept the importance of the principles, but their readiness to adopt them will be influenced by other factors (including their personal circumstances, pressure from above, the general moral climate in the workplace); a third group will seek to prioritise short-term rewards even at the expense of engaging in actions they know to be wrong (see Cox et al. 2003). Whilst compliance measures may be appropriate for this third group, the risk is that such measures may alienate the first group.

Another dimension of diversity relates to mechanisms of communication to wider audiences than just public officials. Our research in Rwanda provided a good example of how the government has placed emphasis on instilling education about values as part of its national rebuilding process following the genocide of 1994, using both formal and informal strategies. The formal mechanisms include changes to the school curriculum, with lessons on anti-corruption and crime, gender issues, as well as culture and values. At the national level, radio shows are used to support the overall message, and public institutions hold 'anti-corruption weeks' to educate Rwandan citizens about the negative consequences of corruption. Of particular importance are *itorero*, a pre-colonial style training camp where participants spend several weeks learning Rwandan history, pre-colonial values and national policies, as well as issues of direct relevance to their particular profession. Interviews we conducted with citizens who had attended *itorero* suggested that the main lessons they drew from them related to patriotism, integrity, heroism, leadership, commitment, dignity, self-esteem, creativity, entrepreneurship, rights and how to live with others. Supporting these various initiatives are poster campaigns, visible throughout the country, with key messages about Rwandan values and taboos.

- *Mutual reinforcement*: A society's rules and values need to reinforce each other. If rules are introduced to address concerns about corruption, these should be consistent with public understanding of appropriate and acceptable behaviour – so, for instance, in settings where local chiefs or leaders are expected to be providers, it may be counterproductive to impose rules that restrict their capacity to disburse favours without alternatives in place. Likewise, efforts to tackle corruption and promote integrity need to be integrated into wider initiatives to deliver effective services.

The Rwandan example offers an example of the importance of coherence and consistency, using appropriate resources to reach the whole population. This stands in marked contrast to the Bolivian case, where we found education efforts at the national level to be sporadic and isolated, such as occasional anti-corruption caravans that are aimed at reaching the younger generation through fun-based activities and games, but that are insufficiently supported by other interventions.

- *Partnership:* It is important for there to be a sense of partnership between authorities and citizens working together towards shared goals. Citizens should believe in the good faith of authorities to implement promised reforms, which requires both transparency and that effective accountability measures to be in place. Compliance-based and values-based initiatives need to complement each other in terms of supporting the overall government message, and it is particularly damaging if public authorities profess a commitment to a specific kind of behaviour but are perceived to act in a manner that contradicts it – as arguably happened with the Conservative administration in the UK under John Major in the early 1990s and led to the establishment of the Committee on Standards in Public Life (see Section 1).

However, the experience of La Paz in Bolivia suggests that even when such mechanisms are in place, citizens may be reluctant to use them. According to a report published by the La Paz City Government in 2013, about 70 percent of respondents were unaware of citizen engagement initiatives. That the mayor, Juan Del Granado, was still able to effective reforms that contributed to a change in the perception of public officials in the city strongly suggests that, whilst consistency and partnership are important, a key factor is strong and committed leadership.

BOX

Compliance-based and values-based approaches to the problem of corruption: one problem, different logics

In order to show the different logics that characterize a compliance-based approach and a values-based approach, we outline the core elements of each ideal type below.

Corruption according to the compliance model

Causes: At the macro level there are conditions such as failures in the political system (lack of party competition and transparency, voter turnout), the size of the public sector, relationship between the public sector and business, complex regulation of market entry and tariffs, and increasing strength of organized crime. At the meso level, the causes of corruption have more to do with organizational structure, including work distribution, the gap between top management and the work floor, lack of control and supervision and mismanagement, lack of transparency, specific policies and rules, and lack of rationalization in public service related to traditional authority, patrimonialism, nepotism and cronyism. At the micro level, individual backgrounds and motives as well as individual economic circumstances are considered to be factors that might explain corrupt behavior within the civil service.

The compliance model places explanatory weight for individual behavior on the context and structure. Individuals are conceived as rational actors whose behavior is determined by cost-benefit calculations. Hence,

a person will commit acts of corruption when the benefits of doing it are bigger than the potential negative consequences. Therefore, the solution to curb corruption is to change the context in a way that the incentives for corruption are reduced and the penalties for it are increased.

Consequences: The compliance model focuses on the economic costs of corruption through distorting incentives, its political costs through undermining institutions, and its social costs through redistributing wealth and power towards the undeserving.

Solutions: Institutional reforms and regulations in order to close down the space in the system for illicit activities. The formula is to reduce monopoly of power, limit and clarify discretion, reduce incentives for corrupt behavior, and increase accountability and transparency. That involves increasing penalties, raising the probability of being caught, and linking pay to performance, among other measures. Under this model, the target of the reform would be to stop individuals from committing corrupt actions.

In terms of leadership, some of the causes of corruption such as lack of control or supervision, and lack of rationalization related to traditional authority, patrimonialism, nepotism and cronyism, points to a certain type of leadership along the lines of what is known as administrative leadership. In other words, a depoliticized leadership focused on managerial activities, which fits in the new public management style in the public sector.

Corruption according to the values model

Causes: At the macro level, these relate to the values and norms of the society and also the education system. At the meso level, the causes of corruption are found in the work culture and the values and norms of individual politicians and public officials. Leadership becomes an important element for the promotion of corruption, particularly the lack of commitment of leaders to public integrity, role modeling and the trustworthiness. In work cultures, lack of mutual trust and ethical beliefs are especially relevant. At the individual level, emotions, dominant and strong personalities, employee moral judgment, and lack of rational decision-making can lead to corrupt behavior.

Consequences: A pro-values model considers the consequences of corruption in terms of how the misbehavior of leaders sets the tone. It also acknowledges the separation between citizens and public institutions and the political class created by a broken trust aggravated by corrupt behavior. From this perspective, corruption reduces the sense of belonging to and protection from the state, prompting individualistic attitudes. Likewise a values model pays attention to the effects of corruption in the way it is perceived when it is systematic and it is 'normalized' or considered even as a solution to get what the state is unable to provide.

Solutions: Efforts directed to the reinforcement of ethical values and the promotion of integrity, the redefinition of the relationship between institutions and public officials promoting a sense of belonging, safety and the identification with the institution's mission and values, and a strategy to restore trust between citizens and government. A values-based approach will not intervene only at the level of the manifestations of behavior, but also at the level of the intentions and underlying beliefs that justify that behavior. Under this model, the target of the reform would be to promote an ethical, values-based attitude.

The model also entails intervening at the structural level to create 'institutions of integrity' and 'the integrity of institutions' as part of a 'developmental integrity model'. The idea of 'institutions of integrity' refers to the institutionalized norms and codes of behavior. Integrity of institutions refers to whether they function correctly, are robust and legitimate and are fit for purpose. Structural conditions affect individual behavior just as individual behavior affects the evolution of the institutions. The preservation of integrity will depend on the congruence of both the institution and the individuals – that is, the alignment of the expectations and actions of the actors within the institution.

Systematic leadership is required, where leaders do not direct but instead guide the process via continuous and complex dialogue and interaction within institutions. Leaders attend to emergent institutional themes, and work for the preservation of the normative congruence. They are accountable not only for the outcome but for the people.

Values in the public versus the private sector: complementary or conflicting?

The introduction of practices drawn primarily from the private sector into the management and organisation of public administration has generated concern about their impact on questions of public integrity. That concern revolves largely around alleged differences in the intrinsic values that characterise the private and the public sectors (Van der Wal et al. 2006). Some have argued that private sector values are fundamentally contrary to those of the public sector: for instance, Bellone and Goerl (1992) argue that entrepreneurial management values autonomy, personal vision, secrecy and risk-taking, whereas administrative values include democratic accountability, participation and openness. The shift in values that has accompanied the move from more traditional public service management practices to a greater emphasis on efficiency and effectiveness carries with it certain corruption risks (Huberts and De Graad 2014: 155).

However, empirical evidence does not offer any clear-cut support for the view that private sector practices in public administration lead to more integrity violations. Indeed, after comparing the organisational values of workers in the public and private sectors in The Netherlands, Van Der Wal et al. (2008) found no support for the hypothesis that any decline in traditional public sector values was taking place as a result of adopting more business-oriented approaches. Moreover, Kolthoff (2007) found in his analysis of Dutch police force data that some core elements of NPM, such as performance measurement and business-style management, helped to reduce the number of integrity violations such as corruption, fraud and theft. These findings suggest that the impact on public integrity of NPM-style reforms may depend more on the way they are implemented than on the specific reforms themselves.

Kolthoff et al. (2007) pose the question of whether the apparent opposition between public and private sector values actually reflects broader shifts in values more generally, whilst Van Der Wal (2009) suggests that the notion of public sector values should not be seen as fixed and unchanging over time. Lyons et al. (2005), for instance, argue that younger employees in the public sector put less emphasis on altruism and universalism, and more on prestige and power. Social values overall have evolved from an emphasis on tradition, respect for authority and concern with material well-being towards self-fulfilment, independence, and emancipation (Van Deth and Scarbrough 1998, 2003).

Despite these broader societal shifts in values, the tendency in public sector management has been towards the imposition of top-down approaches characterised by an increase in rules and regulations. The key concept that helps explain this seeming paradox is trust. In

their study of the effectiveness of public service ethics in European Union member states, Demmke and Moilanen (2012: 1) show that the lower the level of public trust in a society, the greater the reliance on rules. However, this raises the question of whether rules or ethical values are more effective in building trust (Foster Back 2006), and whilst it is often held that ethics are key, being loyal to institutional rules can itself be considered an ethical attitude.

The literature on ethics in public administration distinguishes between two broadly opposing types (Thompson 1990; Adams and Balfour 2003; Finer 1941; Friedrich 1940). The *ethics of neutrality* means that public officials behave according to the laws and principles within their organisation, whilst the *ethics of individualism* means that public officials act in accord with their own principles. In the first case, the institution in question is ultimately responsible for decisions made in its name, whereas in the second case public officials are fully accountable for their own actions.

Any approach to establishing an integrity management framework therefore needs to address potential ethical challenges in three areas: decision-making, organisational performance, and influences on behaviour.

- On *decision-making*, the literature distinguishes between a deontological and a results-based approach (Lewis 2007), the first of these arguing that behaviour and actions are good or bad in and of themselves, whilst the second says that the ethical worth of decisions can be judged only in the light of their consequences. In turn, this highlights a further tension between collective and individual interests. Whilst a disconnect between the two is often seen as an indication of corruption risks within an organisation, Lynch and Lynch raise the question of where responsibility lies for any such disconnect, suggesting that it is up to governments to support the judgement of public officials in a manner consistent with public accountability: 'a government is moral in so far as it induces public servants to relate specific to the general, the private to the public, the precise interest to the inchoate moral judgement' (Lynch and Lynch 2009: 11).

Such an understanding places the onus on public officials to find a way of translating various private and special interests into a 'public will', becoming moral agents responsible for elevating the level of public discourse by explaining the value of public service to citizens (Lynch and Lynch 2009: 11; Garofalo and Gueras 2009: 69). Through such an approach, collaboration between public officials and citizens is encouraged, helping to build bonds of trust that can help prevent corruption (Garofalo and Gueras 2009: 74).

- In relation to *organisational performance*, one key challenge is how most effectively to educate public officials about ethics. Rohr (2007) argues that ethical education should be practical, specific and operational in its objectives, but must also make allowance for new and evolving situations. Whitton (2009) emphasises the need to move beyond simply having codes of ethics and ensuring that skills are taught in how to apply them in practice.

Erakovich and Wyman (2009) outline two approaches to managing ethical compliance within organisations: enforcement through bureaucratic oversight and control, or measurement through accountability mechanisms. Anechiarico (2007), in his comparative study of the anti-corruption experience of the USA and

The Netherlands, argued that the more controls there are in place, the less effective they become.

- Amongst the key elements that determine or influence *individual behaviour* are: culture, leadership, emotions, political beliefs, rules and policies, perceptions, context, environment and values. Erakovich and Wyman (2009) suggest that the interplay between these various factors is more important than any one of them in isolation, and that the way in which an organisation manages that interplay will be crucial in determining its overall performance in respect of integrity management.

Integrity Management: The implementation deficit

A number of studies have referred to an implementation deficit between the discourse around integrity and ethics in public office and its translation into practice (OECD 2009; Demmke and Moilanen 2012; Hoekstra 2016; Mulgan and Wanna 2011; Van Der Heuvel and Huberts 2003). Whilst governments all around the world have increasingly been committing to policies on ethical behaviour, such policies are not being fully implemented. Demmke and Moilanen (2012: 57) point out that ethical policies in the majority of European Union member states have been initiated as responses to scandals, with only The Netherlands adopting their approach on the basis of values-driven public discussions about ethics. This suggests that, for most governments, their policies are driven primarily by instrumentalist concerns. Equally, however, as we have seen in the preceding discussion, the difficulties of identifying how an integrity management policy should work in practice have also been an additional factor in the implementation deficit.

However, perceptions of integrity are important if governments are to be able to claim credibility and trust, and so greater focus has been placed on implementation challenges in recent years. Approaches to implementation can be broadly divided into formal and informal strategies. A formal strategy entails the creation of explicit and visible structures, standards and systems to promote ethical values within organisations and institutions. In such cases, integrity management tends to be centrally managed, with integrity identified as a measurable target to be achieved. Implementation is managed by dedicated officials charged with ensuring adherence with the policy. Informal strategies, by contrast, are implicit and seek to influence the ethical climate within institutions and society more generally. Here, integrity is seen as an end in itself, and its mechanisms to promote it include such things as equitable remuneration policies, effective promotion structures, the promotion of shared values through leadership example, and recognition. Such an approach is more decentralised than in formal strategies, and because it is more dependent on individual commitment and beliefs, it potentially makes integrity promotion more susceptible to subjective and ambiguous interpretations.

Proponents of formal strategies argue that they allow for a more visible and sustained prioritisation of integrity, which is therefore less vulnerable to external turbulence, such as the global financial crisis (Hoekstra 2016). Formal strategies are also seen as being more coherent and resistant to key implementation pitfalls, such as the over-reliance on a small number of committed individuals (Van Der Heuvel et al. 2010). Critics, however, point to

the reputational risk if standards are not met and expectations not lived up to (Kaptein and Wempe 2002). Equally, formal systems are seen as overly bureaucratic, imposing additional administrative burdens, and having officials charged with ensuring implementation might lead some to play down their own responsibilities in this area (Lawton et al. 2013; Van Der Heuvel and Huberts 2003). Against these arguments, critics of the informal approach point to what they see as a naïve reliance on good intentions and conscience on the part of public officials, and argue that the lack of targets and measurable goals means that policy evaluation is more difficult.

The OECD (2009: 58) states that, ‘however important prevention and guidance are, every integrity management framework will need a significant component of enforcement. If the rules are clear for the staff members and the monitoring indicates transgressions of those rules, then sanctions will be necessary if the integrity management framework wants to maintain its overall legitimacy’. This links back to questions about the relative merits of compliance-based versus values-based approaches to promoting integrity.

Leadership and a culture of integrity

Ultimately, whilst some form of combining values- and compliance-based measures is required in any system of integrity management, the key factor is the commitment of, and example set by, leadership. Increasing attention has been paid in recent years to the importance of leadership, or ‘tone from the top’, in setting the right framework for integrity, both in the public and the private sector (Lamberton et al. 2005; Kayes et al. 2007). Indeed, without appropriate signals from leadership, it is impossible to establish an integrity culture – that is, ‘the set of endorsed social understandings, behaviours and practices that affect how people think and act’ (Mulgan and Wanna 2011: 416). Culture and institutional approaches are seen as playing different roles: ‘while institutions and rules provide the background context and can help to frame social action, it is the living-breathing culture that determines how they operate in practice and how people act in the many situations not covered by formal rules’ (Mulgan and Wanna 2011: 416).

Institutional culture is sometimes defined in terms of the existence of formal tools, such as codes of conduct, or else policies such as openness, equal participation opportunities, and so forth. Transparency and openness are the two attributes most frequently mentioned in regard to fighting corruption and promoting integrity. Whilst codes of conduct are widely used to express the values that should prevail in an institution, the mere existence of such codes hardly ensures compliance; as one public official in La Paz, Bolivia, bluntly stated: ‘codes of ethics do not work. What works is good practices, supervision, and ethical solidarity between colleagues’ (interview 5 Dec. 2014). If by the culture of an institution, we understand those activities and behaviours that are taken for granted (Johnson 2001), this refers more to a sense that is felt rather than formally seen or explained. Integrity is intimately connected to a sense of shared community (Brown 2005), reinforced by effective communication.

Critically, communication refers both to what is said and what is not said within an institutional context, as well as who says it, how the message is spread, how the way it is

said sets expectations for how people should interact with each other, and how safe colleagues feel when they wish to ask questions or express views. According to Brown (2005), the quality of patterns of communication (both verbal, as expressed in policy statements, mission statements, conversations, and non-verbal, through work design, daily schedules, practical skills) provide information that helps evaluate an organisation's integrity. Communication in this sense reflects lived patterns of practice, rather than formal codes or rules.

A further aspect of effective communication to support integrity relates to appropriate consideration for others, recognising that colleagues are also private individuals, citizens, family members and that all these relationships will have a bearing on how a person behaves in the workplace (Brown 2005: 10). Thus, communication should relate to the human aspect of institutional performance, and be consistent with the aims of the organisation as expressed both formally and informally.

Leadership is therefore one of the most critical factors for implementing an effective integrity management framework (Heres 2016, Lasthuizen 2008; Hassan et al. 2014). Demmke and Moilanen (2012: 60) found that among EU member states, a lack of active leadership or leadership commitment was identified as the second most significant obstacle to implementing an effective ethics policy, behind a failure to take ethical policies seriously (which itself could be attributed to leadership failures). Heres (2016: 165) states that 'ethical leadership is a key feature in building a strong ethical culture, and thereby preserving and strengthening the legitimacy, trust, and credibility needed for the governance of public institutions'. Moreover, the increased complexity of contemporary societies demands more creative and responsive leadership, able to respond more rapidly than their institutions to change (Jackson and Parry 2008).

Two of the main approaches identified in the literature are *transactional* and *transformational* leadership. Transactional leadership is characterised by an exchange relationship between the leader and those under his/her charge, usually in the form of rewards for performance and compliance. Transformational leadership refers to leaders who bring about change in attitudes, motivations and behaviours – reflecting the difference between leaders, who transform the institutions they head, and managers, who accept the institution as it is (Burns 1978; Rost 1998). However, the direction of influence should not be seen as just one way: transformational leaders also reflect the influences of those in the workplace who are empowered to contribute to organisational development.

In a recent study based on The Netherlands, Heres (2016: 173) identified five ideal-typical leadership traits:

- the safe haven creator: establishes an environment in which it is safe to make mistakes and people can speak up;
- the practising preacher: both models ethical behaviour and engages in dialogue, emphasising values and principles over rules and procedures;
- the moral motivator: shows strong moral character and authenticity, but leaves it to those under their charge to decide what is morally appropriate behaviour;
- the social builder: emphasises shared norms and values, but takes into account both stakeholder and societal interests in decision-making;
- the boundaries setter: sets clear limits to prevent unethical behaviour, and enforces them fairly.

Heres' work, part of the Integrity of Governance Research Group at the VU University Amsterdam (van den Akker et al. 2009), suggests that people typically look for a mix of all these traits when identifying what makes an effective ethical leader.

Mulgan and Wanna (2011) argue that leadership alone is not enough, and that the establishment of a genuine culture of integrity is the responsibility of all members of an institution. In essence, what is required is a collective and genuinely felt sense of identity with the moral purpose and vision of the organisation – something that is unlikely to be achieved by simply relying on rewarding good behaviour. Our case studies in Bolivia and Rwanda provided some evidence to support this view.

Both the Rwandan national government and the municipal government of La Paz in Bolivia appear to have had some success in their respective anti-corruption efforts. Although the two examples represent different cultural contexts and different scales of government, the leadership in both cases shared a key feature in common: they were able to promote positive changes in the self-identity of public officials and also their relationships with citizens. In both cases, these developments were driven by a strong political will to bring about change.

In 2001, major storms precipitated large scale flood damage in La Paz, Bolivia, leaving many families homeless and some bereaved. The municipal government lacked any emergency contingency plans and had limited economic resources; instead, it was forced to rely solely on its workforce to address the crisis. The mayor of the city, Juan Del Granado, worked with public officials to offer desperately needed help in a very direct manner, transforming their identity from simply political agents to being seen as agents of public transformation. The response to the disaster, and the appreciation of the public, helped restore the moral commitment of public officials, encouraging them to think in collective rather than individualistic terms. Since then, being a public official and donning the yellow vest that identifies them on the streets, has become a source of pride. Indeed, it has represented a complete change in the relationship between public officials and citizens, as well as in the self-understanding of their role and purpose (Zúñiga and Heywood 2015).

In Rwanda, anti-corruption efforts have been built on two main pillars: the creation of a 'Rwandan identity' in place of the ethnic identities of Tutsi and Hutu, which were banned in public spaces; and a reconnection with pre-colonial Rwanda, in a drive to recover traditional values and a 'Rwandan way'. To support these efforts, the government has introduced a comprehensive programme of education, based on the idealization of what Rwanda was before the colonial experience, and emphasising the negative associations of what corruption represents: lack of values, enemy of development and peace, lack of dignity, betrayal of the nation. The aim has been to transform the self-image of Rwandans and to re-build the nation in such a way as to prevent any re-emergence of the divisions that had led to the country to genocide in 1994. Both the La Paz and Rwanda examples also underline the importance of co-responsibility, ensuring that citizens feel an engagement in contributing to efforts to make things better.

Part 3: Conclusions

Definitions / understanding integrity

Corruption is often understood as the misuse of public office for private gain. The understanding of corruption as decay or a deviation from an ideal state has encouraged a focus on curbing corruption rather than on increasing integrity – on stopping negative behaviour rather than promoting positive behaviour.

Integrity has a positive, proactive focus: it means more than just ‘not corrupt’, and involves doing the right thing in the right way. Yet lack of clarity about what integrity is has hindered attempts to promote it. In particular, the relationship between personal integrity and role-based integrity, as well as between integrity at the individual or at the institutional level, has resulted in confusion about the how the concept can be translated into practical action.

Integrity thus entails complex relationships with other dimensions, and can be analysed from various perspectives. For the purpose of developing an approach to integrity management (that is, the formal framework to ensure ethical behaviour by public officials), we distinguish core characteristics of personal and political integrity.

The former entails: wholeness (thinking beyond just the personal); action that is consistent with principles (doing the right things); morality (doing things for the right reasons); and process (doing things in the right way). The latter encompasses: normative justice; openness and transparency; citizen engagement; and impartial authorities.

Integrity in a political context therefore involves continuous interaction between institutions of governance and citizens, and requires careful management of both decision-making and accountability structures.

What works in promoting integrity?

Institutional design to promote appropriate incentives and rule-compliance is not enough on its own to ensure integrity. Social norms and values are also important in influencing both individual behaviour and the effectiveness of institutions.

The promotion of integrity requires formal tools, such as codes of conduct, advice mechanisms or opportunities for discussion between authorities and employees about delicate decisions. Professional standards related to specialist expertise (e.g. the Hippocratic Oath) provide another example: they help professionals resist corruption and pursue integrity. But promoting integrity also requires informal tools – such as committed leadership and an appropriate organisational culture – to create the environment needed for formal tools to be effective. These supportive informal factors include the following:

- *Transformational leadership* can set an example for public servants and promote a sense of shared identity, purpose and responsibility. Such leadership also helps build an organisational culture of community, openness and mutual respect.

- *Communication* within an organisation – what is said, how and by whom – can contribute to a sense of community.
- *Continuity*: Using a range of methods can also support continuity and reinforce messages. For example, our research found that Rwanda’s use of a range of channels for its education in values (formal education, the media and community structures as well as new programmes) contrasted with Bolivia’s narrower and sporadic initiatives. Rwanda’s more frequent interventions have achieved higher impact.

Curbing corruption or increasing integrity?

Regulation tends to emphasise either compliance (to prevent corruption) or values (to promote integrity):

- *A compliance-based system* uses rules to reduce officials’ personal discretion, but can be time-consuming and expensive to implement. It implies low trust in public officials.
- *A values-based system* promotes ethical standards – through codes of conduct, for example, or education – and its avoidance of such strict, detailed regulation can make it more cost-effective and efficient. Although it implies higher trust in public officials, and allows them discretion to adapt their actions to the specific contexts and situations they face, it is also more difficult to implement and to monitor

State-level regulation involves some combination of both approaches, but recent developments have seen a greater emphasis placed on compliance mechanisms as a visible response to demands for action following corruption scandals. However, compliance approaches do not teach or instil integrity, nor do they prevent officials from finding ways of technically adhering to the rules while contravening their spirit.

Compliance approaches may in fact undermine integrity and reduce people’s trust in public officials, and therefore reduce trust in the political system. This is because strict regulation does not give officials the opportunity to show integrity and so to earn public trust. Once such a pattern is begun, it is likely to become self-reinforcing: future policy is unlikely to provide such opportunities, and officials’ values-based motivation for probity is likely to decline. Over time, a compliance-based system may reinforce a move away from integrity.

A mix of compliance and values approaches is therefore needed, and recent studies have confirmed that their interaction is important. Particularly in contexts where corruption is deep-rooted, compliance-based efforts alone are unlikely to be enough. So how can the two approaches be used in ways that complement each other?

Therefore, key consideration for policy-makers include the following:

- *Context*: Adaptation to the particular context is of course important. For example, imposing a compliance-based system when a values-based system is already in place can do more harm than good. Equally, expecting integrity-focused codes of

conduct to have any purchase in situations where corruption is deeply embedded is naïve.

- *Timing and sequencing:* Part of attention to context is attention to timing. Different types of intervention may be needed at different times. Compliance-based tools may be useful as a short-term crisis response – to lay a foundation for a more sustainable approach to promoting integrity. For example, our research considers how the mayor of La Paz, Bolivia used tough laws to crack down on corruption and send a strong message to officials, followed by long-term initiatives to promote integrity (1999-2010).
- *Diversity - a range of tools can reach a range of people:* A range of tools is more likely to be effective, as different people will respond better to different approaches. For example, some people might adopt a code of ethics without further prompting; some might need guidance in how to apply principles; and some might disregard an ethical code and require laws and regulations. Likewise, using a range of communication methods is more likely to reach people who have different social backgrounds and levels of education. For example, we have seen how the Rwandan government is using informal and formal education strategies to promote what they argue are pre-colonial values.
- *Mutual reinforcement:* A society's rules and values need to reinforce each other. If rules are introduced to address concerns about corruption, these should be consistent with public understanding of appropriate and acceptable behaviour – so, for instance, in settings where local chiefs or leaders are expected to be providers, it may be counterproductive to impose rules that restrict their capacity to disburse favours without alternatives in place. Likewise, efforts to tackle corruption and promote integrity need to be integrated into wider initiatives to deliver effective services.
- *Partnership of government and citizens:* It is widely regarded as important to promote partnership between authorities and citizens working together towards shared goals. Citizens should naturally believe in the good faith of authorities to implement promised reforms, which requires both transparency and that effective accountability measures to be in place. However, the experience of La Paz in Bolivia suggests that even when such mechanisms are in place, citizens may be reluctant to use them. Ultimately, *leadership* is the critical variable that drives genuine reform.

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This project is co-funded by the Seventh
Framework Programme for Research and
Technological Development of the
European Union



Project profile

ANTICORRP is a large-scale research project funded by the European Commission's Seventh Framework Programme. The full name of the project is "Anti-corruption Policies Revisited: Global Trends and European Responses to the Challenge of Corruption". The project started in March 2012 and will last for five years. The research is conducted by 20 research groups in fifteen countries.

The fundamental purpose of ANTICORRP is to investigate and explain the factors that promote or hinder the development of effective anti-corruption policies and impartial government institutions. A central issue is how policy responses can be tailored to deal effectively with various forms of corruption. Through this approach ANTICORRP seeks to advance the knowledge on how corruption can be curbed in Europe and elsewhere. Special emphasis is laid on the agency of different state and non-state actors to contribute to building good governance.

Project acronym: ANTICORRP

Project full title: Anti-corruption Policies Revisited: Global Trends and European Responses to the Challenge of Corruption

Project duration: March 2012 – February 2017

EU funding: Approx. 8 million Euros

Theme: FP7-SSH.2011.5.1-1

Grant agreement number: 290529

Project website: <http://anticorpp.eu/>