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PUBLIC GOVERNANCE AND TERRITORIAL DEVELOPMENT DIRECTORATE
PUBLIC GOVERNANCE COMMITTEE

PERFORMANCE OF INTEGRITY MEASURES: PROPOSAL FOR AN INTEGRITY MODULE FOR STAFF SURVEYS

Meeting of the OECD Public Sector Integrity Network

OECD Conference Centre
Paris, 20-21 November 2012

At its last meeting in May 2012, the Public Sector Integrity Network supported the development of an employee survey module on integrity. The purpose of the survey module is to obtain comparable data on practices in public organisations across OECD countries from public sector employees as a prime source.
Building on previous work in this area, a set of ten selected questions is proposed to gather the perspective of public sector employee based on examples of existing surveys in OECD countries (see in particular pages 14-19). These questions would provide options in developing a survey module on integrity in practice in public sector organisations.
For action
The Network is invited to:
•   Provide written comments on the preliminary set of questions that could be included in an integrity module for public sector employee surveys, preferably before 15 November) to prepare the discussion in session 3 on "Supporting an evidence-based policy debate: Towards measuring performance".

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EXECUTIVE SUMMARY

A key challenge for governments is to collect evidence on whether the integrity frameworks they have developed in the last decade were effective in promoting integrity and preventing corruption.

In times of fiscal stress, a solid evidence base is all the more important. In particular data on integrity in public organisations can support an evidence based integrity policy.

In this context public employees are a privileged and currently under-tapped source for assessing integrity in public organisations.

Although many governments in OECD countries conduct staff surveys in order to capture employee perspectives, only some of them include a number of specific integrity items.

This paper reviews questions that are used in public sector employee surveys in OECD countries in relation to integrity. The questions are discussed in relation the main functions of an integrity framework - defining, guiding, monitoring and enforcing integrity. The first section also identifies proxy items in public sector employee surveys that relate to the overall organisational climate, in particular in relation to exemplary leadership and organisational fairness.

It also proposes a module on integrity to obtain data across OECD countries on the perception of public sector employees as a prime witness on integrity. It identifies a number of standardised integrity questions to gather the perspective of public sector employee based on examples of existing surveys in OECD countries.

The module would consist of items establishing the level of integrity within public organisations. It helps gather the feedback of public sector employees on (i) the performance of integrity measures, including the direct experience of employees with integrity breaches and (ii) perception of the integrity climate.

What the paper shows is that a module could be introduced at a relatively low cost in existing public employee surveys. It would provide benchmarking data across countries, as well as enrich national data through comparisons of employee, citizen and business perspectives.

The rationale of an integrity module in staff surveys

1.   Most functions of government are increasingly **in search for an evidence-base** to build policies on. Educational performance is compared based on comparative data collected through standardised tests. In health policies, standardised registration systems – the so-called *Diagnosis Related Groups* - strengthen the evidence base. Economic policies are supported by the increasingly sophisticated practices of national accounting. Just to name a few examples. The financial crisis demonstrated the need for well-functioning, solid administrative capacity to regulate society. Yet, because of the fiscal and sovereign debt crisis that followed from the financial crisis, governments will have to do this with fewer resources. A good evidence base of what works is crucial in this endeavour[1].

2.   Many governments in OECD countries have **invested in the last ten years in developing integrity frameworks in the public service**. Therefore they are increasing interested in assessing the effectiveness of these frameworks. The OECD has taken stock of governments' initiatives to assess the performance of integrity frameworks (see in particular Integrity in Government: Towards Output and Outcome Measurement)[1]. It also started collecting comparative data across OECD countries on existing integrity policy and practice in OECD countries as part of Government at a Glance reports.

3.   However a key **challenge** for governments is to collect evidence on progress made considering that misconduct is by nature a hidden phenomenon. Outcome measures of integrity practices could be more quantitative but these are (i) extremely hard to come by because of the challenges of measuring corruption (e.g. they are covert) and (ii) because of possible misinterpretations of that outcome data (e.g. measuring for instance number of over-turned contracts or people fired/suspended for corruption means not necessarily more corruption but actually stronger mechanisms for identifying it.)

4.   Therefore in this context the **perspective of public employees** can be particularly valuable to measure the performance of integrity frameworks. Employees can also report on their direct experiences with breaches to integrity, which helps organisations understand their vulnerability to specific individual and organisational risks. This perception can be used *alongside* other outcome measures that are quantitative to gain a more accurate view of performance of governments in instilling and implementing good integrity practices in the public sector.

5.   The function of **Public Administration** (PA) should not be an exception to this evidence based approach. A rough estimate indicates that PA in a typical developed country accounts for 4% of GDP[2]. Efficiency gains or service improvements in PA thus can be substantial. Moreover, since PA is situated at the beginning of the production chain of public services, improvements in PA potentially are leverage for improvements in services delivery. Public Administration functions such as budgeting, personnel services, regulatory management, and also integrity policies could also benefit from an internationally comparative evidence base.

6.   Performance is usually defined in terms **of outputs and outcomes** that follow from a public production process (Hatry, 1999). Outcomes are the result of activities that convert inputs to outputs. The transformation of inputs such as financial and human resources to activities is mediated by the structure of government, cultural predispositions, and institutional and management arrangements. Outputs are the goods and services, which public organizations supply in response to demand. Outcomes are the consumption of the goods and services (intermediate outcomes) as well as the effects this consumption entails (final outcomes).

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[1]   This paper was prepared by Dr. Wouter Van Dooren, Associate professor in the Research Group Public Administration & Management in the University of Antwerp, in cooperation with Elodie Beth, from the OECD Secretariat. It also reflects the comments provided by the Government at a Glance team.

7.   For public administration functions such as integrity, the interpretation of performance as being the outcome of a public production process is compounded by **two unique characteristics of PA**. First, it is about *enabling rather than delivering*. Services in PA almost never provide final goods and services. However, these intermediary services are often a precondition for the successful operation of other government departments. It is government for government rather than government for the citizens. That takes nothing away from its importance. Public service delivery is a chain of inputs and outputs. Clearly, public administration arrangements are to be found earlier in the chain. Schools need to be staffed and financed before they can provide teaching. As a result, the output and outcome of one organisation could be the input of another. For instance, ethics training sessions are an output for an ethics division but an input for a social security department. The outcome of the training sessions is better awareness of ethics issues within the administration. Rather than to embark on a definitional discussion on input, outputs and outcome, we should look for indicators that tell us something about whether public programmes actually work or not. Indicators that give indications on what works, are performance indicators.
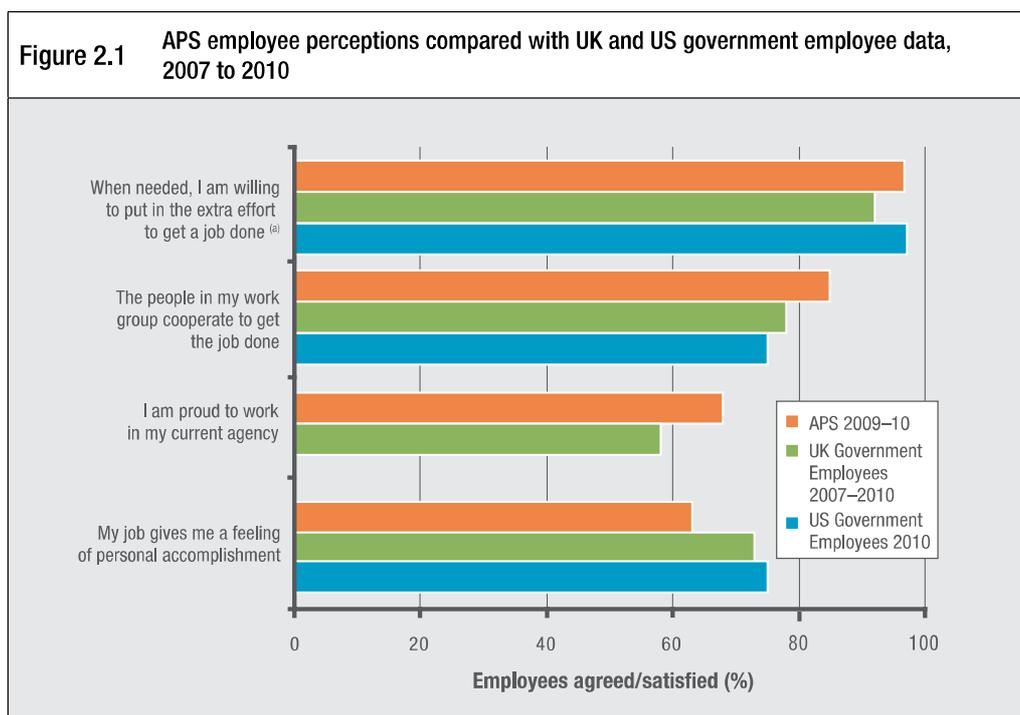
8.   A second typical feature of PA is its *cross-cutting nature*. Precisely because it is an enabler, PA has an impact on all other policy sectors. This is also one of the explanations why it is so difficult to implement government wide administrative policies (Verhoest, Bouckaert, & Peters, 2007). Often, they are perceived to run counter to the vested interests and practices of the policy sectors. For measurement, this cross-cutting nature complicates data collection and standardization.

9.   In several countries, **staff surveys are an exception**, since they are conducted government-wide. In this study, we use examples of surveys across the civil service of the following countries and regions.

- USA federal employee viewpoint survey

- NL   Personeels en Mobiliteitsonderzoek

- UK   Civil Service People survey

- AU   State of the Service Series

- CA   Public Service Employee Service

- UK   (Scotland) Scottish Government Employee Survey 2009

- CH   Personalbefragung 2011 in der Bundesverwaltung"

- B   (Flanders) Personeelspeiling

10.   Last year, the **USA federal staff survey** was renamed. The Human Capital Survey is now called the Federal Employee viewpoint survey. This renaming reflects the idea that a staff survey is actually about personnel informing PA policies. In matters of integrity too, staff can be seen as a privileged witness for assessing the integrity climate of organisations. All staff surveys in the sample have some integrity items included.

11.   Moreover, it seems that staff surveys can be **used for benchmarking**. In particular those items that do not refer to specific local structures or programmes can be used for comparison. The Australian State of the Service employee survey report actually does a benchmarking effort already, albeit not for integrity items (see figure). Substantial differences in job satisfaction, pride, and willingness to cooperate are worth exploring. Similar exercises could also be done for integrity items.

Figure 2.1 APS employee perceptions compared with UK and US government employee data, 2007 to 2010

Note: (a) Related UK government employee survey question was 'I am happy to go the 'extra mile' at work when required'.

Sources: NWC Opinion Research Australasia <http://www.nwcopinionresearch.com>; State of the Service employee survey.
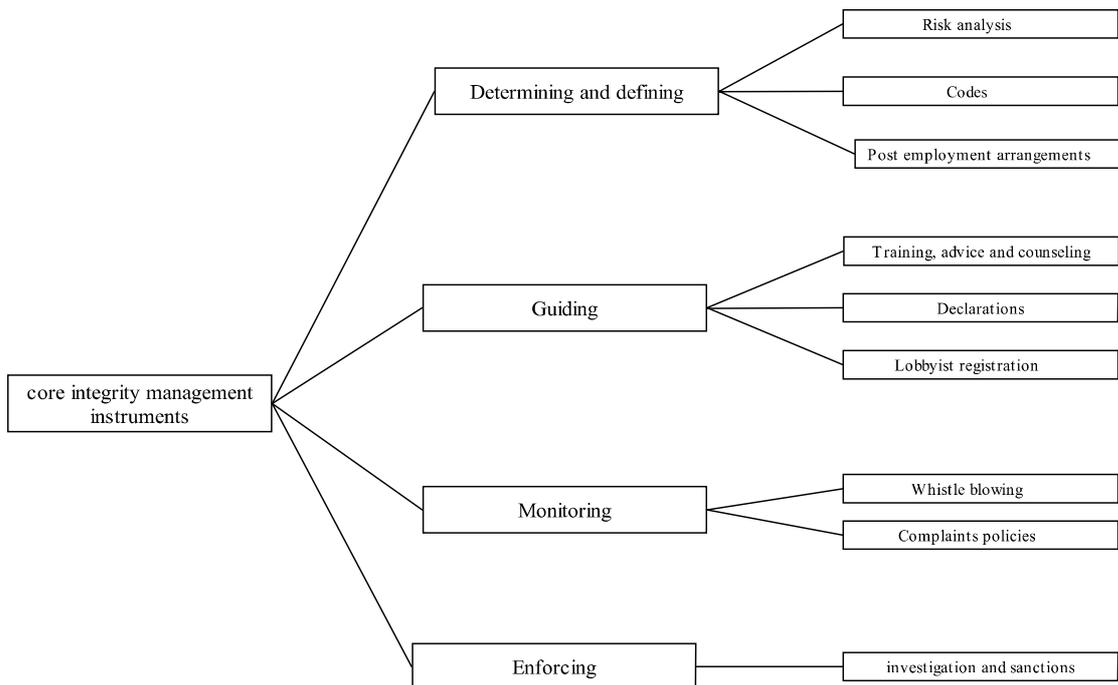
12.   Finally, the use of staff surveys for international integrity research may be a useful **addition to existing initiatives**. It seems that broad public employee assessments of integrity are seldom systematically used in studies of integrity. Transparency international mentions that '*to collect information on the practice of the relevant (integrity) institutions, a number of key informant interviews are conducted with knowledgeable persons from the public sector, civil society, academia and other sectors.*' Public sector employees are indeed interviewed, but it seems that mainly those officials who are working on integrity are included. Global integrity, as well, relies on national expert assessments (journalist, scientists etc.) for their scorings. Surveys or interviews of front-line public employees that are not in the integrity community seem to be less common.

Current Practices related to the integrity framework

13.   The **OECD integrity framework** (OECD 2008) serves as the intellectual backbone to analyse the integrity items in the current staff surveys as well as to develop the proposal of the integrity module. The core integrity instruments are divided into four groups according to what they intend to do.

- First, instruments such as risk assessments, codes of conduct and post employment arrangements aim at **defining and determining** integrity. They try to establish a frame of reference for public employees.

- Secondly, instruments such as integrity training, counselling, registrations of lobbyist, and declarations of mandates or assets are mainly installed **to guide public sector employees** towards integrity. A common ground is not enough; integrity policies also help people in bringing the definition of integrity into practice.

- Thirdly, **monitoring** instruments are used to assess the extent to which integrity is actually practiced in government. Wrongdoing needs to find its way to the surface. Whistle blowing arrangements and complaints policies are examples of these monitory instruments.

- Finally, investigations and sanctions make the toolbox of integrity instruments complete. Sanctions in case of misconduct need to be **enforced**, in order to maintain the integrity of the system.

```
core integrity management
instruments
├── Determining and defining
│       ├── Risk analysis
│       ├── Codes
│       └── Post employment arrangements
├── Guiding
│       ├── Training, advice and counseling
│       ├── Declarations
│       └── Lobbyist registration
├── Monitoring
│       ├── Whistle blowing
│       └── Complaints policies
└── Enforcing
        └── investigation and sanctions
```

14.   In what follows, we briefly assess the existing staff survey along the lines of these four instrument groups. However, before going into the four groups, we also assess whether there is a naked measurement of the perception of integrity. Indeed, the four instruments deal with the integrity policy and the survey items can be used to assess the immediate outcome of how well the instruments function. Yet, the ultimate aim of the measures should be that breaches to integrity are as low as possible.

1.   *Breaches to integrity.*

15.   Staff surveys could ask questions on the extent to which employees experience breaches, e.g. Have employees witnessed misconduct in the public service? Have they heard about misconduct in the public service?

16.   Obviously, this can be a sensitive issue. In particular when survey responses can and/or are traced back to the agency. Sensitivity can lead to social desirability in the answers. This can be avoided by

making clear that data on this item are not broken out to identifiable subunits in organisations, or by shifting the locus of the question outside of the organisation (e.g. in general, public organisations that my agency deals with operate with a high level of integrity). Individual respondents should be anonymous, which is in particular a point of attention in small organisations where the combination of individual background data could reveal identities. For benchmarking purposes, these items could be extended to the private sector (e.g. in general, private organisations that my organisation deals with operate with a high level of integrity).

17.   Breaches of integrity are seldom included in staff surveys. The Dutch survey has one item (*Q. "My direct colleagues have an ethical work attitude"*). The Australian staff survey is by far the most advanced in this field with four items: "*Q 15d the people in my work group are honest, open and transparent in their dealings", Q18f. "My agency operates with a high level of integrity", Q 40a. "In the last 12 months, did you witness another APS employee engaging in behaviour you saw as serious breach(es) of the Code of Conduct? (e.g. Fraud, misusing client's personal information, sexual harassment, leaking classified documentation.)" Q 40b "What type of serious misconduct did you witness? (Choice from 11 instances)".* The survey items concern the direct work environment of the respondent and probe for serious, even criminal offences.

2.   *Determining and defining integrity:*

18.   The staff surveys also ask questions on whether integrity is clearly understood by staff (e.g. are standards of conduct clearly defined according to public employees?). This should be the immediate outcome of the instruments that define integrity for the organisation.

19.   Few examples are found in the surveys of the UK and Scotland, which question awareness of the civil service code. Core values guide the judgement of public servants about on how to perform their tasks in daily operations. To put the values into effect, a vast majority of OECD countries have established written, formal codes of behavioural standards (OECD z.d.). The main function of codes of conduct is thus to define and determine integrity on a more formal basis. Awareness of the civil service code is a necessary, but insufficient condition for performance. If there is no awareness, one can be sure that codes will *not* have an effect. If there is awareness, there may be more integrity, but one cannot be sure. Other integrity measures such as guiding and monitoring of integrity are needed. Moreover, as always, external factors such as scandals or crises may obfuscate the causal relation between integrity instruments and the integrity climate in organisations.

3.   *Guiding public officials:*

20.   The focus should be on whether guidance provided to employees (in form of integrity training, advice, etc.) is sufficient to help identify and manage ethical dilemmas? We focus here on the effectiveness of the integrity policies. The related issue of leading by example is discussed under the proxy measure of leadership. Yet, it can be argued that the issue of how employees rate the integrity of leadership may also be a more direct measure of guidance effectiveness.

21.   The UK and Scotland actually build on their questions on the awareness of code of conducts to assess the effectiveness of guidance. The question is "Are you aware of how to raise a concern under the civil service code?" Guidance is in essence about helping public officials with ethical dilemmas. Codes of conduct provide principles that require interpretation if a concrete case occurs. Effective guidance can only occur when employees are to a large extent aware of how to raise concerns. Again, this is a necessary but insufficient condition for effectiveness of integrity policies. If employees are aware of the code, but don't know how to raise a concern, than the impact of the code will be limited.

22.   Although the issue of how to raise ethical concerns is central to the Canadian survey as well, it does have a slightly different approach. It does not link the question to a Code of conduct, but generally asks whether employees know where to raise concerns (*Q 49 If I am faced with an ethical dilemma or a conflict between values in the workplace, I know where I can go for help in resolving the situation.*) From a performance perspective, this question seems defendable. If only results matter, the main thing is that employees are guided when they are confronted with ethical dilemmas. Who is doing the guidance and whether this guidance fits into the procedures or policies of a code of conduct, may be of less relevance. The counterargument may be that in this way the effectiveness of a specific integrity instrument (in this case the code) is harder to evaluate, since employees may seek help from different people when faced with dilemmas.

4.   *Monitoring:*

23.   Malpractices should come to the surface. Monitoring devices are mainly about this. Key performance issues should be whether employees see monitoring instruments as safe and effective, which is again a necessary but insufficient condition for integrity. If monitoring instruments are seen as either unsafe or ineffective, we know that they will not work. If they are safe and effective, this is alas no guarantee for integrity. Effective enforcing of breaches is also required.

24.   Some items address the **safe environment** for reporting. The US survey (Q17. I can disclose a suspected violation of any law, rule or regulation without fear of reprisal) and the Canadian survey (Q 50 I feel I can initiate a formal redress process (grievance, right of appeal, health and safety, etc.) without fear of reprisal?) have general items on this issue. In particular the Canadian item is very broad.

25.   Other items address the **perceived effectiveness** of the monitory instruments. The Australian staff survey asks for satisfaction with the outcome of reporting. *(Q40d. When you reported the serious misconduct, how satisfied were you with the outcome(s)?)* In a follow up question, they also ask for the reasons of dissatisfaction. (*Q 40f. Why were you dissatisfied with the outcome(s) of reporting the serious misconduct?).* In the menu of 10 answers to this question, 8 answers related to the effectiveness of the procedure (e.g. my agency was slow to take action, the agency did not take action, the employee continued to breach the code, I was not informed of the outcome, …). Two answers related more to the safe environment (*my career has been negatively affected* and *my working relations have been negatively affected*). The UK and Scottish surveys also probe effectiveness, but again tie the questions to the Civil Service Code. (Q. *Are you confident that if you raised a concern under the Civil Service Code it would be investigated properly?*

26.   The Australian survey adds two items on **actual monitory behaviour**. More precisely, they ask whether serious misconduct is reported *(Q 40c. Did you report serious misconduct?).* This item follows upon the question what serious misconduct respondents did witness, for which a menu list of 12 serious breaches is composed (*Q40b What type of serious misconduct did you witness?).* The respondents thus can be expected to have an idea of what the surveyors consider to be a 'serious misconduct'.

27.   The question on the reporting of misconduct is a yes/no item, but again, there is a follow-up question on the reasons why serious conduct is not reported. From the six reasons in the menu, two relate to safety of the procedure ("*relations in the workplace and career concerns*") and two relate to perceived effectiveness ("*no action would be taken, matters were resolved informally*"). Interestingly, one option ("*It is not my responsibility to report the misconduct*") could be argued to be an indicator of effectiveness of defining and guiding. Arguably, most codes see it as the duty of any staff member to report serious wrongdoing. The effectiveness of the code of conduct can be questioned if employees state that they do not take up this responsibility.

5.   Enforcing:

28.   Breaches of integrity should be sanctioned. Do employees perceive that sanctions applied in case of misconduct to be proportional to the seriousness of the breach? Are sanctions consistently applied according to them?

29.   Not many items in staff surveys address enforcing. Only the US survey has a general item that measures the perception of enforcing in a general way (*Q37. Arbitrary action, personal favouritism and coercion for partisan purposes are not tolerated*). The responsibilities for enforcement are shared by disciplinary procedures within government as well as penal procedures in the justice system. Yet, an overall question on the perception of enforcement could be useful.

Measuring Organisational climate as a proxy measure of integrity.

30.   The integrity framework is a good conceptual backbone for direct measurement of integrity policies. The section above has demonstrated that existing staff surveys already take up some items that fit within the framework. Most notable is the Australian staff survey, with several questions on integrity. Yet, the surveys may offer additional information that goes beyond direct measurement of performance of integrity frameworks or specific breaches to integrity. These proxy measures of integrity mainly learn us more about the organisational climate, which can be seen as an important factor for integrity in public organisations.

31.   The analysis of the staff surveys shows that several items focus on the organisational climate. An **integrity climate** refers to amongst others values, morale, clarity of ends and means, and processes "from within" (OECD 2005, 2008b). The assumption is that a good organisational climate will lead to higher levels of integrity. In this sense, measuring the integrity climate is a proxy for the 'real' outcome one would expect; i.e. a corruption free public services (Cullen, Victor, en Bronson 1993; Maesschalck 2004). The following subjects that are commonly found in staff surveys might tell us more about the integrity climate and hence can be used as proxies;

1. Organisational fairness.

32.   "Perceived organisational fairness" is found to be a crucial variable in explaining the integrity of organisational members (Trevino en Weaver 2003). Staff members will be more likely to behave unethically when they perceive their environment to be unfair. For instance, unfair performance appraisals or unfounded pay differences affect the perceived fairness in the organisation. Integrity of other management processes such as HRM may be a precondition for value driven integrity.

2. Leadership.

33.   The leadership of the organisation has a key role in the perception of organisational fairness (Hermalin 1998). The chances of ethical behaviour of employees are small when leadership of the organisation is not acting accordingly[3]. Hence, items on the perception of the quality of leadership may be used to assess the integrity climate.

34.   The table in Annex 2 summarises the items that are used in the staff surveys and attributes them to these two dimensions of an integrity climate outlined above. It seems staff surveys address these dimensions to a considerable extent. In order to build as much as possible on existing practice, the module

on integrity could include these two dimensions to reflect on the overall integrity climate within the organisation (see below).[2]

Benchmarks for performance

35.	Before getting to the proposal of the module, a brief discussion on the benchmarks for assessing integrity performance seems warranted.

36.	Staff surveys usually try to make sense of the data by looking at **trends in the data**. Because measurement takes place within a country, trend analysis has the advantage of not adding cultural and structural variation to the analysis. If changes within a country occur, they can be traced back to potential changes in the data. Yet, generally, the measured results on the survey items move slowly with only small changes from year to year. For instance, only 13% of the items of the UK survey showed a significant change from year 2010 to year 2011 (5% of the 13% is on the border of significance – a 3% point change). Hence, in order to make sense of national data, a comparison with other countries might be useful.

37.	This comparison with other countries should not be limited to a comparison of absolute numbers in a given year. As annex 1 shows, staff surveys are typically repeated yearly or bi-annually. This would allow for a comparison of trends. The variation in structure and culture across countries, which may be problematic for comparison at a given point in time, is no longer a problem when *trends* are compared. There is parallel with the analysis of spreads in bond market. The absolute number reflects a host of structural and cultural factors. Yet, it is mainly the widening or narrowing of the difference between countries that is of interest. Instead of the absolute numbers, we could mainly look at the "***integrity spread***" between countries.

38.	Even when trends are analysed, within or between countries, the issue of **what constitutes unethical behaviour** remains. If integrity perceptions of staff change negatively, this may be due to a more integrity breaches (a negative thing), or to a stricter interpretation of what is accepted as unethical behaviour (a positive thing). Current staff surveys only marginally able disentangling these two potential effects. In order to do so, the level of integrity breaches needs to be assessed. Some measurement of actual breaches to integrity is done, mainly in Australia.

39.	The underlying assumption for the absence of direct measurement of integrity levels seems to be that within a national public sector, a set of ethical standards (high or low) exists as a **cultural construct**. By establishing good procedures for defining, guiding, monitoring and enforcing integrity, this nationally accepted definition could be altered and brought to a higher level.

40.	When employees are surveyed on their perception of breaches, they will refer to this mostly informal construct of unethical behaviour to assess whether a practice is unethical or not. We can draw a parallel with traffic safety and driving without a seatbelts. In most OECD countries, it was perfectly accepted to drive without seatbelts twenty years ago. Car constructors even did not install them on the back seat. Nowadays, most people would call this practice unsafe. Yet, even today, acceptance of driving without seatbelts differs across countries. A survey item asking whether compatriots generally drive safely

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[2]	.	Another dimension that may also be considered is the dimension of g**oal orientation**. It could be argued that in organisations where employees have a clear sense of direction, an integrity climate is more likely to be found. This sense of direction or goal orientation may serve as a touchstone for ethical dilemmas. Moreover, it is most likely that a PSM will be higher in those organisations where employees know the story in which they play a part.

would hence lead to substantially different answers in different place and time and may be relatively unrelated to the actual practice of wearing seatbelts.

41. This **contextual interpretation** of breaches to integrity implies that unaccepted behaviour in one country might be accepted in another and implies that unaccepted behaviour at one point in time may be accepted at another. In this respect, the comparison of an integrity spread with the spread of governments bonds may misleading. Bond spreads are measured in the same currency, i.e. yield percentages. Integrity is not measured in the same currency, but rather in relation to nationally accepted standards at a given point in time.

42. As we argued, both for international assessment as for within-country trend analyses, this, this leads to interpretation problems. We should have a way of establishing absolute, objective levels of integrity to relate the perceptions to. In the case of the seatbelts, this would mean measuring the actual percentage of passengers that does wear a seatbelt.

43. Three strategies are conceivable to obtain these data.

44. First, some surveys use **concrete items** that list integrity breaches. An example can be found in the Australian survey. By mentioning concrete instances, it can be expected that the point of reference for assessing breaches will be more consistent across respondents.

Figure 1. Measuring direct experience with breaches to integrity: The example of a public sector employee survey in Australia

40. a. In the last 12 months, did you witness another APS employee engaging in behaviour you saw as <u>**serious**</u> breach(es) of the Code of Conduct? *(e.g. fraud, theft, misusing clients' personal information, sexual harassment, leaking classified documentation.)*

O_1 Yes
O_2 No **[Please go to question 41]**
O_3 Not sure **[Please go to question 41]**

b. What type of <u>**serious**</u> misconduct did you witness?
[Please select all that apply]

O_1 Access to and misuse of clients' personal information
O_2 Leaking of information (other than misuse of clients' personal information)
O_3 Improper use of Commonwealth resources (e.g. internet, email, vehicles)
O_4 Wastage of public funds (other than improper use of Commonwealth resources)
O_5 Harassment or bullying
O_6 Creation of danger to health, safety or the environment (other than harassment/bullying)
O_7 Conflict of interest—in procurement
O_8 Conflict of interest—in program management
O_9 Conflict of interest—in a regulatory or investigatory role
O_{10} Conflict of interest—other **[Please specify]**...
O_{11} Theft or fraud
O_{12} Improper acceptance of gifts or benefits
O_{13} Other **[Please specify]**...

Source: Extract from a public sector survey in Australia

45.   Secondly, staff surveys can be supplemented by **special in depth surveys** with lower frequency (5 to 10 years). These surveys then dig into integrity issues. There are examples of integrity surveys in countries. The Dutch court of audit for instance ran an integrity survey in 2009 (Algemene Rekenkamer 2009). In 2000, the Finnish government ran a survey on public values in the workplace (Ministry of Finance 2000). The New Zealand State Services Commission ran an in depth survey called the *Integrity and Conduct Survey* in 2007 and in 2010. The methodology and questionnaire is provided by a US based non-profit – the Ethics Resource Centre.

46.   Third, absolute levels of integrity can be established based on **qualitative assessments** of governments by international institutions. Transparency international, Global Integrity, and the GRECO project of the Council of Europe are some likely sources for this information, in addition to OECD's own integrity reviews. Also the HRM reviews and Governance reviews may yield additional information.

47.   More broadly, the combination of qualitative and quantitative sources fits in the OECD's overall perspective on methods for tracking integrity (OECD 2008a). Indicators should be seen as "**blinking" indicators** that require interpretation, which can be guided by more in depth analyses and case studies of integrity systems.

Proposal for an integrity module

48.   In this section, some concrete items that may be included in the integrity module are presented. The selection is to a large extent based on the existing staff surveys in order to maximally build on practical experience. This is not to say that the items below are the only ones that are conceivable. Yet, by suggesting concrete items, the discussion within the OECD working groups and networks may be more focussed and concrete.

49.   Only a limited number of items are suggested. Generally, staff surveys are already rather long and adding a substantive OECD module on integrity may not be realistic. Of course, this makes the debate on what is not measured even more pressing. Many dimensions of integrity will indeed not be measured.

PART 1. Three questions on the occurrence of integrity breaches and vulnerability.

50.   It may be useful to ask some very general questions upfront. Actually, the Eurobarometer series (Eurobarometer 72.2 (2009)) has an item on this, but asked for by citizens. This raises a potential not only to compare internationally, but also to study the gap between citizen perceptions and employee perceptions of integrity in government, including their direct experience with breaches to integrity.

51.   **"Question 1. Breaches to integrity are common in my organisation (Agree, neither agree or disagree, disagree)"**

52.   A second question should capture the perception of vulnerability of the processes of the organization. Countries can and do break out the results for organizations. By asking a general question, we can assess to what extent the processes that the literature considers to be vulnerable, are also perceived to be vulnerable by employees. Since integrity policies should reduce the degree of vulnerability of processes, low vulnerability (together with low incidence – questions 1 and 3) can also be considered an outcome of integrity policies.

53.   **"Question 2. The main processes of my organisation are vulnerable for corruption (Agree, neither agree or disagree, disagree)"**

54.   Following upon this general assessment, it is useful to ask for concrete behaviours. Due to the potential social desirability effects in the answers, it seems better to ask for the occurrence of unethical behaviour of other employees. The question could be:

55.   **"Question 3. In the last 12 months, did you witness another public employee engaging in one of the behaviours listed below? ("Almost always" (5), "Often" (4), "Every once in a while" (3), "Rarely" (2) and "Never" (1).)"**

56.   A list of behaviours that are not accepted in most countries and that are concrete should be determined.

Box 1. Potential list of breaches to integrity: The example of New Zealand

The list below is included in the New Zealand Integrity and Conduct survey and could provide inspiration. It includes more severe and less severe breaches, which allows for a nuanced analysis.

1. Abusive or intimidating behavior towards employees

2. Improper use of the internet or email

3. Lying to other employees

4. Breaches of safety regulations

5. Misreporting of actual time or hours worked

6. An action that places an employee's interests over the organization's interests

7. Discrimination on the basis of ethnicity, gender, age or similar categories

8. Provision of goods or services or work product that fail to meet specifications

9. Lying to customers, vendors, or the public

10. Theft

11. Inappropriate alteration of documents

12. Sexual harassment

13. Falsification or misrepresentation of any records and reports

14. Misuse of your organization's information

    Giving or accepting inappropriate payments, perks or inappropriate gifts

Source: New Zealand Integrity and Conduct survey

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PART 2. Four questions on the integrity policies, based on the integrity framework

57.   Again, a general question on the effectiveness of the integrity policy of the organisation seems to be useful.

58.   "**Question 4. The integrity policy of my organisation is effective in setting clear standards of conduct (Agree, neither agree or disagree, disagree, don't know the integrity policy)"**

59.   Unlike the behaviours of question 3, the value of having a list of integrity instruments to be assessed on their effectiveness will be limited *for international benchmarking*. The differences in the institutional setup would introduce too much noise in the interpretation. Suppose that the effectiveness of a Code of conduct is scored 3/5 in country A and 4, 5/5 in country B, is A then worse off than B. Not necessarily. It may well be that country A has a stronger justice system or that it has other integrity instruments in place. For behaviours (see question 3), this interpretation is more straightforward; more theft, lying, bribes are worse than less. This is not to say that a question listing the integrity instruments and probing their effectiveness is not useful for internal purposes and seems highly recommendable that countries do include such an item.

60.   Furthermore, and building on the existing integrity framework, four concrete questions could be used to assess performance of integrity policies.

61.   One question should capture the success of **defining** integrity. Current staff surveys probe the awareness of the Codes of Conduct (e.g. are you aware of the civil service code (UK)). Several countries do have codes, so this could be a concrete and comparable question (OECD z.d.) for those countries. Yet, the key issue is not whether employees *know* that there is a Code of Conduct. Such knowledge could even be obtained with marketing techniques. The key issue is that they have a sense of the integrity standards in the organisation. Moreover, in many OECD countries often with legal traditions, codes do not exist. A more generic and outcome oriented question could be seems more appropriate. Yet, if a country would want to know also about the impact of the Code, then it seems wise to have concrete question on knowledge of the code *after* the more general question[3].

62.   " **Question 5. I am knowledgeable of what are the expected standards of integrity in my organisation? (Fully to not knowledgeable, there are no standards of integrity)"**

63.   Another question should capture the success of **guiding** towards integrity. A crucial issue is in guiding towards integrity is that employees know where to seek help when confronted with ethical dilemmas (Maesschalck 2004). Again, most countries under study link the issue to the code of conduct, but the question can also be posed in more general sense. Ultimately, the outcome of guiding efforts should be that employees know where to go for resolving problems.

64.   "**Question 6. If I am faced with integrity issues, I know where I can go for help in resolving the situation (Agree, neither agree or disagree, disagree)"**

65.   One question should capture the success in **monitoring** integrity. A necessary condition for integrity breaches coming to the surface is a safe environment for whistle-blowers. This is a recurring

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[3]   In survey design, more general items are usually asked before more concrete items because of the priming effect. By asking about a code of conduct before the general assessment of the standards of integrity, the latter will be heavily influenced by the Code question being in the respondent's implicit memory.

theme in the existing staff surveys[4]. Again, it seems advisable not to link this only to the Code of Conduct and have a more general item.

66.   **"Question 7. I can disclose a suspected breach of integrity without fear of reprisal (Agree, neither agree or disagree, disagree)"**

67.   The final question in part II should ask for the perceived success in **enforcing** integrity. When integrity breaches that come to the surface are not dealt with decisively, but in a fair and proportional way, the integrity policy will quickly find itself to be built on quicksand. Organisations have to walk on the edge of not tolerating breaches of integrity, but nonetheless being fair and proportional. Hence, 2 items are proposed.

68.   "**Question 8.** may be either:

- **Breaches of integrity are not tolerated in my organisation (Agree, neither agree or disagree, disagree)", or**

- **The sanctions for integrity breaches are generally befitting for the seriousness of the offence (Agree, neither agree or disagree, disagree)"**

PART 3: Questions on the organisational climate related to integrity

69.   Based on the discussion on the potential dimensions of an integrity climate, the following questions could be used in staff surveys.

70.   An important dimension of organisational climate is leadership. Most staff survey items deal with trust, satisfaction and confidence in leadership. Some surveys make a distinction between senior leaders, middle management and supervisors. For our purposes, a general item on integrity should suffice.

71.   "**Question 9": My organisation's leaders maintain high standards of honesty and integrity"**

72.   The last dimension of an integrity climate refers to issues of organisational fairness. Organisational fairness is a good predictor for an ethical climate. Surveys typically ask for fairness in concrete situations of hiring, evaluating and promoting staff. Fairness is also evaluated by asking for instances of discrimination, harassment or bullying. For our purposes, a more general assessment of being treated fairly may suffice.

73.   **"Question 10: Hiring and promoting staff in my organisation is based on merit (Agree, neither agree or disagree, disagree)"**

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[1]   The paper can be accessed at:
http://www.oecd.org/officialdocuments/displaydocumentpdf?cote=GOV/PGC/ETH(2009)4&doclanguage=en

[2]   The estimate is based on the COFOG classification of national accounts. Data are from Sweden since here, COFOG II level data are available and Sweden generally scores well in international rankings. We added codes 01.01 Executive and legislative organs, financial and fiscal affairs, external affairs, 01.3 - General services 01.5 - R&D General public services and 01.6 - General public services n.e.c. The administration within line departments is not included under the codes of general public services, but under the respective sectors such as health, education). Therefore, 4% probably is an underestimate of the total number (data source: EUROSTAT)

[3]   This is not to say that unethical behaviour at the top precludes ethical behaviour at the top of the organisation. In particular when professional standards of employees are high, frontline workers may withstand bad examples of leaders.

[4]   Note that other surveys ask for the perception of the adequacy of the investigations that would follow upon reporting. Obviously, this is another precondition for monitoring integrity. Reporting does not only need to be safe, but it also needs to make sense. Yet, the question on enforcing probably lies close to the perception of successful investigation.

ANNEXES

Annex 1: Which items in current staff surveys can be related to the integrity framework?

(Numbers before the items relate to the original numbering in the staff surveys)

Country	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
USA	federal employee viewpoint survey	2011, (2010, 2008,2006,2004)	Likert 5pt				Q17. I can disclose a suspected violation of any law, rule or regulation without fear of reprisal	(37) Arbitrary action, personal favoritism and coercion for partisan political purposes are not tolerated.
								(38) Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated.
NL	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
	Personeels en Mobiliteits onderzoek	2010		Q. My direct colleagues have an ethical work attitude				
UK	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing

				Breaches	Defining	Guiding	Monitoring	Enforcing
	civil service people survey	2011 (2010, 2009)	Likert 5py			Q D01. Are you aware of the civil service code	Q D02 Are you aware of how to raise a concern under the civil service code?	Q D03. Are you confident that if you raise a concern under the civil service code in your organisation, it would be investigated properly?	
AU	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
	state of the service series	2011 (annually from 2004)	Likert 5pt	Q 15d The people in my work group are honest, open and transparent in their dealings			Q 40c. Did you report serious misconduct?	
				Q18f. My agency operates with a high level of integrity			Q40d. Why did you not report the serious misconduct? (choice from 6 motivations)	
				Q 40a In the last 12 months, did you witness another APS employee engaging in behaviour you saw as serious breach(es) of the Code of Conduct? (e.g. Fraud, misusing client's personal information, sexual harassment, leaking classified documentation.)			Q40d. When you reported the serious misconduct, how satisfied were you with the outcome(s)? (5p likert)	
				Q 40b What type of serious misconduct did you witness? (choice from 11 instances)			Q 40f. Why were you dissatisfied with the outcome(s) of reporting the serious misconduct? (choice from 10 reasons)	

CA	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
	Public Service Employee Service	2008 (2011, 2005)	Likert 5pt scal			Q 49 If I am faced with an ethical dilemma or a conflict between values in the workplace, I know where I can go for help in resolving the situation	Q 50 I feel I can initiate a formal redress process (grievance, right of appeal, health and safety, etc.) without fear of reprisal.	
Scotland	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
	Scottish Government Employee Survey 2009	2009			Q. Are you aware of the Civil Service Code?	Q. Are you aware of how to raise a concern under the Civil Service Code?	Q. Are you confident that if you raised a concern under the Civil Service Code in the Scottish Government it would be investigated properly?	
CH	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
	Personal befragung 2011 in der Bundesver waltung	2011 (biannu al since 2000)	6pt					
B - FL	source	year	scale	Breaches	Defining	Guiding	Monitoring	Enforcing
	Personeels peiling	2010 (bi-annual since 2002)	5pt likert					

Annex 2. Which items in current staff surveys can be related to exemplary leadership and organisational fairness?

(Numbers before the items relate to the original numbering in the staff surveys)

USA	Leadership	Organisational fairness
Federal employee viewpoint survey	(54) My organisation's leaders maintain high standards of honesty and integrity	(22). Promotions in my work are based on merit
	(49) My supervisor/team leader treats me with respect.	(15) My performance appraisal is a fair reflection of my performance.
	(51) I have trust and confidence in my supervisor.	(24) In my work unit, differences in performance are recognized in a meaningful way.
	(52) Overall, how good a job do you feel is being done by your immediate supervisor/team leader?	(25) Awards in my work unit depend on how well employees perform their jobs.
	(60) Overall, how good a job do you feel is being done by the manager directly above your immediate supervisor/team leader?	(33) Pay raises depend on how well employees perform their jobs.
	(53) In my organization, leaders generate high levels of motivation and commitment in the workforce.	
	(61) I have a high level of respect for my organization's senior leaders.	
	(66) How satisfied are you with the policies and practices of your senior leaders?	
NL	Leadership	Organisational fairness
Personeels en Mobiliteitsonderzoek	Satisfaction with leadership	

UK	Leadership	Organisational fairness
Civil service people survey	B13. Overall, I have confidence in the decisions made by my manager	B17. I think that my performance is evaluated fairly
	B42. I believe the actions of [senior managers] are consistent with [my organisation's] values	B18. Poor performance is dealt with effectively in my team
	B44. Overall, I have confidence in the decisions made by [my organisation's senior managers]	B26. I am treated fairly at work
		B27. I am treated with respect by the people I work with
		B28. I feel valued for the work I do
		B29. I think that [my organisation] respects individual differences (e.g. cultures, working styles, backgrounds, ideas, etc)
		B39. Compared to people doing a similar job in other organisations I feel my pay is reasonable
		E01. During the past 12 months have you personally experienced discrimination at work?
		E03. During the past 12 months have you personally experienced bullying or harassment at work?
AU	Leadership	organisational fairness
State of the service series	Q16. My supervisor demonstrates honesty and integrity.	Q18k My agency routinely applies merit in decisions regarding engagement and promotion.
	Q17 a. In my agency, the leadership is of high quality	Q14k. I am fairly remunerated (e.g. Salary, superannuation) for the work that I do.

	Q17d. In my agency, senior leaders engage with staff on how to respond to future challenges.	Q16b My supervisor appropriately deals with employees that perform poorly
	Q35i (leave intentions) senior leadership in my current agency is of poor quality	Q18g. My agency deals with underperformance effectively
	Q51c My immediate supervisor exemplifies personal drive and integrity (acts in accordance with the APS Values and demonstrates fairness)	Q30o. I get the respect I deserve from my colleagues
	Q53. Personal attributes of leaders. 14 items, with ethical as a qualification	Q30s. I am subject to bullying at work.
	Q54 items on SES	Q31d. VI. (applying for a job in the APS) I believe that the process was fair
		Q35i (leave intentions) Promotions in my current agency are generally not based on fair and transparent recruitment processes
		Q41a During the last 12 months have you been subjected to bullying or harassment in your workplace?

CA	Leadership	Organisational fairness
Public Service Employee Service	52 I have confidence in the senior management of my department or agency.	Q 45 When I was a candidate in competitions during the past three years, I found that the competitions were run in a fair manner.
	53. Senior management in my department or agency makes effective and timely decisions.	24 Discrimination has affected career prospects
	58 Overall, my department or agency treats me with respect.	29. I am satisfied with the way in which informal complaints on workplace issues are resolved in my work unit.
		37. I feel that I can disagree with my immediate supervisor on work-related issues without fear of reprisal.
		41. My immediate supervisor distributes work fairly.
		44 In my work unit, the process of selecting a person for a position is done fairly.

		45 When I was a candidate in competitions during the past three years, I found that the competitions were run in a fair manner.
		71. After having read the definition of harassment, in the past two years, have you been the victim of harassment on the job?
		72. After having read the definition of discrimination, in the past two years, have you been the victim of discrimination on the job?
		76. My department or agency works hard to create a workplace that prevents harassment and discrimination.
UK -Scotland	**Leadership**	**Organisational fairness**
Scottish Government Employee Survey 2009	Q I believe the actions of senior managers are consistent with the organisation's values	I think it is safe to challenge the way things are done in the organisation
	I believe the actions of senior managers are consistent with the organisation's values	I am treated fairly at work
	Overall, I have confidence in the decisions made by the organisation's senior managers	I am treated with respect by the people I work with

	Overall I have confidence in the decisions made by my manager	During the past 12 months, have you personally experienced discrimination at work?
	The feedback I receive helps me to improve my performance	During the past 12 months, have you personally experienced bullying or harassment at work?
		Compared to people doing a similar job in other organisations I feel my pay is reasonable
		I think that my performance is evaluated fairly
		Poor performance is dealt with effectively in my team
CH	Leadership	organisational fairness
Personal-befragung 2011 in der Bundesver-waltung	oberste Leitung	Diversita t
		Zusammenhalt (v.a. Kommunikation basiert auf Vertrauen)
B - FL	Leadership	Organisational fairness
Personeelspeiling	14. I am satisfied on my direct supervisor	5. I work in a positive atmosphere

		6. I am accepted the way I am
		7. My wage is fair for the work I do.
		17. Evaluations are fair
		21. In my work environment, agreements and rules are followed correctly
		26. In my organisation, resources (human and financial) are well managed.
		27. In my organisation, internal selections of staff are done fairly

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