Integrity and Corruption Prevention Policies in the Public Service

TOWARDS AN ASSESSMENT FRAMEWORK

Symposium on How to Assess Measures for Promoting Integrity and Preventing Corruption in the Public Service

9-10 September 2004
Château de la Muette, Paris

This background document will provide the overarching structure for discussion at the Symposium. The draft Assessment Framework has been developed to provide policy makers and managers with a generic framework to design, prepare and organise assessment initiatives. It addresses the main questions faced in designing and implementing assessments and it also provides options for solutions based on good practices.

Participants will be invited to review the validity of the draft Assessment Framework and in particular provide feedback on the following aspects:
- Comprehensiveness: whether it systematically identifies key elements and functions;
- Coherence: whether it provides a coherent framework for a review of policy and practice; and
- Practicality: whether it provides a sufficiently practical guide to help public officials in developing and implementing effective assessments.

The draft Assessment Framework will be further developed and enriched on the basis of Symposium discussions and country examples provided.

Country experts can also make their comments in written procedure by 20 September 2004.

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INTEGRITY AND CORRUPTION PREVENTION POLICIES IN THE PUBLIC SERVICE

TOWARDS AN ASSESSMENT FRAMEWORK

INTRODUCTION

Good governance requires proper assessment\(^1\), and policies promoting integrity and countering corruption are no exception. While OECD countries have put growing emphasis on improving their legal, institutional and procedural frameworks, only a few countries have actually assessed the implementation of the measures already in place and their impact. Governments need to verify whether integrity policies are achieving their objectives in order to foster a favourable economic, political and social environment for public trust.

Given the inherent complexity and substantially political nature of public integrity policies, assessment of integrity and corruption prevention policies presents particular challenges. A key challenge is how to identify the initial objectives of a policy beyond the political rhetoric. Another difficulty arises from the fact that corruption is often a hidden phenomenon so it can be hard to measure or assess in a precise way. Yet what could be assessed is rather “the opposite” of corruption – i.e. integrity. Even if an assessment cannot fully encapsulate the integrity of a system, it can help identify the strengths and weaknesses of the institutional pillars that support the “ethics infrastructure”\(^2\) - the institutions, systems and mechanisms for promoting ethics and countering corruption in the public service.

Considering the complexity of public integrity policies and the variety of settings in OECD countries, the approach taken in this paper is to provide policy makers and managers with a roadmap to design and organise an assessment that will capture and analyse relevant information for decision-making. The generic assessment framework addresses in a systematic way the issues faced in assessing integrity policies, and provides checklists and options for solutions. It will be further developed and enriched with reviewed good practices on the basis of symposium discussions.

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

\(^2\) Please refer to annex I for further details about the “Ethics infrastructure”.

3
What is an assessment framework?

Assessment initiatives of integrity and corruption prevention policies often emphasise discrete elements of a policy, rather than having a systematic assessment approach that takes into account of how all the pieces of an integrity policy fit together. An assessment framework can help public institutions capture relevant information for decision-making and verify assumptions about the relationship between actions and results in a systematic way.

The draft Assessment Framework includes both procedural steps and standards for effective assessment of integrity and corruption prevention measures. If procedural steps can be easily identified, the difficulty often lies with the definition of explicit standards to assess integrity and corruption prevention policies. The approach taken is to identify the challenges faced by policy makers and managers at each step of the assessment and to provide them in a consistent manner with clear standards to assess integrity and corruption prevention policies.

Identifying key procedural steps

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

Step # 1: **Defining the purpose**
- Why assess;

Step # 2: **Selecting the subject**
- What to assess;

Step # 3: **Planning the assessment**
- Who will assess;

Step # 4: **Agreeing on methodology**
- How to assess;

Step # 5: **Ensuring impact**
- How to integrate assessment results into the policy cycle.

This is an indicative sequencing; in reality, the identified steps will not necessarily be followed or could be carried out at the same time.

Determining standards for assessing integrity and corruption prevention policies

Standards allow decision-makers to have a consistent and comprehensive approach to assessment. Using explicit standards distinguishes assessment from other approaches to strategic management in which priorities are set without reference to explicit criteria. A good assessment should reflect the following concerns.

<table>
<thead>
<tr>
<th>KEY QUESTIONS</th>
<th>STANDARDS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the integrity policy instrument (e.g. the law, institution, procedure) exist?</td>
<td>Check the formal existence of the policy instrument that is being assessed.</td>
</tr>
<tr>
<td>Is the integrity policy instrument capable of functioning (realistic expectations, resources and conditions)?</td>
<td>Check the feasibility of the policy instrument that is being assessed.</td>
</tr>
<tr>
<td>Did the integrity policy instrument achieve its specific objectives?</td>
<td>Check the effectiveness of the policy instrument that is being assessed.</td>
</tr>
</tbody>
</table>
To what extent has the integrity policy instrument contributed to meeting stakeholders’ needs?  
Assess the short and long-term results (whether they were expected or not), and their relevance to stakeholders’ needs.

Is there a logical coherence between different elements of integrity policy?  
Assess whether the policy instrument functions in coherence with other integrity elements.

Source: OECD

**How to design an assessment framework?**

The following graph illustrates the generic integrity assessment framework that combines procedural steps and standards. It aims at giving a logical and consistent approach for assessing integrity and corruption prevention policies by identifying key procedural steps and providing decision-makers with generic standards against which they can assess their policies.

Procedural steps and standards for assessing integrity and corruption prevention policies:

If assessment is to be fully supportive and integrated in the decision-making process, policy-makers and managers need to ensure the following assessment standards are enriched and *tailored* in order to design an assessment framework that responds to their needs:

**Standard # 1:**  **Existence:**  
The formal existence of the policy instrument that is being assessed and its components;

**Standard # 2:**  **Feasibility**  
Determining whether the policy instrument is capable of functioning (realistic expectations, resources and conditions);
Standard # 3: **Effectiveness**  
The extent to which the objectives are achieved;

Standard # 4: **Relevance**  
The extent to which the policy has been contributing to stakeholders’ needs;

Standard # 5: **Coherence**  
The extent to which there is a logical coherence between different elements of integrity policy.

In particular, assessment standards should be carefully defined during steps 1 and 3 of the assessment so that they are:

- **Specific** - In the first step of the assessment, standards will need to be carefully defined according to the purpose of the assessment and the context of the assessment;

- **Transparency** - (e.g. involving stakeholders) - Standards will also be negotiated with stakeholders before carrying out the assessment, so that they reflect the values held by stakeholders and provide a relevant basis for forming judgments concerning policy assessment.

This is all the more important as these standards will be used in the assessment process at different stages in order to:

- **Select the subject of assessment** – what to assess (procedural step #2). For instance, is the assessment trying to assess the existence of a law or its coherence with other integrity elements?

- **Measure the gap between the initial objectives of a policy and its results** – how to assess (procedural step #4). This means that the standards will need to be operationalised in the form of concrete observable measures/indicators for assessing integrity and corruption policies.

The graph in Annex II summarises these two main roles of standards in the generic assessment framework.
STEP ONE: DEFINING THE PURPOSE

WHY ASSESS INTEGRITY AND CORRUPTION PREVENTION POLICIES?

Questions for discussion:
- What are the overall aims and specific objectives of assessment initiatives?
- How do expectations, incentives and pressures drive the design and implementation of assessment initiatives?

To be effective, assessments need a clearly defined purpose from the beginning. Defining the purpose of the assessment implies to clarify both overall aims and specific objectives of the assessment.

Taking the context into account

While OECD countries have put growing emphasis on improving their legal, institutional and procedural frameworks, only a few countries have actually assessed the implementation of the measures already in place and their impact. As a consequence the focus of the draft Assessment Framework will be on ex-post assessments, which are carried out when the policy has been completed to study its effectiveness and judge its overall value.

The context of the assessment, especially the political circumstances, is essential in determining the purpose of the assessment. Assessment might be pro-active and forward-looking but it is also often reactive to specific political circumstances. The assessment might be trying to identify the underlying reasons for a recent scandal. It might be an instrument for justifying resources. It might even be used by an agency in order to justify financial or political decisions already made. Taking into account the political circumstances of the assessment is essential in order to build an assessment framework that captures useful information for decision-making and ensures that results are used for the purposes that were agreed on.

Integrity and corruption prevention is a highly sensitive field that draws a lot of media attention, which has a significant impact on public perception. For instance, a well-publicised scandal could drive up perception indexes even while serious efforts are being made to tackle the problem, which would in turn make it very difficult to assess the results of an integrity policy. Contextual factors should therefore be taken into account when planning an assessment.

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3 A general statement of a desired condition or state to which the assessment is directed.
4 More specific statements that describe what the policy instrument should have accomplished (with reference to initial objectives).
5 An important distinction can be made between ex-post and ex-ante assessments. Ex post assessments are often carried out when the policy has been completed to study its effectiveness and judge its overall value. These assessments are typically used to support decision making – policy, managerial – or enhancing public accountability. Ex-ante assessments are usually undertaken at a planning stage to define the project scope and identify appropriate goals or during the implementation of the policy - intermediate assessment - to gain further insight and contribute to a learning process.
Defining overall aims of assessment

Assessing corruption prevention and integrity policies is a technical exercise but the reason for doing it is profoundly political. Assessment makes it possible for public officials/governments to demonstrate that they are contributing to outcomes that matter to their managers and to citizens.

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

1. Organisational learning

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

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

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

Assessment can also be seen as a forward-looking instrument by documenting experiences, making sense of experiences and disseminating knowledge - a more general intellectual understanding as opposed to concrete recommendations for decision-making.

2. Control and Accountability

In addition, assessment aims to verify whether objectives were reached and/or enhance the legitimacy of decisions as perceived within the government and among society at large. If results of government actions are expected to be negative, policy-makers and managers could opt for internal control, which has less visibility.

Internal control
  
a) Measure the implementation of integrity policies and verify policy results;  
b) Justify decisions made;

External accountability
  
a) Demonstrate the impacts of government actions;  
b) Enhance legitimacy of decisions in order to build trust.
Overall aims of assessment: the experiences of Korea and Finland

Recent assessment initiatives in Korea and Finland illustrate the fact that assessment might contribute to different overall aims:

- **Building and sustaining trust in public institutions.** The Integrity Perception Index developed by the Korean Independent Commission Against Corruption (KICAC) serves as a barometer based on the actual experiences of service users.

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

Source: OECD

**Defining specific objectives of policy**

Once the overall aim and context of the assessment has been clarified, policy-makers and managers need to clarify what the specific policy being assessed was trying to accomplish. If policy-makers and managers want to ensure that assessment is relevant for policy-making, the assessment should measure the results of a policy instrument against its original purposes or targets.

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

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

WHAT DO DECISION-MAKERS WANT TO ASSESS?

Questions for discussion:
- Which policy measures, tools and programmes have been assessed? And why?
- How the subject of assessment was selected?
- What were the criteria for selection?

Assessment can be defined as an effort to collect and analyse information about important aspects of a policy, with the purpose of measuring whether the policy achieved its intended goals. It is about assessing programmes, policy instruments as well as specific actions\(^6\).

**Being aware of specific challenges**

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

As a consequence, most assessment methods today use perception indices to indicate a perceived level of corruption. But perceptions are not precise measures of reality. And in a highly politicised environment perceptions might be both distorted and inaccurate. It is therefore very difficult to assess how specific measures actually contribute to preventing or curbing corruption.

It is possible to assess rather the “opposite of corruption”, i.e. integrity. Even if an assessment cannot fully encapsulate the integrity of a system, it can help identify the strengths and weaknesses of the institutional pillars that support the integrity of the system. These supportive pillars constitute elements and functions of a sound “ethics infrastructure” (for further details, please refer to annex I).

**Selecting the subject of assessment**

While traditional assessment initiatives have mainly focused on verifying the existence of selected tools such as laws, codes of conduct, or administrative procedures, some countries have developed a more holistic approach to assess the implementation of complex programmes and their impacts. The subject of assessment initiatives may vary accordingly:

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\(^6\) Policy is used in the paper in a general way to refer to various integrity elements, including:
- Specific actions: discrete event or decision to promote integrity and prevent corruption;
- Policy instrument: a single tool to promote integrity and prevent corruption;
- Programme: a collection of integrated tools to promote integrity and prevent corruption.
• **Assessing the existence of specific tools;**

This first step in assessment considers whether a certain number of key laws, institutions and procedures are in place to form an “ethics infrastructure” (for further details, please refer to annex I).

This type of assessment has been initially used in the assessment of Central and Eastern European countries in the accession process to the European Union. It has also been used to monitor the implementation of the 1997 OECD Convention on Combating Bribery during its Phase one.

• **Assessing the feasibility of specific tools;**

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

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

• **Assessing the effectiveness of specific tools;**

The central question would be: did the policy achieve its specific objectives?

For example, Japan’s recent assessment initiative has examined how the Ethics Code was applied in central ministries, and how they have affected daily practices.

• **Assessing the relevance of specific tools;**

This type of assessment tries to determine to what extent the policy has been contributing to stakeholders’ needs.

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

• **Assessing the coherence of a collection of integrated tools – a programme;**

This type of assessment focuses on the extent to which there is a logical coherence between different integrity elements (for instance, the coherence of the elements of an integrity programme which includes core standards, systems for financial disclosure reports, systematic training, and counselling).

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7 For further information on this initiative (Support for Improvement in Governance and Management in Central and Eastern European Countries), please refer to the following website: [http://europa.eu.int/comm/enlargement/pas/phare/programmes/multi-bene/sigma.htm](http://europa.eu.int/comm/enlargement/pas/phare/programmes/multi-bene/sigma.htm)

8 For further information on this initiative, please refer to the following website: [http://www.oecd.org/document/21/0,2340,en_2649_34855_2022613_1_1_1_1,00.html](http://www.oecd.org/document/21/0,2340,en_2649_34855_2022613_1_1_1_1,00.html)
STEP THREE: PLANNING THE ASSESSMENT

WHO WILL ASSESS?

Questions for discussion:

- What are the advantages of, and conditions for, internal (self-assessment) and external (independent) assessment?
- Do you involve external stakeholders in the assessment process? If so, at what stage, for what reasons and how do you proceed?
- How do you plan your budget?

Weighing the advantages of internal and external assessment will help determine who will conduct the assessment. The assessor will then need to decide whether stakeholders will be involved and to define a budget accordingly.

Weighing the relative advantages of internal and external assessment

Being aware of specific challenges

A fundamental issue is to clarify who can, or should take institutional responsibility for assessing integrity and corruption prevention policies. The planning of the assessment must be driven by a competent central institution, or shared and adopted by key institutions which can create a system of checks and balances, if it is to be accepted and effective. This is all the more difficult considering that only half of the OECD countries reported in 2000 having a coordinating institution for integrity and corruption prevention policies at a national level.

Internal vs. external assessment

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

On the contrary, if the main overall aim of the assessment is to control and/or be accountable to society at large, an independent – external – assessment might have more weight and improve the legitimacy of the assessment findings. It could also be less costly and time-consuming to use an external assessor if the organisation does not have the necessary internal capacities. Assessment is an evolving field, so an investment in assessment capacity also entails substantial follow-up costs in human resource development to keep updated with methodological and conceptual advances. The advantages and drawbacks of the two approaches are summarised in the table below.
External assessment versus internal assessment

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

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

Combining both approaches

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

Combining internal and external assessment: the example of Australia

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

Choosing the most suitable approach

Policy-makers and managers will first verify whether politicians have a specific preference or whether their choice might be restricted by legal requirements. If the decision is still not obvious, they could consider the following questions when deciding whether to resort to an external assessor or not:

Checklist for internal assessment

- What is the main overall aim of the assessment?
- Is there enough competence internally to ensure the reliability of findings?
- Will findings be credible if the assessment is carried out internally?
- Is there a need for directly using findings in the decision-making process?
- Is there sufficient time to carry out the assessment internally?
- Are internal capacities available (e.g. people, cost of training) for carrying out the assessment?
The following graph will help policy-makers choose between internal and external assessment considering the following key factors.

**Decision-making tool: key factors to consider when choosing between internal and external assessment**

<table>
<thead>
<tr>
<th>FACTORS</th>
<th>Internal Assessment</th>
<th>External Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Overall aim of assessment</strong></td>
<td>The main aim of the assessment is to maximise organisational learning</td>
<td>The main aim of the assessment is to control and/or keep accountable stakeholders</td>
</tr>
<tr>
<td><strong>Reliability of findings</strong></td>
<td>There is a low risk of findings being based on poor methodology</td>
<td>There is a high risk of findings being based on poor methodology</td>
</tr>
<tr>
<td><strong>Credibility of findings</strong></td>
<td>There is a low risk of findings being hidden for internal/political reasons</td>
<td>There is a high risk of findings being hidden for internal/political reasons</td>
</tr>
<tr>
<td><strong>Usability of findings</strong></td>
<td>Findings need to be directly used in the decision-making process</td>
<td>Findings do not need to be directly used in the decision-making process</td>
</tr>
<tr>
<td><strong>Time</strong></td>
<td>There is sufficient time to carry out the assessment internally</td>
<td>There is not sufficient time for carrying out the assessment internally</td>
</tr>
<tr>
<td><strong>Internal capacities</strong></td>
<td>Internal capacities that are available for carrying out the assessment</td>
<td>Internal capacities are not available for carrying out the assessment</td>
</tr>
</tbody>
</table>

Source: OECD

**Deciding on the involvement of external stakeholders in the process**

Consultations, networking and liaison are time and resource intensive, so it is important to determine whether the involvement of external stakeholders is necessary and to what extent they should be involved.

*Balancing the need for involving external stakeholders and the constraints around the assessment*

The decision will reflect the balance between the importance of understanding the issues for external stakeholders, and the constraints around the project, the most common being the need for confidentiality, timelines and budget. The factors that advocate in favour of a more participative approach are: the need to enhance the legitimacy of the decision, the number of players potentially affected by the decision, the transparency of stakeholders’ views on the issue, the overall agreement on the issue and the risk of not consulting.
**Decision-making tool: involving external stakeholders or not**

### Participative approach

<table>
<thead>
<tr>
<th>Yes/No</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>The goal of the assessment is to verify whether objectives were reached and/or enhance legitimacy of decisions</td>
</tr>
<tr>
<td>Yes</td>
<td>There is time to address the matter</td>
</tr>
<tr>
<td>Yes</td>
<td>Your tasks have multiple players potentially affected by the policy</td>
</tr>
<tr>
<td>Yes</td>
<td>The matter is open for debate</td>
</tr>
<tr>
<td>Yes</td>
<td>There is a lack of understanding of stakeholders’ views</td>
</tr>
<tr>
<td>Yes</td>
<td>Stakeholders tend to disagree on the subject</td>
</tr>
<tr>
<td>Yes</td>
<td>You are ready to assume the cost of involving stakeholders</td>
</tr>
<tr>
<td>Yes</td>
<td>There are high risks in not consulting</td>
</tr>
</tbody>
</table>

### Non participative approach

<table>
<thead>
<tr>
<th>Yes/No</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td></td>
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<tr>
<td>No</td>
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<td>No</td>
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<td>No</td>
<td></td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

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

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**Consulting the political level**

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

**Selecting the issues to be addressed with stakeholders**

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

**Selecting a method that suits the problem and the external stakeholders**

Different approaches could be put forward depending on the problem and the organisations and interests represented. The involvement of external stakeholders might take different forms such as:

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

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

Budgeting for an Assessment

Conducting an assessment requires an organization to invest valuable resources, including time and money. The benefits of a well-planned, carefully conducted assessment outweigh its costs. Generally, an assessment costs around 5 percent of the budget of an activity being evaluated. Although specific pieces of the assessment budget will need to be revised in the course of the assessment process, the assessment budget should be considered as part of the initial planning step.

**Checklist: Developing an assessment budget**

Worthen and Sanders⁹ provide a useful framework for developing an assessment budget. The categories of their framework include:

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


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STEP FOUR: AGREEING ON METHODOLOGY

HOW TO ASSESS

Questions for discussion:

- What are the strengths and weaknesses of methods used for assessing specific policy measures? How were the adequacy of approaches and methods verified?
- What are the criteria for successfully matching methods and procedures to pull together reliable evidence for achieving the objectives of the assessment?
- How did you balance different methods (e.g. for collecting objective data and subjective opinions)?

The key issue is to what extent “objective” performance assessment techniques (e.g. effectiveness of institutions, procedures etc.) can be used within an assessment model that also takes account of the political dimensions of the integrity regime. Reaching agreement on the methodology of an assessment involves the following key steps:

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

Designing a logical model

Why design a logical model?

Drafting an assessment plan will most likely require numerous meetings with the assessment team and other stakeholders. The main concern at this stage is to determine what questions need to be answered. An effective way to narrow the possible field of assessment questions is through the development of a policy logical model. A policy logical model describes how the policy works and helps evaluators to focus the assessment. Frequently, a professional evaluator is charged with developing a logical model for managers. But a logical model that is developed by all stakeholders - staff, participants and evaluators – might produce more opportunities for learning.

What is a logical model?

The logical model is a tool to map out what the policy is trying to achieve and the steps by which the policy is supposed to achieve its objectives.

The foundation of a good assessment is a detailed understanding of the integrity and corruption prevention policy being assessed. The most difficult step is to break it up – conceptually - into its component parts in order to highlight progress towards the ultimate outcome of the policy.
The logical model ties together, in a logical chain, the relevant inputs, activities, outputs and outcomes from the perspective of a particular policy:

- **Inputs** are typically resources (e.g. people, financial resources) that are related to the policy.
- **Activities** are the processes, tools, events, technology and actions that are an intentional part of the policy development and implementation.
- **Outputs** are a tangible, immediate, and intended product or consequence of an activity that the policy makes available to a target group (such as personnel trained, better technologies developed etc).
- **Intermediate outcomes** are usually benefits or changes in participants’ knowledge, attitudes, values, skills, behaviour, condition or status as a result of the policy.
- **The ultimate outcome** is an organisational or system level change which might include improved conditions, increased capacity and/or changes in the policy arena.

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

Policy-makers should start with defining the ultimate outcome of the policy they are assessing. The following question could be tackled: How was the policy supposed to make a difference, e.g. did it aim at changing the behaviour of public officers or at reinforcing public trust?

One of the challenges is that the closer you get to the ultimate outcome, the more difficult it is to establish a direct relationship between the success of a policy and its ultimate outcome. In the case of the reform of a code of conduct, one of the ultimate outcomes is to ensure people’s trust for the public service. But what if we observed increased trust for public service one year after the reform: would it make sense to attribute this positive change to the reform? Conversely, if there had been a decrease in trust, would it make sense to conclude that the reform was ineffective? Many other factors might have influenced the level of public trust for the public service. For instance, a political scandal that has been widely publicised could have degraded the level of trust (ultimate outcome) although the reform of the code had already shown good intermediary results.

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

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

The ultimate outcome gives a context and basis for judgement over the logics of the policy. Even if the policy-maker cannot necessarily hold itself responsible for the ultimate outcome, it is important to determine the ultimate outcome in order to:

- Assess the effectiveness of the policy: over the years, what have been the changes/improvements towards this ultimate outcome?
- Assess the relevance of the policy: to what extent did the policy contribute to stakeholders’ needs?
- Assess the coherence of the policy: do government actions make a coherent set to achieve this ultimate outcome?

These elements will be key for policy-makers in order to influence public perceptions about the impact of the policy and to reinforce public trust.

Breaking down the elements of a policy

A logical model is a systematic way to break down the different elements of a policy in order to facilitate their assessment. A logical model could help organisations design their assessment through the following questions.
Key questions

- What were the ultimate outcomes that the reform was aiming at (such as build public trust, prevent violation of an Ethics law, improve organisational learning)?
- What were the key intermediate outcomes that the reform intended to achieve e.g. (key changes such as raise civil servants' awareness, improve monitoring, enhance communication)?
- What were the main outputs (immediate results such as personnel trained, information provided)?
- What were the main activities that were conducted to address the problem (actions taken such as number of training courses, promotional activity)?
- What were the inputs (people, resources etc.)?
- Context: how did the policy function within the economic, social and political environment (e.g. new law, recent scandal etc.)?

Source: OECD

The logical model also reveals the assumptions on which the policy is based. By making explicit assumptions built into the policy, the logical model will help explain the results of a policy - why targets and outcomes are/are not being achieved and what the unexpected outcomes of government actions are.

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

The understanding of the policy goal is captured in the “logical model” which will provide a basis for developing a set of assessment measures or even indicators. For each outcome, the assessor should specify what observable measures, or indicators, will demonstrate that the key outcome has been achieved. If this step is often enlightening, it is also challenging because of the need to move from a rather intangible concept to specific activities.

Revealing the link between cause and effect

While the proper identification of measurable outputs and outcomes is a precondition for assessing how particular tools function as part of a system, assessing the impact of the whole integrity policy requires both the recognition of causality of inputs and impacts, and the creation of credible indicators that highlight their relationships.

In most OECD countries, observable measures tend to reflect only activities and outputs (e.g. number and frequency of trainings, promotional activity etc.) instead of revealing the link between cause (outputs) and effects (outcomes). For instance, it is easier to measure the number of training courses delivered than the impact of training on public servants’ behaviour. Observable measures or indicators are suitable if they provide information not only about inputs and outputs, but also provide credible evidence that the policy is contributing to intermediate and ultimate outcomes by showing meaningful changes over time.

Using standards for selecting a meaningful set of observable measures

There are trade-offs to be made between what should be and what can be measured. Based on the available information, it would be useful to develop a few credible and well-analysed observable measures/indicators that substantively capture changes in the situation.
In the case of corruption prevention and integrity measures, there is a growing demand for establishing a set of observable measures (or indicators) that reflect both:

- Inputs (existence, feasibility) and outputs (effectiveness);
- Intermediate outcomes, especially benefits for civil servants (relevance);
- The coherence of the policy assessed with other integrity policies to contribute to the ultimate outcome (coherence).

The example of the Office of Government Ethics in the United States

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

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

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

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

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

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

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

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

Source: OECD
Combining quantitative and qualitative data

Developing appropriate methods to capture useful evidence for assessment is a condition that should go hand in hand with the capacity for examining the information collected. A critical factor in the selection of methods is to ensure the balancing of objective data and subjective opinions (perception of managers, personnel and citizens) that may over or under emphasize actual effects in order to ensure the credibility of the findings. Qualitative approaches will provide depth and detail and serve to enrich and explain quantitative findings. Using both approaches will help confirm and reinforce the assessment findings.

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

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

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

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

\[ ACI (100\%) = Integrity Level Perceived by Citizens (58.8\%) + Evaluation of Anti-Corruption Efforts (41.2\%) \]

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

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

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

Source: OECD
Balancing the need for meaningful information with the cost and complexity of collecting data

One of the difficulties in identifying relevant data is to balance the need for meaningful information with the costs of collecting data. Each observable measure/indicator has a mix of “good” and “bad” attributes. While it usually easy and low-cost to collect information about inputs, activities and outputs, these observable measures often have a weak relationship to the ultimate outcome and are therefore less meaningful. On the contrary, intermediate outcomes have a strong cause and effect relationship to the ultimate outcome, but require more efforts and costs to obtain data.

Cost, complexity and/or the timeliness of data collection may prevent a result from being measured directly. In this case, proxy indicators may be useful to capture information. For instance, in the case of a whistle blowing procedure, an expert review of sample cases might be time-consuming or costly in order to assess whether the procedure had been appropriately applied. A lower-cost proxy indicator could measure "percentage change in the number of whistle blowing cases filed". The use of this proxy would assume that government employees are more willing to file cases if they think the law will be predictably and fairly applied. Proxy indicators should be used carefully because if they are based on a non-founded assumption, they might mislead the results of the assessment.

Identifying what information is needed and defining data collection methods

Identifying the information needed

The policy assessment plans depend on what information needs to be collected in order to make major decisions. The following questions need to be addressed:

- What information is needed to make current decisions about a policy?
- What information is already available? Identify the available objective (statistical data) and subjective data (e.g. surveys on experienced or perceived corruption level).
- What information needs to be collected?

Defining a method to collect data according to the context and the needs

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

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

Evaluators must choose the approach or combination of approaches that allow the most accurate answer to assessment questions. Please refer to annex IV for an overview of major methods for collecting information.
**Checklist: How to select a methodology**

In selecting methodologies, consider the following questions:

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

Source: OECD

**Combining subjective and objective methods**

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

- Traditional administrative control methods and targeted opinion surveys of stakeholders;
- Surveys, collecting opinions from various fields and using focus groups;
- Informal and public hearings (see box below).

**Balancing objective and subjective methods: country experiences**

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

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

Source: OECD
STEP FIVE: ENSURING IMPACT

HOW ARE ASSESSMENT RESULTS INTEGRATED INTO THE POLICY CYCLE?

Questions for discussion:
- How are the results of assessment integrated into the policy cycle?
- How are the results of assessment channelled to decision makers and managers?
- Was the public informed? If so, how? How did the results of assessments influence levels of trust in public institutions?

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

Assessment processes and results can inform decisions by providing information on key aspects of the policy, identifying strengths and weaknesses and clarifying options. Therefore deliberate effort is needed to ensure that findings are appropriately disseminated and utilised in the policy-making through an active follow-up of the assessment.

Communicating findings and insights

Communication of assessment results is essential for integrity and corruption prevention policies. It represents one of the few checks on the power wielded by government and keeps civil servants and elected officials accountable for their actions and behaviours. In particular, governments increasingly need to report on how they have been managing public resources so as to create a favourable climate for investment and growth.

A communication strategy should be an essential part of the initial assessment plan.

Defining the targeted audience

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

Selecting an effective communication strategy in order to convey messages

Although documentation of the assessment is needed, a formal assessment report is not always the best product to convey clear messages. Like other elements of the assessment, the reporting strategy will be discussed in advance with stakeholders. Such consultation ensures that the information needs of relevant
audiences will be met. Planning effective communication also requires considering the timing, style, tone, message source, vehicle, and format of information products. Possible communication instruments include reports but also presentations, websites, newsletters and pamphlets, interviews in media.

Publicising results: the example of Korea

The ‘naming and shaming’ strategy has generally been used to make the results of evaluations public and mobilise influence of public opinion in recent assessment initiatives in Korea. Both KICAC and SMG have publicised the evaluation outcomes through mass media that put pressure on low-ranked organisations to take follow-up actions urgently. The National Assembly also received information on evaluation under request and called for organisations under its jurisdiction to improve their anti-corruption programmes specifically taking into account the evaluation results. As a result of this naming and shaming strategy, the organisations ranked low by evaluation generally made proactive efforts and initiated specific measures to avoid their low ranking evaluation results in the future.

Ensuring an active follow-up of the assessment

Because of the effort required, reaching justified conclusions in an assessment can seem like an end in itself; however, active follow-up reminds intended users of their planned use.

Follow-up might be required to prevent lessons learned from becoming lost or ignored in the process of making complex or politically sensitive decisions. Facilitating use of assessment findings also carries with it the responsibility for preventing misuse. Assessment results are always bound by the context in which the assessment was conducted. However, certain stakeholders might be tempted to take results out of context or to use them for purposes other than those agreed on. Active follow-up might help prevent these and other forms of misuse by ensuring that evidence is not misinterpreted and is not applied to questions other than those that were the central focus of the assessment.

Follow-up mechanisms could even be institutionalised so that they support the integration of assessment findings in policy-making such as mandatory responses from public officials within a limited time frame or follow-up reviews to verify or ensure implementation (e.g. in the forms of external audits).

Follow-up reviews: the example of the Office of Government Ethics in the United States

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

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

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

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

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

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

The ideal mix and degree of these functions will depend on the cultural and political-administrative milieu of each country.

An ethics infrastructure has eight key elements:

**Political commitment and ethical leadership**

In the absence of sustained political commitment to ethical behaviour in the administration, efforts to encourage such behaviour will be in vain. Attempts to improve public sector ethics in OECD countries have been sponsored at the highest political levels, such as the recent approval by the Government in August 1999 of a comprehensive anti-corruption strategy and programme requested by the Korean President, or the Government Programme to Fight Against Corruption adopted by the Government of the Czech Republic in February 1999. Other actions, such as the integrity measures sponsored by the Minister of the Interior in the Netherlands in 1995 or the creation and work of the Committee on Standards in Public Life set up in 1994 by the Prime Minister in the United Kingdom, have demonstrated strong political support. Furthermore, political leaders also serve as important role models. This is also true for senior public officials who should set a positive example for other employees.

**Workable Codes of Conduct**

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

**Professional Socialisation Mechanisms**

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

**Ethics Co-ordinating Body**

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

**Supportive Public Service Conditions**

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

**Effective Legal Framework**

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

**Efficient Accountability Mechanisms**

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

**Active Civic Society**

Ethics is everybody’s responsibility, including that of an assertive media, which through its probing reporting helps citizens to act as watchdog over the actions of public officials. Freedom of information laws, such as the one adopted by Ireland in 1997, Japan in 1999, Czech Republic in 1999 and the United Kingdom in 2000 can institutionalise and support public awareness and responsiveness.
ANNEX II: STANDARDS FOR ASSESSING INTEGRITY AND CORRUPTION PREVENTION POLICIES

Specific objectives
What were the initial objectives?

COHERENCE
Is there a logical coherence between different elements of integrity policy?

RELEVANCE
To what extent has it been contributing to stakeholders’ needs?

EFFECTIVENESS
Did it achieve its specific objectives?

FEASIBILITY
Was it feasible (realistic expectations, resources and conditions)?

EXISTENCE
Is the tool in place?

WHY ASSESS
Purpose
Context (Timing, political circumstances, media, co-ordination)

USING STANDARDS TO SELECT WHAT TO ASSESS

WHAT IS ASSESSED

ASSESSING RESULTS AGAINST INITIAL OBJECTIVES
ANNEX III: BALANCING COMPLEXITY WITH THE IMPERATIVE TO ACT

Balancing complexity with the imperative to act can be used as a guide to assess the likelihood of moving particular issues forward. The following table assumes that whole of government issues involving external stakeholders are likely to be complex (routine, simple issues without external stakeholders are not included).

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

<table>
<thead>
<tr>
<th>QUADRANT A</th>
<th>QUADRANT B</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is a high imperative to act (e.g. crisis, national priority, government mandate) and it is a complex issue, but not intractable (e.g. agreed goals, timelines, solutions):</td>
<td>There is a high imperative to act (e.g. major long-term consequences, hot issue) and it is a very complex issue (agreement difficult to achieve):</td>
</tr>
</tbody>
</table>
|  - Stakeholder agreement is likely  
  - Common objective(s) should be identifiable  
  - Outcomes should be achievable for issues in this quadrant  
  - Be aware of long-term stakeholder involvement in any issues that have evolved through other quadrants  |  - Stakeholder agreement is unlikely  
  - Stakeholder views are likely to be well known  
  - Outcomes can be very difficult to achieve in this quadrant  
  - The high imperative to act may help to identify compromises and common objective(s)  |
| Be aware of the potential for the issue to migrate to Quadrant B | Assess options for migrating the issue to Quadrant A or Quadrant D |

<table>
<thead>
<tr>
<th>QUADRANT C</th>
<th>QUADRANT D</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is a lower imperative to act (e.g. long lead time, new or partly resolved issue) and the issue is complex, but not intractable (e.g. agreement on goals likely):</td>
<td>There is a lower imperative to act (e.g. stale or developing issue) and it is a very complex issue (e.g. stakeholder differences can be irreconcilable):</td>
</tr>
</tbody>
</table>
|  - General stakeholder agreement is likely but may be frustrated by the low imperative to act  
  - Trials and one-off projects might help stakeholders produce evidence for a higher imperative to act  
  - Solutions can be found for issues in this quadrant  |  - Stakeholder agreement is unlikely  
  - Stakeholder views are likely to be well known  
  - Trials and one-off projects may place onus on stakeholders to find common objective(s)  
  - Sustainable solutions are hard to find for issues in this quadrant  |
| Assess the desirability of migrating the issue to Quadrant A, and be aware of the potential for this to occur if there is a crisis | Assess the desirability of migrating the issue to Quadrant C, and be aware of the potential for it to migrate to Quadrant B |

Source: Connecting Government, Whole of Government’s responses to Australia’s Priority Challenges, 2004
ANNEX IV: AN OVERVIEW OF METHODS FOR COLLECTING DATA

The following table provides an overview of the major methods used for collecting data during assessments.

<table>
<thead>
<tr>
<th>Methods</th>
<th>Overall Purpose</th>
<th>Advantages</th>
<th>Challenges</th>
</tr>
</thead>
</table>
| **Surveys** (e.g. public perception, government employee, agency employee) | To quickly and/or easily get lots of information in a non threatening way | - can complete anonymously  
- inexpensive to administer  
- easy to compare and analyse  
- administer to many people  
- gather different perspectives: public perception, government employee, agency employee | - might not get careful feedback  
- wording can bias responses  
- are impersonal  
- in surveys, may need sampling expert  
- does not tell full story |
| **Interviews**                  | To fully understand someone's impressions or experiences, or learn more about their answers to questionnaires | - get full range and depth of information  
- develops relationship with client  
- can be flexible with client | - can take much time  
- can be hard to analyse and compare  
- can be costly  
- responses can be biased |
| **Documentation review**        | To illustrate how a policy operates without interrupting the policy          | - get comprehensive and historical information  
- does not interrupt policy  
- information already exists  
- few biases about information | - often takes much time  
- information may be incomplete  
- need to be quite clear about what is being looked for  
- not flexible means to get data; data restricted to what already exists |
| **Observation**                 | To gather accurate information about how a policy actually operates, particularly about processes | - view operations of a policy as they are actually occurring  
- can adapt to events as they occur | - can be difficult to interpret seen behaviours  
- can be complex to categorise observations  
- can influence behaviours of policy participants  
- can be expensive |
| **Focus groups (e.g. management, client)** | To explore a topic in depth through group discussion | - quickly and reliably get common impressions  
- can be efficient way to get much range and depth of information in short time  
- can convey key information about potential problems or risks | - can be hard to analyse responses  
- difficult to generalise scientifically  
- need of a good facilitator for safety and closure  
- responses can be biased |
| **Stakeholder analysis** | To identify and assess the importance of key actors that may affect the policy in question, especially expectations, perceptions and constraints of stakeholders | - can illuminate observed outputs of a process  
- understand how participants in a process are shaping the outcome of it  
- useful when other quantitative analysis is not possible (ex: confidential cases) | - often takes much time  
- difficult to identify key stakeholders and “weight” the importance of their responses  
- can be expensive |
| **Tests** | To assess the level of knowledge of individuals regarding specific subjects (e.g. after a training, counselling) | - easy way to assess the understanding of a subject by civil servants  
- can be especially useful to assess the knowledge gained after an on-line training | - timing of the assessment is quite important |
| **Case studies** | To fully understand client's experiences in a policy, and conduct comprehensive examination through cross comparison of cases | - fully depicts client's experience in policy input, process and results  
- powerful means to portray policy to outsiders | - usually quite time consuming to collect, organise and describe  
- represents depth of information, rather than breadth |

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

- **Assessment**: it is an effort to collect and analyse information about important aspects of a policy, with the purpose of measuring whether the policy achieved its intended goals.

- **Assessment framework**: it comprises both procedural steps in assessment practice and standards for effectively and consistently assessing policies.

- **Evaluation**: it is a systematic, analytical assessment addressing important aspects of an object (be it policies, regulations, organisations, functions, programmes, laws, projects, etc.) and its value, with the purpose of seeking reliability and usability of its findings.

- **Logical model**: it is a systematic way of mapping out what the policy is trying to achieve and the steps by which the policy is supposed to achieve its objectives. The logical model ties together, in a logical chain, the inputs, activities, outputs and outcomes relevant from the perspective of a particular policy.

- **Overall aim**: A general statement of a desired condition to which the assessment is directed.

- **Specific objectives**: More specific statements that describe what the policy should have accomplished. The challenge is to clarify what were the initial objectives of the policy assessed.