Integrity Infrastructure

The Integrity Infrastructure is a model that covers different aspects of integrity. Although there are other existing integrity models, such as the one of the OECD, we have chosen to develop this model, based on our experience and knowledge.

The Integrity Infrastructure Model covers every aspect of integrity in a systematic and coherent way and consequently offers a solution for the fragmentation of integrity policy, which is often a problem in governmental organizations. This fragmentation is often due to the dispersal of responsibility for integrity policy in public authorities over various disciplines and departments. The communication between the people involved often leaves a lot to be desired, which can make the policy less cohesive than it should be. It is precisely the integrated nature of integrity policy that the Integrity Infrastructure Model emphasizes and this in turn highlights the areas in which integrity policy can be shaped. The model is intended for managers, staff officers and integrity coordinators within the public authority responsible for the development, implementation and enforcement of the integrity policy. Governmental organizations can use the model to develop new policy and to review existing policy.

Two layers
The Integrity Infrastructure Model is built around themes, areas of attention and instruments. The model's core is formed by the concept of integrity and the themes that can give rise to integrity issues. The first layer around that core consists of the six areas of attention for which integrity policy can be developed. The key principle here is that integrity policy can be effective only if equal attention is paid to all six areas. The second layer contains existing tried-and-tested instruments.

The six areas of attention in the model represent a logical cycle: starting with the role of senior management (1), relevant core values and standards (2) are mapped. These form the basis of structures and processes (3) that make the organization less vulnerable. In the next step, attention is given to personnel and the organizational culture (4). Unfortunately, incidents happen (5); every organization has to be well prepared to handle them. In the final step, the integrity policy and its instruments are monitored and evaluated (6). In this way, a learning process is started which makes improvement possible.

1) Role of top management
An ethics policy can only succeed when the organization’s management attaches importance to the issue and is prepared to make the necessary investments. In addition, the senior management needs to formulate an explicit vision of the required policy and how that policy is to be implemented. An effective ethics policy requires customization; the policy needs to be compatible with the specific organization and a standardized policy for the entire public administration is therefore inappropriate. The senior management’s duty and responsibility is to develop a specific viewpoint on ethics and ethical policy for the organization and to actively convey this policy to everyone involved.

The management needs to set a good example by stressing that ethics is an important issue, both in word and deed; in word by regularly emphasizing the importance of ethics; in deed by developing and formally adopting the organization’s ethics policy. Moreover, it is essential that the management makes clear who is responsible for the coordination of the ethics policy, which actors are involved and the management’s role in the process.
2) Core values and standards
Customization implies that the design and implementation of ethics policy takes account of the specific organizational culture. Consequently, it is necessary to begin by making an inventory of the organization’s guiding values and standards to obtain an insight into the organization’s principles, i.e. the principles for which it is prepared to be called to account. These values and standards constitute the underlying philosophy on which the ethics policy is based. They also set out moral principles which the staff can use to test their personal subjective professional opinions. The formulation of explicit values and standards results in a more detailed specification of intrinsically abstract concepts such as ethics and the conduct expected of good civil servants. In recent years a large number of administrative organizations have developed codes of conduct. In addition, a range of guidelines and national and international codes of conduct have been published in recent years that can serve as a source of inspiration and provide assistance.

3) Structures and processes
Core values and standards are supported by the organization’s structures and processes which are designed to promote ethical conduct. The organization’s structures and processes encompass the totality of formal rules, procedures, regulations and working agreements that determine how the organization conducts its operations, what duties the staff are expected to carry out, how they carry out their duties and the responsibilities and powers that are assigned to them. Examples of measures include the separation of duties, rotation of staff, designation of vulnerable duties, examinations of antecedents and regulations relating to the acceptance of gifts or favours, outside activities, financial interests and securities transactions.

4) Culture and personnel policy
Ethics are manifested in the form of the civil servants’ actions. Consequently, the personnel constitute a major issue for attention. The organization’s culture is a complex issue which exerts a major influence on its ethics. It embraces the entirety of standards and values that determine the organization’s working methods. The organizational culture gives shape to the conduct of staff members, their mutual relationships and their contacts with third parties, and consequently it constitutes a major assurance mechanism for ethics. The objective is to achieve a culture in which the staff regards discussion of difficult issues as self-evident and are prepared to engage in those discussions, either when requested to do so or on their own initiative. This enables them to jointly explore and determine the substance and limits of their responsibilities and to clarify and test their shared standards and values. In addition, an open culture also enables colleagues to call each other to account for their conduct. An open culture can be promoted by allowing scope for doubts or criticism, by making staff problems at work or in private life open to discussion, by the management’s devotion of attention to ethics, by communication on ethical issues, by furthering openness with third parties, by devoting attention to ethical issues during toolbox meetings and job performance interviews and by dealing with violations of ethics in an open manner.

5) Incidents
Unfortunately, no ethics policy is able to prevent incidents. Any group of employees will always include individuals who seek personal gain or deliberately act in contravention of the rules. Incidents are situations in which members of staff contravene the organization’s standards and values. However, it has to be realized that the effect of such incidents is not incidental, since the public does not make a distinction between different sections or tiers of public administration: every incident damages public confidence in the entire administration. For this reason, dealing with
(suspicions of) abuses must be an essential element of any ethics policy. Carefully-considered and powerful investigations of violations demonstrate that great importance is attached to ethics, and in turn reduce the risk of future violations. Failure to take action against violations – or dealing with violations in a half-hearted manner – can incite similar conduct by others. In addition, the failure to take action against violations that are initially minor can lead to escalation into major violations. The management must make it clear that conduct of this nature will not be tolerated and do so by taking consistent and conscientious action against all minor and major violations and communicating its actions. Procedures designed to deal with incidents constitute an important element of ethics policy. The registration of notifications of unethical behaviour and the way they are dealt with is one procedure which has been introduced on a wide scale in recent years. Procedures for whistleblowing not only offer a way to report incidents (and protection for the whistleblower), but also offer a structure for dealing with incidents in organizations.

6) Evaluation and reports
In conclusion, all ethics policies need to extend to an evaluation of the instruments, procedures, rules and guidelines developed to address the various issues. Evaluations and reports are forms of management information about the performance, effectiveness and efficiency of the ethics policy. Questions of relevance to the evaluation of an ethics policy include: Has the policy been implemented? Are the rules and procedures observed? Are the targets realistic and have they been achieved? Does the policy yield the required result? Are the measures still adequate? Are the original reasons for implementing a measure still relevant? Do any measures constitute a source of new vulnerabilities and infringements of ethical standards? Could any measures addressing specific vulnerabilities be replaced by more effective or economical measures? This information may identify the need to make extra investments in one or more of the above issues. It is also very important that the policy can be amended as required.

Reflection
In general, when anti-corruption and integrity measures are initiated, the first steps taken are to formulate standards and values and develop structures and processes: codes of conduct and value statements are established and formal rules and procedures are put in place. These steps are generally initiated by the administration and made public in an ethics policy. Part of the policy, but in most cases only after these first steps have been taken, is attention for culture and personnel policy. Workshops, training programmes and other awareness-raising instruments are examples of this. This leaves two areas of attention and one overall issue that are covered less intensely: in the literature, but also during the discussions of the informal working parties in this project, there are still question marks surrounding the topics of how to deal with instruments, how to measure corruption and integrity and how to integrate the different topics.

Reading more
To learn more about different ways of implementing the different aspects of the Integrity Infrastructure, please read ‘Catalogue of Promising Practices’. In this book different countries share their best practices including lessons learned.