

# U4 Expert Answer



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## Monitoring public institutions' integrity plans

### Query

***Can you share some best practices on systems for monitoring the implementation of public institutions' integrity plans, including possible indicators that help to measure results?***

### Purpose

We are supporting the anti-corruption agency in Serbia. One of the tasks of the agency is assisting the different public institutions in elaboration of integrity plans. The anti-corruption agency is now working on a system for monitoring the implementation of such plans and needs some advice on how to proceed.

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### Summary

Monitoring integrity requires a conceptual framework that defines integrity as well as set clear objectives, targets and SMART performance indicators by which progress can be measured. The OECD has developed a comprehensive integrity assessment framework, which aims at: 1) collecting valid and reliable data on the existence and functioning of the key instruments, processes and actors in place for defining integrity, guiding integrity, and monitoring and enforcing

compliance and; 2) comparing them with benchmarks compiled across comparable government institutions.

Optimal monitoring relies on a mixture of both objective and perception-based data and involves to some degree a combination of various monitoring methods such as desk reviews, expert assessments, surveys, focus group discussions, field observation, professional assessment of integrity provisions and practices, corruption and integrity checklists, risk assessments, etc. Whatever the option selected, the monitoring system should be inclusive and participatory and provide for civil society's participation and access to information and documents.

The review of monitoring systems in countries such as Indonesia, Pakistan or Tanzania indicates that, in spite of considerable efforts invested in their design, existing monitoring mechanisms face major implementation and coordination challenges in practice, due to lack of resources, capacity, and political backing. Given constraints relating to access and quality of data in many countries, there is a need to build monitoring systems which allow the collection of accurate and reliable data in a sustainable manner, while taking into account the information management capacities of local institutions.

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## 1 Overview of public sector integrity assessment tools

### System-wide assessment approaches

A wide range of assessment tools have been developed to assess the institutional framework for promoting integrity and preventing corruption across the public sector. Many of these well-known instruments - such as Transparency International (TI)'s National Integrity System country studies or Global Integrity's country reports - focus on the national, regional or local levels and consist of a broad assessment of the principle institutions and actors that provide effective safeguards against corruption in a society. These "system-wide approaches" typically assess a country's integrity system or ethics infrastructure in terms of the existence, capacity, effectiveness and coherence of institutions and systems to promote integrity and combat corruption (Transparency International, Forthcoming).

Similarly, a variety of governance indicators such as TI's Corruption Perceptions Index or the World Bank Institute's worldwide governance indicators are based on expert, business people or citizens' perceptions and experience of corruption and rank countries in terms of their perceived vulnerability and/or effectiveness in controlling corruption. While such approaches have been instrumental in raising awareness, they provide little differentiated information on the various forms of corruption and/or on sector or agency level corruption, and are not the best suited to track progress and monitor corruption trends at the institutional level.

This answer will take a targeted approach and focus on institutional assessments that can be used to assess and monitor the capacity and effectiveness of public sector organisations to implement the integrity framework at the organisation level.

### Institutional approaches to assessing public integrity: the OECD's integrity assessment framework

Most of these institutional assessments involve assessing the organisation's capacity to promote integrity and prevent corruption, its internal governance systems and procedures, its role in the overall integrity system, as well as reviewing values and behaviours that are likely to foster or hamper the development of an integrity culture across the organisation.

### *The integrity framework*

Monitoring integrity involves defining the concept of integrity – which is broader than that of corruption – and establishing a theoretical framework that clearly defines objectives and outcomes against which progress can be measured (Armytage, L., 2009). The OECD's Public Governance Committee has developed an integrity framework to help governments better assess the implementation and impact of anti-corruption policies and collect evidence-based comparative information on measures for fostering integrity and resistance to corruption in public institutions (OECD, 2009). As a comprehensive framework covering most aspects of public sector integrity, it constitutes a useful starting point for developing a monitoring methodology. An assessment approach has been developed along with this framework, based on a data and benchmark strategy that, rather than measuring corruption, uses specific governance data to facilitate broad-based assessment of integrity.

The OECD's overall integrity framework focuses on: 1) core integrity instruments (e.g. ethics codes, conflict of interest policy, whistleblowing arrangements, etc); 2) processes (e.g. planning, implementing, evaluating, adapting the integrity framework and/or instruments) and 3) structures/actors (e.g. organisational aspect of integrity management, ethics units, integrity actors, etc) that foster integrity within public sector institutions. The components of this framework support the four main functions of integrity management (OECD, 2009b):

- Defining integrity covering instruments such as codes of conduct/ethics, conflict of interest policy, post employment measures, stakeholders' participation, etc;
- Guiding towards integrity including instruments such as integrity training, advice and counselling, leadership, etc;
- Monitoring integrity with tools such as whistleblowing protection, complaints mechanisms/policies, inspections, early warning systems, measurement of integrity violations, etc;
- Enforcing integrity, including formal and informal sanctions, procedures for handling integrity violations, etc.

In addition, this framework is dependent on wider governance and management systems, referred to as complementary integrity instruments, processes and actors, which fall into the remit of adjacent management fields such as personnel management, financial

management, information management, quality management and others. Although they do not primarily deal with integrity issues, they play an important role in preventing corruption and fostering an integrity environment across the public sector.

### ***The integrity assessment framework and related indicators***

Aligned with this integrity management framework, the aim of the assessment is to collect valid and reliable data on the existence and functioning of the above mentioned key instruments, processes and actors in place for defining integrity, guiding integrity, and monitoring and enforcing compliance and compare them with benchmarks compiled across comparable government institutions. Performance targets and indicators need to be Specific, Measurable, Accurate, Reliable and Time-bound (SMART). In addition, beyond efficient delivery of integrity reforms, indicators should to the extent possible capture actual outcome of reforms, with the view to monitoring reform outputs and their effect on public sector integrity (Armytage, L., 2009).

Consistent with this approach, the OECD integrity assessment aims at collecting four kinds of data on the integrity framework, in terms of input (resources, materials, investments), public sector processes (structures, procedures and management arrangements), outputs (results of services and processes measured in terms of quantity and quality) and outcomes (impact and consequence of processes and outputs). The OECD recommends the following sequence for data-gathering and benchmarking activities:

- Examine the core components of the integrity framework consisting in an inventory of instruments, processes and actors for defining, guiding, monitoring and enforcing integrity as outlined above;
- Examine selected inputs and public sector management processes (e.g. measures for promoting integrity in procurement, personnel and financial management systems, etc); and benchmarking them against data from comparable institutions;
- Gathering complementary data on less tangible inputs and processes such as the “integrity climate”;
- Repeating this assessment to establish trends.

The OECD has compiled a list of possible indicators that can be used to assess the various components of the integrity management framework (OECD; 2009a).

### **Methods for gathering evidence**

Institutional integrity assessments typically rely on an in-depth analysis of the strengths and weaknesses of the legal and institutional framework in place, complemented by primary data to assess how these institutions operate in practice and/or validate the findings of the initial assessment (Transparency International, Forthcoming). The assessments can be internally-driven and take the form of self-assessment or externally-driven assessments conducted by independent evaluators. There are many options for collecting data with different methodological and cost implications. In some contexts, quantitative approaches are not always feasible due to cost or availability of data related constraints and the optimal approach is often a combination of various techniques, including perception surveys, expert assessments and civil society participation (Armytage, L., 2009). The various techniques that can be used separately or combined include (UNODC, 2004):

**Desk review and expert evaluations:** Data can be collected from a wide variety of pre-existing sources such as previous academic research, assessments by interest groups, the auditor general, media reports, etc through desk research. Expert evaluations can also provide detailed knowledge of the organisation or sector in terms of institutional structures, day-to-day operations of the bureaucracy and ability of internal and external control procedures to control corruption risks. Such evaluations can include informal interviews with key informants to validate the findings of the desk review.

**Surveys:** Surveys can be used to identify extent, forms and locations of corruption, the effectiveness of anti-corruption efforts and public perceptions on these. Such approaches can be used to validate/invalidate the findings of the expert evaluation and provide baseline data to monitor progress over time. Surveys of service users can help uncover gaps in implementation that may not have been identified at the desk research/expert evaluation stage. However, surveys are usually resource intensive and take time to implement.

**Focus group discussions (FGD):** Qualitative data can also be collected by conducting FGD, whereby targeted interest groups hold in-depth discussions and exchange

their views on corruption, integrity management across the sector or institution, etc.

**Field observation:** Observers can be sent to monitor specific activities directly. Although useful for obtaining detailed information, such exercises are usually very costly and time-consuming and are usually used for follow-up or detailed examination of particular problem areas.

**Professional assessment of integrity provisions and practices:** An independent assessment of the integrity instruments, rules and provisions in place can be conducted by researchers and possibly reviewed where appropriate by professional bodies. The objective of such review is to determine what measures can be used against corruption, as well as identify gaps and inconsistencies.

**Corruption and integrity checklists:** Checklists are useful instruments for breaking down the concepts of integrity and corruption into more detailed and verifiable data than perception-based indicators and that can be used as diagnostic tools and provide an extensive overview of the major features of the institution's integrity framework. The USAID handbook for assessing corruption and integrity provide examples of such check-lists (USAID, 2005).

**Risk assessments:** Risks assessment aim to identify risk factors and corruption vulnerabilities which exist in particular institutions or functions. While not primarily meant as monitoring tools in terms of assessing actual incidence of corruption, they can be used as "red flags" or indicators of potential corruption. They typically combine secondary data with the use of check lists, focus groups and/or key informant interviews (Transparency International, Forthcoming).

#### Assessment tools in practice: Country examples

There are many examples of country level assessment tools that have been implemented to assess public sector integrity at institutional level. Transparency International's GATEway project has compiled some of these tools in a soon to be published inventory of assessment tools on corruption and integrity at country level (Transparency International, Forthcoming). Among these tools:

**Integrity assessment of public organisation, Korea:**  
The Korean Anti-Corruption and Civil Rights

Commission has developed a methodology for integrity assessment of public organisations in which service users of public organisations assess the level of corruption of public organisations. Citizens who had first hand experience of targeted institutions for the preceding year are surveyed by phone on experiences of corruption, transparency in administrative processes and accountability of public officials (Hyun-sun Hong, 2009).

**Corruption risk assessments in public institutions, Republic of Moldova:** The Republic of Moldova has developed a methodology to identify the institutional factors that may facilitate corruption and formulate recommendations to prevent them. The evaluation consists of a self-assessment process that includes three steps: 1) evaluation of preconditions; 2) per se evaluation of corruption risks and 3) elaboration of integrity plans to address risk factors (Centre for Combating Economic Crimes and Corruption, No date). In terms of preconditions, the methodology aims to assess the legal framework, the organisational structure and the codes of ethics of the organisation. In terms of corruption risk assessment, the assessment investigates, identifies and analyses risks by assessing employees' resistance to corruption, administering a questionnaire to the staff of the organisation, assessing the organisation's relation with the public and analysing concrete corruption cases.

**Diagnostic study of Bangladesh Public Service Commission (PSC):** TI Bangladesh conducted an assessment of the Public Service Commission in 2007 - whose role is to select the most competent civil servants through competitive examinations – combining several methods of collecting data. Information and data was obtained from both primary and secondary sources, supplemented by a series of discussion with key informants and review of published documents (e.g. PSC related Constitutional mandates, rules and regulations, government orders, gazettes, inquiry reports, annual reports and other publicly available documents). The primary data were collected through a survey of 434 public service examinees (both successful and unsuccessful) for which a semi-structured questionnaire was used (TI Bangladesh, 2005).

## 2 Country examples of public sector integrity monitoring systems<sup>1</sup>

### Country examples of monitoring systems

Monitoring involves assessing progress made in anti-corruption measures regularly over a period of time and implies the establishment of an effective monitoring mechanism. In most countries, the roles and responsibilities for monitoring anti-corruption are set out in the national anti-corruption strategies and usually assigned to the Office of the President or to a State Minister to provide political leverage to deal with subordinate line ministries or public agencies (Hussmann, K, 2007). However, in practice, existing monitoring mechanisms face major implementation and coordination challenges. In many cases, monitoring is considered a priority neither by government, donors or the responsible agency, resulting in ill-conceived, under-resourced and poorly conducted ticking-box exercises, which take the form of mere self-assessments by change-resistant organisations with little input from non-state actors. The following examples are based on a U4 report on implementation of Article 5 of the UNCAC in six countries<sup>2</sup>, including Indonesia, Pakistan, and Tanzania.

#### *Indonesia*

The Minister of State Administration, MenPan, is tasked to monitor and evaluate progress and has elaborated a sophisticated monitoring system to track the progress of government agencies towards achieving the targets set out in the national anti-corruption strategy, Ren-PK. It consists of a complex internal monitoring system whereby each ministry, province and district collects data which is aggregated and analysed by MenPan and then submitted to the President in the form of an implementation report twice a year. Externally, civil society should be included in the monitoring process

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<sup>1</sup> This section is mostly drawn from a 2008 U4 expert answer on [Corruption and public sector reform monitoring systems](#) and a U4 report synthesising six country case studies : [Anti-corruption policy making in practice: What can be learned for implementing Article 5 of UNCAC?](#)

<sup>2</sup> Country case studies include: Georgia, Indonesia, Nicaragua, Pakistan, Tanzania, and Zambia.

through working groups coordinated by MenPan. In practice, this elaborate mechanism faces a number of practical and operational challenges, and very few implementation reports are reportedly received by MenPan. Due to lack of data MenPan then relies on TI's CPI as a principal indicator to monitor progress. In addition, MenPan does not seem to have sufficient capacity, leadership, political authority and resources to coordinate this process effectively.

#### *Pakistan*

The monitoring of the anti-corruption strategy is the responsibility of the Steering Committee created for the strategy development process that has been converted into an Implementation Committee, headed by the chairman of the Accountability Bureau. Monitoring consists of self-reporting carried out by the Implementation Committee and the strategy requires quarterly meetings to review implementation, provide advice and guidance for improvement. As of August 2007, the Committee had not met for nearly two years. Theoretically, the composition of the implementation Committee included representatives from civil society and the media, but they have not been involved in practice.

#### *Tanzania*

In Tanzania, the National Anti-Corruption Strategy Action Plan (NACSAP) uses a different implementing model, with each agency being responsible for the implementation of its specific action plan. All agencies are required to report to the President on progress through quarterly self assessment reports. The President's Office was assigned the role of coordinating and monitoring the implementation of NACSAP through a strategic reporting system. This system consists of one page reports with information about: 1) the number of corruption complaints, 2) action taken, 3) self-assessment of performance against targets set out in the beginning of the quarter, and 4) five targets to be achieved in the next quarter. Quarterly monitoring reports are published, although not proactively disseminated. In practice, despite considerable efforts invested in designing this system, compliance has been limited and mainly focuses on complaints and action taken. There is also limited participation of external actors from civil society.

## Lessons learnt

Meaningful participatory monitoring supports effective implementation of anti-corruption plans. In many cases, monitoring does not receive sufficient political and operational attention and the exercise is often undermined by a gap between limited institutional capacity and overambitious objectives. A few lessons emerge from national experience of monitoring anti-corruption commitments (Hussmann, K., Hechler, H., 2008):

- Robust monitoring requires a conceptual framework that defines integrity as well as clear objectives, targets and SMART performance indicators by which progress can be measured. To the extent possible, indicators should not only focus on outputs but strive to capture outcomes of reform efforts on promoting integrity and reducing corruption. As there are often challenges of quality of data as well as of access to information in developing countries, there is a need to strike a balance between the need for the cost of data.
- As anti-corruption cuts across different sectors and institutions, the lead agency in charge of coordinating and monitoring the implementation of the anti-corruption policy should have sufficient leadership, capacity, authority and political backing to perform its mandate.
- Effective monitoring requires adequate resources and expertise and an independent monitoring body. The decision of what to monitor determines the allocation of resources for collecting and analysing data (Armytage, L., 2009).
- A related concern is the need to build monitoring systems which allow the collection of accurate and reliable data in a cost-effective and sustainable manner, while taking into account the information management capacities of the local institutions, and a cost-benefit analysis of the various options should be conducted at the design stage (Armytage, L., 2009). In the case of Indonesia for example, there was a clear institutional gap between the resources allocated to the monitoring process and the overambitious objectives.
- Monitoring systems based on mere self-assessments are likely to fail, as these are often conducted by change resisting organisations.

- Optimal monitoring involves to some degree a combination of various monitoring methods and a mixture of both objective and perception-based data, collected through techniques such as including internal and external evaluations, self – assessments, expert reviews, and users' perception surveys when feasible as well as the publication of a report with recommendations for improvement.
- The monitoring system should be inclusive and participatory and provide for civil society's participation and access to information and documents.
- Monitoring involves local capacity-building that goes beyond training and develops institutional, organisational, technological and human capacity (Armytage, L., 2009).

## 3 References

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