

# U4 Expert Answer



## Overview of integrity assessment tools

### Query

*Can you provide an overview of public sector integrity assessment tools aimed at assessing the integrity of public officials?*

### Purpose

To support the Corruption Eradication Commission (Indonesian: Komisi Pemberantasan Korupsi, KPK) in elaborating an Assessment Tool on Personal Integrity. This assessment tool will be used to assess the "integrity score" of KPK personnel. The assessment can be as a set of questions regarding the attitude, ethic, behaviour of a person which relate to Integrity.

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### Summary

Public integrity assessments tools usually aim to assess the institutional framework for promoting integrity and combating corruption across the public sector, and/or to identify corruption or corruption risks within specific government agencies and/or among public officials. There are only a few integrity

assessments tools that have been implemented to rate public official integrity and ethics in countries across the globe such as integrity tests for pre-employment screening, integrity testing, and life-style checks.

At the institutional level, integrity assessment tools are more commonly used at the institutional level to assess the role, capacity and/or effectiveness of specific anti-corruption related institutions, such as anti-corruption agencies or internal oversight and regulatory bodies within public sector agencies. Assessments also aim to identify the preconditions for corruption which exist in a particular institutions as well as the actual incidence of corruption drawing on the understanding and experiences of public officials.

## 1 Overview of public sector integrity assessment tools

### Overview

Public integrity assessments tools usually aim at assessing the institutional framework for promoting integrity and combating corruption across the public sector, and/or at identifying corruption or corruption risks within specific government agencies and/or

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among public officials. The focus of such assessments is on the broad area of public administration rather than on the delivery of public services (GATEway, Transparency International, 2011).

Assessments may be conducted internally by the government agency or externally by a third party. The great majority of integrity assessments focus on assessing the integrity of the institution as a whole rather than of individuals, including those where public officials are surveyed (e.g. public officials are asked to access the clarity of ethical guidelines and procedures, or their personal experiences with integrity building measures of the agency, etc).

This answer focuses on the different integrity assessments conducted at the individual level, those that aim to identify the ethical behaviour of selected public officials, as well as at those at the institutional level which include an assessment of public officials.

## Methods for gathering evidence

The types of data used for public integrity assessments vary according to the approach taken. Institutional approaches rely largely on legal- institutional analysis to assess the strength of the institutional framework for combating corruption, combined with interviews of public officials to evaluate how these institutions operate in practice or to validate the findings of the assessment. Some corruption risk assessments may combine focus groups, interviews/surveys with public officials, checklists and questionnaires to identify weaknesses within the organisation that could potentially offer opportunities for corruption (Transparency International, 2011).

## 2 Personal integrity assessment tools

Some countries have been testing public officials' integrity by simulating corruption opportunities (i.e. integrity testing) or checking his/her life style and background (i.e. life style check). Some types of assessment often undertaken in the private sector could also be adapted for public officials (e.g. integrity tests).

## Integrity Tests for pre-employment screening

Integrity tests are often used in the private sector for pre-employment screenings. They aimed at assessing attitudes and experiences related to a person's honesty, trustworthiness, reliability, and pro-social behavior. These tests typically ask direct questions about previous experiences related to ethics and integrity or questions about preferences and interests from which inferences are drawn about future behavior in these areas. Integrity tests thus are used to identify individuals who are likely to engage in inappropriate and dishonest behaviour at work (US Office of Personnel Management, website).

### *Types of tests*

The most common types of integrity tests are **overt integrity** and **personality-based measures**. Overt integrity tests are designed to assess one's attitudes toward specific manifestations of dishonesty and about their past involvement in such behavior. Personality-based measures may not contain obvious references to specific counter-productive behaviours, but its results could help shine a light on dishonest behaviour or other characteristics which could affect a person's integrity (US Office of Personnel Management, website).

### *Benefits and challenges*

There is no consensus on the benefits/reliability of such assessments. Nevertheless, in the private sector, where the tool is frequently used, some studies have demonstrated that they may have a positive impact on a number of organisational outcomes such as performance, difficulties in dealing with supervision, among others. It may also reduce business costs by identifying individuals who are less likely to be absent or engage in wrongdoings. Another advantage identified is that those tests send the message to applicants that integrity is an important value within the organisation (Barrett, 2000; US Office of Personnel Management, website).

The main challenge in conducting such assessments relates to the reliability of the responses. Individuals tested may respond in the way they are expected rather than how they really are. Other critics of integrity tests state that tests may violate legal and ethical standards of privacy, particularly because they often include personal questions which are not directly related to job performance (US Congress, 2000).

With regard to the public sector, there is little information on successes/challenges of this approach as a tool to enhance integrity and prevent corruption within government agencies.

### *Integrity tests in practice: country example*

In the Netherlands, anyone nominated for appointment to a position involving policy-making in the financial sector must be submitted to an integrity test. The test involves questions related to criminal antecedents, business-related financial antecedents, and supervisory and tax administrative antecedents. The questions can be accessed at

[http://www.afm.nl/-/media/files/formulieren/meldingsformulier/en/integrity\\_test.ashx](http://www.afm.nl/-/media/files/formulieren/meldingsformulier/en/integrity_test.ashx)

The Essex Centre for the Study of Integrity developed an online integrity survey. The survey intends to analyse the integrity of individuals compared to the results of average British citizen. However, the survey could be adapted for other situations, including for assessing public officials' integrity.

Questions include daily-life situations, such as whether one finds justifiable to buy something known to be stolen, or lying in someone's own interest.

The test can be accessed at:

[http://www.essex.ac.uk/government/documents/integrity\\_test.pdf](http://www.essex.ac.uk/government/documents/integrity_test.pdf)

## Integrity testing

Another tool used in a few countries for assessing the integrity of public officials is referred to as **Integrity testing**. They can be conducted as a random check in a given agency or targeted at specific officials suspected of corruption. According to the OECD, "Integrity testing" is a tool by which public officials are deliberately placed in potentially compromising positions without their knowledge, and tested, so that their resulting actions can be scrutinised and evaluated by the relevant authorities (OECD, 2005: 68). There are two possible types of integrity tests: (i) random, which applies to any of official in any government agency/unit; (ii) targeted, which applies only to officials suspected of corruption (OECD, 2005).

For example, an official may be offered what appears to be a genuine bribe, in realistic circumstances, by a person acting as a member of the public, while under surveillance by the official's employer or a law-enforcement or anti-corruption agency. If the official

accepts the "bribe", it may be reasonable to conclude that they were corrupt, at least on that occasion (OECD, 2005).

Other integrity testing involves the tracking, surveillance and monitoring of target officials. The target official's movements, their associates, telephone calls, financial transactions, and other indicators of possible corrupt activity could be scrutinised, and the official could then be subjected to more complex tests, which are in effect undercover operations conducted against the organisation's own staff.

In some countries, this tool may require special legislation allowing it as well as special legislation allowing the use of any evidence obtained in a prosecution. Furthermore, the success of such integrity tests as a corrupt deterrent depends on the establishment of wider integrity systems to ensure that repetitions will not happen. If integrity systems are in place, such tests could be an important tool for follow-up and monitoring.

### *Integrity testing in practice: country example*

In Australia for example, the Federal Government announced in March 2012 that it will introduce legislation to conduct targeted integrity tests on Commonwealth law enforcement officers suspected of corruption (Minister of Home Affairs and Minister of Justice, 2012).

The Australian Commission for Law Enforcement Integrity and agencies including the Australian Federal Police, the Australian Customs and Border Protection Service and the Australian Crime Commission will have the power to conduct such tests, which could include:

- A covert operative handing a wallet containing cash to officers and observing that correct handling protocols are observed;
- Leaving valuable goods at a simulated crime scene or suspected shipping container to test whether an officer steals the item;
- A covert operative offering a Commonwealth officer a bribe; and
- Putting false information in a database to catch a person suspected of unlawfully disclosing information.

More information is available at:

[http://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate\\_Committees?url=aclei\\_ctte/integrity\\_testing/report/index.htm](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate_Committees?url=aclei_ctte/integrity_testing/report/index.htm)

### *Life-style checks*

Lifestyle check (also called asset consistency check) is an investigation into the ways of living or lifestyle of government officials to determine consistency of such lifestyle with their income. This lifestyle check proceeds from the presumption that government officials living extravagantly beyond their means may have acquired ill-gotten wealth or are engaged in graft and corrupt practices to support such an extravagant lifestyle.

### *Life-style check in practice: country example*

The **Philippines** has adopted such tests, initially focusing only on high-ranking government officials, with the objective of increasing transparency as well as identifying and punishing wrongdoings. In the first phase, employees of the Bureau of Internal Revenue; Bureau of Customs; and Department of Public Works and Highways were targeted.

Such checks are conducted by the Office of the Ombudsman, the Presidential Anti-Graft Commission (PAGC), and by the Transparency Group in the Office of the Presidential Chief of Staff and involves six phases: (i) Identification of targets/subjects; (ii) Data Gathering; (iii) Confirmation/Validation; (iii) Fact-finding/Case building; (iv) Formal preliminary investigation; (v) Filing of petition/information in court.

The PAGC has also developed a Handbook for civil society and citizens in general to assist in the conduction of such checks.

The Handbook can be accessed at <http://gateway.transparency.org/tools/detail/432>

More information on life-style checks in the Philippines is available at:

[http://www.worldbank.org/socialaccountability\\_sourcebook/Regional%20database/Case%20studies%20on%20social%20accountability.pdf#page=104](http://www.worldbank.org/socialaccountability_sourcebook/Regional%20database/Case%20studies%20on%20social%20accountability.pdf#page=104)

## 3 Institutional integrity assessments tools

### Types of assessment

Institutional assessments aim at assessing the role, capacity and/or effectiveness of specific anti-corruption related institutions, such as anti-corruption agencies or internal oversight and regulatory bodies within public sector agencies. Several assessments also aim to identify the preconditions for corruption which exist in a particular institutions as well as the actual incidence of corruption (Transparency International, 2011). Finally, institutional assessments may also look into organisational culture and ethics in the public sector. This involves reviewing values, behaviours and specific individual actions to identify corruption risks and potential conflicts of interest among public officials.

Institutional assessments can be (i) internally-driven (self-assessment) conducted within the organisation/agency; or (ii) externally-driven, conducted by independent evaluators.

### Institutional-level assessment tools: country examples

There are many examples of country level assessment tools that have been implemented to assess public sector integrity at the institutional level. Transparency International's GATEway website has compiled some of these tools, including:

#### *Corruption risk assessment at the institutional level in the Republic of Moldova*

The objectives of Corruption Risk Assessment are to identify the institutional factors that favour or might favour corruption, and to draw up recommendations on how to eliminate or diminish them. The assessment is conducted in three stages:

- (i) assessment of preconditions, including the analysis of the legal framework, analysis of vulnerable activities (e.g. collection of payments, granting permissions, etc), organisation structure, and of other regulations guiding the behaviour of employees (e.g. Codes of Conduct);
- (ii) assessment of corruption risks as such, including the investigation and identification of risks through an **assessment of employees'**

resistance against corruption risks (e.g. familiarity of employees with regulations, integrity in the selection of personnel, regulations on gifts and additional income, etc), a questionnaire to officials, and the analysis of concrete corruption cases. At this stage, it is worthwhile highlighting the questionnaire to the employees of the institution: the questionnaire includes questions on conflict of interest, discretion, supervision and accountability, undue influence, perceptions on the integrity of colleagues, among others. The assessment also provides a guideline for interpreting the answers given by public officials – for example: if the answer to questions regarding the ‘private use of goods and services’ (questions 42-44) is “no” or “I don’t know”, it possibly means that the threshold against improper appropriation of goods and services is too low.

- (iii) The last stage involves the drafting of an Integrity Plan based on the findings of the other previous stages. The Integrity Plan represents a detailed action plan regarding the prevention of corruption within the institution.

More information on the methodology of the Moldovan Corruption Risk Assessment is available at: [http://www.coe.int/t/dghl/cooperation/economiccrime/moneylaundering/projects/molico/AC/Output1.6/912%20MOLICO%20Nat%20Legis%20\\_methodology%20of%20corruption%20risk%20assessment.pdf](http://www.coe.int/t/dghl/cooperation/economiccrime/moneylaundering/projects/molico/AC/Output1.6/912%20MOLICO%20Nat%20Legis%20_methodology%20of%20corruption%20risk%20assessment.pdf)

### *Survey of public sector employees’ awareness of misconduct and reporting obligations in Australia*

The Corruption and Crime Commission recently undertook a survey of public sector employees’ awareness of misconduct risks and reporting obligations.

The survey comprised a number of situations where the reader was required to decide whether or not the behaviour described was misconduct and to comment on their awareness of their own and their agency’s reporting obligations.

The questionnaire can be accessed at: <http://www.ccc.wa.gov.au/PreventionAndEducation/Resources/Documents/Answers%20to%20Questions%20Public%20Sector%20Misconduct%20Survey%202012.pdf>

### *Integrity development review in the Philippines*

Integrity Development Review (IDR) is a preventive measure against corruption under the responsibility of the Office of the Ombudsman. Although not directly focusing on staff integrity, it entails a systematic assessment of the agency’s corruption resistance mechanisms and its vulnerabilities to corruption, which may have an impact on staff’s integrity.

The framework builds on the Corruption resistance Review (CRR) approach developed by the Independent Commission Against Corruption of New South Wales and the Corruption Vulnerability Assessment (CVA) tool adapted from the Office of Management and Budget. The CRR helps agencies assess their level of corruption resistance and progressively develop and implement corruption prevention measures to meet certain standards of organisational integrity. CVA determines the susceptibility of agency systems to corruption and examines the adequacy of safeguards to forestall wrongdoings.

The **Corruption Resistance Review** is the first phase of the Integrity Development and is divided in three stages:

- The first stage is the Integrity Development Assessment, a self-assessment undertaken in a focus group discussion where participants (public officials) are requested to rate the efforts of their agency to put in place measures to curb and prevent corruption. It does not, however, measure or determine incidences of corruption.
- The review includes the analysis of (i) leadership; (ii) code of conduct; (iii) gifts and benefits Policy; (iv) human resource management: Recruitment, Selection and Movement of Personnel; (v) performance management; (vi) procurement management; (vii) financial management: budgeting, accounting, cash handling; (viii) whistleblowing, internal reporting and investigation; (ix) corruption risk management; (x) interface with external environment
- The second stage entails a survey of employees with the aim of checking the deployment of integrity building measures and solicit feedback from employees on (i) their personal experiences with integrity building measures of the agency; (ii) clarity of guidelines and procedures (particularly when they serve as

safeguards); (iii) effectiveness of corruption prevention measures; (iv) their suggestions for improvement

- The survey uses the sealed envelope technique to encourage honest feedback and ensure the confidentiality of respondents and responses. It also comprised a mixture of open and closed questions. The respondents could select one response from a range of possible answers. Open questions allowed respondents to say as much information as necessary.
- The third stage involves the collection and analysis of documents to support the ratings made during the assessment process

The second phase, the **Corruption Vulnerability Assessment Process**, is an instrumental step in addressing corruption and understanding the nature of the problem. The assessment involves process mapping, identification and classification of risks, checking of existing controls, and evaluation of adequacy of safeguards. Data and information may be culled from document review, key informant interviews, and process observation to the extent possible.

More information is available at:

<http://pdf.ph/downloads/governance/Understanding%20the%20IDR%20%28PDF%29.pdf>

and at:

[http://www.ombudsman.gov.ph/docs/statistics/2007\\_bucor.pdf](http://www.ombudsman.gov.ph/docs/statistics/2007_bucor.pdf)

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